



Artists' Association of Finland

**Equality and
non-discrimination plan 2021–2024**

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1. INTRODUCTION

This is the equality and non-discrimination plan of the Artists' Association of Finland (later referred to as *the Association*). The plan was drawn up by a working group on equality and non-discrimination, which consisted of representatives of the Association's staff and trustees, i.e. members of the board. It was approved by the board of the Artists' Association of Finland on 21 May 2021 and by the Association's representatives on 21 June 2021.

The Artists' Association of Finland is an opinion leader and specialist organisation of visual arts, and it represents more than 3,000 professional artists. The Association's objective is to enforce and promote the status of visual arts, the working conditions of visual artists and the importance of the arts in society. We carry out our mission by actively influencing cultural policy decision-making processes and through advocacy efforts as well as by providing services, support and information about working as a visual artist. We provide up-to-date information about the industry to decision-makers, the media and art audiences. We develop practices and structures in the field of visual arts together with other art industry organisations. The Association has a representative on the decision-making bodies of more than 20 foundations, associations and organisations. Our member associations consist of six nationwide artists' associations.

The equality and non-discrimination plan complements the Association's strategy for 2022–2026 and the annual action plan. The plan is statutory and based on both the Non-discrimination Act and the Act on Equality between Women and Men. The plan also takes into account the general grant terms and restrictions updated by the Ministry of Education and Culture in June 2019.¹

The equality and non-discrimination plan describes the objectives and measures by which the Association promotes equality and non-discrimination in its activities as well as the principles of equal treatment that have a broader impact on its activities. **The Association promotes equality and equal treatment of people in its role as an employer, when providing services and when operating in the field of cultural activities.**

¹*Equality and non-discrimination. Grantees must promote equality and non-discrimination in their activities, and comply with the employer obligations provided for in the Equality Act (Act on Equality between Women and Men 609/1986) and the Non-discrimination Act (1325/2014).*

The Ministry of Education and Culture considers it important that grantees take into account the objectives of equality and non-discrimination in terms of both staffing policy and operations to the extent required by the nature of an activity.

The Artists' Association of Finland aims to actively develop ways to prevent discrimination and promote equality in the visual arts scene. The Association recognises its opportunity and obligation to keep the promotion of diversity and equality at the forefront of its advocacy for policies that support artists.

The aim of this equality and non-discrimination plan is not only to fulfil the statutory obligation described above, but also to act as a tool that guides the Association's strategic and operational activities and as a plan for its staffing policy. The implementation of the plan is monitored, and it is regularly updated.

Getting acquainted with this plan is part of the induction process for employees and board members of the Artists' Association of Finland. The promotion and implementation of the plan is supervised by the working group on equality and non-discrimination until the end of 2021, and in 2022, these responsibilities will be transferred to an equality officer to be appointed later. The plan is valid from 1 August 2021 until 1 August 2024.

1.1 EQUALITY AND NON-DISCRIMINATION IN LAW

The Artists' Association of Finland's equality and non-discrimination plan is based on two acts: *the Non-discrimination Act (1325/2014)* and *the Act on Equality between Women and Men (609/1986, i.e. the Equality Act)*. Equality means that all people are treated equally, regardless of their sex, gender, age, ethnicity, nationality, language, religion or belief, opinion, disability, health, sexual orientation or any other personal attribute.

In a fair society, personal attributes, such as ethnic or social origin or colour, must not affect people's access to education, employment or services. Fundamental rights belong to everyone.

In the Finnish Constitution, the principle of equality refers to both the prohibition of discrimination and the equality of people before the law.

2. ABOUT THE PROCESS OF DRAWING UP THE PLAN

Preparatory work for the Artists' Association of Finland's equality and non-discrimination plan began in autumn 2019 with a workshop related to the Culture for All service's Diversity Agents training, led by the artist and cultural worker **Kême Pellicer**. The workshop was attended by staff and board members from the Artists' Association of Finland and its member organisations.

