

SEEKING REAL EQUALITY: A PRACTICAL GUIDE FOR FINNISH MUNICIPALITIES TO COMBAT DISCRIMINATION



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SEEKING REAL EQUALITY: A PRACTICAL GUIDE FOR FINNISH MUNICIPALITIES TO COMBAT DISCRIMINATION

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Contents

CHAPTER ONE: INTRODUCTION	5
Purpose of this practice guide	5
Using this practice guide – Starting point	5
Using this practice guide - Framework for action	5
The Intercultural City and non-discrimination	6
CHAPTER TWO: THE ISSUE OF DISCRIMINATION	7
Defining and understanding discrimination, individual and systemic	7
Impact of discrimination, individual and systemic	7
National context in Finland	8
The importance of addressing discrimination	11
CHAPTER THREE: ORGANISATIONAL DRIVE	13
Challenge: Creating the conditions within a municipality for addressing discrimination, individual and systemic, and for giving leadership on this	13
Solutions and pathways for municipalities to consider and take	13
Practices of interest – European and national	14
CHECKLIST for organisational drive	15
CHAPTER FOUR: IDENTIFY	17
Challenge: Making individual and systemic discrimination visible, building and sustaining the evidence base for effective responses	17
Solutions and pathways for municipalities to consider and take	17
Practices of interest – European and national	18
CHECKLIST for identifying discrimination, individual and systemic	19
CHAPTER FIVE: PREVENT	21
Challenge: Establishing and implementing organisational systems with a capacity to eliminate discrimination and advance equality	21
Solutions and pathways for municipalities to consider and take	21
Practices of interest – European and national	22
CHECKLIST for preventing discrimination, individual and systemic	23
CHAPTER SIX: TACKLE	25
Challenge: Enabling reporting of experiences of discrimination, addressing reports of discrimination, and tackling incidents of discrimination	25
Solutions and pathways for municipalities to consider and take	25
Practices of interest – European and national	26
CHECKLIST for tackling discrimination, individual and systemic	27
APPENDIX ONE: RESOURCES	29
National	29
European	29
APPENDIX TWO: REFERENCES	31

CHAPTER ONE:

INTRODUCTION

Purpose of this practice guide

This practice guide has been prepared within the framework of the European Union / Council of Europe Joint Project 'Building an inclusive integration approach in Finland'. The practice guide is to serve as a resource for the municipalities involved in the project, and other municipalities in Finland, to: build on their work over this project; deepen their learning and engagement with the issues of individual and systemic discrimination; and act as exemplars of good practice for all municipalities.

Five municipalities completed the ICC (Intercultural Cities) Index, as part of the project. Tackling discrimination was identified from this process, as one of the top priorities in most of the municipalities. Room for improvement in this area was established across the municipalities, and the need for a practice guide on tackling discrimination was highlighted in subsequent stakeholder meetings.

This practice guide seeks to:

- ▶ enable and stimulate municipalities to build on their commitment to eliminating discrimination, individual and systematic, and deepen their understanding of these issues; and
- ▶ support municipalities to identify and take practical steps to more effectively combat individual and systemic discrimination and advance the achievement of full equality in practice.

Using this practice guide - Starting point

The practice guide starts from the evident commitment across the municipalities involved in the project to combat individual and systemic discrimination and promote full equality in practice. It is designed to sit within the national legislative and policy context within which the municipalities operate.

The practice guide is based on the importance of a planned and systematic approach for an effective response to non-discrimination and equality. Such an approach is based on the development and

functioning of an organisational infrastructure dedicated to combating discrimination and promoting equality.

This organisational infrastructure includes, in particular: a standard established for the organisation that captures its ambition in relation to non-discrimination and equality; senior staff and organisational structures that hold responsibility for realising this ambition; and organisational processes in place that give effect to this ambition.

Organisational commitment within the municipality can usefully be built on by allocating responsibility for and ensuring capacity on issues of non-discrimination and equality. Equality training for those given responsibility for these issues within the municipality is a valuable enabler to ensure shared understanding and competence.

Action planning by those given responsibility for this issue, is the key driver for making progress on equality and non-discrimination. This involves examining the strands of activity proposed in this practice guide; and establishing current action in the municipality on issues of non-discrimination and equality. This allows those responsible to pinpoint where there is a good fit between what is already being done and this practice guide, that can be built on; and to identify any gaps that become evident that should be addressed. Priority actions to be taken over the next period can then be agreed.

Regular reflection is the key quality control measure for action on non-discrimination and equality. This can be led by those given responsibility for this issue but needs to include a wider range of management and staff and stakeholders. Steps taken and outcomes achieved over the previous period, are reviewed with a view to reporting on and celebrating progress made; and identifying areas for improvement to inform future action plans.

Using this practice guide - Framework for action

This practice guide, in advancing a planned and systematic approach to non-discrimination and equality,

suggests and gives direction on four strands of activity for the municipality to combat individual and systemic discrimination.

- ▶ **Organisational drive:** actions to create the conditions within the municipality to respond effectively to the issues of individual and systemic discrimination – see: Chapter 3.
- ▶ **Identify:** actions to uncover systemic discrimination and render it visible, in particular in the outcomes for the groups subjected to this – see: Chapter 4.
- ▶ **Prevent:** actions to develop and implement systemic remedies to a systemic problem, reviewing and checking policies, procedures, practices, and perceptions within the organisation for their impact on groups exposed to discrimination – See Chapter 5.
- ▶ **Tackle:** actions to enable individuals to report experiences of discrimination, and actions to address and redress the impact of individual and systemic discrimination – see: Chapter 6.

Each strand of activity is addressed in a separate chapter. This is done in terms of the challenge posed to act, the actions required to meet this challenge, and European and national practices of interest. Each section concludes with a checklist to enable the municipality to track progress on building a planned and systematic approach to the issues.

Practices of interest are presented for each strand of activity both to inform and inspire municipalities in their ambition to pursue this planned and systematic approach to non-discrimination and equality. Drawing from the experience of municipalities in Finland, and across Europe and beyond, these practices demonstrate that such an approach is possible and offer innovation for its effective pursuit. While practices of interest are noted under particular strands of activity, it is found that such practices often tend to encompass and link more than one of the four strands of activity set out above in the one initiative.

The practice guide is completed with two appendices: one identifying a number of resources for municipalities; and one setting out a number of references for further information.

