

STAFF EQUALITY AND NON-DISCRIMINATION PLAN

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1. Introduction

The International School of Helsinki is a private school dedicated to treating all members within the community equitably and fairly, regardless of background or identity. The framework and guiding principles for equality planning and practices in Finland, in areas from recruiting, contracts, professional growth, to occupational health and safety, and reporting, are guided by the Finnish legislation listed below. While proactive measures required by these legislative frameworks help to encourage integrated planning and policy development, the school seeks to build on the measures to foster a workplace culture truly rooted in competence, well-being, equality, and respect.

The **Non-Discrimination Act** (in force since 1 January 2015) requires all organisations with more than 30 regular employees—as well as all statutory education and training providers, regardless of size—to evaluate equality across all areas of operation. A written equality plan must be created at intervals not exceeding three years and regularly updated. The plan must include specific measures to promote equality and prevent discrimination on all legally recognised grounds.

The **Equality Act** prohibits discrimination based on gender, gender identity, or gender expression. It sets out clear obligations for both employers and educational institutions to prevent and address gender-based discrimination in working life and education.

Under the **Act on Cooperation in Undertakings**, private employers with more than 20 employees must evaluate the provision of employee training and competence development. The results of this evaluation, along with planned future actions, must be documented in a plan that includes:

- (i) an overview of current and anticipated future training provision;
- (ii) goals and actions for developing and maintaining employee competence and well-being;
- (iii) defined responsibilities and a timetable for implementation;
- (iv) follow-up and monitoring procedures; and
- (v) principles for the use of external workforce.

The **Constitution of Finland** guarantees equality for all individuals. No one shall be treated differently without a justifiable reason based on sex, age, origin, language, religion, belief, opinion, health, disability, or other personal characteristics.

The **Employment Contracts Act** and the **Occupational Safety and Health Act** protect employees from workplace harassment and any treatment that endangers health or safety. Employers are responsible for ensuring a working environment that is free from inappropriate or harmful conduct.

The **Penal Code of Finland** prohibits discrimination in job advertisements, recruitment processes, and throughout the course of employment.

2. Purpose

While responding to Finnish legal obligations, this plan has been developed to ensure that the International School of Helsinki fosters a safe, inclusive, and equitable working environment for all staff. It is a reflection of the school's deep commitment to professional growth, well-being, equality, and non-discrimination. The plan outlines clear priorities and actions to support a healthy, diverse, and thriving work community.

3. Context

The International School of Helsinki is an IB World School with approximately 500 students and 100 staff from over 40 and 25 different nationalities respectively. 127 students and 35 staff members are Finnish nationals respectively. The main language of staff communication is English.

4. Achievements from previous plans

ISH's Mission (We empower and inspire one another to take thoughtful action), Vision (Inclusive, Challenging, Engaged), and Catalysts (Wellbeing, Autonomy, Belonging, Connection) serve as evidence of the school's commitment to equality, with significant initiatives taken over recent years to enhance Diversity, Equity, Inclusion and Justice (DEIJ) within the community. Measures include the creation of a Statement of Belonging, appointment of staff members to a DEIJ Working Group, the creation of Affinity Circles, and an initiative to provide free staff childcare during afternoon meetings. Awareness training has been provided to staff in areas such as gender identity and microaggressions. Training was also provided to help staff identify areas of growth for progressing on the continuum of becoming a totally inclusive school. Enhancements to the school's physical spaces have been made to support heightened sensitivities including the installation of bio-rhythm lighting, improved sound-proofing and acoustic infrastructure.

There is an appreciation that the work is never-ending, and our hope in preparing and implementing this plan builds on the pledge made for ongoing growth and understanding of diversity and inclusion.

5. Sources of data

The data used to create this plan was gathered from the DEIJ survey <u>linked here</u>. This survey was based on previous surveys distributed by ISH, where questions were adapted from examples published by the Finnish Ministry of the Interior (Equality Planning Working Group, 9.4.2010). To improve the quality of the information collected in the school's latest survey, the DEIJ working group reviewed and adjusted it in consultation with the Head of School.

Key feedback and response patterns from the DEIJ staff survey results were identified in a workshop held with the DEIJ Working Group on 19.3.2025. This workshop was additionally attended by the Head of School, Human Resources (HR) Manager, and Education Planner from Helsinki Pride, Touko Niinimäki. The survey summaries and comparisons with previous results were analyzed in the workshop and served as the basis for the key points they identified:

Graphs with results from DEIJ survey 24/25
ISH Staff DEIJ Survey Results Summary
Comparative analysis 24/25-21/22

In addition to the DEIJ survey, feedback from the CIS Survey distributed to students and parents in December 2024 contained the data that the DEIJ working group referred to when identifying Priority Area #1 below.