The workshop explored various aspects of diversity and inclusion, especially from the perspective of the activities of the Association and its member organisations; the current situation, experiences and needs were also assessed together with better ways to include equality and non-discrimination in future activities. The workshop also introduced the attendees to terms and concepts such as *inclusion, diversity, equality, accessibility and intersectionality*.

A three-strong working group was established in spring 2020 to draw up the equality and non-discrimination plan, the members of which were the Association's Head of Communications, **Rosa Kuosmanen**, lawyer **Aura Lehtonen** and graphic artist **Seela Petra Lehtonen**, who is a member of the Association's board. The group was responsible for preparing the plan and the process. Other members of the staff and the board as well as various stakeholders were also consulted during the process. The staff and the board commented on the plan at various stages of the process.

A joint training event on the promotion of diversity and inclusion was held by DEI specialist **Sara Salmani** in spring 2021 as part of the preparatory work for the plan. The workshop was attended by staff and board members from the Artists' Association of Finland and its member organisations.

Preparation for the Association's five-year strategy was under way at the same time and also addressed the issues of equality, inclusion and accessibility as part of its activities. During the process, the Association also drew up a reply to the Call for Action petition addressed to organisations in the arts sector. The reply examined the implementation of equality and anti-racist practices in the Association's activities as well as areas for development. The reply was used in preparing the equality plan.

Finnish artists' organisations that are members of the Artists' Association of Finland were also involved in the equality work: Artists' Association MUU, the Finnish Painters' Union, the Association of Finnish Sculptors, the Association of Finnish Printmakers and the Association of Photographic Artists. Some member organisations also have their own, separate equality and non-discrimination plans.

At the time of preparing the equality and non-discrimination plan, the Artists' Association of Finland employed a total of five people, four of whom were permanent workers, three worked full-time and one was a part-time trainee. Employees of three other organisations also work in

the Association's premises as subtenants. All employees of the Association are women. Three of the board members are women and four are men.

3. EQUALITY ASSESSMENT

The process of drawing up the equality and non-discrimination plan included an assessment of the organisation's current situation and the various areas of operations from the perspectives of equality, anti-racist practices and accessibility. The assessment tried to identify any issues that might perpetuate structural inequalities and that would require special attention. The key point to explore was how equal the different areas of operations are from the point of view of different groups.

The equality and non-discrimination situation was assessed by organising inductions for the staff and trustees as well as discussions on policies that advance or restrict equality. These discussions focused on wishes, challenges and areas for development related to the Association's activities with regard to individual projects and strategic measures that determine how activities are carried out. The assessment looked at how equality principles are currently being implemented in the Association's activities in terms of services for members, appointments, communications, recruitment and accessibility in the office. The implementation and development of equality efforts in the various areas of operations are discussed in more detail in Chapter 4.

When assessing the current situation, it was also explored how the Artists' Association of Finland's existing strategy, staff guidelines, values, rules and the most recent annual reports reflect issues related to equality and non-discrimination. The values of the Artists' Association of Finland are the intrinsic value of art and the appreciation of artists' work, cooperation, transparency, pluralism and expertise.

The Ministry of Justice has developed a tool for assessing equality that includes a non-discrimination test. The members of the equality and non-discrimination working group took the test, which consists of various questions and statements. The result of the non-discrimination test is given on a scale of 1 to 5.

The non-discrimination test levels are:

1. Organisation feels indifferent to equality
2. Organisation responds to discrimination
3. Organisation is gradually recognising the benefits of equality
4. Committed to equality
5. Leader in equality

The Artists' Association of Finland received 38/60 points, which means that it is at level 3. According to the test, our organisation is gradually recognising the benefits of equality.²

The assessment concluded that measures to promote equality have already been taken in many areas of operations but that diversity and non-discrimination will need to be identified and considered in an even more comprehensive manner in the future. It was recognised that there is room for improvement in our practices and that work for equality must be continuous.

