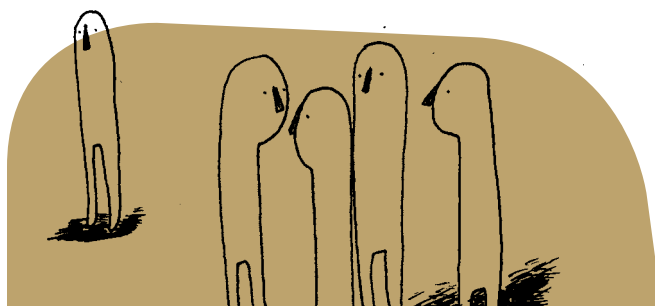
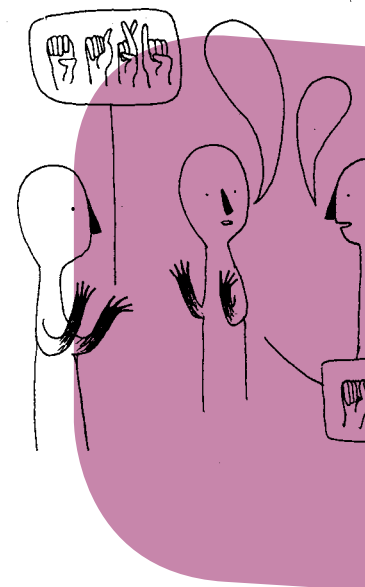
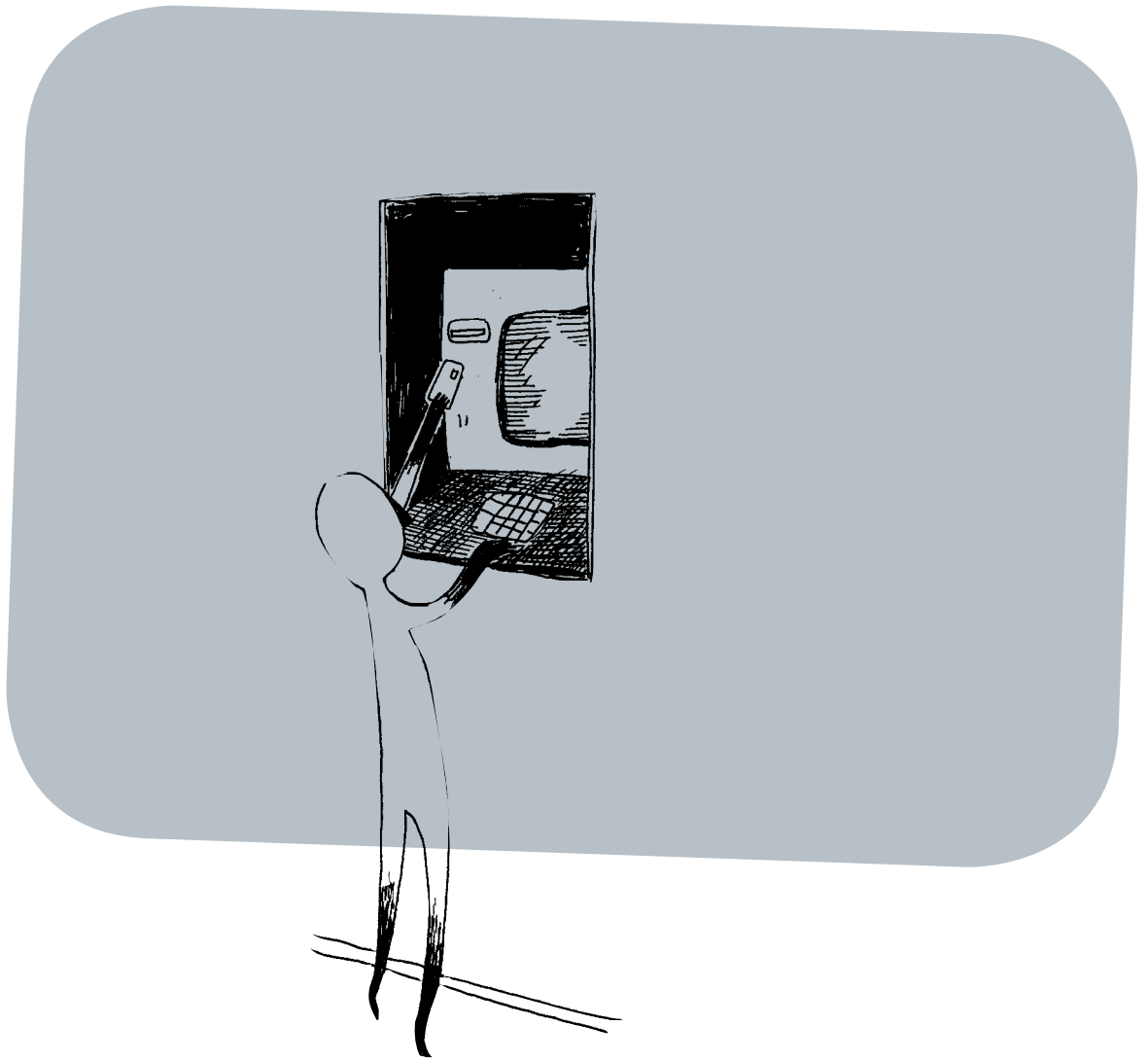




Equality planning guide



Equality planning guide



MINISTRY OF THE INTERIOR

DESCRIPTION

Date of publication
9.4.2010

Authors (name, chairman and secretary of the body)
Equality planning working group
(chairman Sinikka Keskinen,
secretaries Panu Artemjeff and Tiina Järvinen)

Type of publication

Guide

Commissioned by

Ministry of the Interior

Body appointed on

25.2.2009 /SM003:00/2009

Name of publication

Equality planning guide

Parts

Abstract

This guide has been produced to help authorities in their equality planning. It contains information on legislation on equality, concrete examples of the equality plan drafting process, information on the setting of objectives under the plan, the content of a plan and the structure of the plan document. The guide also provides examples of issues relating to equality with regard to various groups. The guide was produced by a work group set up by the Ministry of the Interior (SM003:00/2009). One of its tasks was also to revise the general recommendations for equality plans. Representatives of different authorities, NGOs, organisations involved in equality and gender equality issues, and self-government bodies contributed to the work of the group. An electronic version of the guide is available at www.yhdenvertaisuus.fi. The guide has been published in English, Finnish and Swedish.

Keywords

Equality, Equality planning, discrimination, fundamental rights

Other information

ISBN number for online version: 978-952-491-574-8 (PDF), available at www.intermin.fi or www.equality.fi

Name of series and number of publication	ISSN	ISBN	
Ministry of the Interior publication 10/2010	1236-2840	978-952-491-573-1	
Number of pages	Language	Price	Confidentiality rating
40	English	Free of Charge	

Distributed by

Ministry of the Interior

Published by

Ministry of the Interior

SISÄASIAINMINISTERIÖ

KUVAILULEHTI

Julkaisun päivämäärä
9.4.2010

Tekijät (toimielimestä, toimielimen nimi,
puheenjohtaja, sihteeri)

Yhdenvertaisuussuunnittelun suositus- ja
opastyöryhmä

(puheenjohtaja Sinikka Keskinen,
sihteerit Panu Artemjeff ja Tiina Järvinen)

Julkaisun laji

Opas

Toimeksiantaja

Sisäasiainministeriö

Toimielimen asettamispäivä

25.2.2009 /SM003:00/2009

Julkaisun nimi

Yhdenvertaisuussuunnittelun opas

Julkaisun osat

Tiivistelmä

Tämä opas on tarkoitettu yhdenvertaisuussuunnitelmia tekevien viranomaisten tueksi. Se sisältää tietoa yhdenvertaisuuteen liittyvästä lainsäädännöstä, konkreettisia esimerkkejä yhdenvertaisuussuunnitelman laatimisprosessista, suunnittelun tavoitteenasettelusta, sisällöistä ja suunnitelma-asiakirjan rakenteesta. Lisäksi oppaaseen on kerätty esimerkkejä yhdenvertaisuuskysymyksistä eri ryhmien osalta. Oppaan on laatinut sisäasiainministeriön asettama työryhmä (SM003:00/2009) jonka tehtäviin kuului myös yhdenvertaisuussuunnittelun yleisten suositusten uudistaminen. Työryhmän työskentelyyn osallistui eri viranomais- tahojen, kansalaisjärjestöjen, yhdenvertaisuus-, tasa-arvo- ja itsehallintoelinten edustajia. Oppaan sähköinen versio löytyy internetosoitteesta www.yhdenvertaisuus.fi. Oppaasta on olemassa suomen-, ruotsin- ja englanninkieliset versiot.

