

Migration Institute's Equality and Non-Discrimination Plan 2025-2027

Introduction

The Migration Institute's Equality and Non-Discrimination Plan is implemented and maintained by a working group consisting of CEO and Occupational Safety Manager Saara Pellander, Occupational Safety Representative Krista Mielismäki-Kettunen, 1st Deputy Representative Mika Orjala, and 2nd Deputy Representative Linda Bäckman (from January 2026 onwards Eveliina Lyytinen). The Migration Institute's Board reviewed and approved the plan in its meeting on 12 December 2024.

The working group holds regular monitoring meetings and reports on progress and necessary measures during the annual staff dialogue, which also includes updating the staff development plan. Training needs for staff and management are assessed during the semi-annual monitoring meetings. All group members are familiar with equality and non-discrimination issues and receive additional training from the employer when needed.

Quantitative and qualitative data on the Migration Institute's activities and outputs are collected through operational monitoring, annual reports, and the monitoring meetings of the Equality and Non-Discrimination Plan.

1. Employer's Planning Obligation: Promoting Equality and Non-Discrimination

Under the Non-Discrimination Act (§7), employers have an obligation to promote equality. Employers must assess the realization of equality in the workplace and, considering workplace needs, develop working conditions and practices applied in recruitment and personnel decisions. Measures must be effective, appropriate, and proportionate to the operating environment, resources, and other circumstances.

Employers with at least 30 employees must have a plan for necessary measures to promote equality. These measures and their effectiveness must be discussed with staff or their representatives.

Under the Act on Equality between Women and Men (§6), every employer must promote gender equality in working life systematically and purposefully. To promote equality in working life, the employer must:

- Act so that both women and men apply for open positions
- Promote equal placement of women and men in different tasks and create equal opportunities for career advancement
- Promote gender equality in working conditions, especially pay
- Develop working conditions suitable for both women and men
- Facilitate work-life balance for women and men by paying attention to work arrangements
- Act to prevent gender-based discrimination in advance

The Equality Act prohibits discrimination based on gender, gender-related reasons, gender identity, or gender expression. The Non-Discrimination Act prohibits discrimination based on age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family

relationships, health, disability, sexual orientation, or other personal characteristics (see Appendix 3).

The Equality Act (§6a) requires that if an employer regularly employs at least 30 employees, they must prepare a gender equality plan at least every two years, particularly concerning pay and other employment conditions, and implement measures to promote equality accordingly. The plan must be prepared in cooperation with employee representatives such as shop stewards, elected representatives, occupational safety delegates, or other designated representatives. Employee representatives must have sufficient opportunities to participate and influence the preparation of the plan.

The gender equality plan must include:

- An assessment of the workplace’s gender equality situation, including a breakdown of women and men in different tasks and a pay survey covering job classifications, salaries, and pay differences
- Necessary measures planned to promote equality and achieve pay equality

The pay survey ensures that there are no unjustified pay differences between women and men performing the same or equivalent work for the same employer. If the survey reveals clear differences in pay between women and men based on job complexity, task groups, or other criteria, the employer must investigate the reasons and grounds for these differences. If pay systems based on pay components are in use, the main components must be examined to identify the causes of differences.

2. Migration Institute Staff, Pay Model, and Pay Survey

During 2024, the Migration Institute employed 33 people, including university interns. Of these, 12 were in permanent positions and 21 in fixed-term positions. In addition, the institute had one hourly-paid employee and six other interns and work trial participants. The gender distribution is female-dominated (70%). Permanent positions are more evenly distributed between genders than fixed-term positions, where women are overrepresented.

TABLE 1. Staff distribution by type of employment

Staff total 33	Permanent total 12	Fixed-term total 21			
Women	Men	Women	Men	Women	Men
23	10	7	5	16	5

All employees in permanent and fixed-term positions have the same employment benefits, with the exception of the pre-employment health check, which is primarily intended for contracts longer than one year. Chaining short fixed-term contracts may lead to an unequal situation.

The age distribution of staff is fairly even, although the largest group is aged 40-44, and the smallest group is aged 35-39.