The Association's staff and trustees try to become more aware of the needs and means of increasing equality in its own activities and the activities of its member associations. Both the staff and the board recognise the relevance and importance of the issue. The aim is to adopt and apply more inclusive and non-discriminatory practices in a systematic manner at different levels of the Association's activities, in decision-making processes as well as in the planning of activities and programmes.

4. EQUALITY IN THE ARTISTS' ASSOCIATION OF FINLAND'S ACTIVITIES

The Artists' Association of Finland promotes equality and equal treatment of people in its role as an employer, when providing services and when operating in the field of cultural activities. All forms of discrimination are prohibited in the Association's activities. The key is to identify, address and prevent discrimination in all areas of its operations.

This equality and non-discrimination plan highlights four recommendations for how the Association and its member organisations can promote equality and diversity. The recommendations emerged from the assessment and the workshop held in autumn 2019.

1. The Association works with artists and experts from different backgrounds and minorities.
2. The Association develops its staff's and board members' skills and awareness about minorities and trains staff on equality-related issues.

² *“Great, your organisation is beginning to recognise the added value created by equality promotion! Your systematic and inclusive efforts will be rewarded by employee well-being and high-quality operations.”*

The test result and the ideas in the online guide are available at: <http://yhdenvertaisuus.finlex.fi/en/syrjimattomyystesti/2918/> It is recommended that organisations repeat the test regularly and compare the results. The test can also be taken when this plan is updated.

3. The Association's staff and board members adopt new approaches to issues such as communications, recruitment processes, dealings with audiences, exhibition practices and other procedures.
4. The Association highlights artists, experts and other individuals from different minorities and backgrounds in its operations.

The measures included in the recommendations aim to improve the Artists' Association of Finland's operations so that equality and non-discrimination can be achieved by its staff and board, in its administration and services, communications and activities targeted at various stakeholders.

4.1 ADVOCACY WORK

The Artists' Association of Finland promotes and oversees the interests of professional artists who work in Finland. It does this by actively influencing cultural policy decision-making processes, by meeting decision-makers, such as politicians and civil servants, by providing statements and by collaborating with funding bodies, such as the government and foundations that support arts. The Association produces and provides up-to-date information about the industry and visual artists' work to decision-makers, the media and art audiences. The Association also safeguards artists' interests in other areas, such as employment and industrial policies as well as social and health policies.

The advocacy efforts of the Artists' Association of Finland are guided by the government programme goals published every four years. As a rule, the Association's advocacy efforts cover all professional visual artists working in Finland. However, artists have different needs and abilities to carry out their profession. When planning advocacy objectives, communications and measures, attention should also be paid to targeted measures to remove potential barriers to equality with regard to professional visual artists from different backgrounds.

The Association promotes work methods and procedures in visual arts that comply with health and safety requirements. Visual artists must be able to carry out their profession in all situations without fear of discrimination, harassment, pressure or other inappropriate treatment. The Association provides its member artists with legal advice and counselling services in situations such as work-related discrimination and sexual harassment. Artists must also feel that it is easy for them to contact the Association in confidence if they are treated inappropriately in their job as a visual artist.

Another important part of the Artists' Association of Finland advocacy efforts is working in various working groups and industry bodies. The Association's board nominates visual artists, as candidates or representatives, to many institutions, working groups and art competition

juries. The Association has a representative on the decision-making bodies of more than 20 foundations, associations and organisations. Each nomination must be carefully considered in the framework of diversity and non-discrimination. Language and other requirements, for example, should be waived if they are not necessary for performing a task. The criteria need to be discussed, and feedback, as appropriate, given to the institution in question.

The Board tries to ensure in nomination processes that the same people are not appointed to decision-making positions several times. A person's expertise and suitability for a job or position is the key criterion.

Decisions on nominations have considered – and will continue to consider – aspects of equality and diversity in the nomination of candidates or representatives. The board and the equality officer to be appointed will monitor how equality manifests itself in nomination proposals: whether there are candidates of different genders from different backgrounds, artists in different stages of their artistic career, from different parts of Finland and from different forms of visual arts. In order to ensure that equality is achieved and people from under-represented groups are considered for nominations, the Association will familiarise itself with and, whenever possible, adhere to the principles of positive discrimination. The Association aims to take diversity and artists from different backgrounds into account in these nomination processes, and it is aware of representation issues.