6. Planning Process

This structure and scope of the plan were discussed during the ISH DEIJ team's consultations with Touko Niinimäki (Education Planner, Helsinki Pride) during an off-campus DEIJ retreat on 11.09.2024 and during a further consultation session with Niinimäki on 22.1.2025. The topic during both these sessions was best practices for formulating effective DEIJ plans (i.e., equality/non-discrimination plans) that align with all relevant Finnish legislation.

The effectiveness of the plan will be evaluated annually by the Leadership, the DEIJ working group, ISH shop stewards, the Occupational Health and Safety Committee, and volunteer staff members.

The school will update the Equality Plan regularly, as needed, to ensure it reflects current realities and incorporates adjustments based on what is and is not working. To gather feedback in the future, the school will explore alternative survey systems that may provide more frequent and timely results (eg: applications which distribute both standardized and custom questionnaires to evaluate employee engagement).

EQUALITY PLAN

Priority Areas, Goals and Actions

Priority Area 1 - Faculty Support for Embedding DEIJ Principles in Curriculum and Learning

All PYP, MYP and DP teachers will need support as they undertake responsibility for implementing steps which address feedback from Question C3D3 in the CIS survey from December 2024. The question asked families to agree or disagree with the statement, "The school's curriculum provides my child with opportunities to learn about their own background and culture." 45.8% of parents and 35.8% of students disagreed or strongly disagreed.

Goal 1.1

Strengthen faculty readiness for providing curriculum which embeds DEIJ principles, via sustained professional development. Develop a three-year professional development (PD) program that includes both training and dedicated time for integrating DEIJ principles into the curriculum. The program should equip teachers with effective strategies to embed diverse perspectives, cultures, histories, and identities into their practice, delivered at agreed intervals with ongoing support from facilitators.

Actions and Timing

Year One (2025-2026) Autumn:

- **a.** Program Directors identify training needs for Learning Collaborators (LC's) and Instructional Leaders (IL's), who in turn will be responsible for supporting teachers in integrating DEIJ principles into curriculum.
- **b.** LC's and IL's, in consultation with DEIJ Working Group, to conduct needs assessments with teaching teams, and to create a DEIJ curriculum PD calendar for 2025-2026 to address needs.

• Year Two (2026-2027)

Autumn:

- **a.** LC's and IL's, in consultation with DEIJ Working Group, to reassess teachers' needs in order to decide if the professional development delivered has been effective, and what needs improvement.
- **b.** LC's and IL's, in consultation with DEIJ Working Group, to create a DEIJ curriculum PD calendar for 2026-2027 according to findings of reassessment.

Year Three (2027-2028)

Autumn:

- **a.** Program Directors analyze Council of International Schools (CIS) student and parent survey data to assess perceived representation in the curriculum.
- **b.** If progress is limited, LC's and IL's incorporate continued targeted PD time and content to embed DEIJ principles into instructional practice.

Responsible Leaders

 Program Directors, Learning Collaborators and Instructional Leaders, DEIJ Working Group

Priority Area 2 - Discrimination and reporting

In the section of the DEIJ survey on "Reporting and Accountability", 23% of staff replied that they do not know how to report grievances. Anonymity is a concern, along with a lack of trust in the reporting process. When discriminatory actions occur, there is tension between transparency and anonymity. 40.2% report experiencing microaggressions within ISH, while only 32.2% experience them outside ISH. Colleagues are the most likely sources of discrimination. Survey results indicate that the primary bases for discrimination are gender, experienced by 11.5% of staff; age, 9.2%; ethnicity, 8%; body image, 6.9%; and political views, 5.7%.

Goal 2.1 Provide PD or guidelines to help staff engage in difficult conversations as a first step before grievance reporting. Further develop trustworthiness of the grievance reporting system by enhancing clarity and accessibility. Increase visibility of grievance reporting, expand reporting channels, train key staff, implement systems to ensure timely response protocols, and gather feedback to ensure employee safety and accountability in every step of the process.

Actions and Timing

Year One (2025-2026)

Autumn:

- **a.** Wellbeing Coordinator and HR Manager coordinate PD or sharing of guidelines for restorative conversations.
- **b.** Operational Leadership (Head of School, Business Manager, Human Resources (HR) Manager to improve the visibility of grievance and whistleblowing instructions.
- **c.** Operational Leadership to launch an annual, all-staff walkthrough of grievance and whistleblowing procedures.

d. Operational Leadership to investigate expanding reporting and feedback channels in consultation with the Data Protection Officer (DPO) Team, e.g., evaluate apps such as MyConcern or Elective for other surveys.