The Intercultural City and non-discrimination

The Intercultural Cities (ICC) programme of the Council of Europe supports cities in re-evaluating their policies through an intercultural lens and developing comprehensive strategies to positively manage diversity and harness its advantages. The ICC programme is founded on four core principles:

1. **Real equality:** Ensuring equal opportunities and rights for all individuals, across all cultural or ethnic backgrounds.
2. **Diversity Advantage:** Recognising and leveraging the benefits that diverse populations bring to communities, fostering innovation and growth.
3. **Meaningful Interaction:** Promoting genuine engagement and dialogue among different cultural groups to build mutual understanding and cohesion.
4. **Active citizenship and participation:** Ensuring that no-one is left aside, and all have a voice in shaping their local society.

To help cities align with these principles, the ICC provides practical tools such as the ICC Index, intercultural checklists, peer-to-peer exchanges, and knowledge transfer mechanisms. These resources are designed to evaluate and enhance city policies and actions, ensuring they effectively promote intercultural integration and inclusivity. As of 2025, over 160 cities across Europe and beyond utilise the tools provided by the ICC programme.

The ICC programme plays a valuable role in combating discrimination by guiding cities to adopt intercultural strategies that promote equality, leverage diversity, and encourage meaningful interactions among diverse communities. By fostering intercultural competence, the programme helps cities identify and prevent systemic discrimination, creating environments where diversity is viewed as a strength.

The ICC programme employs a range of instruments to combat discrimination and foster inclusivity, including training and capacity-building initiatives, the sharing of best practices, peer reviews, and study visits. Complementing these efforts, the ICC provides an extensive collection of publications and resources, with exemplars in Appendix One: Resources.

CHAPTER TWO:

THE ISSUE OF DISCRIMINATION

Defining and understanding discrimination, individual and systemic

Individual discrimination is concerned with the less favourable treatment of an individual, often by another individual, on the basis of a ground such as gender, disability, racial or ethnic origin, religion or belief, age or sexual orientation.

Systemic discrimination has been defined by the Council of Europe as occurring where:

“the procedures, routines and organisational culture of any organisation contribute to unequal outcomes for minority groups compared to the general population. Systemic discrimination can be rooted in the way organisations go about their day-to-day business as policymakers, employers, or service providers, and can also feature in automated decision making” (Policy Brief on [Identifying and Preventing Systemic Discrimination at the Local Level](#), 2020).

Individual discrimination tends to be the more visible of the two, and more immediately contentious. It is more likely to be a matter of intent. There are, however, high levels of under-reporting of individual discrimination which can render it less visible. This is due to:

- ▶ perceptions that reporting the incident will do nothing to change the situation;
- ▶ fear of negative consequences of reporting;
- ▶ lack of trust in statutory bodies;
- ▶ lack of awareness and knowledge about rights and systems of redress; and
- ▶ lack of resources.

Systemic discrimination tends not to involve intent or deliberate action. It is often invisible, only becoming visible in unequal outcomes for groups that result. These unequal outcomes are experienced by groups such as women, racialised minorities, LGBTI people, people with disabilities, older people, young people, and people with particular religious beliefs.

Systemic discrimination occurs across the full spectrum of institutional endeavour, including policy

making, programme design, service design and delivery; and management of employment. It impacts across all policy fields, including employment, income, education, health, housing, culture, policing, public infrastructure, and beyond. While artificial intelligence systems have potential to further the public good, if badly designed or incorrectly used they have emerged as a new source of systemic discrimination (Allen & Masters 2020).

Impact of discrimination, individual and systemic

Individual discrimination diminishes the dignity of the individual person and impacts negatively on their self-esteem. It excludes the individual involved and denies their access to a resource such as employment or service being provided.

Systemic discrimination disadvantages whole groups. It is a root cause of inter-generational disadvantage. The unequal outcomes for groups across these policy fields that result are the marker of systemic discrimination. Such unequal outcomes are evident in the situation, experience, voice and response to identity of these groups, where:

- ▶ Situation is about lack of access to and the unequal distribution of key resources such as income and employment, and such as education, health, and housing.
- ▶ Experience is about lack of access to relationships of solidarity, care and respect when participating in society and community, and when engaging with institutions, employers, and service providers.
- ▶ Voice is about lack of access to influence, having a say in decisions that impact on one, and participating in governance of society and its institutions.
- ▶ Response to identity is about lack of recognition for identity and lack of flexibility and allocation of resources required to address the practical implications of such difference and how different groups chose to live out their identity.

National context in Finland

Data gathering

Under the anti-discrimination monitoring programme developed by the Ministry of Justice and currently implemented by the Prime Minister's Office, data on discrimination in Finland is collected from various

actors. Research data has been systematically gathered since 2010, indicating that a significant number of people experience discrimination, across a wide range of grounds. In recent years, there has been an increasing focus on structural discrimination in this work, and on how well societal institutions recognise potentially unintentional discriminatory practices in their activities.

INFO BOX 1: Discrimination in Finland Report

The **Discrimination in Finland report**, which captures the overall situation of discrimination in Finnish society, is published every four years. The most recent one was published in 2024 (Mannila 2024). The report examines discrimination and other similar phenomena (bullying at school, harassment, hate crime) over the period 2020-2023.

According to this report:

- ▶ Discrimination is a significant problem in Finland and data indicate that discrimination has increased during the period under review.
- ▶ Applications received by the non-discrimination Ombudsman and occupational safety and health authorities have grown by around 50% and the number of hate crimes has also increased by around 50%.
- ▶ Discrimination and harassment experienced by people of African background are more common in Finland than in other EU reference countries of the study.
- ▶ Discrimination in recruitment continues across the grounds, but the gap between the labour market positions of immigrants and the native population has shrunk.
- ▶ Discrimination against persons with disabilities is common in education and work. Most people with disabilities find that equality at the workplace is poorly realised.
- ▶ 43% still think society has a negative attitude towards old age.
- ▶ Promoting equality is largely pursued in formal steps taken, but the practical implementation of these is inadequate.

In 2023, the Ministry of Justice published a first **national report on structural discrimination** in education and the labour market (Artemjeff & Sheikh, 2023). The study included a draft model for monitoring of structural discrimination and a set of indicators to be followed at the national and institutional levels. According to the report, each sector should build

a discrimination monitoring model that takes into account the specific issues of the given sector, following the example of the Ministry of Employment and Economy's employment discrimination monitoring model. Data sources suitable for monitoring structural discrimination should also be further developed.

