

INDEPENDENT EVALUATION OFFICE

RESPONSE OF THE BANCO DE ESPAÑA TO THE EVALUATION
OF THE MACROPRUDENTIAL FRAMEWORK
ACTION PLAN

Banco de España

Within the framework of the Banco de España's annual evaluation plan, an evaluation has been carried out of the decision-making framework of the Banco de España's macroprudential policy. The evaluation, developed by the Independent Evaluation Office (OIE) with the collaboration of three independent and renowned experts in the field,¹ had as its main objective to carry out a critical review of the decision-making framework and to identify possible alternatives for its improvement.

The Banco de España has defined the necessary actions to address the recommendations included in the evaluation report. Below are the main recommendations and the actions that the Banco de España commits to undertake in response.

Section I: The generation of results

Recommendation: Adapt the scenarios of the Banco de España's stress tests (FLESB) to better reflect the specific vulnerabilities of the Spanish banking system, systematically incorporating relevant exposures to emerging and advanced economies, in order to fully leverage the added value of internal methodologies.

- A new methodology will be developed to design multiple scenarios in the Banco de España's stress tests (FLESB), incorporating macroeconomic models that capture relevant geographical dimensions, in order to more accurately assess the specific risks of the Spanish banking system and their impact on the economy and financial conditions. To this end, collaboration will take place with other general directorates of the Bank, in particular, the Directorate General of Economics.

¹ Claudio Borio (Bank for International Settlements), Elena Carletti (Universidad de Bocconi) y Michael McMahon (University of Oxford).

Recommendation: Advance preparatory work for the possible implementation of borrower-based measures (BBM). This includes conducting rigorous analyses for their calibration and evaluation and considering the design of automatic mechanisms that reinforce their stabilising effect against discretionary adjustments.

- The development of an analytical framework for BBM will be deepened, through the improvement of metrics on credit granting standards, the development of models to assess their macroeconomic impact, and the analysis of their specific characteristics that reinforce their stabilising effect. This work will be complemented by the study of international experiences and collaboration with other general directorates of the Bank, in particular, the Directorate General of Economics.

Recommendation: Strengthen the analysis of the non-bank financial intermediaries (NBFIs) sector, exploring improvements in coordination mechanisms within the Macroeconomic Authority Financial Stability Council (AMCESFI), with the creation of working groups with adequate resources or the strengthening of data exchange, to anticipate and mitigate possible risks to financial stability.

- Within the scope of AMCESFI, and in collaboration with the National Securities Market Commission (CNMV) and the Directorate General of Insurance and Pension Funds (DGSFP), the analysis of the NBFIs sector will be reinforced through the development of a granular database on bilateral exposures between financial institutions, in order to analyse the network of the Spanish financial system. Likewise, a stress testing tool for the entire Spanish financial system will be developed, also based on international best practices.
- An internal working group will be created at the Banco de España with staff from different areas to promote initiatives related to the analysis of the NBFIs sector.
- Furthermore, the analysis of interconnections between banks and non-bank entities will be deepened through the use of national and international data sources (AnaCredit, CIRBE).

Section II: Communication of results

Recommendation: Recalibrate the functions between the macroprudential analysis and financial stability teams and the communication team of the Banco de España to better leverage their strengths: economists should focus on analytical content and key messages, while the communication team should lead the development of communication materials. Additionally, a segmented audience approach will be adopted to broaden the reach and effectiveness of communication.

- Coordination between the Financial Stability and Macroprudential Policy areas and the communication area will be improved, involving the latter from early stages in the preparation of the Financial Stability Report (FSR) and other similar publications to optimise the drafting and presentation of key messages.²
- A joint communication strategy will be developed for the FSR and other relevant publications, including new formats such as blogs, podcasts, and branch presentations, with a segmented audience approach.³
- For macroprudential measures, a specific communication strategy will be established in coordination with the communication area, which will include the review of related publications and the definition of a media strategy to ensure clear and accessible messages for non-specialist audiences.

Recommendation: Optimise the Financial Stability Report (FSR) by reducing its length and simplifying the language to improve its accessibility without losing rigor, complemented by a segmented audience approach. Additionally, it is suggested to review the coherence between the FSR and other similar publications, and to improve impact measurement through surveys and focus groups, in addition to current quantitative metrics.

- In collaboration with the communication area, a more concise structure and more accessible language will be implemented in the FSR, with new graphic material, deepening the line already initiated in the Spring 2025 FSR of the Banco de España. Likewise, external perception of the changes will be monitored.
- Coordination between the FSR and the Report on the Financial Situation of Households and Companies of the Banco de España will be evaluated, analysing its media impact and its contribution to institutional communication objectives.

² The Spring 2025 FSR of the Banco de España has already benefited from this new working scheme, which will continue to be deepened.

³ Likewise, progress has been made in this direction in the Spring 2025 FSR.

Recommendation: Prepare a clear and pedagogical communication strategy that convincingly explains the necessity and functioning of BBM. This strategy should anticipate possible public resistance and could benefit from the experiences of other countries that have already implemented similar measures.

- A specific communication strategy on BBM will be developed, in collaboration with the communication area, with the aim of improving public understanding and anticipating possible resistance, also considering related technical developments.

Section III: Means to produce results

Recommendation: Explore ways to provide clearer guidance on the general objectives of the work program of the Financial Stability and Macprudential Policy area through discussions within the Financial Stability Committee (CEF). This will help strengthen alignment among all areas of the Banco de España that address macroprudential issues.

- Regular meetings will be established with senior management to strategically guide the area's work program. These meetings will be complemented by external contributions from academic experts and by monitoring and discussion mechanisms within the CEF.

Recommendation: Systematically promote internal mobility within the Banco de España through appropriate incentives, such as considering mobility in promotion processes and establishing clear expectations from the time of onboarding. This cultural change, led by senior management, is key to improving work quality, professional development, and job satisfaction, especially in areas such as financial stability where diversity of knowledge and experience is essential.

- The promotion of internal mobility will be addressed comprehensively within the framework of the Banco de España's Strategic Plan 2030, encouraging interdepartmental collaboration mechanisms—such as working groups on cross-cutting financial stability issues—to foster the exchange of knowledge and experiences, regardless of the final destination of the results.
- In the context of the Strategic Plan 2030, approved by the Governing Council on May 26, 2025, the Executive Commission approved an organisational restructuring that, among other aspects, incorporates a matrix model in which, alongside hierarchical dependencies, functional dependencies are added that will foster interrelation and allow for the full exploitation of identified synergies. Likewise, the Strategic Plan 2030

projects a major boost to mobility. As a result of the synergy identification process, the DEFPM now concentrates the analysis of financial intermediaries and the financial situation of households and non-financial companies, expanding its resources and also ensuring proper interrelation with the Directorate General of Economics through the aforementioned matrix model.