Spring:

e. Program Directors, Operational Leadership and Occupational Health and Safety (OHS) Representative to participate in specialized grievance-handling training to strengthen safety and response confidence.

Year Two (2026-2027)

- **a.** Wellbeing Coordinator and HR Manager coordinate PD or sharing of guidelines for restorative conversations.
- **b.** Operational Leadership and Program Directors to agree on more formal response protocols, including immediate acknowledgement, regular communication, and defined timelines for resolution.
- **c.** Operational Leadership to ensure annual grievance procedure walk-throughs are taking place.

Year Three (2027-2028)

- **a**. HR Manager to collect feedback after grievance processes to evaluate experience and resolution effectiveness.
- **b.** Operational Leadership to review and refine procedures based on feedback and evolving staff needs,
- **c.** Operational Leadership ensures annual grievance procedure walk-throughs are taking place.

Responsible Leaders

 Operational Leadership, Program Directors, OHS Representative, Wellbeing Coordinator, HR Manager

Goal 2.2 Refine and finalize the following key guiding statements/policies and establish clear practices for their implementation: **a.** <u>ISH inclusive language values guidelines</u>, **b.** <u>Statement of Belonging c. Safeguarding practices</u>. Provide annual training for all staff to (i) deepen understanding of statements, and (ii) enhance consistent, effective application of them across the school community, including responding to identity-based harm.

Actions and Timing

Year One (2025-2026)

Autumn:

- **a.** Program Directors and Counseling Team to lead new staff in comprehensive training at the first in-service all-staff PD, dedicated to reinforcing these three policies.
- **b.** Program Directors and Counseling Team to provide Advisory Leaders (Upper School) and social-emotional lesson (SEL) teachers (Lower School) with planning time and resources tailored for different grade levels, to introduce safeguarding, identity-based harm, and ISH Statement of Belonging to faculty.

Spring:

d. DEIJ Working Group and Student Support Services Director to refine language values and share during all-staff PD, and with all students in Advisory and SEL lessons.

Year Two (2026-2027)

Autumn:

- **a.** Program Directors and Counseling Team to lead new staff comprehensive training at first in-service all-staff PD, dedicated to reinforcing the three policies.
- **b.** Program Directors will provide Advisory Leaders (Upper School) and SEL teachers (Lower School) with planning time and resources to introduce safeguarding, identity-based harm, and ISH Statement of Belonging to faculty.

• Year Three (2027-2028)

Autumn:

- **a.** Program Directors and Counseling Team will lead new staff comprehensive training at the first in-service all-staff PD, dedicated to reinforcing these three policies.
- **b.** Program Directors will provide Advisory Leaders (Upper School) and SEL teachers (Lower School) with planning time and resources to introduce safeguarding, identity-based harm, and ISH Statement of Belonging to faculty.

Responsible Leaders

 Program Directors, Counseling Team, Advisory leads (Upper School) and Koti Advisors, SEL teachers (Lower School), Wellbeing Coordinator, DEIJ Working Group, Student Services Director

Priority Area 3 - Diversity

While hiring from outside the European Economic Area is limited by (i) overall statutory quotas, (ii) the need to justify the expertise, (iii) requirements of Finnish visa application processes, and, for example, by (iv) specific language knowledge requirements, DEIJ survey comments indicate it could be beneficial to evaluate ISH's diverse hiring practices. Additional initiatives taken to expand diversity will require ISH to take into account that candidates from less economically secure regions may face more obstacles, so the need for transparency to allow candidates to fully evaluate compensation packages, and the initiatives relating to onboarding, offboarding and mentoring need careful planning.

Goal 3.1 Research best practices for enhancing international school staff representing greater diversity. Evaluate possible alternative recruiting platforms and/or identify organizations that cater to underrepresented groups.

Actions and Timing

Year One (2025-2026)

Autumn:

Head of School (HoS) and HR Manager research and evaluate possible use of platforms that specialise in supporting candidates from diverse backgrounds.

Year Two (2026-2027)

Autumn/Spring:

Program Directors and HR Manager to coordinate staff training aimed at mitigating unconscious bias.

Year Three (2027-20278)

Autumn/Spring:

Head of School and HR Manager to invite feedback from DEIJ Working Group and Affinity Group Leaders, on the effectiveness of the recruiting process in supporting diversity.