TABLE 2. Staff age and gender distribution

Age	Women	%	Men	%	Total	%
-34	6	26	0	0	6	18
35-39	2	9	0	0	2	6
40-44	5	22	3	30	8	25
45-49	1	4	3	30	4	12
50-54	4	17	1	10	5	15
55-59	2	9	1	10	3	9
60-	3	13	2	20	5	15
Total	23	100	10	100	33	100

In 2024, the institute's Board consisted of 6 women and 4 men. Among the members of the Supervisory Council, 31 were women and 29 men. In the previous round of preparing the equality and non-discrimination program, women were clearly underrepresented in both bodies, whereas now both have a female majority. Memberships in the Board and Supervisory Council are based on nominations by member organizations. Since autumn 2019, requests have specifically asked for both male and female candidates. The gender balance of the Board is considered separately. When selecting candidates for the Board and Supervisory Council, attention is paid to both the Migration Institute's and member organizations' equality and non-discrimination plans, and efforts are made to ensure diversity in candidate selection.

Staff remuneration consists of a base salary and a personal component. The level of requirement is determined by the job. The personal component takes into account previous work experience, relevant (academic) degrees, other relevant training, and other merits that affect job performance.

Some funders have predefined salary levels for different positions, which may occasionally differ from the Migration Institute's pay model. When hiring people for externally funded projects, efforts are made to ensure that these positions are aligned with the levels of comparable positions within the institute.

Goal

The Migration Institute adheres to and promotes equality among employees. Equal starting pay is given for the same or equivalent work if employees are equally qualified. The institute's pay model is transparent and consistent. Differences in personal pay components are based on acceptable reasons, not gender or other personal characteristics unrelated to competence.

Actions

Attention to gender equality and representation is paid in all institute activities. The staff description included in the pay model will be updated, and requirement levels reviewed as needed. The employer monitors pay development.

3. Recruitment Procedures

Recruitment aims to promote the development of a staff structure that is equal, diverse, and multilingual. In individual cases, so-called positive action may be applied, meaning giving preference

to an underrepresented group—for example, an applicant with an immigrant background—if the candidates are equally or nearly equally qualified.

The Migration Institute also seeks to employ persons with partial work ability, for example through work trials.

Vacant positions are communicated openly and nationwide through multi-channel communication and, where possible, in different languages. When distributing job advertisements, attention is paid to who can be reached through different channels, and networks that promote diversity and internationalization are utilized already at this stage.

For each position, the language skills required to perform the job are assessed. Language requirements are stated in the job advertisement. If Finnish language skills are necessary for the job, the advertisement may be only in Finnish. If Finnish is not essential, the advertisement may be in English or, if needed, in another language. For example, if a research assistant is sought whose task is to interpret Arabic-language interviews, the job advertisement may also be in Arabic.

Recruitment aims to avoid unnecessary qualification requirements that could create an additional barrier to applying. Some tasks may require knowledge of less common languages, but not necessarily Finnish or Swedish, and such skills enrich and benefit our work community.

The following sentence is included in job advertisements:

“We welcome applicants of different ages, genders, and individuals belonging to linguistic, cultural, and other minorities.”

Anonymous recruitment will be piloted starting in 2025, initially for internships and non-research positions during the first screening stage. If these trials yield positive results, the possibility of anonymous recruitment will also be explored for researcher positions.

The interview stage of recruitment is guided primarily by norms related to safeguarding the interviewee’s privacy. Preparing for interviews also includes familiarization with privacy protection regulations. Interviewers must know which topics are not appropriate for a job interview. As a rule, questions about family, religion, political opinions, or sexual orientation do not belong to the employer. Asking about parenthood or family responsibilities—such as family relationships, marital status, or childcare arrangements—during recruitment is prohibited under the Equality Act. This practice cannot be justified by claiming that answering such questions is voluntary.

Goal

The Migration Institute operates in an equal manner and considers accessibility, diversity, and equality perspectives in all recruitment processes. Equality and non-discrimination objectives are also communicated in the selection of Board members.

Actions

All recruitment is carried out without discrimination and with respect for privacy. When preparing recruitments, the need for positive action and the possibility of anonymous applications are assessed.

Recruitment supports the Migration Institute's values of openness, ethics, fairness, and community. Diversity is also taken into account in recruitment.

4. Harassment

Harassment is prohibited under both the Equality Act and the Non-Discrimination Act.

Under the Equality Act, *sexual harassment* refers to verbal, non-verbal, or physical, sexually oriented unwanted behavior that intentionally or effectively violates a person's mental or physical integrity, particularly by creating a threatening, hostile, degrading, humiliating, or distressing atmosphere. *Gender-based harassment* refers to unwanted behavior related to gender, gender identity, or gender expression that is not sexual in nature.

According to the Non-Discrimination Act, harassment is behavior that intentionally or effectively violates a person's dignity when it relates to age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, health, disability, sexual orientation, or another personal characteristic. At the workplace, harassment may manifest as bullying, where an employee is treated in a humiliating, degrading, or threatening manner, or where a hostile and aggressive atmosphere is created. Behavior that violates dignity may include speech, emails, facial expressions, gestures, or displaying inappropriate material.