Avainsanat (asiasanat)

Yhdenvertaisuus, yhdenvertaisuussuunnittelu, syrjintä, perusoikeudet

Muut tiedot

Sähköisen julkaisun ISBN 978-952-491-568-7 (PDF), www.intermin.fi/julkaisut tai www.yhdenvertaisuus.fi

Sarjan nimi ja numero	ISSN	ISBN	
Sisäasiainministeriön julkaisut 10/2010	1236-2840	978-952-491-573-1	
Kokonaissivumäärä	Kieli	Hinta	Luottamuksellisuus
40	Englanti	Maksuton	
Jakaja	Kustantaja/julkaisija		
Sisäasiainministeriö	Sisäasiainministeriö		

Contents



Introduction	7
What does equality mean?	8
Discrimination	9
Formal equality	9
Substantial equality	10
What is an equality plan?	13
Who needs to draw up an equality plan?	14
What is the aim of the plan?	14
Whose equality does the plan promote?	17
How is the plan produced?	18
The plan's content	21
Equality in the workplace	22
Equality in services and other areas	24
Structure of an example plan	26
Monitoring, assessment and updates	27
Additional information and where to get help	28
APPENDIX I: Equality survey	30



This publication has been produced as part of the YES – Equality is Priority Project, supported by the European Community programme for employment and social solidarity - PROGRESS (2007–2013).

The information contained in this publication reflects the authors' view, and the European Commission is not liable for any use that may be made of the information contained therein. Said information does not necessarily reflect the position or opinion of the European Commission.

The YES – Equality is Priority Project is a cooperation project involving the public administration and authorities, and bodies and organisations representing groups at risk of discrimination. This project is aimed at promoting non-discrimination and equal opportunities. It is being implemented by the Ministry of the Interior, Ministry of Justice, Ministry of Education, Ministry of Social Affairs and Health, Ministry of Employment and the Economy, the Defence Forces/Defence Command Finland, the Sami Parliament and organisations and advisory committees representing groups at risk of discrimination. More information is available at www.equality.fi.

Designed by Grafismo
Illustrations by Mari Ahokoivu
Equality-logo by Hahmo Design Oy
Printed by Painoyhtymä Oy, Porvoo
Year of publication: 2010
Published by Ministry of the Interior
ISBN 978-952-491-567-0
Ministry of the Interior publication 10/2010
ISSN 1236-2840

Introduction

The Non-Discrimination Act has been in force since 2004. Under the Act, the authorities have a duty, in all they do, to foster equality purposefully and methodically and to draw up an equality plan stating the aims, content and means used in respect of an authority's efforts to promote equality, and how the results are monitored. Since the Act took effect, equality plans have been drawn up in line with the general recommendations issued by the Ministry of Labour in 2004, and again in 2007. At the start of 2010 the Ministry of the Interior issued new general recommendations on the content of equality plans.

This guide has been produced with reference to the general recommendations for drawing up equality plans. Its purpose is to help authorities to produce their own equality plans. It contains information on legislation on equality, concrete examples of the equality plan drafting process, information on the setting of objectives under the plan, the content of a plan and the structure of the plan document. The guide also provides examples of issues relating to equality with regard to various groups¹. The guide was produced by a work group set up by the Ministry of the Interior (SM003:00/2009). One of its tasks was also to revise the general recommendations for equality plans. Representatives of different authorities, NGOs, organisations involved in equality and gender equality issues, and self-government bodies contributed to the work of the group. An electronic version of the guide is available at www.yhdenvertaisuus.fi.

¹ The lists of examples are not exhaustive and more will appear on the on-line version of the guide at yhdenvertaisuus.fi

What does equality mean?

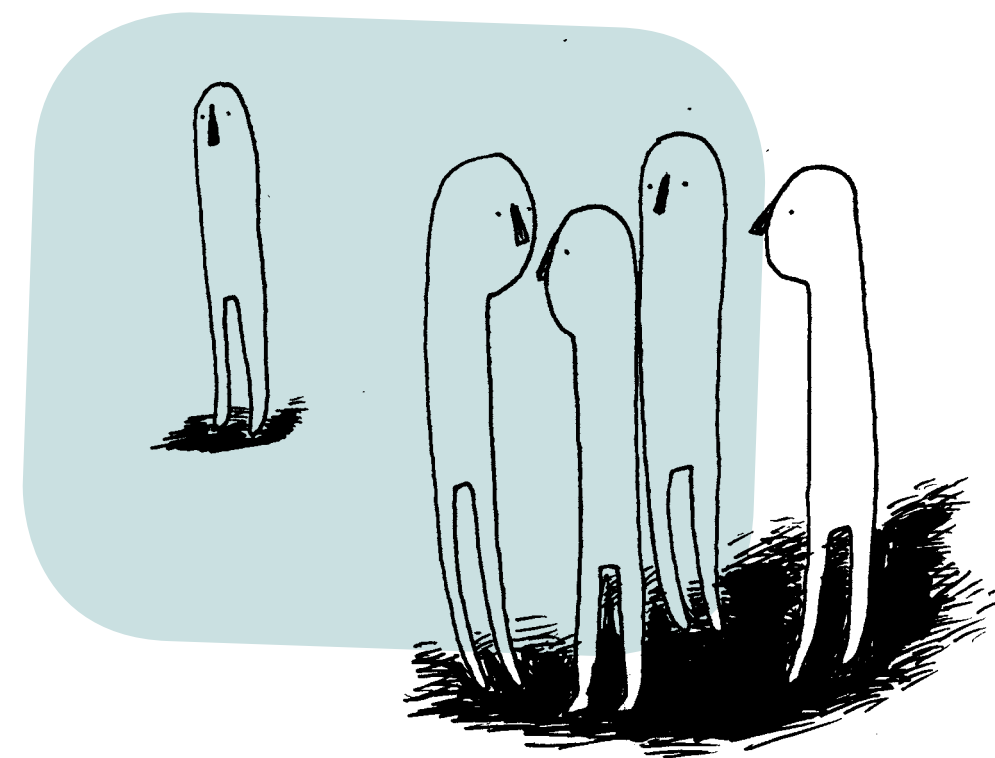
Equality means that all people are equal regardless of their sex, age, ethnic or national origin, citizenship, language, religion or conviction, opinion, disability, health, sexual orientation or any other personal trait. In a just society, personal factors, such as origin or skin colour, should not affect people's chances of receiving an education or training, finding work or accessing services - basic rights belong to everyone.

In the Constitution of Finland the principle of equality refers both to the prohibition of discrimination and people's equality before the law. The Non-Discrimination Act, the Criminal Code of Finland, the Act on Equality between Women and Men and labour legislation² define prohibition of discrimination in various areas of life more closely.

Constitution of Finland	Non-Discrimination Act	Criminal Code of Finland	Occupational Safety and Health Act	Act on Equality between Women and Men
Section 6 Equality • Formal equality • Prohibition of discrimination • Substantial equality ¹	Section 6 Prohibition of Discrimination • Direct discrimination • Indirect discrimination • Harassment • Instruction or order to discriminate	Chapter 11, section 11 Discrimination Chapter 47, section 3 Work discrimination Chapter 47, section 3a Exploitative work discrimination Chapter 11, section 10 Ethnic agitation	Section 28 Harassment	Section 7 Sex discrimination • Direct • Indirect • Harassment

² For example: Occupational Safety and Health Act, Employment Contracts Act, State Civil Servants Act and the Act on Municipal Office-holders

³ [HE 309,1993 vp]



Discrimination

According to section 6 of the Non-Discrimination Act, discrimination means:

- 1) the treatment of a person less favourably than the way another person is treated, has been treated or would be treated in a comparable situation (direct discrimination);
- 2) that an apparently neutral provision, criterion or practice puts a person at a particular disadvantage compared with other persons, unless said provision, criterion or practice has an acceptable aim and the means used are appropriate and necessary for achieving this aim (indirect discrimination);
- 3) the deliberate or de facto infringement of the dignity and integrity of a person or group of people by the creation of an intimidating, hostile, degrading, humiliating or offensive environment (harassment);
- 4) an instruction or order to discriminate.

Formal equality

The Constitution of Finland prohibits treating people differently without an acceptable reason. The realisation of formal equality means that people must be treated in the same way in a similar situation. Equal treatment is an important legal principle in administration/government. Under section 6 of the Administrative Procedure Act, the acts of the authority must be impartial and proportionate to their objective. Furthermore, under the Employment Contracts Act (section 2 of Chapter 2), employers are under an obligation to treat their employees equally.

Substantial equality

Treating people the same way, however, does not always guarantee the realisation of equality, because people differ in terms of their basic characteristics, background and opportunities. The realisation of substantial equality depends on the active eradication of inequality that is based on discrimination in society. The authorities have a duty under the Constitution and the Non-Discrimination Act to promote equality between people. Under section 4 of the Non-Discrimination Act, the authorities must alter any circumstances that prevent the realisation of equality.