Responsible Leaders

 Head of School, HR Manager, Program Directors, DEIJ Working Group, Affinity Group Leaders

Goal 3.2 Further enhance for all candidates, including those whose home country may be further from Finland and who may therefore face more financial and emotional obstacles, the transparency of factors affecting finances and life in Finland. The aim is to secure their ability to make choices which are as informed as possible.

Actions and Timing

• Year Two (2026-2027)

Autumn/Spring:

- **a.** HR Manager to compare new hires' after-tax income information estimates shared prior to employment, with actual information after employment has begun, to evaluate accuracy and transparency.
- **b.** HR Manager to evaluate ways to enhance the mentoring program for new hires.

Responsible Leaders

HR Manager

Priority Area 4 - Compensation and professional growth

In sections of the DEIJ survey related to promotions, salary, and well-being, staff expressed several concerns. Over 40% of respondents cited a lack of transparency regarding pay increases and promotional opportunities. Seventeen out of thirty-eight qualitative responses referenced perceptions of unfair pay, often linked to workload disparities, class sizes, the demands of Standard Level and Higher Level courses, and unclear differences in working hours between the Lower and Upper School. These inconsistencies in workload and corresponding compensation were seen to negatively impact staff well-being. In addition, professional development opportunities were noted as unevenly distributed—for example, between teachers and Educational Assistants (EAs). At the same time, staff widely expressed appreciation for existing benefits such as E-passi and Mehiläinen, highlighting their positive impact on overall well-being.

Goal 4.1 Further enhance clarity of monthly salary calculations, compensation for additional roles, and all corresponding work time expectations.

Actions and Timing

Year One (2025-2026)

Autumn:

- **a.** Operational Leadership to develop more comprehensive and explicit guidelines for the Employee Handbook which clearly explain, step by step, the principles behind collective agreement salary calculations. A presentation of the guidelines to be offered to faculty at the start of the school year.
- **b.** HR Manager will maintain an updated list of links to all job descriptions which is accessible to all staff and which includes all additional faculty roles, along with their (i) work hour expectations, (ii) compensation, and (iii) appointment duration.
- **c.** Business Manager and HR Manager to offer training to individual faculty members to improve their understanding of their own salary calculation after the first salary of

the school year. For any questions where faculty request further clarification, provide direct legal feedback from CBA.

• Spring:

d. Operational Leadership to coordinate a critical review of (i) the benefits to the school of hiring faculty from abroad, comparing their compensation to local hires', (ii) Lower School vs. Upper School contracts, comparing workload and compensation.

Responsible Leaders

Operational Leadership

Goal 4.2 Enhance equity of PD among all staff groups, including EA's and Support Staff.

Actions and Timing

Year 1 (2025–2026)

Autumn/Spring:

- **a.** As part of professional growth discussions with EAs, Support Staff, and other faculty, Supervisors will support staff in identifying individual professional goals and suitable PD opportunities.
- **b.** Supervisors will document all discussions in the HR system (Sympa) and ensure timely follow-up with PD registrations. Should staff not be able to attend workshops, Supervisors to help further staff learning by identifying and / or approving the purchase of professional literature considered foundational or seminal work on the topic.
- **c.** Leadership will begin the design of a revised appraisal system that recognises and values professional development for all staff groups in ways that are relevant to their roles and responsibilities.

Year 2 (2026–2027)

Same actions as Year 1, with continued implementation and refinement of the revised appraisal system.

Year 3 (2027–2028)

Same actions as Year 1, with review and adjustment of the appraisal system based on staff feedback and effectiveness.

Responsible Leaders

Staff Supervisors, Operational Leadership

Priority Area 5 - Leadership experience

While 92% of 2024-2025 equality survey respondents replied that, based on experiences during the past 6 months, DEIJ is moving forward at ISH, survey results showed that there remains a lack of transparency about leadership position appointments. 16% ranked the fairness of opportunities for leadership roles the lowest two scores (either 1 or 2 out of five), and approximately 26% ranked the fairness of hiring, promotions (and salary distribution) the lowest two scores. Eleven respondents (13%) discussed in open-ended questions ideas to improve ISH leadership selection, including rotating leadership roles more, avoiding longevity considerations or cronyism when appointing leaders, and giving more people the chance to demonstrate their abilities.