An employer commits discrimination if they fail to take available measures to eliminate harassment after becoming aware that an employee has been subjected to harassment by another employee. Measures available to the employer include, for example, hearing and instructing the parties involved, issuing a warning to the person responsible for harassment, and, as a last resort, terminating the employment relationship.

The Occupational Safety and Health Act also stipulates the employer's obligation to take available measures to stop harassment: <https://www.tyosuojelu.fi/tyoolot/epaasiallinen-kohtelu>.

Attached to this plan are instructions on how to act when encountering harassment within the institute (Appendix 1), as well as in cases of external hate speech and harassment (Appendix 2).

Goal

No employee or visitor experiences harassment at the Migration Institute.

Actions

Management clearly states that harassment is not tolerated in the workplace. Events organized by the institute follow safe space principles. Harassment is addressed consistently and effectively. Employees are trained to avoid and prevent harassment. Supervisors are trained to detect, investigate, and eliminate harassment. The institute communicates instructions for intervention to both employees and supervisors, and these instructions are regularly updated.

5. Age

Age is one of the prohibited grounds for discrimination under the Non-Discrimination Act.

The Migration Institute does not practice age discrimination in recruitment or in workplace activities. The institute involves employees of all ages in planning common matters and takes seriously the views expressed by young, middle-aged, and older employees. The institute supports employees of different ages in coping at work, developing necessary skills, and advancing in their careers. It supports work-life balance and encourages men to take parental leave and leave for caring for a sick child. The institute supports older employees' ability to cope at work by adopting a positive attitude toward, for example, part-time retirement and other flexible working arrangements.

Goal

The Migration Institute treats employees of all ages and life stages equally and respectfully and supports their ability to cope at work. The institute does not practice age discrimination in recruitment.

Actions

Employees' ability to cope at work is supported in cooperation with occupational health services and, when necessary, through working time and other arrangements. To avoid age discrimination in recruitment, anonymous recruitment may also be tested.

6. Disability and Health

According to Section 8(2) of the Non-Discrimination Act, refusal to provide reasonable accommodations is one of the prohibited forms of discrimination. Any accommodations that a person with a disability may require must not affect the hiring decision. If the most qualified applicant is a person with a disability, excluding them because of the obligation to make reasonable accommodations constitutes discrimination.

Reasonable accommodations refer to necessary and appropriate changes and arrangements made in individual cases that do not impose a disproportionate or undue burden. In working life, accommodations may relate to working conditions and work organization, working time arrangements, work methods, assistive devices, as well as training and guidance related to the job, taking into account the individual needs of the person with a disability. In practice, accommodations may include, for example, changing the lighting or acoustics of workspaces or installing equipment suitable for the employee with a disability. To ensure accessibility of information, various technological solutions may also be considered.

As an employer, the Migration Institute strives to take into account each employee's specific characteristics and needs and to make necessary reasonable accommodations. The institute has also employed interns and work trial participants according to their work ability.

Under the Non-Discrimination Act, health status is also a prohibited ground for discrimination. Health status refers to both physical and mental health and includes both acute and chronic illnesses. If an

illness causes a long-term limitation due to physical, mental, or psychological impairment that may prevent a person from fully participating in working life on an equal basis with other employees, it can be interpreted as a disability.

The Migration Institute supports employees in maintaining work ability in accordance with the occupational health care action plan. It assists employees in acquiring necessary work aids, such as computer glasses.

The Migration Institute's premises are accessible to those who use mobility aids. The institute is exploring whether an induction loop can be installed in the lecture hall to support hearing. If other accessibility issues arise in the premises, for example for visually impaired persons, the institute will seek to address them as far as possible.

The institute also pays attention to accessibility in its communications.

Goal

Disability is not a barrier to working at the Migration Institute. Employees are not discriminated against based on health status. The institute is fully accessible in all its activities.

Actions

The Migration Institute will make reasonable accommodations as needed to enable persons with disabilities to work and also when required by an employee's health condition. The overall accessibility of the premises will be reviewed and improved where possible. Accessibility of communications will be assessed.

7. Origin and Nationality

According to the Non-Discrimination Act, no one may be discriminated against on the basis of origin, nationality, or language.

The Migration Institute's staff includes people who are not Finnish citizens and who were born and lived elsewhere before moving to Finland. Although multilingualism and multiculturalism are generally viewed positively, it is still possible that people who have moved to Finland or belong to racialized minorities experience difficulties related to work or the work community that the employer and supervisors may not anticipate. Therefore, it is important to pay special attention to ensuring that everyone has the opportunity to raise any difficulties or shortcomings they may observe.

