# Operational plan on equality and non-discrimination 2021-2025





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# 1. Introduction

The equality and non-discrimination plan helps the National Land Survey of Finland (NLS) to maintain and improve the equal treatment of its customers and other external stakeholders. This equality and non-discrimination plan presents actions that promote equality and non-discrimination in the services and other activities of the NLS. This plan describes how the NLS, as an organisation and employer, promotes equality and non-discrimination and prevents and intervenes in any discrimination.

The premise of the activities of the NLS is that different groups of people can equally use the services provided by the NLS and that equality is realised both inside and outside the NLS. The organisation assesses the realisation of equality and non-discrimination in its activities and promotes the realisation based on plans and goals.

Activities throughout the organisation have been assessed critically to prepare this plan, on the basis of which actions have been defined to ensure equality and non-discrimination. This plan defines the goals, content and means of equality and non-discrimination activities at the NLS, as well as the monitoring of results. The actions defined in this plan will be implemented from the beginning of 2021.

As a public authority, the NLS is obligated to ensure an equal and non-discriminating treatment for everyone. The Non-Discrimination Act (1325/2014) entered into force at the beginning of 2015. Its purpose is to promote equality, prevent discrimination and enhance the protection provided by law to those who have been discriminated against. Section 5 of the Non-Discrimination Act defines the duty of the authorities to assess and promote equality.

The principle of equality is included in the Administrative Procedure Act. As a result, it forms the basis of all administrative and official decisions. Therefore, equality and non-discrimination also form the basis of the planning and provision of services at the NLS.

The realisation of equality and non-discrimination in external services has not previously been drafted into a plan. Nevertheless, it has been part of the organisation's operating principles, as equality and non-discrimination are included in the values and strategy of the NLS. One of the four values of the NLS is "Different together", which strengthens the message of equality and non-discrimination towards customers and employees. The strategic goals of the NLS indicates that the organisation aims to be "a sought-after and attractive place to work". The equal treatment of customers, jobseekers and employees supports the achievement of this goal.

Internal equality and non-discrimination at the NLS have been monitored and developed in <u>the</u> <u>personnel policy for equality and non-discrimination</u>, prepared as part of the personnel plan. The key difference between the personnel policy and this plan is the target group, since the particular aim was to expand this plan to external customers and stakeholders.

One of the goals of this operational plan on equality and non-discrimination is to improve the NLS employees' awareness of the principles of equality and non-discrimination and strengthen the employees' engagement in equality and non-discrimination, as well as their realisation in activities. The planning process was communicated broadly in internal communication channels, and different personnel groups were engaged in discussions in various ways.



# 2. Current state of equality and non-discrimination at the NLS

## 2.1. Assessments behind the plan

The planning process started by assessing the current state. The state of equality and nondiscrimination at the NLS has been assessed regularly as part of the VMBaro job satisfaction survey, most recently conducted in the autumn of 2019. The claims and questions that describe experiences of internal equality and non-discrimination were selected for a more detailed examination. On the basis of the results, it was stated that the state of internal equality and non-discrimination is fairly good. The results are presented in Appendix 1. However, the aim was to specify the perspective of internal equality and non-discrimination further, and it is discussed further in Section 2.2.4.

Because the aim was to expand the equality and non-discrimination plan to the customer perspective, an assessment survey, covering the entire personnel, was conducted in March 2020. The purpose of the self-assessment was to identify the organisation's views of how equality and non-discrimination are realised in services the NLS provides for its external customers.

The survey included the following bases of discrimination: gender, age, disability, ethnic or cultural origin, religion and religious beliefs, sexual orientation, language or other reason that concerns a person. Based on the survey results, it can be stated that all NLS decisions are based on the legislation, regulations and guidelines and, in this way, the realisation of equality and non-discrimination lays a strong foundation for all services. The survey results are presented in Appendix 2.

The aim was to develop equality and non-discrimination in a more target-driven manner. As a result, a working group was established to develop these aspects and to prepare a plan. A diverse group of NLS managers and specialists interested in this theme participated in the preparation of the plan. They represented all operation units and different functions. The content on which the plan focused was selected so as to cover and address the themes and special characteristics of equality and non-discrimination that are central in the operating environment and activities of the NLS.