Grounds for nominations can also be requested directly from the Association. The board is the Association's decision-making body. The board is selected by the representatives of the member associations. The board consists of the chairs of the member associations' boards.

Objectives: the Association considers diversity and equality in its nomination proposals. The equality officer appointed by the Association will set up a system to monitor the achievement of the objectives.

Measures:

1. The working group on equality and non-discrimination draws up ethical guidelines based on the Association's equality and non-discrimination plan, which the Association's representatives nominated to various bodies need to read and commit to when approving their nomination.
2. Through its partners and other contacts, the Association identifies artists and specialists from diverse backgrounds who can work in industry bodies and positions of trust.

3. If necessary, the Association contacts the organisations requesting nominations and enquires about the necessity of language requirements or other criteria, for example. The Association actively informs organisations of the objective of increasing diversity.
4. The board annually monitors the increase in equality and diversity in nominations on the basis of the equality officer's report.

4.2 SERVICES AND COUNSELLING

The services provided by the Artists' Association of Finland are available to all professional artists who belong to the Association's member organisations, and some of the services are also available to artists who are not members. All artists who have access to the Association's services are treated and served equally, regardless of any personal attributes.

Artists, and Finnish society in general, consist of different and diverse individuals. Diversity may refer to attributes such as language, cultural differences, ethnic characteristics, gender, sexuality, socioeconomic status, age, physical characteristics, disability, appearance, religion, political views or different ideologies and beliefs.

Intersectionality must be taken into account in the Association's activities and in the equality and non-discrimination plan: each individual belongs to several different groups simultaneously, and many factors influence an individual's behaviour, needs, experiences and abilities. In an equal society, everyone is equal, regardless of their background and characteristics. No one must be discriminated against because of a personal characteristic.

Artists have different needs and priorities in terms of what kind of services and support they need in order to be able to work as visual artists. The Association aims to better identify and actively dispel assumptions and their impact. This involves participation in working groups and training events as well as learning more about new artists from different backgrounds and their needs. All member artists are also supported in an equal manner, regardless of their background or other personal characteristics. The Association provides its member artists with legal advice in situations such as work-related discrimination, harassment or other inappropriate treatment.

The Association offers services in Finnish and English, and in some cases also in Swedish.

Artists' organisations should determine if the very large and diverse group of visual artists working in Finland are all in an equal position to become members of these organisations and, consequently, to have access to the Artists' Association of Finland's membership services. Efforts are being made to improve this situation through communications, by working with various cultural organisations and attending discussions and working groups.

Objectives: the Association takes into account the needs, interests and preconditions arising from different backgrounds and other factors when providing services and planning activities; it also reaches potential new target groups better than before. The Association offers services in multiple languages to increase accessibility.

Measures:

1. The Association offers services in two languages: Finnish and English. An increasing proportion of the support materials is also produced in Swedish.
2. The membership criteria of the member associations are examined with the associations. The aim is to make applying for membership easier by means such as communications and by providing services in collaboration with various cultural organisations.
3. The Association assesses the demographics and needs of the artists belonging to the member associations and users of its services through surveys, for example.

4.3 COMMUNICATIONS

The Artists' Association of Finland has several audiences to which the various areas of its activities have been targeted; these include artists and other visual arts professionals, art organisations, policy makers and civil servants, sponsors and the media. To improve the ways the Association reaches different target groups and audiences and takes their needs into account, communications and programme content need to be developed.

The choice of available languages and the expanded reach that follows have been identified as key areas for development. A lack of content in English and issues with accessibility have been recognised, and these issues have been addressed to better reach the diverse range of professionals in the field of contemporary art. Some of the events and content is available in languages other than Finnish. The selection of languages is always considered on a case-by-case basis and the Association aims to offer content in multiple languages, where possible, or by using interpreters, for example. Achieving equality and accessibility also requires financial investments. There needs to be a budget for multilingual communications, the production of accessible content and special arrangements at events, for example.