The active promotion of equality may mean deviating from the equal treatment principle so that vulnerable groups may benefit from substantial equality³. The promotion of substantial equality also depends on tackling indirect discrimination. Indirect discrimination is frequently unintentional and arises, for example, when the effects on different people of an apparently neutral provision or practice are not recognised. To assess the impact of equality is to examine the effect of an action from the perspective of groups at risk of discrimination.

Positive action means taking special measures to improve the status and circumstances of a certain group that is exposed to discrimination (for example, the elderly, children, ethnic minorities). Such measures aim to safeguard the existence of substantial equality, while not being discriminating against others in terms of their degree. Under section 7 of the Non-Discrimination Act, positive action must be appropriate to its objective. In the context of a narrow legal examination, positive action means temporary measures for recruitment, career advancement and pupil/student selection that increase the proportion of under-represented groups at workplaces, in personnel categories and in educational establishments. Advanced planning has an impact in situations where two equally qualified applicants are compared to the advantage of the applicant representing an under-represented group.

In a broader perspective, positive action means measures to support the substantial equality of different groups and their opportunities for participation in different areas of life. Examples of such measures include the fact that there are special arrangements in place to aid the schooling of Roma children (classroom assistants) and the use of interpreting services and information material in different languages when dealing with people with a poor command of Finnish. These are also examples of making services more client-oriented.

Under section 5 of the Non-Discrimination Act, a person commissioning work or arranging training must, where necessary, take any reasonable steps (so-called 'reasonable accommodation') to help people with disabilities to gain access to work or training, to cope at work and to advance in their career. Aids that facilitate the work of disabled people, such as induction loops, screen readers, etc. are examples of reasonable accommodation.

³ [HE 309,1993 vp] See also legal justifications for differential treatment (Non-Discrimination Act, section 7)

⁴ Non-Discrimination Act, section 7. See also Scheinin 1999, 244. In Hallberg, P., Karapuu, H., Scheinin, M., Tuori, K., Viljanen, V-P. (1999): *Perusoikeudet (Basic Rights)*. WSOY (Juva 1999)

What does reasonable accommodation mean?

Reasonable accommodation⁶ means necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms. Reasonable accommodation is a way to promote the employment of disabled people, their ability to cope at work and keep their job, and their training and lifelong learning.

Vulnerable groups where it concerns the realisation of equality include children and young people, the elderly, ethnic, religious and linguistic minorities, the disabled and sexual and gender minorities. On the other hand, everyone may encounter prejudice and negative attitudes. The mechanisms of discrimination are often similar, regardless of people's background. However, there are also special features associated with the realisation of equality among different groups. The following table gives some of the commonest examples.

EXAMPLES OF PROBLEMS IN THE REALISATION OF EQUALITY⁷

Roma people	<ul style="list-style-type: none"> • Roma children are bullied at school more than other children • Special conditions are imposed on Roma families when they rent accommodation / rented accommodation is not offered to them at all • Roma people are not employed by a company, because the general view is that they would harm its public image • Roma employees or customers are often the first to be accused in cases of theft at work or in a shop
Sámi people	<ul style="list-style-type: none"> • Sámi-speaking children do not have access to Sámi day care, or elderly people whose language is Sámi do not have access to care of the elderly in the Sámi language • There is inadequate information on services in the Sámi language • Sámi people who live outside the Sámi Domicile Area do not have the opportunity to attend courses in the Sámi language for the number of hours a week in the mother tongue syllabus written into the national curriculum, or there are no opportunities for studying their mother tongue at all • Economic policy and decisions on land use take inadequate account of the traditional sources of livelihood of the Sámi people
Immigrants	<ul style="list-style-type: none"> • Immigrants that do not speak Finnish or Swedish have no access to the range of services available and do not receive them as a result • All immigrants are referred to specialist services whatever their skills, background or requirements • Language skill requirements are set too high for jobs for which they are not necessary in order to do it • People with foreign names or who speak Finnish with a foreign accent are not called for job interviews

⁶ Definition in the UN Convention on the Rights of Persons with Disabilities (See: <http://www.un.org/disabilities/default.asp?navid=13&pid=150>)

⁷ More information in Aaltonen, Joronen ja Villa (2009) *Syrjintä Suomessa 2008. (Discrimination in Finland 2008)*. Ihmisoikeusliitto (Finnish League for Human Rights)

The disabled

- People in wheelchairs have no access to certain shops, jobs or classrooms
- The hearing-impaired cannot hear what is being said at noisy meetings
- Lack of interpreting services preventing hearing-impaired people from dealing with local authority departments and agencies or, for example, attending staff meetings at work
- Disabled children cannot take part in physical exercise lessons because the school has no classroom assistant
- The visually impaired cannot take part in university entrance tests because the test requires the candidate to see, although they would be able to manage on the course

Sexual and gender minorities⁸

- Problems obtaining employment in situations where employers refuse to employ people belonging to sexual and gender minorities
- People are unwilling to let those they work with know that they have a partner of the same sex
- Young people/adults belonging to sexual and gender minorities have to listen to offensive jokes at school/work
- Gay parent families do not have access to the same services as other families
- It is difficult for people belonging to a gender minority to use separate facilities for men and women, such as male and female changing rooms, toilets, etc.

Children and young people

- Children and young people are not consulted when decisions that affect their lives are being taken
- Children from different backgrounds do not have equal opportunities to pursue their hobbies and interests or to have access to services
- Not all young people have the same opportunity to access the services of, for example, the school nurse, school psychologist or school welfare officer
- Bullying and sexual harassment at school

The elderly

- The elderly are seen as too ill or unable to influence decisions that relate to their own lives
- The elderly do not get the surgical operations they need because it is thought that these are no longer necessary or that the elderly are not a priority
- The needs of the elderly are ignored when electronic services are being designed

Religious groups and people with certain beliefs (convictions)

- People's clothing and religious practices are thought to prevent them from doing their work when this is actually not the case
- People belonging to religious minorities encounter prejudice and it is more difficult for them to find work
- At school and day care centres it is difficult to find substitute meals because of religious requirements

Multiple discrimination

- Elderly Roma people are discriminated against as both Roma and elderly people
- Disabled immigrants are not accepted for integration courses under Finnish labour policy because their potential for employment is seen as being inferior to that of others
- There is a higher risk among children with an immigrant background that they will be bullied at day care centres or at school
- The partner of an elderly person belonging to a sexual minority is not recognised as a family member where it concerns medical treatment or care for the elderly

⁸ Lesbians, gay men (orientation towards the same sex) and bisexual people (orientation to both sexes), intersexuals, transsexuals, transvestites ja transgender people (for example, people who feel they are a different sex from their physical one or whose sexual experiences are diverse, or people who are born with the physical characteristics of both sexes)



What is an equality plan?

An equality plan is a plan drawn up by an authority or other organisation with respect to how it intends to promote equality and prevent and tackle discrimination in its capacity as employer and in its activities and functions.

Under the Non-Discrimination Act, the authorities have a duty to foster equality methodically and purposefully. Under section 4 of the Non-Discrimination Act, each authority must draw up a plan for the fostering of ethnic equality, which must be as extensive as required by the nature of the work of the authority. Although this legal obligation only applies to ethnic origin, the equality plan is of greater benefit to the authorities if it also extends to other prohibited grounds of discrimination, especially religion or conviction, age, disability and sexual orientation. The equality plan should state the aims, content and means used in respect of an authority's efforts to promote equality, and how the results are monitored.

Who needs to draw up an equality plan?

Under the Non-Discrimination Act, all central and local government authorities must draw up an equality plan, which must be as extensive as required by the nature of the work of the authority⁵. The promotion of equality is especially important in colleges and schools and in social service and health care organisations. Equality planning is an aid to good governance/administration, staff development and the development of services. It could therefore also be recommended that organisations that are not under an obligation to draw up an equality plan should do so anyway.

What is the aim of the plan?

The aim of the equality plan is to improve equality in the functions and activities of an organisation. The main areas for development to fulfil this aim are:

1. Identifying and tackling discrimination
2. Assessing the impact of equality in functions, activities and practices and implementing measures to promote equality⁶
3. Increased participation

An authority might set as its equality plan's objective, for example, the development of services and staff in such a way that they meet the actual needs of various client and user groups and that everyone, regardless of ethnic origin, religion, conviction, age, disability or sexual orientation, has an equal opportunity to use and take advantage of the services. The objective could also be to boost staff diversity and exploit this in the authority's functions and activities. A viable equality plan contains tangible measures, details of those responsible for their implementation, a timetable for implementation and information on the monitoring of implementation. An equality plan that takes account of all grounds of discrimination may contain concrete measures relating to the following objectives:

⁵ Independent bodies governed by public law discharging public administrative functions, authorities in the province of Åland, and non-incorporated state enterprises must draw up a plan. The duty to draw up the plan does not, however, apply to the Evangelical Lutheran Church or the Orthodox Church, or to individual actors comparable to an authority when discharging public administrative functions.