#### 2.2. The NLS as a service provider

#### 2.2.1. NLS services

The NLS aims to serve its customers equally in all parts of Finland. This is reflected not only in the NLS having a nationwide operating area, but also in the active development of online services. Both of these factors allow customers to use services, wherever they are.

Having a nationwide operating area has promoted the realisation of regional equality and nondiscrimination, as the change has provided customers living in different parts of Finland with opportunities to have access to high-quality and correctly timed services. This change has also provided internal benefits, as the NLS has largely shifted to multilocational work, i.e. placeindependent work. As a result, commuting has decreased significantly, and job satisfaction has increased.



Correspondingly, the development of online services has promoted the regional equality of customers, as service development has resulted in more location-independent customer service. Customers can prepare nearly all agreements and applications related to the sale and purchase of properties and apartments online without visiting a customer service point and receive cadastral survey documents in electronic format in place of physical documents. Because a website is usually opened for the largest cadastral surveys, customers can monitor the progress of surveying online. Starting from the spring of 2020, it has been possible to hold cadastral survey meetings via remote connections based on temporary legislation. The NLS will promote legislation that enables cadastral survey meetings to be held remotely.

The NLS has a broad range of online services, and most customers use online channels. Even though visits to customer service points are decreasing, the NLS continues to maintain them. As a result, the NLS can ensure that customers who cannot or do not want to use online services have access to the same services. The flexible opening hours of customer service points also increase equality and non-discrimination.

The NLS aims to provide services in multiple languages. Customer service is available not only in Finnish and Swedish, but also in English and the Saami language. Languages related to map products are discussed in more detail in Section 2.2.2.

The NLS has a long history of customer-driven surveys and registrations. Online customer service channels make surveying and processing quicker and easier. In addition to online services, the organisation has invested comprehensively in customer-driven operating practices which is reflected in regular training provided for employees and different document templates that streamline the use of services.

Equality and non-discrimination are addressed not only in customer service, but also in pricing. The prices of the most common cadastral surveys, title registrations and mortgages have for long been harmonised at a national level. The most recent change that strengthens equality and non-discrimination from this perspective is the fixed pricing of most services. As a result of fixed prices, the prices of services are the same for customers in all parts of Finland, independent of distances, the service language or other regional conditions. Streamlined pricing aims to improve customers' service experiences, while supporting regional and linguistic equality.

In customer satisfaction surveys intended for external customers of the NLS, customer service has always been ranked very high. Advantages include the eagerness of customer service employees to serve customers, compliance with schedules given, services responding to customer needs and expertise. Every year, prices, the availability of employees, opening hours and privacy in services have been mentioned as areas to be developed. A few customers have pointed out the sufficiency of employees' linguistic skills in their feedback. Customer satisfaction surveys have not included any specific questions to identify equality and non-discrimination in services.

2.2.2. Map and geospatial information products from the perspective of equality and nondiscrimination

The duty of the NLS is to see to the general mapping operations and maintaining of the national topographic information system, as well as to provide expert services for society at large (section 2 of the Act on the National Land Survey of Finland (1025/2018)). Relating to this duty, the organisation produces and maintains national map and place name datasets.



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All map products of the NLS are available to customers free of charge on the NLS website. Maps are freely available in many interface services of the NLS and the open data file download service. Equality in map products is also supported by the NLS plain map, which has a selected data content and specific text types.

Regional aerial photography and laser scanning, which form the basis of mapping activities, are carried out regularly over the whole of Finland on the basis of a national programme. The programme includes regional variations based on estimated updating needs.. Aerial photography is mainly carried out every three years, while the cycle in the northernmost parts of Finland is 12 years. Corresponding cycles in laser scanning are six and 12 years respectively. Repetitive aerial photography and laser scanning have a direct impact on how updated map and geospatial information products are.

Linguistic elements in map products include information associated with maps (covers, additional information and explanations of symbols) and texts on maps (place names and explanations of objects). The NLS provides map information in Finnish, Swedish and English. In addition, the NLS provides place names presented on maps in Finnish, Swedish, Northern Saami, Inari Saami and Skolt Saami, as well as explanations in both Finnish and Swedish in bilingual regions. Because regional and object-specific variation in the use of explanations of map objects provided in different languages has been identified in bilingual regions, this issue will be approached as required.

Guidelines agreed together with the Institute for the Languages of Finland apply to the maintenance of the place name data of the NLS and the presentation of place names on maps. The NLS also applies harmonised principles to place names, independent of the region or place name language. Traditional place name datasets are based on information that has been obtained from local inhabitants and verified subsequently.