Goal

Employees of all backgrounds feel equal in the work community, and their ability to work and participate fully in the institute's activities is guaranteed. The institute is committed to operating according to anti-racist principles within its own work community.

Actions

The institute will prepare clear guidelines for addressing racist discrimination. Staff will receive training related to anti-racism. Supervisors encourage employees belonging to minorities to raise issues and shortcomings they observe in work practices or work culture, create safe spaces for bringing them up, and monitor these proactively.

8. Working Language and Multilingual Communication

The Migration Institute aims to create a language-aware work environment. The institute's working languages are Finnish, English, and Swedish. Meetings are held in Finnish and English. Key documents and guidelines are available in Finnish and English.

Reviewing meeting matters, materials, or other work-related instructions in a language other than Finnish is the responsibility of the supervisor or, depending on the situation, another suitable person within the institute. The essential point is that the employee receives the necessary information in a language they understand and does not feel excluded from the work community. Using Finnish in the workplace and in everyday situations supports language learning. Employees may also attend language courses during working hours. For foreign-language employees, interns, and visitors, language-related issues are discussed and agreed upon at the start of employment.

In external communication, the Migration Institute uses Finnish, Swedish, and English as needed and appropriate. Attention is also paid in institute events to which languages should be used in each situation. For some individuals, using English increases participation opportunities, but it is important to remember that not everyone necessarily speaks English fluently, whether they are immigrants or native residents. The Swedish-speaking Centret's activities are mainly in Swedish. It is also important to be able to use plain Finnish/plain Swedish in internal and external communication.

Goal

All staff members understand their employment-related rights and instructions and stay informed about current matters at the institute. The institute communicates in multiple languages.

Actions

The institute will provide staff training on language awareness. Supervisors and the occupational safety manager ensure that the institute's guidelines and other documents are understandable. Material will be translated or interpreted into different languages as needed. Language-related needs

will be discussed with staff. Plain Finnish/plain Swedish will be used in communication when necessary.

9. Religion and Belief

According to the Non-Discrimination Act, no one may be discriminated against on the basis of religion or belief.

The Migration Institute takes into account that employees may have different religious or philosophical beliefs or may not practice any religion. All beliefs are respected, and harassment related to them is not tolerated within the work community or by visitors.

Employees may, if they wish, practice rituals related to their religion during working hours. They may also agree with the employer on observing religious holidays.

For larger events or seminars, the Migration Institute strives, where possible, to ensure that a quiet space is available for religious practice. Religious dietary requirements are also taken into account where possible in shared catering and meals.

Goal

The beliefs of the institute's employees and visitors are respected, and related needs are accommodated flexibly within reasonable limits.

Actions

Ensure that, during events organized by the institute, a space is available for religious practice (within the constraints of available facilities).

10. Sexual Orientation and Gender Identity

The Non-Discrimination Act prohibits discrimination based on sexual orientation; the Equality Act prohibits discrimination based on gender identity or gender expression.

As an employer and work community, the Migration Institute is aware of the diversity of sexual orientation and gender identity. The institute avoids making unnecessary assumptions about employees' sexual orientation or gender. Discrimination or harassment related to gender identity, gender expression, or sexual orientation is addressed immediately. The Migration Institute's restrooms are gender-neutral.

Discrimination can be prevented by recognizing situations that transgender people may face in working life. Pre-established guidelines are helpful, for example, in situations where an employee undergoes gender reassignment and needs time off for treatments. A person who has undergone

gender reassignment may also request a corrected employment certificate reflecting their new identity.

Goal

All employees and their family relationships are treated equally and respectfully, regardless of their sexual orientation, gender identity, or gender expression. An open atmosphere is maintained in the work community, and assumptions or generalizations about people's gender and sexuality are avoided.

Actions

Make it clear to both employees and visitors that the work community does not operate on heteronormative or binary gender assumptions. Provide training for management and staff on sexual and gender diversity when necessary.

11. Equality and Non-Discrimination in the Institute's Activities

The Migration Institute wishes to demonstrate to its partners and visitors that it values equality and non-discrimination in all its activities. It also communicates about the accessibility and barrier-free nature of its premises.

When organizing events, attention is paid to diversity, accessibility, and equality in the selection of speakers and other invited guests, as well as in enabling barrier-free participation.