⁶ Both universal and special measures, such as positive action and reasonable accommodation

Ethnic origin

- Development of staff skills and competence in intercultural interaction
- Development of local cooperation between the authority (?) and agencies representing the Roma population, groups with an immigrant background, and the Sámi people
- Action to identify ethnic discrimination and awareness raising
- Prevention and resolution of ethnic conflicts
- Establishment of the linguistic and cultural rights of the Sámi people, as the indigenous people, in the work of the authority (also applies to localities outside the Sámi Domicile Area)
- Support for associations founded by immigrants, the Sámi people and the Roma people
- Support for participation by means of educational and training courses

Language

- A guarantee that client services, information (including information in electronic format and information materials), guidance and advice will be in Finnish, Swedish and, in the Sámi Domicile Area, in Sámi
- Guaranteeing equality through the use of interpreting services, including sign language, at least when the matter in hand is initiated by the authority, it is essential from the point of view of legal protection, or it is necessary in order to fulfil the fundamental principles of good administration under the Administrative Procedure Act
- The use of clear language in dealing with clients, information and guidance

Religion and conviction

- Measures to prevent discrimination due to different views among religious minorities, those with no religious beliefs and the prominent religion
- Dissemination of information on religious practices and external features of religions
- Prevention of discrimination on the basis of people's convictions, e.g., political action, membership of an ideological or professional/trade organisation, pacifism or opting for non-military service, or adherence to other ethical principles

Disability

- Increased accessibility (electronic, physical, technical) thanks to accessibility studies and the further action taken as a result
- Taking account of the needs of disabled people in publishing
- Action to prevent discrimination against disabled people
- Reasonable accommodation measures in services procured by the authority
- Development of positive action in the work of the authority

Age

- Forms of positive action and service structures targeted at young people and older people
- Preventing and combating discrimination against young and older people, and children, in decision-making, services and schools
- Identification and prevention of multiple discrimination encountered by older and young people

Sexual orientation, gender identity and gender expression

- Preventing and combating discrimination against sexual minorities¹¹
- Ensuring that preventing and combating discrimination encountered by gender minority people¹² is included either in the gender equality plan (in the first instance) or the general equality plan
- Staff training with respect to the situation regarding LGBT¹³ people and their service needs
- Creation of an open atmosphere in which sexual or gender minority employees feel welcome and accepted for who they are
- Guarantee of access to services for gay parent families
- Guarantee of non-discriminatory treatment when dealing with clients

Multiple discrimination

- Gender impact assessment with respect to the equality plan and gender equality mainstreaming
- Identification of groups exposed to multiple discrimination in the work of the authority and in the operating environment
- Legislative gender impact assessment and similar examination process for other prohibited grounds of discrimination



¹¹ Lesbians, gay men (orientation towards the same sex) and bisexual people (orientation to both sexes)

¹² Intersexuals, transsexuals, transvestites ja transgender people (for example, people who feel they are a different sex from their physical one or whose sexual experiences are diverse, or people who are born with the physical characteristics of both sexes)

¹³ A term covering both these previously mentioned groups

Whose equality does the plan promote?

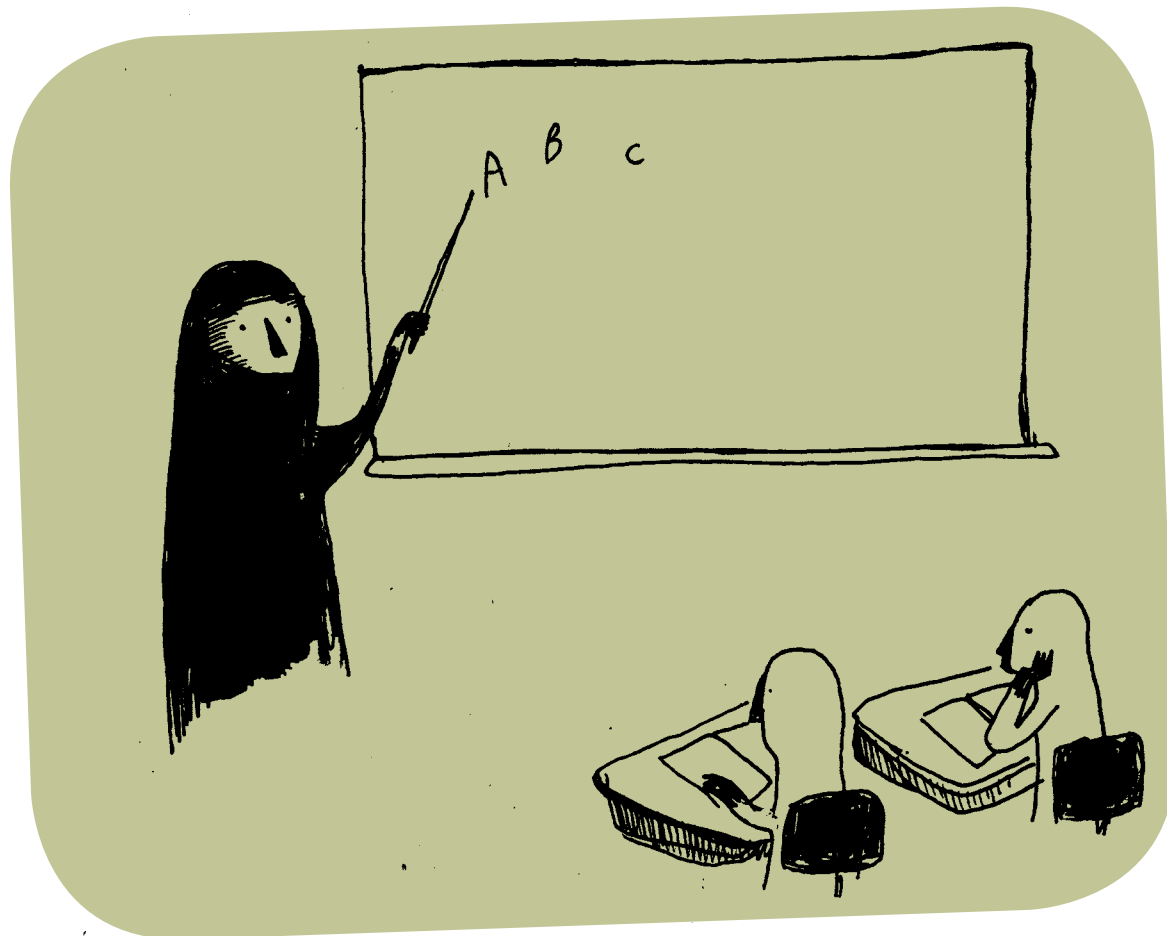
The equality plan promotes the equality of everyone involved, i.e. the users of services, employees and job applicants. The plan, as required under the Non-Discrimination Act, only examines equality from the perspective of ethnic groups. In such a plan the focus is on employees, job applicants and users of services that belong to ethnic minorities. Section 4 of the Non-Discrimination Act does not require the promotion of equality for other groups; nonetheless, it is useful to draw up a plan that covers more than just the one group.



How is the plan produced?

How the plan is produced depends on the organisation's structure and the nature of its work. An equality plan for the authorities may be either a separate plan or part of some other, such as a gender equality plan, occupational safety and health programme or study plan. If a plan is being produced by a local authority (municipality) it is worth considering whether it should be produced centrally to cover all sectors or if one should be drawn up for each sector. The plan's coordination could be the responsibility of one agency (e.g. central administration), whose task it would be to provide the various sectors with guidance on how to draw up their individual plans.

A good plan will depend on successful preparation and the stages involved are described in the following table:



Stages in producing an equality plan

- 1. Formation of a group**

It is worth setting up a separate work group to draw up the equality plan. The group should contain representatives of the staff, management and groups at risk of discrimination. First on the agenda would be for the group to discuss

 - why the plan is being produced
 - what benefit it will have
 - how it relates to the work of the organisation
 - whether the group contains all the essential elements
 - what sort of resources are at the group's disposal (working hours, staff)
- 2. Participation**

To encourage participation, the organisation should announce that the plan is being drafted and that the consultation procedure is under way as early on as possible. Information makes it easier to collect data and encourages staff to take part in the plan's production and implementation. It is also worth considering how to inform people when the plan is ready. The following need to be kept informed:

 - staff
 - clients
 - other major stakeholders
- 3. Survey of the situation**

The drawing up of the actual plan starts by making a survey of the situation, where the organisation's work and operating environment are examined from the perspective of equality. A key issue to look at here is how equal the approaches to its various functions are from the point of view of different groups. The survey can be based on several data collection methods and sources, such as:

 - looking at how existing strategies, guidelines and policies take account of issues of equality and non-discrimination
 - statistics and data on the operating environment and clients
 - statistics and data on staff
 - indicators and other performance management data describing the quality of the operation
 - client feedback
 - complaints received
 - equality surveys for staff and clients¹⁴
 - consultation with different groups
 - other separate studies, such as accessibility surveys, the monitoring of the drafting of statutes, etc.