2.2.3. Equality and non-discrimination in communication and digital services

The NLS communicates in multiple languages and channels. External communication mainly takes place on the organisation's websites and in different social media services. The content of websites has been translated from Finnish into English, and a significant part of the content is also available in English and partly in the Saami language. In social media, messages are posted in Finnish, Swedish and English.

The NLS focuses on a clear official language in personnel training. The organisation provides its employees with regular courses on a clear official language and addresses this particularly in induction provided for new employees. Moreover, the NLS encourages its employees to maintain their skills in a clear official language by taking online courses during working hours. In addition to a clear official language, the need for increasing communication in a plain language has been discussed within the organisation. Currently, the NLS has no plain language material, but the necessity of such material will be investigated.

From the very beginning, the NLS has participated in the implementation of action plans for open administration during different operating periods and, as part of these, in promoting equality and nondiscrimination. According to the programme for 2019–2023, employees will use a non-discriminating and clear language in spoken and written communication.



Directive (EU) 2016/2102 of the European Parliament and of the Council and relevant national legislation require the authorities to make their digital services accessible. This means that the websites and mobile apps of public organisations, including their content, must be usable and understandable, regardless of the user. The NLS has taken extensive measures to improve the accessibility of its digital services. Accessibility statements indicate grounds for any deficiencies and service repair schedules, insofar as a service is not wholly accessible. The NLS intranet will be accessible after its update in 2021.

#### 2.2.4. Equality and non-discrimination in internal NLS activities

The NLS is an organisation of more than 1,600 employees who represent a broad range of different educational backgrounds, nationalities and age groups. The starting point of all activities is that noone can be discriminated against due to their ethnic origin, gender, nationality, age or opinions, for example. The goal is to provide an equal and non-discriminating workplace. The achievement of this goal is supported by the "Best Practices at NLS" programme, which strengthens equal activities in the working community.

Equality and non-discrimination are addressed in internal activities through leadership, payroll, communication, training material and the organisation's events. Furthermore, equality and non-discrimination are strengthened by means of internal communication and external practices. Special attention is paid to non-discriminating expressions, gender-sensitivity and equality. In this way, the NLS can better address cultural and gender diversity in its activities. The realisation of equality and non-discrimination is monitored regularly in a personnel report and the VMBaro job satisfaction survey. According to the most recent survey, Swedish and English-speaking employees require more real-time communication in their own language.

#### 3. Actions to promote equality and non-discrimination

#### 3.1. Identified needs and actions

The NLS maintains the aforementioned proven practices that promote equality and nondiscrimination. The organisation continues to develop its services and have an impact on legislative processes to protect its customers' interests. We will focus on equality and non-discrimination in customer service and develop our internal instructions and our online services to be more customerdriven.

To promote linguistic equality, we will ensure that our translation principles are updated, and our employees have sufficient linguistic skills. With regard to our map products, we will investigate whether we should address linguistic equality associated with explanations of map objects more closely in bilingual areas. We will invest in multilingual content in social media by producing content more regularly in Finnish and other languages.

Our communication activities will continue to be customer-driven. We will focus specifically on the impact of communication. As a result, the communication activities of the NLS will be more effective and meet the needs of their target groups even better. We will continue to clarify the content of our websites and invest in employee training in the area of customer-driven communication. A course on good official language provided on the eOppiva platform will be added as part of the induction training provided for new employees.



In addition to communication, we will develop our accessibility. We will continue to send internal accessibility factsheets to our employees and add the "Accessible online documents" course as part of induction provided for employees who build online services. We will also promote equality and non-discrimination in the field of plain language by investigating the need for plain language material on the external websites of the NLS. We will also identify those whose skills in a plain language should be increased. These employees will be encouraged to complete the Ministry of Finance's basic training in a plain language, which will provide them with valuable tools for realising equality and non-discrimination in customer service.

We will ensure the realisation of equality and non-discrimination in the internal activities of the NLS. Furthermore, we commit to addressing the needs of linguistic minority groups more systematically in internal communication, and we will identify equal treatment more effectively. We will expand questions related to the realisation of equality and non-discrimination to extensive surveys covering our personnel and customers. On the basis of these surveys, we will initiate necessary measures.