INFO BOX 2: Examples of recommendations of the report on structural discrimination

<p>General</p>	<p>The Government should commission an equality review of legislation. This should cover, the obligations on institutions with regard to discrimination, and an identification of the interactions between equality legislation and other legislation, in relation to access to rights.</p> <p>Cooperation with groups experiencing discrimination should be strengthened among all in administrative branches with the aim of identifying and preventing structural discrimination.</p> <p>Institutions' ability to assess the normative background to their own activities and organisational culture should be strengthened by various means (training, self-assessment methods, measurement). Such an assessment is important in combating structural discrimination.</p> <p>The use of positive action should be strengthened in different institutions.</p>
<p>Labour Market</p>	<p>Monitoring of structural discrimination should focus on:</p> <ul style="list-style-type: none"> ▶ development of labour market legislation from the point of view of discrimination protection. ▶ structural inequality in the labour market and the development of differential outcomes. ▶ issues of discrimination in entering working life, during the working career and at the end of employment relationships for different population groups. ▶ the guidance and employment services related to education and working life, as well as obtaining work placements. <p>At the level of the institution, the monitoring would take place as part of employers' equality planning, and in connection with that, focus on:</p> <ul style="list-style-type: none"> ▶ the principles and norms guiding the organisation's operations. ▶ the outcomes of operations from the point of view of different population groups. ▶ the characteristics of the organisation, such as personnel diversity, inclusive structures, and accessibility provision.
<p>Educational Sector</p>	<p>Monitoring of structural discrimination would focus on:</p> <ul style="list-style-type: none"> ▶ the development of education legislation in terms of discrimination protection, and access to education. ▶ the identification of discrimination occurring at the different stages of education and access to educational institutions. ▶ the occurrence of discrimination in schools and educational institutions. <p>At the level of schools and educational institutions, the monitoring would take place as part of equality planning, and should identify discriminatory practices in:</p> <ul style="list-style-type: none"> ▶ study guidance. ▶ teaching content and teaching situations. ▶ learning and competence assessments. ▶ the culture of the educational institution (bullying etc.).

Policy context

During the past two government terms, there have been two national action plans to combat discrimination and promote equality:

- ▶ The first plan was ["An Equal Finland : Government Action Plan for Combating Racism](#)

and [Promoting Good Relations between Population Groups 2021-2023](#)". This was evaluated within the Council of Europe's project "Building an inclusive integration approach to Finland" in the report ["Arviointi valtioneuvoston toimenpideohjelmasta rasismin torjumiseksi](#)

ja hyvien väestösuhteiden edistämiseksi” (Artemjef, Attias and Mohamed, 2023).

- ▶ The current plan, “New Boost for Equality” (2024-2027), is aimed at addressing discrimination in education, employment, sports, and youth policy, and influencing societal attitudes and discussion culture to reduce discrimination. The programme also aims to strengthen public sector professionals’ skills in recognising and addressing discrimination at all administrative levels.

Additionally, there have been specific programmes to promote equality for certain population groups, such as Roma and persons with disabilities.

Legislation prohibiting discrimination

The Finnish Constitution prohibits discrimination based on personal characteristics and ensures

minorities’ right to maintain their language and culture. It also guarantees everyone the right to participate and have an independent and impartial trial. According to the Constitution, public authorities are responsible for ensuring that the fundamental rights of all people within Finland’s jurisdiction are realised. The Non-Discrimination Act, Equality Act, Criminal Code, and several labour laws further clarify the Constitution’s prohibitions on discrimination, including associated legal remedies and sanctions.

The Non-Discrimination Act defines the prohibited forms of discrimination based on all grounds except gender and gender expression, which are addressed by the Gender Equality Act. The Gender Equality Act uses similar definitions of discrimination and also prohibits sexual harassment. The Criminal Code defines criminally punishable forms of discrimination, such as defamation, incitement against an ethnic group, and exploitative workplace discrimination.

INFO BOX 3: Prohibited forms of discrimination in Finnish Non-Discrimination Act	
Direct discrimination	The treatment of a person less favourably than the way another person is treated, has been treated or would be treated in a comparable situation, because they come under one of the protected grounds
Indirect discrimination	An apparently neutral provision, criterion or practice that puts a person at a particular disadvantage compared with other persons because they come under one of the protected the grounds, unless said provision, criterion or practice has an acceptable aim and the means used are appropriate and necessary for achieving this aim
Harassment	The deliberate or de facto infringement of the dignity and integrity of a person or group of people, coming under the protected grounds, by the creation of an intimidating, hostile, degrading, humiliating or offensive environment
Instruction or order to discriminate	An instruction or order to discriminate
The denial of reasonable adjustments	On request, an employer or service provider must promptly provide a written report based on their procedures, to a person with disabilities who considers 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, or in accessing services.
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.
Prohibition of discriminatory work advertisements	When advertising an open position, public service office or post, an employer may not unlawfully require that applicants have the personal characteristics or qualities referred to in this Act.

Provisions on direct discrimination, in equal treatment legislation, are central to combating individual discrimination, with their focus on less favourable treatment of the individual. However, the concept of systemic discrimination is not often found to be specifically addressed in equal treatment legislation. Provisions on indirect discrimination do hold some potential in regard to addressing systemic discrimination.

However, casework on indirect discrimination is limited and has been found to be difficult to progress. The concept of indirect discrimination, which is discrimination by effect, is poorly understood. Casework on indirect discrimination suffers due to broad interpretations of the exemption allowed in the legislation in relation to indirect discrimination, and due to an overemphasis on requirements for statistical evidence in a context where the collection of equality data is inadequate (Mulder 2020).

Statutory equality duties

The Non-Discrimination Act requires authorities, educational institutions, and employers to actively work against discrimination and promote equality. Authorities must assess how their actions affect various population groups and promote equality within their operations, and must have a plan outlining the necessary measures to advance equality.

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

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

An equality plan should be based on an equality assessment that employs various methods to evaluate the current state of equality for the organisation. A viable equality plan contains tangible measures, details of those responsible for their implementation, a timetable for implementation and information on the monitoring of implementation. An equality plan that takes account of all grounds of discrimination may contain measures for enhancing equality through key functions and policies of an organisation. According to the Ministry of Justice's guidelines, the plan should also strengthen the participation of various population groups and foster engagement in societal decision-making and service development.

Local equality work is supported by various guidelines and guides, including the Association of Finnish Local and Regional Authorities' "Every Face Counts" guide or the Finnish Institute for Health and Welfare's guide for regional equality work.