The Migration Institute can also reflect awareness and interest in the position of minorities through its choice of research topics. Good examples of this include:

- *Migration-Muuttoliike* journal 1/2024: "Moninaiset kieliyhteisöt työssä ja arjessa (Diverse Language Communities at Work and in Everyday Life)" (eds. Bäckman & Vanhanen)
- The book *Vähemmistöt muuttajina (Minorities as Migrants)* (eds. Leinonen & Tervonen, 2021)
- Liisa Hokkanen's (2022) publication on the experiences of inclusion among Sámi persons with disabilities
- Outi Lepola's 2018 report *Koko ajan jännittyneenä - Moniperusteinen syrjintä seksuaali- ja sukupuolivähemmistöihin kuuluvien kokemana (Constantly Tense - Intersectional Discrimination Experienced by Sexual and Gender Minorities)*

Institute employees also promote non-discrimination by participating in anti-discrimination and diversity-promoting working groups and other expert roles, as well as through advocacy work related to these issues.

In procurement and tendering, in addition to economic factors, accessibility, ethics, and diversity considerations are taken into account.

Goal

The Migration Institute presents itself as an organization that adheres to and promotes equality and non-discrimination, also to its partners and visitors.

Actions

The Migration Institute pays attention to equality and non-discrimination in all its activities and collaborations.

12. Role of Supervisors, Employee Representatives, and Management

The Migration Institute aims to address problems and disturbances as early as possible to prevent issues and conflicts from escalating. Primary responsibility for addressing problems in the work community lies with management and the supervisor of the employee who has experienced discrimination or harassment, who may, if necessary, receive support from occupational safety representatives and/or occupational health services.

An employee who has experienced discrimination or harassment should first turn to their immediate supervisor or the occupational safety representative. They must be able to trust that they will be treated appropriately and that those handling the matter act impartially and maintain confidentiality. Situations must be addressed with the seriousness they require, without delay, and professionally.

In particular, the CEO and Administrative Director, as well as the occupational safety representative and deputy representatives, must be well informed about promoting equality and non-discrimination as part of occupational safety and workplace well-being. They must familiarize themselves with these issues and, if necessary, participate in related training and organize training or learning opportunities for supervisors, employee representatives, and all staff.

Goal

The employer, those responsible for occupational safety, and supervisors actively monitor workplace practices and atmosphere and intervene proactively in problems, discrimination, and harassment.

The institute understands the different roles and responsibilities of the CEO, Research Director, immediate supervisors, management team, and the institute's governing bodies (Board and Supervisory Council).

Supervisors and employee representatives are able to handle discrimination and harassment complaints in a manner that inspires trust. They receive support and, if necessary, training for this task.

Actions

Supervisors and employee representatives are given the opportunity to familiarize themselves with good practices for handling discrimination and harassment cases, allocate time for resolving them, and, if necessary, receive training during working hours.

The CEO/Occupational Safety Manager obtains and shares information and, if necessary, training related to promoting equality and non-discrimination, workplace diversity, and occupational safety.

New employees are also informed about the roles and responsibilities of the management team, immediate supervisors, Research Director, and the Board and Supervisory Council.

13. Implementation, Monitoring, and Updating of the Equality and Non-Discrimination Plan

All employees of the Migration Institute must familiarize themselves with the Equality and Non-Discrimination Plan, adhere to non-discrimination in their own activities, and refrain from harassment. The plan is presented to every new employee during orientation. Training on equality and non-discrimination issues may be organized for all staff during staff meetings and development days.

Supervisors and occupational safety representatives are required to thoroughly familiarize themselves with the plan.

The employer bears special responsibility for compliance with the plan and implementation of the measures outlined in it, as well as for the general promotion of equality and non-discrimination. Promoting equality requires adherence to it in all activities and open communication about it.

It is important to create an open and dialogical atmosphere that enables employees to raise observed problems easily and resolve them.

The Occupational Safety Manager and occupational safety representatives continuously monitor the implementation of the Equality and Non-Discrimination Plan and review it together semi-annually.

Any harassment experienced by staff is surveyed annually as part of the workplace well-being questionnaire. The questionnaire will include the question: "Have you observed any shortcomings related to equality and non-discrimination in the work community?"

The realization of equality and non-discrimination is monitored through regular workplace well-being surveys. The Equality and Non-Discrimination Plan is updated every three years. The CEO/Occupational Safety Manager and occupational safety representatives are responsible for updating the plan. Staff are consulted, involved, and informed during the update process.

Goal

All employees of the institute are familiar with the Equality and Non-Discrimination Plan and comply with it. The plan is implemented and continuously updated.