We will ensure that this operational plan on equality and non-discrimination is updated and that the actions defined herein are carried out.

These actions will be part of the performance agreement between the NLS and the Ministry of Agriculture and Forestry between 2021 and 2025.

3.2. Concrete actions for 2021–2025

#### **NLS** services

- When updating our document templates and internal instructions, we will ensure the realisation of equality and non-discrimination.
- We will update our translation principles and produce more real-time and comprehensive Swedish and English translations.
- We will identify whether linguistic equality is realised in explanations of map objects in bilingual areas, after which we will define the corrective measures required.
- We will add the theme of equality and non-discrimination to customer surveys.

#### Communication

- We will assess the impact of communication, also from the perspective of equality and nondiscrimination.
- We will update and clarify the content of our websites in a customer-driven manner, considering equality, accessibility and a plain language.
- We will update the internally used digital work environment, considering the starting points of equality and non-discrimination.
- We will invest more in multilingual content in social media by producing content more regularly in Finnish and other languages.
- We will add a course on a good official language provided on the eOppiva platform as part of induction training provided for new employees.



#### Accessibility and plain language

- We will continue to send internal accessibility factsheets to our employees and add the "Saavutettavat asiakirjat verkossa (Accessible online documents)" eOppiva course as part of induction provided for employees who build online services.
- We will identify the need for plain language material on the external websites of the NLS.
- We will require all employees who need to use a plain language in their work to complete the Ministry of Finance's basic training in plain language.

#### Internal equality and non-discrimination

- The "Best Practices at NLS" programme, which supports equality and non-discrimination, will be implemented in 2021. The goal is that all employees complete the "Best Practices at NLS" online course, and that it is added as part of induction provided for new employees.
- We will address the needs of linguistic minority groups more systematically, also in internal communication.
- We will add the theme of equality and non-discrimination to customer surveys.

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Case number: MML 32060/00 01 00/2020 17.12.2020

## Appendix 1

Results of the VMBaro job satisfaction survey

The survey was conducted for the NLS personnel in the autumn of 2019

Number of employees who received the survey: 1,668 Total number of respondents: 1,271

A quantitative summary of the survey is presented below

Survey scale:

- 5 = I strongly agree
- 4 = I somewhat agree
- 3 = I neither agree nor disagree
- 2 = I somewhat disagree
- 1 = I strongly disagree

Table 1. Fairness, equality and non-discrimination

	5	4	3	2	1	Average
My nearest supervisor treats me fairly	50%	34%	13%	2%	1%	4.31
My salary is fair	10%	31%	33%	18%	8%	3.17
My colleagues treat me fairly	52%	37%	10%	1%	0	4.40
Gender equality is realised in my working community	51%	33%	13%	3%	0	4.33
People are treated equally in my working community	39%	40%	16%	3%	2%	4.12



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#### Table 2. Harassment

	Yes	No
Have you identified inappropriate behaviour in your working community during the past year?	14%	86%
Have you experienced inappropriate behaviour in your working community during the past year?	8%	92%
Have you identified harassment (workplace bullying) during the past year?	5%	95%
Have you experienced harassment (workplace bullying) during the past year?	3%	97%
Have you identified sexual harassment during the past year?	1%	99%
Have you experienced sexual harassment during the past year?	0%	100%



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## Appendix 2

Results of the "Equality and non-discrimination in services provided by the NLS and in customer contacts with the NLS" survey

The survey was conducted for the NLS personnel in the spring of 2020

Number of employees who received the survey: 1,762 Total number of respondents: 611

A quantitative summary of the six-step survey is presented below

Survey scale:

- 5 = I strongly agree
- 4 = I somewhat agree
- 3 = 1 neither agree nor disagree
- 2 = I somewhat disagree
- 1 = I strongly disagree

	5	4	3	2	1	l cannot say	Average
We treat people equally irrespective of gender	458	103	19	4	2	25	4.73
We treat people equally irrespective of age	391	138	40	9	4	29	4.55
We treat people equally irrespective of a possible disability	408	114	13	3	0	73	4.72
We treat people equally irrespective of their ethnic background or culture	385	113	23	6	4	80	4.64
We treat people equally irrespective of religion or convictions	426	96	18	4	1	68	4.73
We treat people equally irrespective of sexual orientation	417	92	15	4	0	83	4.75
We treat people equally irrespective of language	263	182	74	16	3	74	4.28