The survey should make use of any gender equality plan in place as well as existing questionnaires. It is worth considering the limitations to the collection of data when a survey of the situation is being made. How and what sort of data is it possible to obtain from different groups and where is the borderline between data collection and the protection of privacy?

¹⁴ Appendix 1 to the guide is an example of a gender and general equality questionnaire for staff

4. Targeting of measures Tangible measures should be included in the equality plan to develop issues that arose in the survey of the situation. When measures are being developed it is important to decide:

- what the aim of the measure is
- who will be responsible for it and how it will be financed
- what its timetable for implementation is
- how the impact of the measures will be assessed

5. Writing and adopting the plan A description of the planning process, the methods used in surveying the situation and the measures for development selected are assembled in the form of an equality plan, a strategic document for the promotion of equality¹⁵. The plan is considered and discussed, edited and adopted in its final version as part of the organisation's normal decision-making procedure.

6. Announcements and implementation The measures in the equality plan are implemented and announced according to the agreed timetable.

7. Follow-up The impact of measures should be monitored at regular intervals. Responsibility for this can be that of an existing follow-up group or one set up specifically for the purpose. Monitoring might take the following forms:

- quality assurance procedures
- using other indicators and impact assessment methods
- questionnaires/surveys
- other feedback mechanisms

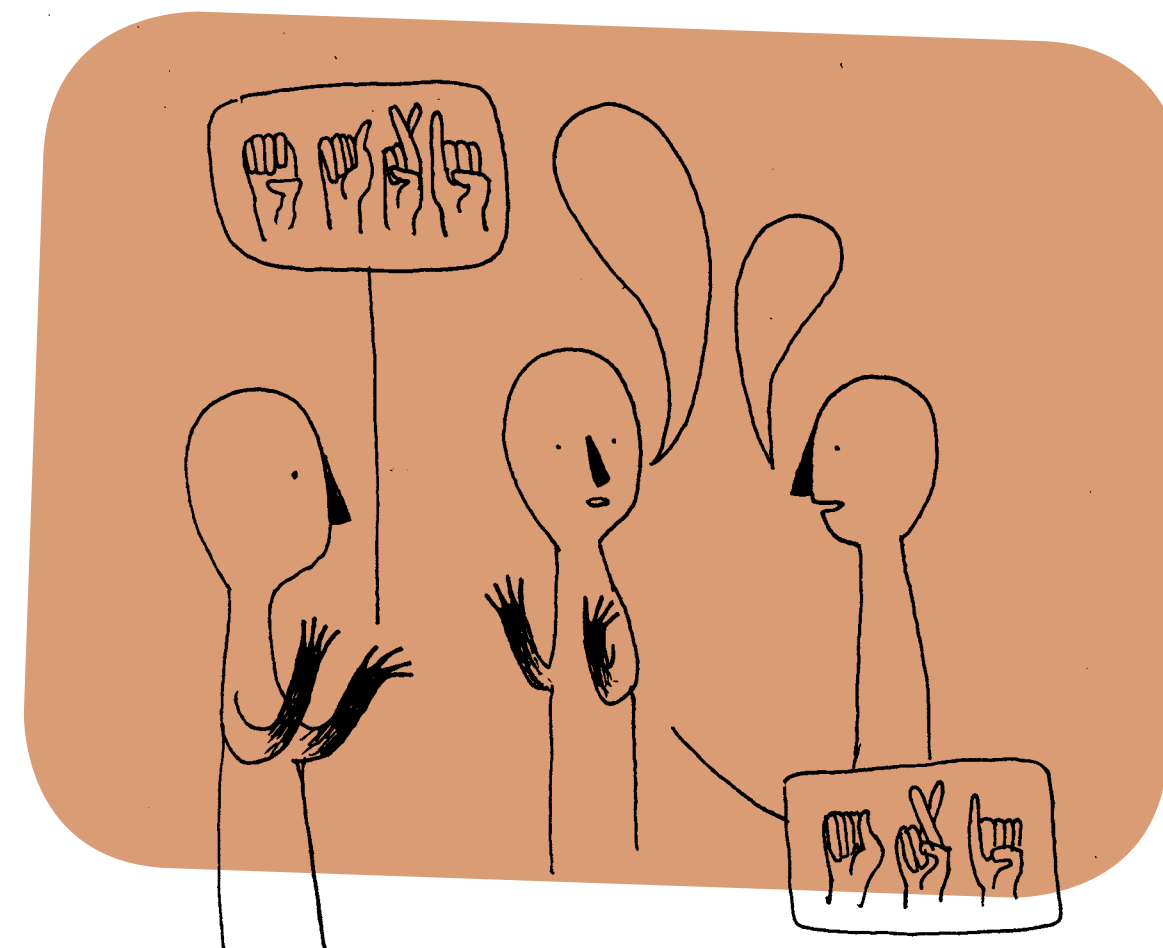
Both the situation with respect to equality and the implementation of the plan should be monitored.

8. Updates A good plan is temporary by nature. When the time comes it will need to be updated in order to improve its effectiveness. Updates are made with reference to the monitoring of the plan's implementation and of the situation regarding equality.

¹⁵ The structure of an example plan can be found on page 20

The plan's content

An equality plan's content will vary according to the work of the organisation¹⁶. An equality plan can boost an organisation's ability to identify and develop the impact of equality in its own work. At the same time, of course, there is greater equality throughout the entire workplace. The plan will also examine the workplace, the services the organisation provides and its other functions.



¹⁶ For example, in educational establishments equality can be examined with reference to selection tests, course organisation, grades obtained and the availability of study materials.

Equality in the workplace

Area	Objectives	Examples of practices
Management	<ul style="list-style-type: none"> • Management to take account of staff diversity in the workplace • Promotion of equality is incorporated into strategic objectives and organisational structures 	<ul style="list-style-type: none"> • Diversity management training courses • Issues of equality are taken into account in the drafting budgets and strategies • Coordination of equality is made the responsibility of a group set up for the purpose or an individual
Recruitment	<ul style="list-style-type: none"> • Job applicants representing various groups become interested in jobs within the organisation • All qualified applicants have an equal chance of being selected • More staff from minority backgrounds to be employed • More diversified staff skills 	<ul style="list-style-type: none"> • Monitoring of recruitment by means of discrimination tests • Guaranteeing accessibility to the recruitment process • Job advertisements that encourage different groups to apply • Recruitment of staff that speak different languages
Induction	<ul style="list-style-type: none"> • Induction and guidance for different employees to be effective, comprehensive and flexible 	<ul style="list-style-type: none"> • Appointment of a personal supervisor when someone starts work • The induction process takes account of the different needs of employees • Two-way induction
Staff training	<ul style="list-style-type: none"> • Better staff competence in issues of equality and discrimination • Negative attitudes dispelled 	<ul style="list-style-type: none"> • Courses for staff on equality and discrimination and on different groups of people • Attendance at courses provided by NGOs • Equality surveys
Staff pay, career advancement, and duties assigned	<ul style="list-style-type: none"> • Fair pay and working conditions • Equal opportunities for everyone in career advancement and access to training courses for staff • The duties assigned reflect the skills and expertise of staff 	<ul style="list-style-type: none"> • Human resource accounting and specifying how demanding various tasks are • Development meetings • Individual job planning (e.g. working hour arrangements) • Mentoring • Regular review of assigned duties

Area	Objectives	Examples of practices
Well-being at work and improved working conditions	<ul style="list-style-type: none"> • Enabling staff to cope better at work and greater openness • Fewer absences due to illness • Using certain aids if necessary to improve conditions of work for staff 	<ul style="list-style-type: none"> • Well-being at work action • Flexible arrangements for working hours and place of work • Equal treatment of different forms of family and care relationships • Hearing aids, lighting, electrical tools, accessibility surveys
Occupational safety and health	<ul style="list-style-type: none"> • Knowing how to identify cases of discrimination • Tackling discrimination and bullying effectively • Better cooperation between employees 	<ul style="list-style-type: none"> • Instructions on occupational safety and health and other separate instructions in the event of discrimination; instructions on how to tackle discrimination and harassment • Supervision by the health and safety authorities and shop stewards
Greater employee participation	<ul style="list-style-type: none"> • Better opportunities for employees to have a say in issues that affect everyone • More openness and trust in the workplace • Taking advantage of all the potential skills and expertise of employees 	<ul style="list-style-type: none"> • Cooperation/coordination groups • Work group quotas
Information and communications	<ul style="list-style-type: none"> • Communications within the organisation to be transparent and viable and to reach all employees • Staff are aware of the organisation's commitment to the promotion of equality 	<ul style="list-style-type: none"> • Taking accessibility into account in communications • Diverse forms of information dissemination: intranet, internal bulletins, staff newsletters, information sessions • Announcement of the equality plan