Actions

During orientation, new employees are also introduced to the Equality and Non-Discrimination Plan. It is kept visible to all employees, and its goals and measures are discussed periodically. Management, supervisors, and occupational safety representatives focus on monitoring the plan and report on its implementation to staff during the spring dialogue. This allows development needs arising from the plan to be incorporated into the staff development plan.

Saara Pellander

Saara Pellander (Jan 8, 2026 11:22:21 GMT+2)

Saara Pellander

Director

(updated 7.1.2026)

Appendix 1: Instructions for Handling Discrimination and Harassment Situations

An employee may experience hate speech, racist/discriminatory treatment, and harassment within the work community or from a partner related to the Migration Institute's activities (such as a colleague, supervisor, or stakeholder representative). It is important to maintain a healthy workplace atmosphere and ensure that employees feel encouraged to report harassment immediately to their supervisor and/or occupational safety representatives. Agreed and well-known procedures for handling offensive feedback reduce individual stress and help prevent internal conflicts caused by strain.

General

The Occupational Safety and Health Act prohibits harassment that causes harm or danger to an employee's health. Harassment is systematic and continuous negative behavior or actions.

Examples of harassment include:

- Repeated threats
- Intimidation
- Malicious and suggestive messages
- Demeaning and mocking speech
- Continuous unjustified criticism and obstruction of work
- Questioning reputation or status
- Isolation from the work community
- Sexual harassment

Such behavior can harm or endanger an employee's health. Harassment may also involve misuse of managerial authority, such as:

- Repeated unjustified interference with work
- Unjustified changes to the quality or quantity of tasks
- Illegal changes to agreed working conditions
- Improper use of managerial power
- Giving humiliating orders

What is NOT harassment?

Not all poor behavior at the workplace constitutes harassment or other inappropriate treatment as defined by the Occupational Safety and Health Act. For example, minor, isolated incidents such as occasional inappropriate remarks or work-related disagreements are not harassment.

Decisions and actions within the employer's managerial authority may sometimes be perceived as inappropriate. However, the employer has the right to plan, direct, and supervise work. The employer also has the authority to decide on the nature, scope, and methods of work and workplace procedures.

How to Act

- Address the harassment you experienced as soon as possible with the person behaving negatively. Clearly state that you consider the behavior inappropriate and do not accept it. Describe concretely what behavior you found inappropriate. Ask them to stop the harassment or change their behavior.
- If you do not feel comfortable doing this alone, you can ask a colleague or occupational safety representative to join you and together request the person to change their behavior. Occupational health services can also support you in harassment situations.
- If the person continues the harassment, inform them that you will escalate the matter to your supervisor. For further handling, it is important to document how the harassment occurs, how often it happens, and what actions you have taken.
- If the harasser is your immediate supervisor, inform them that the matter will be escalated to their supervisor. If you do not feel comfortable reporting to your immediate supervisor, contact the occupational safety representative.
- If the CEO engages in discrimination or harassment, contact the Chair of the Board directly or together with the occupational safety representative.
- The Board and Supervisory Council may have a role in resolving discrimination and harassment cases if their members are involved.
- If your employer does not act to stop the harassment or the measures taken have not helped, you can request information and assistance from the occupational safety authority. Regional State Administrative Agencies' occupational safety divisions act as regional occupational safety authorities. They provide guidance and advice and, if necessary, ensure that the employer acts to stop harassment after being informed.

Contact Information:

- Regional State Administrative Agency for Southwestern Finland, Occupational Safety Division
Switchboard: 0295 018 000
Email: tyosuojelu.lounais@avi.fi
- National Occupational Safety Authority Telephone Service:
Tel: 0295 016 620

Appendix 2: Guidelines for Handling Hate Speech or Racist Treatment at the Migration Institute

The following guidelines explain how to act in situations involving hate speech or racist treatment (verbal or physical harassment) at the Migration Institute. The instructions outline how the situation should be handled and the responsibilities involved from the perspectives of the affected employee, the supervisor, the institute's director and management team, and the entire work community. The Migration Institute is committed to anti-discrimination and anti-racist practices not only as a work community but also in all its communications and events. Related principles are summarized at the end of these guidelines. This document is an appendix to the Migration Institute's Equality and Non-Discrimination Plan and will be updated as needed when the plan is revised.

General

Responsibility for resolving the situation lies with the organization's management or, at minimum, the supervisor, together with the HR manager, communications officer, and the occupational safety committee. Under the Occupational Safety and Health Act, the employer is responsible for continuously monitoring workplace hazards, including harmful feedback. The immediate supervisor must ensure that responsibilities for identifying and addressing harmful workload factors are clear.