INFO BOX 4: Common features of municipal equality planning – Every Face Counts

1. The municipality must promote equality through equality planning as an authority, as an employer and education provider. The promotion obligation also covers joint municipal authorities' activity.
2. Equality impact assessment is the starting point of the planning process, to identify key target areas for development which are addressed by the equality plans activities.
3. The Equality plan should identify concrete measures to tackle discrimination and promote equality within the key areas of municipal authorities' responsibilities.
4. Implementation and evaluation phases are crucial parts of municipal equality planning.

In the absence of specific provisions on systemic discrimination in equal treatment legislation, statutory equality duties can play a central role in combating such discrimination. These are a systemic response to a systemic problem. In requiring the introduction of equality-focused systems within organisations, statutory equality duties serve to dismantle or disarm those internal systems that might currently involve systemic discrimination.

Statutory equality duties on public authorities, with an institutional focus, to take specified steps to promote equality for employees or people accessing their services are noted as particularly relevant in combating systemic discrimination. Likewise, statutory equality duties on public authorities, with a mainstreaming focus, to promote equality and eliminate

discrimination when key decisions are being made in implementing functions, are valuable (Crowley 2016).

The importance of addressing discrimination

Addressing individual and systemic discrimination and advancing full equality in practice enhance the city and its ambitions, enable organisational goals and objectives, and stimulate morale and a positive organisational culture within the municipality.

The principles of real equality, diversity advantage, meaningful interaction, and active citizenship and participation, identified by the Council of Europe as shaping the intercultural city, are rooted in non-discrimination and the search to achieve full equality in practice.

Equality is undermined by the unequal outcomes for groups, that result from systemic discrimination, and by the negative impacts on individuals from the groups concerned, that result from individual discrimination. Diversity advantage cannot be harnessed for benefit to society and the community, in contexts of individual and systemic discrimination. Interactions between groups and individuals are compromised in contexts of inequality. Active citizenship and participation are diminished where the voice of those experiencing discrimination does not come forward and is not heard.

Values of dignity, accessibility, participation and inclusion are central to the culture of municipalities, given their nature and purpose. The engagement and prioritisation of such values within an organisation is central to motivating a concern for the common good

and the goals and objectives that flow from this. They are at the heart of the municipality's commitment to non-discrimination and equality. Individual and systemic discrimination undermines these values, running counter to and diminishing the organisational culture and ambitions of the municipality.

Individual discrimination excludes and diminishes individuals from groups that are subject to such treatment. Systemic discrimination disadvantages whole groups. Systemic discrimination is a root cause of and drives sustained intergenerational disadvantage.

The commitment to non-discrimination and equality challenges the municipality to innovate and to look beyond 'business as usual'. It involves openness to challenge and critique and a willingness to look carefully at one's organisation and the manner in which it functions and the core values that motivate it.

CHAPTER THREE:

ORGANISATIONAL DRIVE

Challenge: Creating the conditions within a municipality for addressing discrimination, individual and systemic, and for giving leadership on this

Problem: The issues of non-discrimination and equality can lack sufficient attention within an organisation, and there can be an absence of organisational standards on these issues, in relation to staff, policy beneficiaries, and service-users.

At the level of individual discrimination, there can be limited commitment to take this issue seriously and a lack of momentum to eliminate it.

At the level of systemic discrimination, there can be limited acknowledgement of this issue, and a lack of understanding of this issue and how to respond to it.

Response: Establish a standard, backed by leadership, underpinned by an organisational structure, and sustained by an organisational culture.

Senior staff demonstrate commitment to non-discrimination and equality, and an organisational structure holds a mandate to ensure an adequate response to these issues.

Staff understanding of, and skills on, non-discrimination and equality are enabled and sustained, and a shared concern on these issues is developed across the organisation.

Solutions and pathways for municipalities to consider and take

Five strands of action can be pursued in building organisational drive for non-discrimination and equality, enabling an effective response to the challenge:

1. Leadership

Leadership within the Municipality plays a central role in ensuring there is no room for any form of discrimination and progress is made towards equality. Senior management place non-discrimination and equality concerns at the heart of municipal policy goals, include a focus on these issues in their deliberations, and lead by example on these issues.

2. Standard

The Municipality sets a standard by developing, implementing and communicating a non-discrimination and equality policy. The policy sets out: the commitment to non-discrimination and equality; the scope of the policy and action to be taken in each field covered; where responsibility for implementing the policy lies at a senior level; and the structures and systems to drive implementation of the policy.

3. Structure

The Municipality convenes a staff working group with a mandate to inform, drive and sustain an ongoing focus on achieving its commitment to non-discrimination and equality. The staff working group draws its members from across the different departments and levels of the Municipality. It promotes, supports and monitors action to achieve the standard set.

4. Systems

Municipality communication systems serve to shape and inform workplace values and culture, engaging values of dignity, participation and inclusion, and including a sustained focus on issues of and progress on non-discrimination and equality.

Municipality participatory systems engage groups that experience inequality and their representative organisations, so they can effectively contribute to decision-making within the Municipality and giving effect to the commitment to non-discrimination and equality. This can include processes and structures, including the establishment of formal councils for such a purpose.

Municipality data systems include for gathering and analysing equality data, on groups experiencing inequality, to enable a comprehensive and informed view on issues of non-discrimination and equality, to inform decision-making.

5. Capacity

The Municipality takes steps to strengthen the awareness and competence of staff to understand the issues of, and engage in effective action on, non-discrimination and equality. Training initiatives build staff knowledge and skills to recognise and address discrimination, interact effectively with people from groups experiencing inequality, and progress equality at all levels of the organisation.

Practices of interest – European and national

Gender Equality and Non-Discrimination Commission in Helsinki

Rationale: The City of Helsinki established the Equality and Non-Discrimination Commission to promote, monitor, and assess the implementation of gender equality and the prevention of discrimination based on gender, gender expression, or gender identity within the city's activities and services.

Who is involved: Appointed by the City Board in 2023, the commission comprises 11 members, each with a personal deputy, serving a two-year term (2023–2025). Members include elected political officials representing various parties, ensuring diverse perspectives in addressing equality issues.

Practice: The commission supports the integration of equality principles across all city activities and services. It monitors and assesses the implementation of city-level equality and non-discrimination plans, makes proposals, and issues statements to promote and realise equality and non-discrimination within the municipal framework

Impact Sought: The commission aims to institutionalise equality and non-discrimination in Helsinki's governance structures, ensuring long-term progress in addressing systemic inequality and discrimination in municipal services and activities.