Equality in services and other areas

Area	Objectives	Examples of measures
Development of the service strategy	<ul style="list-style-type: none"> • Services to be equally available to everyone • Identification of the special needs of users of services 	<ul style="list-style-type: none"> • General services that support participation • Special services for different groups • Performance management and targeting of resources
Client services	<ul style="list-style-type: none"> • The organisation is and is perceived to be approachable • There is no discrimination in services 	<ul style="list-style-type: none"> • Staff training for those employed in services • Client feedback mechanisms • Avoidance of presuppositions and condescension
Advice and case management	<ul style="list-style-type: none"> • Advice and case management to make it easier for different groups to access services 	<ul style="list-style-type: none"> • Immigrant service points and guidance in the client's own language • Monitoring the accessibility of services
Interpreting and services in the client's own language	<ul style="list-style-type: none"> • Clients and authorities understand one another • The client's privacy is protected through the use of professional interpreters 	<ul style="list-style-type: none"> • The use of interpreters and remote interpreting • The use of aids and other means to facilitate communication
Special services	<ul style="list-style-type: none"> • Knowing how to target special services appropriately • Services for special groups and positive action to improve the client's substantial equality 	<ul style="list-style-type: none"> • Avoidance of presuppositions and condescension • Services for immigrants and the disabled • Preparation for working life for different groups • Roma liaison officers
Client feedback	<ul style="list-style-type: none"> • All clients to have an opportunity to give feedback on the service they receive 	<ul style="list-style-type: none"> • Different ways of collecting client feedback
Cooperation with different population groups	<ul style="list-style-type: none"> • Being able to take better account of the needs of clients and improved impact of services • The views of minorities are considered in drafting strategies, programmes, etc. and in decision-making 	<ul style="list-style-type: none"> • Hearings and consultation events • NGO strategies • Collecting and making use of client feedback

Area	Objectives	Examples of measures
Preventing and tackling discrimination in services	<ul style="list-style-type: none"> • No discrimination on the part of those responsible for client services • Clients to be able to complain if they feel they have been discriminated against 	<ul style="list-style-type: none"> • Non-discrimination is discussed at the development meetings of those responsible for client services • The procedure for making a complaint is made known to clients: complaint, claim for rectification, appeal • Other complaint mechanisms • Patient and social affairs ombudsman/officer
Information	<ul style="list-style-type: none"> • Information to be effective and transparent, and to reach all client groups • The information service to deal with issues that are essential for minorities and not to be stereotypical 	<ul style="list-style-type: none"> • Information for groups • Information materials in different languages; use of pictorial materials • Use of a wide range of information channels (radio, free newspapers and magazines) • Accessible information channels • Intervening when biased or mistaken information on minorities is being given out
Accessibility	<ul style="list-style-type: none"> • Business premises, client service equipment and information services must be accessible 	<ul style="list-style-type: none"> • Accessibility surveys carried out in collaboration with disability organisations
Drafting legislation, guidelines and policy	<ul style="list-style-type: none"> • The impact of equality to be taken account of in the drafting of statutes • Guidelines not to result in directly or indirectly discriminatory structures or practices 	<ul style="list-style-type: none"> • When guidelines are being drawn up their impact on different minority groups is assessed • Cooperation with different minority groups
Procurement	<ul style="list-style-type: none"> • Improved impact of equality in public procurement 	<ul style="list-style-type: none"> • The impact of equality within an operation is included in the criteria when drafting invitations to tender

Structure of an example plan

1. introduction

Areas for consideration: - Why has the plan been produced?

- What grounds of discrimination does the plan apply to?
- What benefit will the plan have?
- How does it relate to the other functions and activities of the organisation¹⁷?

2. Description of the planning process

Areas for consideration: - How and what sort of plan was drawn up?

- Who contributed to the production of the plan? Were representatives of different groups involved?
- At what level in the organisation was the plan adopted?
- How was the drafting of the plan announced?

3. Survey of the situation

Areas for consideration: - How was equality in the organisation evaluated?

- Was information on all grounds of discrimination available?
- What sort of functions to promote the equality of different groups and to tackle discrimination already exist?
- In what areas are issues of equality important?
- What sort of areas for development emerged in the survey of the situation?
- What sort of impact has the equality plan that was drawn up previously had?

4. Measures

Areas for consideration: - What sort of measures to promote the equality of different groups are to be taken? (specify the groups here)

- What sort of means for identifying and tackling discrimination will be developed?
- Who will be responsible for implementing the measures?
- How will the work be financed?

5. Follow-up and assessment

Areas for consideration: - What is the timetable for assessing the impact of the plan's implementation?

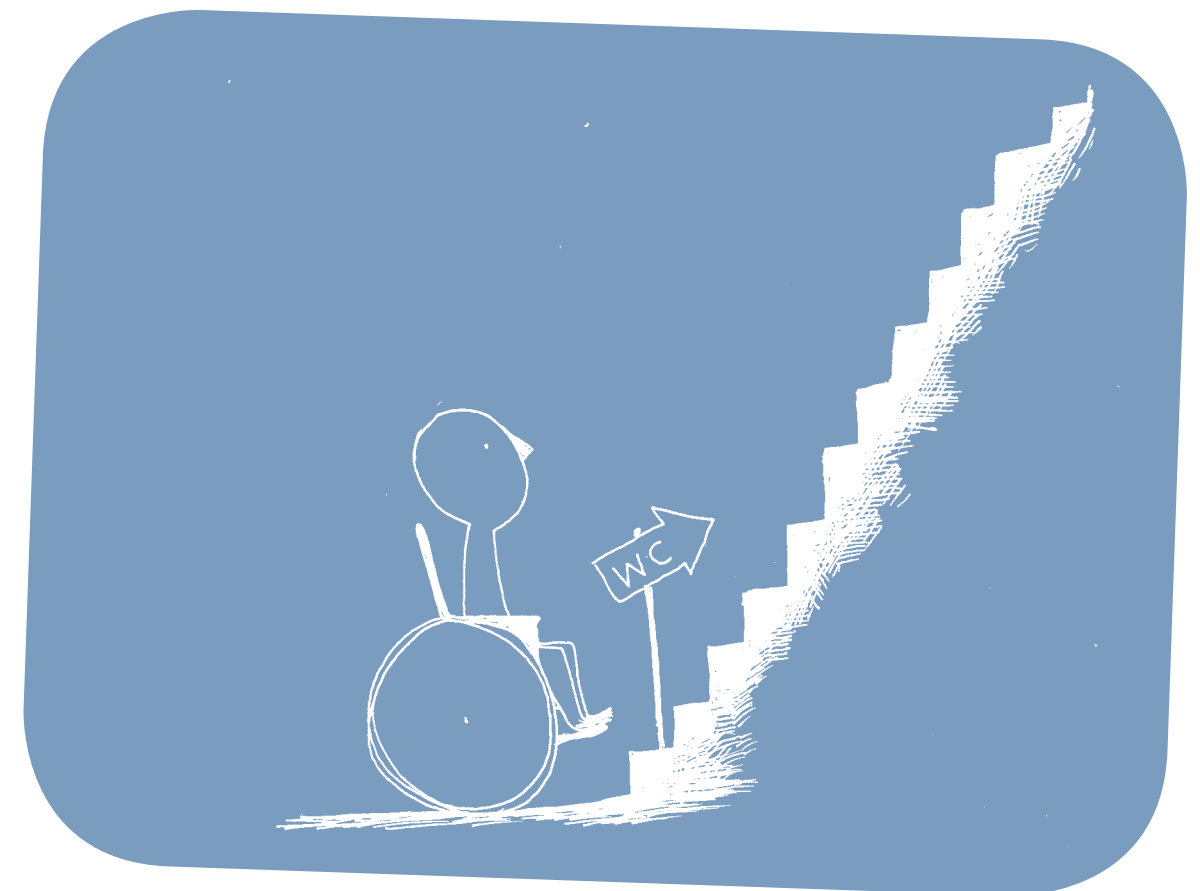
- What indicators will be used to assess the impact of the various measures?
- What other sort of monitoring/follow-up methods will be employed (follow-up surveys, statistics, etc.)?
- Who will be responsible for carrying out the follow-up/monitoring and assessment procedures?

¹⁷ The promotion of equality and tackling discrimination are objectives which may have connections with several areas of the work of authorities. For example, occupational safety and health, the development of good administration, gender equality, policy programmes for the disabled and Roma people, or anti-racism guidelines may have points of contact with the equality plan.

Monitoring, assessment and updates

The impact of the measures in the equality plan should be monitored and assessed at regular intervals. Responsibility for this can be that of an existing follow-up group or one set up specifically for the purpose. The plan could contain a list of indicators to help measure the impact of the plan. They could either be specific indicators, drawn up just for the purposes of the equality plan, or universal indicators used in existing quality assurance procedures. The plan's impact should also be assessed with the help of surveys, statistics or consultation meetings with specific groups. If the impact of the measures is found to be weak, or the operating environment has undergone significant changes, the plan should be revised and updated.