Employee

If you encounter hate speech or racist treatment:

- **If possible, do not read the message yourself.** Ask a colleague, communications officer, or another trusted person to save it. Offensive messages can linger in your mind, and reading them yourself can be mentally very stressful.
- **Save messages immediately.** Social media messages can disappear or change, so they must be saved right away. Emails, text messages, or messages received through other channels must also be saved, not deleted.
- **Are you in danger? Act immediately.** If a threat is directed at you, contact emergency services or the police immediately. Whether the threat is direct or indirect, save it. Even an indirect threat may constitute a criminal offense.
- **Report the offensive message to the website or social media platform administrator and request its removal.** You can also block the user so they can no longer send you messages or post on your page.
- **Seek help—do not stay alone.** Inform your supervisor and the organization. It is not a private matter if an expert receives offensive feedback related to their work. Hate speech can escalate and spread, also putting the organization's reputation at risk, so quick action is essential.
- **Do not lose your composure.** Remember that polite behavior and professional language are always in your best interest, even if the other party lacks respectful communication skills. Do not respond to messages before assessing the situation.

Report the situation immediately or as soon as possible to:

- A colleague
- Your immediate supervisor and/or

- The institute's director and/or
- The institute's occupational safety representatives/deputies

Together, assess whether a police report should be filed. You are not solely responsible for deciding whether the experience is "serious enough" or warrants reporting. It is important that the police receive the report and can record it.

Immediate Supervisor

- Be informed of the incident
- Hold a joint discussion with the affected employee (immediately and later if needed), provide general support, and refer to occupational health services if necessary
- Provide practical support (e.g., communication, possible police report)

Institute Director and Management Team

- Be informed of the incident
- Decide whether the situation requires broader handling within the work community (see section "Work Community" below)

Work Community

- General information sharing (case-by-case consideration)
- Review the situation and, if necessary, reiterate shared guidelines
- Support the colleague who was targeted and communicate that they are not alone

Occupational Safety

- Be informed of the incident
- Provide practical assistance and support (see section "Immediate Supervisor")

Communications

- Internal communication
- External communication
- Other communication responsibilities (e.g., reporting offensive messages to website or social media administrators for removal)

Occupational Health

- Contact occupational health nurse, doctor, and/or psychologist as needed (a visit to the occupational health psychologist does not require a referral)

Appendix 3: Prohibition of discrimination in law

Constitution of Finland (11 June 1999/731)

Section 6 Equality

Everyone is equal before the law.

No one shall, without an acceptable reason, be treated differently from other persons on the ground of sex, age, origin, language, religion, conviction, opinion, health, disability or other reason that concerns his or her person.

Children shall be treated equally and as individuals and they shall be allowed to influence matters pertaining to themselves to a degree corresponding to their level of development.

Equality of the sexes is promoted in societal activity and working life, especially in the determination of pay and the other terms of employment, as provided in more detail by an Act.

Non-Discrimination Act (1325/2014)

Section 8 Prohibition of discrimination

No one may be discriminated against on the basis of age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation or other personal characteristics. Discrimination is prohibited, regardless of whether it is based on a fact or assumption concerning the person him/herself or another.

In addition to direct and indirect discrimination, harassment, denial of reasonable accommodation as well as an instruction or order to discriminate constitute discrimination as referred to in this Act.

Section 9 Positive action

Proportionate different treatment that aims to promote de facto equality, or to prevent or remove the disadvantages attributable to discrimination, does not constitute discrimination.

Section 10 Direct discrimination

Discrimination is direct if a person, on the grounds of personal characteristics, is treated less favourably than another person was treated, is treated or would be treated in a comparable situation.

Section 12 Justifications for different treatment at work and in employing personnel

Different treatment in employment relationships and service relationships under public law, as well as work experience placements and other equivalent activity and also when employing or engaging into service, is justified if the treatment is founded on genuine and determining requirements concerning the type of occupational tasks and their performance, and the treatment is proportionate to achieve the legitimate objective.

Different treatment based on age or domicile is also justified if the treatment has an objectively and appropriately justified employment policy objective or an objective concerning the labour market, or if the different treatment is attributable to the age limits adopted for qualification for retirement or invalidity benefits.

Section 13 Indirect discrimination

Discrimination is indirect if an apparently neutral rule, criterion or practice puts a person at a disadvantage compared with others as on the grounds of personal characteristics, unless the rule, criterion or practice has a legitimate aim and the means for achieving the aim are appropriate and necessary.