Accessibility and non-discrimination in terms of both the language and content of the Association's communications as well as the technical characteristics of the communications platforms are taken into account. The Association aims to systematically improve accessibility and to consider the needs of various user groups when planning and implementing

communications. The Association is committed to complying with the EU Web Accessibility Directive on digital online content. The Association's website artists.fi, the public art website julkinentaide.fi, the artist register kuvataiteilijamatrikkeli.fi and the online magazine taiteilijalehti.fi were accessibility audited in 2020 and 2021.

When it comes to competitive tendering and outsourcing, the Association must pay attention to service providers' knowledge of accessibility and diversity as well as financial issues.

It is acknowledged that it is necessary to highlight the diversity of the art scene in Finland in communications and other contexts such as the subjects and news covered in the Taiteilija ('Artist') magazine. Spotlighting artists and experts from different backgrounds and working in partnerships are necessary means to increase representation.

Objectives: the Association's communications are more accessible in terms of the language and content as well as the technical characteristics of the communications platforms. The diversity of artists is acknowledged and presented in a more comprehensive manner in content and communication efforts.

Measures:

1. The websites maintained by the Association comply with the accessibility requirements.
2. The online materials produced by the Association take accessibility requirements into account. Content is maintained and added in English and also in Swedish, where possible. The Association tries to offer content in sign language or through written interpretation, where possible.
3. Every year, the Association allocates budgets, within its resources, for accessibility, translation and other expenses.
4. The Association pays more attention to diversity and representation issues in the content of its communication channels and the Taiteilija magazine by giving a voice and visibility to writers from different backgrounds.
5. The Association's website provides information on its investments and sustainability.

4.4 EVENTS

All forms of discrimination, racism, sexism, harassment and ableism are prohibited at all events organised by the Artists' Association of Finland. When organising events such as discussions, training events and meetings, the Association must pay attention to the programme content

from the perspective of diversity and accessibility, accessibility of the venue, accessibility of information and the principles of safe space.

The Artists' Association of Finland's member organisations run their own galleries and produce their artistic content, exhibitions and other regular programmes. The member organisations operate independently, and the Artists' Association of Finland is not involved in planning their programmes or in their decision-making processes. However, the chairs of the member organisations form the Association's board and, consequently, act as a link between the Association and each member organisation.

Consideration and promotion of equality and diversity issues in terms of membership of artists and programmes depend on the individual member organisations: some of them offer information in multiple languages, for example. The member organisations also recognise the need to develop their services and content so that they better acknowledge the diversity of the sector and consider equality issues when planning their activities.

Objectives: at its events, the Association considers issues related to diversity and accessibility of content, accessibility of venues, accessibility of information, and adheres to the principles of safe space. Improving accessibility in all areas of operations must be consistent and strategic.

Measures:

1. The Association uses the accessibility and diversity checklist for events by the Culture for All service in the planning and implementation of events.
2. The Association introduces a pre-registration system for its events to identify and meet any accessibility requirements.
3. The Association explores providers of services related to issues such as accessibility and equality, e.g. interpretation services, and buys third-party providers' expertise in planning its events if necessary.

4.5 FACILITIES

All forms of discrimination, racism, sexism, harassment and ableism are prohibited in the Artists' Association of Finland's facilities. The principles of safe space are adhered to both in the Association's own premises and in other premises where its activities are organised. All employees who use the office and those responsible for organising events are informed of the principles.

The Artists' Association of Finland's office is located at Iso Roobertinkatu 3–5 A 22 in the centre of Helsinki. The office is on the second floor in a building with no lift, and it is not accessible for wheelchair users, for example. The office also does not have accessible or

gender-neutral toilets. The Association's website offers information about the accessibility status of the office as well as information that meetings, for example, can also be held either in alternative, accessible facilities or online.