Producing a plan does not mean that all the challenges can be resolved at once. Progress is achieved step by step and it is crucial that people are aware of what the challenges to equality are and that these should be addressed. The plan's objectives might be divided into the long-term and the short-term, in order to make their realisation a realistic exercise.



Additional information and where to get help

List of agencies that can give advice and provide additional information

	Agency	Contact details
Ethnic origin or citizenship Roma people Sámi people	Ombudsman for Minorities	www.vahemmistovaltuutettu.fi
	Finnish Refugee Advice Centre	www.pakolaisneuvonta.fi
	Advisory Board for Ethnic Relations	www.intermin.fi/etno
	Advisory Board on Roma Affairs	www.romani.fi
	Sámi Parliament Human Rights project	www.samediggi.fi
	The Rasmus Network	www.rasmus.fi
Gender	Ombudsman for Equality	www.tasa-arvo.fi
	Equality Clinic	www.tasa-arvoklinikka.fi
	Council for Gender Equality	www.tane.fi
	Centre for Gender Equality Information in Finland	www.minna.fi
Gender identity and gender expression	SETA ry.	www.seta.fi
	Transgender Support Centre	www.transtukipiste.fi
	Ombudsman for Equality	www.tasa-arvo.fi
Sexual orientation	SETA ry	www.seta.fi
	Sexual and Gender Minorities at Work	www.valt.helsinki.fi/sosio/tutkimus/equal
Disability	National Council on Disability	www.vane.to
	Kynnys: the Threshold Association	www.kynnys.fi
	Finnish Association of People with Physical Disabilities	www.invalidiliitto.fi
	Finnish Disability Forum	www.vammaisfoorumi.fi
	Finnish Federation of the Visually Impaired	www.nkl.fi/tietoa/esteettomyys
	Finnish Association on Intellectual and Developmental Disabilities / Plain Language Centre	www.papunet.net/selkokeskus
	Information on accessibility planning	www.elsa.fi www.esteeton.fi www.esteettomyys.net
	Finnish Federation of the Hard of Hearing	www.kuuloliitto.fi
	Finnish Association of the Deaf	www.kl-deaf.fi
	Finnish CP Association	www.cp-liitto.fi
	Finnish Deafblind Association	www.kuurosokeat.fi

	Agency	Contact details	
Age The elderly	Central Union for the Welfare of the Aged	www.vanhustyonkeskusliitto.fi	
	Youth	Advisory Council for Youth Affairs Finnish Youth Co-operation - Alianssi Ombudsman for Children in Finland	www.minedu.fi/nuora www.alli.fi www.lapsiasia.fi
Health	Finnish Central Association for Mental Health	www.mtkl.fi	
All grounds of discrimination	Local police	www.poliisi.fi	
	Victim Support Finland	www.rikosuhripaivystys.fi	
	Finnish League for Human Rights	www.ihmisoikeusliitto.fi	
	Ombudsman for Children	www.stm.fi	
	Your trade union Your employers' association Human rights project	www.ihmisoikeudet.net	
Workplace discrimination	Occupational Safety and Health Inspectorates	www.tyosuojelu.fi	
	Confederation of Finnish Industries EK	www.ek.fi	
	Church of Finland Negotiating Commission KiSV	www.evl.fi/kkh/heo/	
	Commission for Local Authority Employers	www.kuntatyonantajat.fi	
	Office for the Government as Employer	www.vm.fi/vm/fi/12_Valtio_tyonantajana/03_Valtion_tyomarkkinlaitos/	
	Central Organisation of Finnish Trade Unions -SAK	www.sak.fi www.sttk.fi	
	Finnish Confederation of Professionals STTK		
	Akava – Confederation of Unions for Professional and Managerial Staff in Finland	www.akava.fi	
	Legal assistance	Ministry of Justice, Finland	www.om.fi www.oikeus.fi

You can find more information on equality planning at www.yhdenvertaisuus.fi

APPENDIX I: Equality survey

Equality survey

Thank you for answering this quality survey!

Answering the survey means you will be contributing to the development of your work-place. Here are some instructions on how to complete the questionnaire follow.

Choose the answers that match your experience best at your current place of work. Please answer carefully. Please note that some of the questions are multiple choice and with some there is only one alternative.

There are 22 questions in the survey, three of which are open. Questions 13, 17 and 20 feature a 'jump function'. If you answer 'no' to these questions you can move on to the next main question.

More information on the questionnaire is available from the Human Resources Manager on (tel.)

BACKGROUND DETAILS

1) Age

- <35
- 35-44
- 45-54
- 55>

2) Sex

- Female
- Male

3) Department/unit

According to type of organisation, e.g.:

- Personnel department
- Administration
- Etc.

4) Personnel category

According to type of organisation, e.g.:

- Management
- Supervisory
- Specialist
- Executive

5) My job / post is

- Permanent
- Temporary

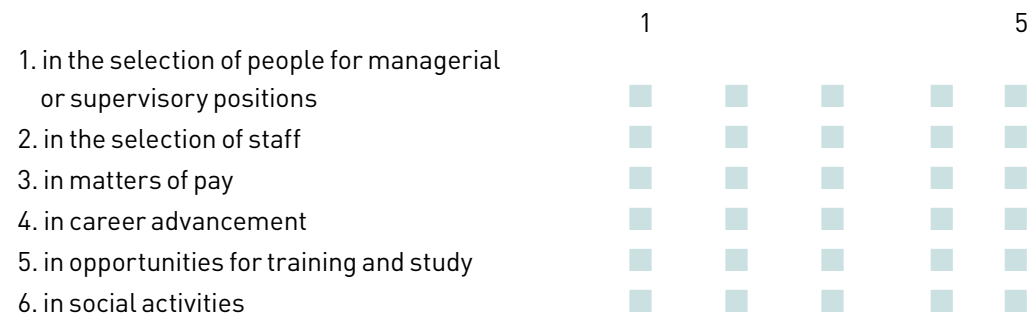
EQUALITY COMPETENCE AT MY PLACE OF WORK

Gender equality: non-discrimination between women and men

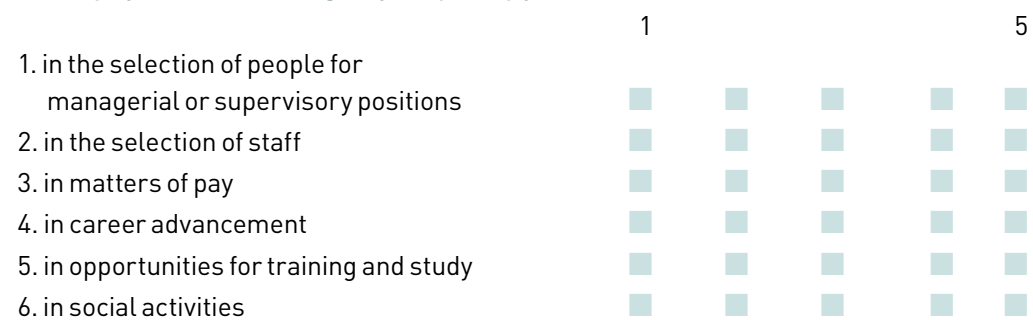
(General) equality: non-discrimination on the grounds of age, sexual orientation, disability, ethnic origin or other personal trait

Based on your own knowledge and experience, give a mark for you place of work on a scale from 1 to 5, where: 1= very badly 2= quite badly, 3= satisfactorily, 4= quite well 5= excellently

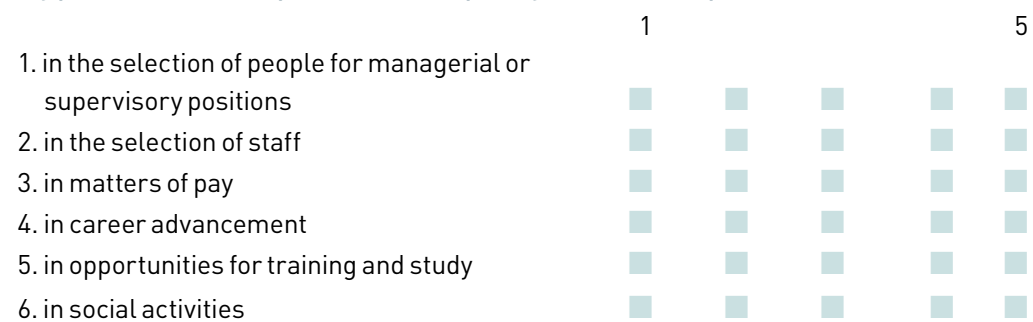
6) In my opinion issues of gender equality at my place of work are dealt with