Section 14 Harassment

The deliberate or de facto infringement of the dignity of a person is harassment, if the infringing behaviour relates to a reason referred to in section 8(1), and as a result of the reason, a degrading or humiliating, intimidating, hostile or offensive environment towards the person is created by the behaviour.

An employer's actions are to be considered discrimination if the employer, after having been informed that an employee in their employment was subjected to harassment as referred to in subsection 1, neglects to take action to remove the harassment.

Section 15 Reasonable accommodation to realise equality of persons with disabilities

An authority, education provider, employer or provider of goods and services has to make due and appropriate adjustments necessary in each situation for a person with disabilities to be able, equally with others, to deal with the authorities and gain access to education, work and generally available goods and services, as well as to manage their work tasks and to advance their career.

In assessing the reasonableness of the adjustments, attention shall also be devoted, in addition to the needs of the person with disabilities, to the size, financial position, nature and extent of the operations of an actor, referred to in subsection 1, as well as the estimated costs of the adjustments and the support available for the adjustments.

On request, the employer shall promptly provide a written report on the grounds of its procedures to a person with disabilities, who considers that they have been discriminated against as a result of the denial of reasonable adjustments in applying for employment or public service employment or in an employment relationship or in an employment relationship under public law.

Section 16 Prohibition of victimisation

A person must not be treated unfavourably or in such a way that they suffer adverse consequences as a result of pleading the rights or obligations provided for in this Act, participating in the clarification of a matter concerning discrimination, or taking other action to safeguard equality.

Act on Equality between Women and Men (8.8.1986/609)

Section 8 Discrimination in working life

The action of an employer shall be deemed to constitute discrimination prohibited under this Act if the employer:

- 1) upon employing a person or selecting someone for a particular task or training, bypasses a more qualified person of the opposite sex in favour of the person chosen, unless the employer's action was for an acceptable reason and not due to gender, or unless the action was based on weighty and acceptable grounds related to the nature of the job or the task;
- 2) upon employing a person, selecting someone for a particular task or training, or deciding on the duration or continuation of an employment relationship or the pay or other terms of employment acts in such a way that the person finds themselves in a less favourable position on the basis of pregnancy or childbirth or for some other gender-related reason;
- 3) applies the pay or other terms of employment in such a way that one or more employees find themselves in a less favourable position based on their gender than one or more other employees in the employer's service performing the same work or work of equal value;
- 4) manages the work, distributes tasks or otherwise arranges the working conditions in such a way that one or more employees find themselves in a less favourable position than other employees on the basis of gender;
- 5) gives notice on, terminates or otherwise discontinues an employment relationship, or transfers or lays off one or more employees on the basis of gender.

The action referred to above in subsection 1(2-5) is deemed to constitute discrimination prohibited under this Act also if it is based on gender identity or gender expression.

The action referred to above in subsection 1(2-5) does not, however, constitute discrimination if the matter concerns a situation referred to in section 7(4) and there is an acceptable reason under that provision.

Section 8a Prohibition of countermeasures

The action of an employer shall be deemed to constitute discrimination prohibited under this Act if a person is given notice or otherwise treated less favourably after they have appealed to a right or

obligation laid down in this Act or taken part in investigating a matter concerning gender discrimination.

The Criminal Code of Finland 19 December 1889/39

Section 11 Discrimination

A person who in his or her trade or profession, service of the general public, exercise of official authority or other public function or in the arrangement of a public amusement or meeting, without a justified reason

- 1) refuses someone service in accordance with the generally applicable conditions;
- 2) refuses someone entry to the amusement or meeting or ejects him or her; or
- (3) places someone in a clearly unequal or otherwise essentially inferior position

owing to his or her race, national or ethnic origin, skin colour, language, sex, age, family ties, sexual preference, inheritance, disability or state of health, or religion, political orientation, political or industrial activity or another comparable circumstance

shall be sentenced, unless the act is punishable as work discrimination or extortionate work discrimination, for discrimination to a fine or to imprisonment for at most six months.

Section 3 Work discrimination

An employer, or a representative thereof, who when advertising for a vacancy or selecting an employee, or during employment without an important and justifiable reason puts an applicant for a job or an employee in an inferior position

- (1) because of race, national or ethnic origin, nationality, colour, language, sex, age, family status, sexual preference, inheritance, disability or state of health, or
- (2) because of religion, political opinion, political or industrial activity or a comparable circumstance

shall be sentenced for work discrimination to a fine or to imprisonment for at most six months.






Equality and non-discrimination plan updated and signed

Final Audit Report

2026-01-08

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