See: [Equality and Non-Discrimination Commission](#)

Vantaa's Equality Plan

Rationale: Vantaa's Equality and Non-Discrimination Plan (2022–2025) was developed to fulfil the obligations of Finland's Equality Act and Non-Discrimination Act. It aims to create an inclusive city where diversity is valued, and systemic barriers to equality are addressed. It includes a valuable focus on organisational systems.

Who is Involved: The City Council and administration oversee the plan, while municipal departments integrate its principles into their operations. Residents and community organisations contribute through consultations to ensure it reflects the needs of Vantaa's diverse population.

Practice: The plan includes a focus on systems to: incorporate equality into decision-making processes; train staff to address discrimination; and monitor progress and ensure accountability.

Impact Sought: The plan seeks to foster a culture of inclusion, reduce discrimination, and strengthen social cohesion by ensuring equitable opportunities and trust in municipal governance.

See: [Vanta City Equality and Equality Work Plan for the Strategy Period 2022-2025](#)

Municipal Department for Integration and Diversity (MA 17) in Vienna

Rationale: Vienna's MA 17 was established to address the challenges of a diverse and multicultural city. The goal is to foster a cohesive society by promoting integration and ensuring equitable access to resources and opportunities for all residents. The department recognizes that successful integration benefits both the city and its residents, enhancing social harmony and economic vitality.

Who is involved: MA 17 operates under the Vienna City Administration and collaborates with NGOs, community organisations, local educational institutions, and cultural associations. These partnerships enable the department to address the needs of diverse populations effectively. MA 17 also involves municipal agencies to align city-wide efforts on integration and anti-discrimination.

Practice: MA 17 implements various initiatives, including language courses, cultural events and workshops, mediation and support services, policy advice, and information hubs

Impact Sought: MA 17 aims to create a city where diversity is seen as a strength. Its goal is to ensure all residents, across all cultural backgrounds, feel included, have equitable access to opportunities, and can actively participate in civic life. By reducing barriers and promoting understanding, the department contributes to a more harmonious and vibrant Vienna.

See: [Integration and Diversity web page](#)

CHECKLIST for organisational drive

Have we established and secured or are we taking necessary steps to establish and secure:

- 1. a model of leadership** that affords appropriate priority to combating individual and systemic discrimination and advancing full equality in practice, and that ensures steps are taken to give effect to this priority?
- 2. an organisation-wide commitment** to non-discrimination and equality, articulated by way of a non-discrimination and equality policy for the organisation and its key functions?
- 3. responsibility** for progressing and giving effect to this commitment in terms of a senior

management role, and of a cross-organisational working group or committee?

- 4. organisational systems** that: communicate and engage our values of dignity, inclusion and participation internally and externally; engage groups affected by inequality, and their representative organisations, in processes of dialogue, consultation, and shared decision-making; and gather data to track progress and impact on the groups affected by inequality?
- 5. Staff capacity**, where all staff have an opportunity and are encouraged to develop their understanding of non-discrimination and equality, and the practice required to give effect to the organisational commitment in this regard?

CHAPTER FOUR:

IDENTIFY

Challenge: Making individual and systemic discrimination visible, building and sustaining the evidence base for effective responses

Problem: Discrimination experienced by service-users, policy beneficiaries and staff, both individual and systemic, is often invisible.

At the level of individual discrimination, most people who experience discrimination do not report it, and there are consistent high levels of under-reporting.

At the level of systemic discrimination, discrimination that results from organisational policies, procedures, and practices, is only visible in outcomes of inequality and disadvantage across all fields, for groups experiencing this issue.

Response: Make discrimination, and the inequalities that result from discrimination, visible so that it can be effectively addressed and eliminated.

Build and track an evidence base, of both quantitative and qualitative data and information, on the issue and its impact.

Engage and exchange on the issue with those experiencing discrimination and with their representative organisations.

Solutions and pathways for municipalities to consider and take

Two strands of action can be pursued in establishing a visibility for the issue of discrimination, enabling an effective response to the challenge:

1. Evidence

The Municipality:

- ▶ uses its own data systems to capture and quantify issues of discrimination and inequality, for analysis and response.
- ▶ undertakes its own research or conducts surveys to capture and quantify issues of discrimination and inequality, for analysis and response.
- ▶ analyses national or regional research projects and surveys to establish issues of discrimination and inequality of relevance for the Municipality.
- ▶ engages with other stakeholders that gather and analyse equality data, to exchange knowledge and learning and develop shared approaches.

2. Engage

The Municipality recognises, supports and engages in an ongoing manner with organisations, representative of groups experiencing inequality, for the particular purpose of identifying discrimination in its various forms. This engagement would serve to enable an open and forthright exchange on areas and issues of discrimination and inequality. It would be pursued in a manner to stimulate reporting of discrimination by members of these groups experiencing inequality and to inform action on these issues.

Practices of interest – European and national

Oulu's Municipal Immigrant Council

Rationale: The municipal immigrant council follows the organisational structure of the youth council, older people's council and disability council, which are required by the Municipal Act to enhance the participation and engagement of those groups. The intention is to have a participation structure, enable dialogue and relationships, build cooperation between stakeholders in integration and recognise needs and issues to tackle at the local level.

Who is involved: City coordinator of multicultural affairs, and immigrant council members representing different communities (backgrounds, languages, religions, nationality, gender, profession) and who have expertise in the issue.

Practice: The immigrant council is linked to the political stakeholders, the city council and the local members of national parliament. These structures and communication channels enable real chances to make an impact and to influence. The council is chosen every fourth year, following the cycle of municipal elections. There are five permanent experts and 11 immigrant council members, from which a chair is elected. An open call is launched with the above-mentioned criteria of representation. Applicants write a motivation letter. The members are selected in a process based on co-design. The applicants are invited to a workshop, in which the criteria are designed. During the mandate, ongoing capacity-building takes place, the members are provided with training, information and study tours. The resource for the council is €35,000 per year, and the members are paid for meetings.

Impact sought: Meaningful participation and real opportunity and structure to influence on issues affecting the migrant population of the city.

See: [Immigrant Council](#)

Office for Non-Discrimination in Barcelona (OND)

Rationale: The OND was established to uphold human rights and address systemic and interpersonal discrimination. Its mission is to provide a platform for individuals facing discrimination and to ensure the city actively promotes equality and inclusion.