Since the DEIJ survey, the ISH Recruitment Policy has been adopted, which is expected to enhance transparency in leadership and all other appointments. The ISH Recruitment Policy's key purpose includes (i) ensuring ISH conducts recruitment processes fairly, transparently, and non-discriminately, complying with equal treatment provisions in Finnish law, (ii) guaranteeing that those responsible for recruitment demonstrate a professional approach, handling each stage with honesty, integrity, and fairness towards internal and external applicants, (iii) preventing favouritism and predetermined appointments.

Goal 5.1

Actions and Timing

• Year 1 (2025-2026)

Autumn:

a. HR Manager to oversee that the Recruitment Policy is shared, and easily accessible for all to read.

Spring:

- **b.** HR Manager to collaborate with Program Directors and IL's to create subject specific candidate matrices and interview questions to support consistent and effective candidate selection processes.
- **c.** Program Directors and Operational Leadership to note down any needed modifications to Recruitment Policy.
- **d.** Operational Leadership to approve Recruitment Policy amendments and check their legality if needed.

Responsible Leaders

• HR Manager, Program Directors, IL's, Operational Leadership

Goal 5.2 Evaluate opportunities which may give more staff the possibility of gaining leadership experience.

Actions and Timing

Year 1 (2025-2026)

Spring:

- **a.** Program Directors and Operational Leadership to review all extra roles, including those where leadership responsibility is required, and list them systematically in a location accessible to all staff, like the Employee Handbook. All roles are to be listed, with information on which ones may be appropriate for rotation.
- **b.** HR Manager to ensure that the Employee Handbook regularly updates all existing additional roles along with their agreed duration.
- **d.** Program Directors and HR Manager to ensure agreed role rotations are reflected in openings posted for the following year.

• Year 2 (2026-2027)

Spring:

Program Directors and HR Manager to ensure agreed role rotations are reflected in openings posted for the following year.

Responsible Leaders

Program Directors, Operational Leadership, Head of School

Priority Area 6 - Expanding staff understanding of DEIJ

There is appreciation and gratitude for the DEIJ group. 92% say the school is making progress in achieving DEIJ goals, and 82% say ISH ranks either 4/5 or 5/5 as an inclusive workplace. 82% of staff feel valued and supported by their colleagues. There were comments suggesting that the DEIJ group should continue to evolve and that it is essential to keep emphasizing the culture of DEIJ in the school. To support the further evolution of DEIJ within the school, targeted and evidence based DEIJ professional development for each staff group should take place.

Goal 6.1 Deliver targeted DEIJ training for faculty, support staff, and leadership teams to enhance role-specific awareness and understanding of how to apply DEIJ principles in their work. DEIJ Trainings to be co-designed with different staff groups, and offered twice yearly. Dedicated resources and time to support the DEIJ working group's leadership in this area will be provided. In addition, leadership will foster a sense of belonging and inclusion for staff Affinity Groups by, for example, evaluating appropriate compensation for facilitators.

Actions and Timing

Year 1 (2025-2026)

Autumn:

- **a.** Program Directors and IL's to coordinate two annual targeted DEIJ trainings per school year as follows:
 - Faculty e.g., curriculum design as planned (see Section 1).
 - Support Staff Topics decided with input from DEIJ Working Group,
 Wellbeing Coordinator and Support Staff themselves.
 - Program Directors and IL's Topics are decided with input from the DEIJ Working Group, Wellbeing Coordinator and the Program Directors and IL's themselves.
- **b.** DEIJ Working Group to coordinate Affinity Groups for staff (e.g., BIPOC, Colorful Connections, and Neurodiversity).
- c. Compensation for staff and student Affinity Group facilitators to be evaluated.

Year 2 (2026-2027)

Autumn:

- **a.** Program Directors and IL's to coordinate two annual targeted DEIJ trainings per school year as follows:
 - Faculty e.g., curriculum design as planned (see Section 1).
 - Support Staff Topics decided with input from DEIJ Working Group,
 Wellbeing Coordinator and Support Staff themselves.
 - Program Directors and IL's Topics are decided with input from the DEIJ Working Group, Wellbeing Coordinator and the Program Directors and IL's themselves.
- **b.** DEIJ Working Group to coordinate Affinity Groups for staff (e.g., BIPOC, Colorful Connections, and Neurodiversity).

• Year 3 (2027-2028)

Same as Year 2

Responsible Leaders

Program Directors, IL's, Wellbeing Coordinator, DEIJ Working Group

At the International School of Helsinki, we empower and inspire one another to take thoughtful action. While we may not be able to implement every recommendation at once, this plan reflects our ongoing commitment to learning, listening, and improving together. Anchored in our values of well-being, belonging, autonomy, and connection, we will approach this work with care and collective responsibility.