The Association undertakes to pay attention to accessibility issues when selecting venues for its events.

In addition to the accessibility of the built environment, accessibility must be taken into account in other contexts such as online environments, communications, the provision of information and the pricing of events and services.

Objectives: the office and work environment must be as functional and safe as possible, taking into account the individual needs of the employees, trustees and other users of the facilities.

Measures:

1. The aim is to organise events primarily in venues that are accessible in as many aspects as possible.
2. The office toilets are to be made gender neutral.
3. The Association provides information on the principles of safe space to all users of its facilities.

4.6 COOPERATION

The Artists' Association of Finland develops practices and structures in the field of visual arts together with other art industry organisations and a variety of other partners.

Important partners include artists and other visual arts professionals, art organisations, policy makers and civil servants, sponsors and the media. The organisations with which the Association works particularly closely in many areas are the six national artists' organisations that are its member associations.

Cooperation with various organisations involves advocacy work (e.g. joint statements), different types of development projects (e.g. pricing practices in visual arts and art education) and programme content (e.g. the Young Artists exhibition).

Resources permitting, the Association seeks to take an active role in cooperation projects that promote equality and development in the sector. For example in 2020, the Association participated in projects aimed at improving training and working opportunities for artists with

learning or other disabilities or who use sign language, and projects focusing on identifying barriers.

Objectives: the Association accelerates its collaboration with artists and experts from different backgrounds and minorities. The Association seeks cooperation with partners that also take equality issues into account in their activities.

Measures:

1. The Association's partners are public information and they are described in a transparent manner at least every year in the annual report.
2. The Association also evaluates its partners from the perspectives of diversity and equality. As a rule, collaborative activities are only established with partners whose activities do not conflict with the Association's policies.
3. The Association continues and develops its cooperation with partners in the sector, including Globe Art Point, Kettuki and the Association For Culture on Equal Terms (Yhdenvertaisen kulttuurin puolesta ry) and, where necessary, relies on their expertise, for a fee, in issues related to accessibility, non-discrimination and equality. Partners can be consulted when planning advocacy work, projects and event productions, for example.
4. The Artists' Association of Finland reports to its sponsors on equality targets and requirements to ensure that its goals are achieved.

4.7 RECRUITMENT AND EQUALITY IN THE WORK COMMUNITY

The Artists' Association of Finland is a workplace with a zero tolerance policy on discrimination and harassment. The Association values its staff and invests in developing a fair and equal work culture. The Association's employees work 3.6 person-years a year, and it also employs temporary trainees.

The director's task is to promote a safe atmosphere and equality among the Association's employees and to prevent discrimination in the workplace.

It is the employer's duty to promote equality in the workplace. Supervisors must ensure that no employee is discriminated against or harassed. It is also the responsibility of all employees to ensure that they do not discriminate against anyone and that they contribute to the achievement of equality.

The director supports and encourages employees equally in their development and further training at work, ensures that tasks are equally distributed and also promotes well-being at work.

The aim is to strengthen equality and non-discrimination efforts through open and inclusive recruitment processes, transparency regarding pay and decision-making, opportunities for employees to have a say on how they work, organisational policies and practices, open communications and regular appraisals. All employees of the Association meet every one or two weeks for a staff meeting, and they also attend more extensive planning meetings at least twice a year.

At staff meetings, all employees have an equal opportunity to express their opinions and participate in decision-making.

Members of staff in permanent, fixed-term, full-time and part-time employment are entitled to collective employee benefits. Different employment contracts and working hours are taken into account when planning the staff's activities. Jobs related to the daily running of the office and various maintenance jobs are divided equally among the employees.

The Association's board monitors and evaluates the payroll developments every year. Employees have access to agendas and minutes of the Association's board meetings.

Appraisals, awaydays and company outings can be useful in developing the Association's operations, cooperation and job allocation, and they enhance staff well-being and sense of community.