Who is involved: The OND is part of the Barcelona City Council and works in partnership with local NGOs, community leaders, minority groups, and legal experts. It collaborates with educational and cultural institutions to amplify its impact and align city policies with human rights principles.

Practice: The OND addresses inequality and discrimination through various initiatives. It collects and monitors data on discrimination cases to identify trends and inform policy development. The OND works with grassroots organisations to codesign inclusive policies, ensuring the voices of marginalised groups are heard and addressed. It provides free legal assistance to victims of discrimination, guiding them in filing complaints and seeking justice. It also organises public awareness campaigns educate citizens on their rights and promote a culture of diversity and respect, and training programmes to equip municipal staff, law enforcement, and educators with tools to combat discrimination.

Impact Sought: The OND strives to build a discrimination-free city, where all residents feel valued and respected, reduce systemic inequalities, and empower individuals to exercise their rights fully, fostering a city culture rooted in diversity and inclusion.

See: [Office for Non-Discrimination](#)

Immigration Observatory of Bilbao

Rationale: The Immigration Observatory of Bilbao, part of Bilbao's Intercultural Plan, is a collaborative initiative between the Bilbao City Council and the University of the Basque Country (UPV). It was established to provide in-depth knowledge about the city's migratory dynamics, recognising that understanding this reality is key to designing effective integration and coexistence strategies.

Who is Involved: The Observatory is managed by the Bilbao City Council in partnership with Ikuspegi (Basque Observatory on Immigration related to the UPV and the Basque Government), leveraging academic expertise and municipal data.

Practice: The Observatory conducts annual updates on the foreign population in Bilbao, a barometer on public perceptions and attitudes toward immigration, and specific studies on neighbourhoods, demographic groups, and integration-related challenges.

Impact Sought: By informing policy and programme development, the Observatory aims to foster social cohesion, promote integration, and enhance coexistence in Bilbao, ensuring data-driven and context-sensitive approaches to diversity management.

See: [Immigrant Observatory of Bilbao](#)

CHECKLIST for identifying discrimination, individual and systemic

Have we established and implemented, or are we taking necessary steps to establish and implement:

- 1. initiatives to gather evidence** of discrimination and inequality such as: commission research; analysis of existing research; and organising to exchange knowledge across organisations?

- 2. initiatives to engage** with the groups that experience inequality and their representative organisations specifically to examine and explore issues and experiences of discrimination?

CHAPTER FIVE:

PREVENT

Challenge: Establishing and implementing organisational systems with a capacity to eliminate discrimination and advance equality

Problem: Organisations take a reactive response to discrimination, responding to issues as they emerge, rather than also taking a proactive approach to ensure such issues do not emerge in the first place, for service-users, staff and policy beneficiaries.

At the level of individual discrimination, there can be a lack of procedures to prevent incidents of discrimination.

At the level of systemic discrimination, there can be an absence of any systemic response to what is a systemic problem

Response: Develop and implement organisational systems to prevent and eliminate discrimination and to progress equality.

Review organisational functions and their implementation for issues of discrimination or potential discrimination, and take steps to resolve issues that arise.

Introduce steps within decision-making processes that check for discrimination and ensure a positive impact on groups that experience inequality.

Solutions and pathways for municipalities to consider and take

Two strands of action can be pursued in preventing discrimination and addressing inequalities that result, enabling an effective response to the challenge:

1. Review

The Municipality undertakes an equality review of functions related to its workplace, its services, and/or specific parts of the Municipality. This process examines plans, procedures, practices and staff perceptions relevant to the function under review, for their capacity to hinder or advance non-discrimination, adapt for and accommodate diversity, and progress equality. The equality review can usefully lead on to preparing an action plan to address any issues found to arise. It is usefully a participative exercise involving civil society organisations representative of the groups that experience inequality.

2. Assess

The Municipality implements an equality impact assessment process when key decisions are being made, most specifically in the final stages of developing or reviewing plans, strategies, policies, programmes, and services. In assessing the potential impact on groups experiencing inequality the Municipality would check at final draft stage to ensure that:

- ▶ there is no exclusion or discrimination that would limit access and benefit for these group;
- ▶ needs specific to these groups are met, which if not addressed would result in barriers to access and benefit; and
- ▶ positive action is envisaged targeting these groups where significant inequalities are evident.

This equality impact assessment is usefully a participative exercise involving organisations representative of the groups experiencing inequality.

Practices of interest – European and national

Equality Review, Malmö

Rationale: Malmö's status as a highly diverse city necessitated an inclusive governance approach to ensure access and participation for all. The city launched a comprehensive equality review to identify and address discriminatory practices and barriers to inclusion across its municipal functions.

Who is involved: Malmö City Council collaborated with civil society organisations, including groups representing migrants, women, and persons with disabilities, along with internal municipal departments and external experts in diversity and inclusion. Participatory workshops engaged residents and stakeholders to integrate diverse perspectives into the findings.

Practice: The equality review examined workplace procedures, service delivery mechanisms, and decision-making structures. Areas such as recruitment policies, public service accessibility, and municipal communications were checked for systemic inequalities. The review culminated in an action plan of targeted measures, including policy adjustments, training programmes for staff, and public engagement initiatives.

Impact Sought: The initiative aimed to create a municipal system free of discrimination, ensuring that public services are accessible and equitable for all residents while fostering a culture of diversity and inclusion. By addressing systemic barriers, Malmö sought to improve trust in municipal institutions and promote social cohesion.

See: [Voluntary Local Review City of Malmö](#)

Inclusion and Diversity Reports, Kirklees

Rationale: Kirklees Council is committed to fostering an inclusive and diverse workforce that reflects the community it serves.

Who is involved: The initiative is led by Kirklees Council's Inclusion and Diversity team, in collaboration with strategic and service directors, employee networks, and the broader workforce. This collective effort ensures comprehensive data collection and the implementation of effective diversity policies.

Practice: Kirklees Council gathers data on various workforce characteristics, including marital status, disability, ethnicity, gender, age, sexual orientation, and religion. This information is compiled into workforce equality data charts, providing a clear breakdown of the organisation's demographic composition. The data is shared with strategic and service directors and chairs of employee networks to enhance understanding and representation. The collection and analysis of workforce equality data enables informed decision-making and the development of strategies to promote equality and address disparities within the organisation. The council has also implemented initiatives such as name-blind recruitment and the [Oleeo](#) recruit system to progress workforce diversity.