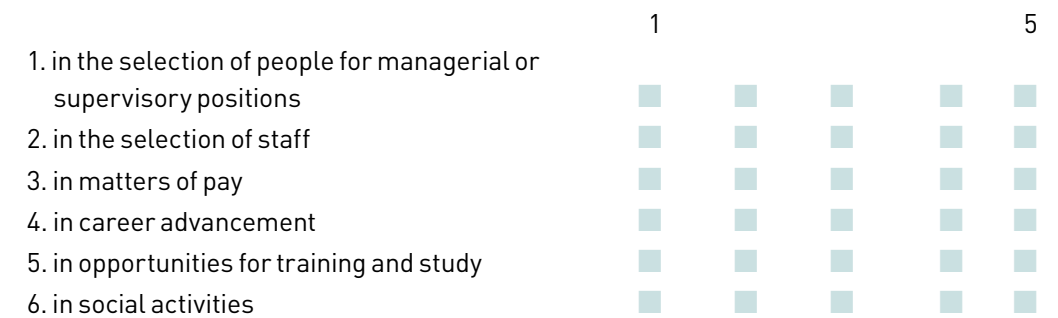
7) In my opinion issues of age equality at my place of work are dealt with



8) In my opinion the equal treatment of people in different employment relationships at my place of work (on a permanent/temporary basis, full- or part-time) is dealt with



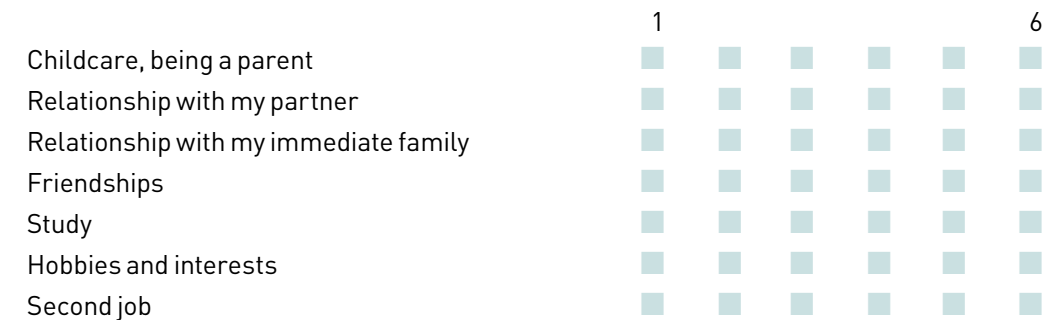
9) In my opinion issues of equality with respect to minorities (people who are different in terms of their disability, sexual or gender orientation, ethnic or cultural background, religion, conviction or set of values) at my place of work are dealt with



RECONCILIATION OF WORK AND OTHER AREAS OF LIFE

10) In the past year, how often have you faced difficulties reconciling work and the following areas of your life?

1= does not apply in my case, 2= never, 3= once or twice a year, 4= once or twice a month, 5= once or twice a week, 6= every day



11) If in the past year you have faced difficulties reconciling work and the areas of your life mentioned above, which of the following factors do you think it is due to?

You can choose more than one answer.

- Pressure of work
- Business trips and being away because of work generally
- My manager/supervisor does not make it easy for me to reconcile work and other areas of life
- I do not know enough about my rights under the law
- My job is so important/demanding
- Other reason; what?
- I have not faced difficulties reconciling work and other areas of life

12) How in your opinion could reconciliation of work and other areas of life be improved at your place of work?

WORKPLACE DISCRIMINATION

Discrimination: Treating people unfairly in terms, for example, of terms and conditions of employment, including pay or working conditions, harassment, e.g. name calling, intimidation or social isolation. Discrimination may be based on a person's age, sex, ethnic or national origin, citizenship, language, religion, conviction, opinion, health, disability, sexual orientation, or it may be for some other reason.

13) Have you observed or experienced discrimination at your place or work in the past two years?

- Yes
- Yes, I have observed it
- Yes, I have experienced it
- Yes, I have observed it and experienced it
- No, I have not observed it or experienced it

If you have not observed or experienced discrimination go to question 17.

14) What do you think the discrimination is due to?

15) Who has been responsible for the discrimination?

You can choose more than one answer.

- A fellow worker
- The manager/supervisor
- A subordinate
- A client or partner, including internal clients
- Someone else; who?

16) Has any action with regard to discrimination been taken at your place of work?

- Yes
- No

SEXUAL HARASSMENT

Sexual harassment: Offensive or indecent materials, letters, telephone messages, emails, speech, jokes, facial expressions or gestures in respect of a person's sex or sexuality, or inappropriate remarks or questions relating to a person's sex or sexuality. Unwanted propositions relating to sexual intercourse, intimidation or demands taking advantage of one's position in the organisation or position of trust, pawing, other unwanted physical contact, etc.

17) Have you observed sexual harassment at your place of work in the past two years?

- Yes, I have observed it
- Yes, I have experienced it
- Yes, I have observed it and experienced it
- No, I have not observed it or experienced it
- If you have not observed or experienced sexual harassment go to question 20.

18) What has been the nature of the sexual harassment you have observed or experienced?

You can choose more than one answer.

- Unwanted remarks concerning the body or sexuality
- Double entendres or mouthing obscenities
- Displaying or showing images or other materials that are offensive in terms of someone's sex or sexuality
- Inappropriate mail, email or telephone calls
- Physical advances
- Direct sexual propositions
- Other; what?

19) Who has been responsible for the sexual harassment?

You can choose more than one answer.

- A fellow worker
- The manager/supervisor
- A subordinate
- A client or partner, including internal clients
- Someone else; who?

GENERALLY INAPPROPRIATE LANGUAGE

20) Have you observed or experienced inappropriate language (e.g. degrading or otherwise inappropriate jokes or name calling/nicknames relating to a person's sex, ethnicity, sexual orientation, age, position, health or disability) in the past two years?

- Yes, I have observed it
- Yes, I have experienced it
- Yes, I have observed it and experienced it
- No, I have not observed it or experienced it

If you have not observed or experienced inappropriate language go to question 22.

21) What in your opinion has the inappropriate language you have observed or experienced related to?

You can choose more than one answer.

- Age
- Sex
- Position at work
- Sexual orientation
- Health or disability
- Origin
- Personal characteristics
- Other; what?

EQUALITY DEVELOPMENT NEEDS

22) How necessary do you think it is to develop the following areas?

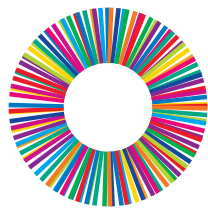
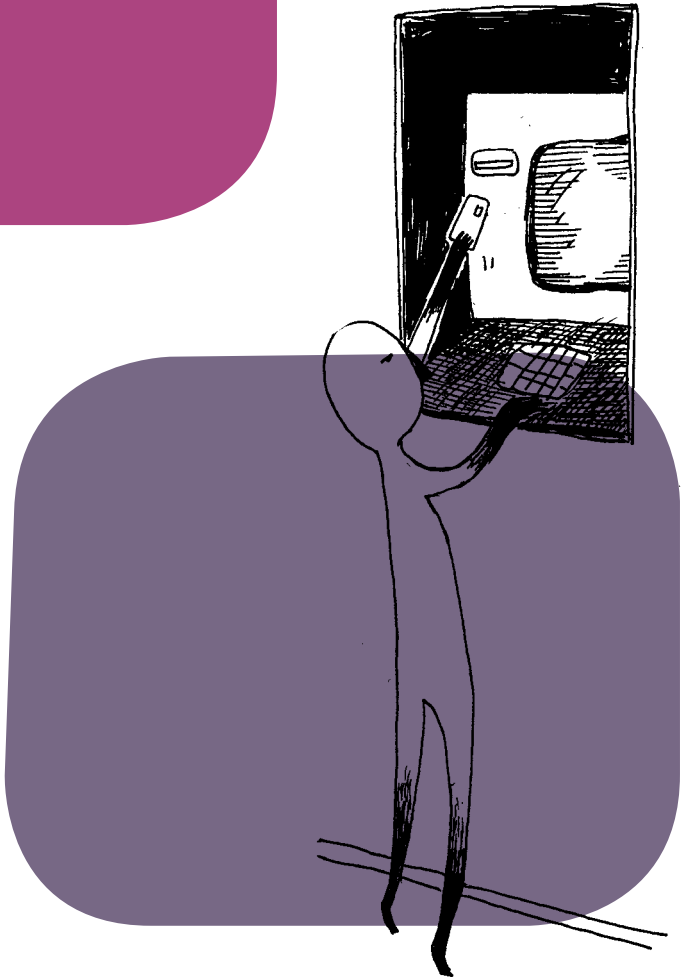
1= completely unnecessary, 2= unnecessary 3= not unnecessary but not necessary either 4= quite necessary 5= very necessary

	1				5
Gender equality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Age equality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Equality for minorities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training in equality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

23) What measures could be taken to foster equality?
What issues in particular need attention?

24) Other remarks

THANK YOU FOR YOUR TIME!



yhdenvertaisuus.fi
equality.fi