When planning activities and the allocation of jobs and practicalities, the individual methods, skills and abilities of each employee and any particular requirements that depend on an individual's situation in life are considered, and reasonable adjustments are made if necessary. Requirements related to the work environment are also regularly discussed, and the staff's skills in issues related to diversity and accessibility are developed. The requirements of new employees are also discussed with them before they start the job.

The Artists' Association of Finland provides its staff and board members with regular training on equality, accessibility, anti-racist practices and well-being at work. Training is provided by third-party specialists. The staff can also familiarise and train themselves in these issues during their working hours.

EQUALITY IN THE WORK COMMUNITY:

Objectives: the Association develops and maintains working conditions and practices that promote equality.

Measures:

1. Training on equality in the workplace is included in the induction of employees and board members.
2. Members of staff in permanent, fixed-term, full-time and part-time employment are entitled to collective employee benefits.
3. When planning activities, the allocation of jobs and practicalities, the individual methods, skills, abilities and the situation in life of each employee are considered, and reasonable adjustments are made if necessary.

RECRUITMENT:

Objectives: transparent and carefully thought-out recruitment practices ensure that the Association promotes a good workplace culture, the equal treatment of employees and diversity in its work force.

Measures:

1. The Association's recruitment criteria are public.
2. The Association advertises vacancies through multiple channels and, depending on the job, in different languages.
3. The Association's recruitment practices have not specifically encouraged applicants from different backgrounds to apply for jobs. The Association will address this issue by adding the following sentence to its future job and traineeship advertisements: "We encourage you to apply for this job regardless of your gender, age, ethnicity or other personal attributes."
4. When advertising jobs, the Association informs potential applicants of the fact that its office is not fully accessible. The aim is to avoid requiring any qualifications that are non-essential for a particular job and that may discriminate against applicants or prevent them from applying for a particular position. The Association assesses, on a job-by-job basis, whether the Finnish language or any other skills are a prerequisite for performing a job.
5. The Association considers whether the recruitment process could be anonymous either fully or in part.
6. The Association's recruitment process adheres to the legislation on equality and positive discrimination.

5. IMPLEMENTATION, MONITORING AND UPDATING

The equality and non-discrimination plan was drawn up by a working group on equality and non-discrimination, which consisted of representatives of the Association's staff and board. The group will work until the end of 2021, and it monitors the implementation of the plan in the early stages.

One of the Association's employees will be elected as equality officer in 2022. The job will involve liaising with the Association's employees, board members and stakeholders in issues related to equality and non-discrimination. The equality officer will set up a monitoring system that can be used for reporting the measures taken and targets achieved to the Association's board every year.

The equality officer will ensure that equality is considered in the Association's operations and decision-making processes. The equality officer will monitor the achievement of and progress towards the objectives and submit a report to the Association's board every year. The equality officer will also submit proposals to the board regarding measures to advance the objectives of the equality and non-discrimination plan. The board will discuss the proposals at its meeting at least once a year. The employees will also discuss the progress and achievement of the objectives at the weekly staff meetings.

The Association must monitor the impacts of the measures at regular intervals, both in terms of the equality situation and the implementation of the plan. Forms of monitoring include:

- quality assurance procedures;
- impact assessment methods;
- follow-up surveys and other feedback mechanisms.

The Association aims to improve and modify the ways in which it operates on the basis of feedback. The Association must encourage people to provide more feedback as it is valuable for the development and improvement of its operations. The staff and trustees can also offer feedback, which will be discussed openly to improve procedures.

The equality and non-discrimination plan is public, and it is posted on the Association's communication channels. A report on the implementation of the measures is published every year. This plan will be updated in 2024 to improve its effectiveness. Monitoring efforts and the equality situation will be the basis of the updated version.

This plan is based on the materials and guidelines published by the Finnish Institute of Occupational Health, the Occupational Safety and Health Authority, the Non-Discrimination Ombudsman and the equality.fi website, which is maintained by the Ministry of Justice. The plan was inspired by the equality and non-discrimination plan published by the Culture for All service.