Impact Sought: Kirklees Council aims to create a more representative and inclusive workplace. This approach facilitates the identification and addressing of under-representation and supports the development of targeted initiatives to promote diversity and equality within the organisation.

See: [Workforce Equality Data Charts](#)

Equality and Human Rights Impact Assessment in County Wexford, Ireland

Rationale: A statutory equality and human rights duty requires Irish public bodies to have regard to the need to eliminate discrimination, promote equality of opportunity and protect human rights for service-users, staff and policy beneficiaries, across all their functions. The groups identified for the statutory duty are those covered by the equality legislation alongside those exposed to poverty. In giving effect to the statutory duty, public bodies must conduct an equality and human rights impact assessment in developing plans, policies and programmes.

Who is involved: Wexford County Council has played a leading role in its commitment to and implementation of this statutory duty. In this, it is motivated by its core organisational values of inclusiveness and democracy. It has taken a participative approach, engaging with organisations representative of groups experiencing inequality.

Practice: Wexford County Council undertook an evidence-based and participative assessment of the equality and human rights issues facing the groups identified for the statutory duty that are relevant to its various functions. When developing a plan, policy or programme, Wexford County Council establishes which among these equality and human rights issues are relevant to the purpose of the plan, policy or programme, and then takes steps to ensure these issues are addressed in the drafting process. At the final draft stage, a formal check is undertaken to ensure that the issues have been adequately and appropriately addressed, with amendments proposed and examined where this is not the case.

Impact sought: Wexford County Council seeks to build on and strengthen its work on advancing equality and human rights through this more planned and systematic approach.

See: [Public Sector Duty Assessment](#)

CHECKLIST for preventing discrimination, individual and systemic

Have we established and implemented or are we taking necessary steps to establish and implement:

1. **an effective process of organisational function equality review** whereby key functions can be assessed for the presence of discrimination and for their impact on equality?

2. **an effective process of equality impact assessment** whereby the development and review of plans, strategies, policies, programmes, and services are checked at final draft stage to ensure a positive impact on groups experiencing inequality?

CHAPTER SIX: TACKLE

Challenge: Enabling reporting of experiences of discrimination, addressing reports of discrimination, and tackling incidents of discrimination

Problem: Lack of, or inadequate, responses made to incidents of discrimination or contexts of inequality that result, as experienced by staff, policy beneficiaries and service-users.

At the level of individual discrimination, processes to enable and respond to reports of discrimination can be limited or lacking.

At the level of systemic discrimination, systems to address the impact of this issue can be limited or lacking.

Response: Create the conditions that enable discrimination to be reported, and that establish an adequate response to incidents and contexts of discrimination.

Put in place supports to encourage and enable people to report incidents of discrimination, and to stimulate their confidence in the possibility of change.

Establish procedures to receive and respond adequately and appropriately to reports of discrimination, and ensure their effective implementation.

Develop, and invest in, initiatives to tackle inequalities that result from discrimination, in particular systemic discrimination, and to advance equality.

Solutions and pathways for municipalities to consider and take

Two strands of action can be pursued in tackling discrimination and resultant inequality, enabling an effective response to the challenge:

1. Procedure

The Municipality establishes procedures and guidelines for receiving and addressing individual discrimination complaints. Service-users and staff across the organisation are made aware of these procedures and guidelines. Specific staff are identified as contact points to direct and assist those who feel they have been discriminated against. Staff involved in implementing the procedures are trained to ensure an adequate and appropriate response to discrimination complaints.

2. Plan

The Municipality's equality plan serves as an umbrella for initiative to address discrimination and the inequalities that are a product of systemic discrimination. These plans need to encompass all parts of the Municipality, while at the same time ensuring that each part of the Municipality has specific equality goals and measures that address its unique context and issues. The equality plan would include actions to identify, prevent and tackle all forms of discrimination. Positive action for equality of participation in society, allowed under equal treatment legislation, is an important element in such plans in tackling the impact of systemic discrimination, alongside steps to address needs specific to groups.

Practices of interest – European and national

Victim Support Finland (RIKU)

Rationale: This initiative addresses the need to provide specialized support services to victims of crime, including those facing discrimination, to ensure their access to justice and recovery. It emphasises the importance of tailored, locally accessible assistance to empower individuals and promote equality.

Who is involved: The initiative is led by Victim Support Finland (RIKU), in collaboration with local authorities, law enforcement, and civil society organizations. It also engages volunteers and professionals trained to offer support.

Practice: RIKU provides free and confidential services, including counselling, legal guidance, and practical assistance for victims of crime and discrimination. It offers both face-to-face and online support, ensuring accessibility. RIKU also collaborates with stakeholders to improve awareness of victim rights and works to enhance inter-agency cooperation to better address the needs of victims.

Impact Sought: The initiative aims to strengthen the support network for victims, ensuring their voices are heard and their rights protected. By promoting recovery and resilience, it contributes to building a more inclusive and supportive society.

See: [Riku Services](#)

Discrimination Reporting Centre for the Amsterdam Region (MDRA)

Rationale: The Discrimination Reporting Centre for the Amsterdam Region (MDRA) was established to provide residents of the region with a dedicated platform to report and address incidents of discrimination. This initiative aligns with the Municipal Anti-Discrimination Facilities Act (WGA), which mandates that every municipality establish an accessible, independent facility for handling discrimination complaints.

Who is involved: MDRA operates as an independent organisation, collaborating closely with local authorities, community groups, and other stakeholders to combat discrimination. Its team comprises trained professionals who offer support and guidance to individuals facing discriminatory practices.

Practice: MDRA provides a confidential and accessible platform for individuals to report discrimination they have experienced or witnessed. Reports can be submitted through various channels, including online forms, telephone, and in-person consultations. Upon receiving a complaint, MDRA assesses the situation and offers appropriate assistance, which may include mediation, legal advice, or referrals to other relevant agencies. Additionally, MDRA engages in public awareness campaigns and educational programs to inform the community about discrimination and promote inclusivity.

Impact Sought: By offering a reliable avenue for reporting discrimination, MDRA aims to empower individuals to speak out against unjust treatment, thereby fostering a more inclusive and equitable society. The organisation seeks to reduce the prevalence of discrimination in the Amsterdam region through its services and outreach efforts, ensuring that all residents feel valued and respected.

See: [Report Discrimination](#) web page

Municipal Policy of the City of Geneva in terms of Diversity

Rationale: The City of Geneva's diversity and anti-racism policy, an equality plan, is rooted in the city's cosmopolitan character. Recognising the opportunities and challenges of this diversity, the policy aims to promote inclusion, ensure equal opportunities, and combat all forms of discrimination. Its objective is to foster a harmonious and unified community where diversity is celebrated as a strength.

Who is involved: The policy is led by the City's administrative council and supported by municipal departments such as the Service Agenda 21 – Ville Durable. Collaboration involves local community organisations, civil society groups, and residents, ensuring that the policy reflects the perspectives and needs of the city's diverse population.

Practice: The policy is implemented through five strategic axes. Geneva strives to be a welcoming city by creating initiatives to make all residents feel valued, regardless of their background. It aims to be accessible by removing barriers such as language and administrative challenges to municipal services. The city actively combats discrimination based on race, ethnicity, nationality, or religion through targeted actions and policies. It positions itself as a responsible city by incorporating diversity into internal policies, including staff training to serve multicultural communities effectively. Finally, it fosters participation by encouraging community involvement in civic life and decision-making processes. Actions across these strategic axes include such as public awareness campaigns, support for community-led projects, and platforms for intercultural dialogue.

Impact Sought: The policy aims to build a cohesive and inclusive society where all residents enjoy equal access to services and opportunities. By addressing discrimination and promoting participation, the City of Geneva seeks to strengthen social bonds, enhance mutual understanding, and create a community where every individual feels respected and empowered.

See: [Municipal policy of the City of Geneva in terms of diversity](#)

Equity and Anti-Racism Plans for Municipalities and Villages (Nova Scotia, CA)

Rationale: The Equity and Anti-Racism Plans for Municipalities and Villages were created to tackle systemic racism and inequalities in local governance and service delivery. They aim to embed equality and anti-racism principles into municipal operations, ensuring fair access to resources and opportunities for all residents. The initiative seeks to build trust, foster inclusion, and promote social cohesion.

Who is involved: The plans involve municipal governments as the primary implementers, with support from community organisations, marginalised groups, and policy experts. Municipal leaders drive the process, while community members contribute through consultations and co-creation of solutions. Policy experts guide the design of effective strategies and frameworks.

Action taken: The plans begin with a needs assessment to identify systemic barriers and areas requiring intervention. Municipalities then set goals and develop actionable strategies to address racism and promote equality. Training programmes enhance staff awareness and competence, while participatory mechanisms ensure marginalised voices influence decision-making. Progress is monitored through evaluation systems, allowing for adjustments based on outcomes and feedback.

Impact sought: The initiative aims to eliminate systemic racism, ensure access to municipal services, and empower marginalised communities. It seeks to foster trust between municipalities and residents, enhance representation in decision-making, and build socially cohesive and inclusive communities.

See: [Equity and Anti-Racism Plans for Municipalities and Villages](#)

CHECKLIST for tackling discrimination, individual and systemic

Have we established and implemented, or are we taking necessary steps to establish and implement:

1. a structure or process for people to report incidents of discrimination, secure advice on

what can be done to resolve the issue, and progress a resolution?

2. an equality plan to give effect to our commitment to equality, address issues of inequality and discrimination identified, and progress action to eliminate discrimination, address needs specific to diversity, and achieve full equality in practice?

APPENDIX ONE:

RESOURCES

National

Resource of Interest – Equality Impact Assessment

Equality Impact Assessment Tool of Ministry of Justice

This is a practical guide on undertaking equality impact assessments. It includes:

- ▶ information on the contents of the Non-Discrimination Act,
- ▶ suggestions for assessment criteria for use by various actors,
- ▶ examples of issues related to various groups facing the risk of discrimination,
- ▶ examples of development of organisational activities from a non-discrimination perspective,
- ▶ examples of methods for assessing equality, and
- ▶ tips on how to proceed from assessment to preparing and implementing an equality promotion plan

See: [Tool for the Assessment of Equality](#)

Resource of Interest – Equality Impact Assessment

Guide on regional equality impact assessment in Social and Welfare sector

The guide provides wellbeing services with information and tools for promoting non-discrimination and gender equality in their operations. It was drawn up at the Finnish Institute for Health and Welfare as part of the Well Planned project funded by the EU's Citizenship, Equality, Rights and Values programme. It sets out non-discriminatory services and their elements, and provides concrete tools for their realisation.

See: [Equality Promoters Guide](#)

Resource of Interest – Equality Plan

Guide to promoting equality in the municipality's operations

The guide supports planning and implementation for the promotion of equality in the municipality. It was produced by the Association of Finnish Local and Regional Authorities.

See: [Every Face Counts](#)

European

Resource of Interest – Enhancing the Evidence Base

Toolkit for Equality: the local level. Mapping and clustering of policy approaches

This report addresses the need for local authorities to understand and tackle discrimination and inequality. It emphasizes the collection of reliable data to develop targeted and effective policies. It involved local authorities, civil society organizations, and academic institutions, coordinated by the European Training and Research Centre for Human Rights and Democracy (ETC-Graz). The report presents findings from surveys, to a template included in the document, conducted by local authorities to capture data on experiences of discrimination in their communities. The results are analysed to identify patterns of inequality and guide policy recommendations.

See: [Toolkit for Equality: The Local Level](#)

Intercultural Cities Programme

The Council of Europe Intercultural Cities Programme has developed a range of resources to equip cities with the tools and strategies needed to effectively address individual systemic discrimination, build inclusive communities, and advance equality. The website for the ICC programme: <https://www.coe.int/en/web/interculturalcities>

Resource of Interest – Equality Data Systems

Training manual on equality data collection and analysis to prevent and address systemic discrimination - Committee of Experts on Intercultural Integration of Migrants

This manual informs and enables action on the collection and analysis of equality data, in a manner that shapes effective responses to systemic discrimination. Its three modules are: equality data: purpose and principles; targeted equality data initiatives; and an equality data strategy.

See: [Training Manual](#)

Resource of Interest – Identify and Prevent Systemic Discrimination

Policy Brief on identifying and preventing systemic discrimination at the local level

This Policy Brief supports policy makers in the cities on key policy lines and strands of practice in tackling systemic discrimination in their organisations.]

See: [Policy Brief](#)

Resource of Interest – Artificial Intelligence

Policy Brief on preventing the potential discriminatory effects of the use of artificial intelligence in local services

This Policy Brief supports decision-makers at the local level to understand the potential biases and risks of artificial intelligence and learn about ways of mitigating such risks.

See: [Policy Brief](#)

APPENDIX TWO:

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