Equal terms, equal value

Stockholm University of the Arts' plan for active measures for equal rights, opportunities and against discrimination for 2024-2026.

Disclaimer: In case of a discrepancy between the Swedish and the English version of the decision, the Swedish version will prevail

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1.   Introduction

Chapter 3 of the Discrimination Act contains a requirement to continuously document the work with active measures. According to the Discrimination Act, active measures are partly about preventing discrimination and partly about promoting equal rights and opportunities regardless of the grounds for discrimination. Active measures cover both the study environment and the work environment as well as students, applicants for education programmes, employees and applicants for positions.

The aim of this document is to describe how SKH works to promote equal rights and opportunities and to prevent discrimination. This document describes the systematic active measures that have been identified as central and university-wide and that can be assumed to have the greatest impact in the areas of the Discrimination Act. Further active measures are described in SKH's operational plan and in the departments' operational plans.

The end of the document, chapter 5, describes the annual process, division of responsibilities and follow-up for how SKH works with active measures.

1.1   Work on active measures under the Discrimination Act

According to Chapter 3 of the Discrimination Act (2018:567), the work with active measures means conducting preventive and promotional work by

1. examine whether there are risks of discrimination or retaliation or whether there are other obstacles to the equal rights and opportunities of individuals in the organisation,
2. analyse the causes of identified risks and barriers,
3. take such preventive and promotional measures as may be reasonably required; and
4. follow up and evaluate the work according to 1-3.

Figure 1Four-step work wheel from the DO website

1.2 Documentation according to the Discrimination Act

According to the Discrimination Act, the documentation must contain

1. an account of all aspects of the work
2. a description of the actions taken and planned
3. an account of how the obligation to co-operate with students and staff is fulfilled.

1.3 Areas under the Discrimination Act

1.3.1 Active measures - education providers

For SKH as an education provider, the work on active measures shall include continuous work in the following areas:

1. admission and recruitment procedures,
2. examinations and assessments of student performance,
3. study environment,
4. opportunities to reconcile studies with parenthood,
5. teaching methods and organisation of education.

1.3.2 Active measures - employers

From an employer's perspective, the work on active measures should include continuous work on the following areas:

1. working conditions,
2. salaries and other employment conditions,
3. recruitment and promotion,
4. training and other skills development,
5. parenthood and work.

1.3.3 Procedures and guidelines for harassment and sexual harassment

In addition to work in the above areas, the university must also have guidelines and procedures to prevent harassment, sexual harassment and reprisals (negative sanctions for those who report misconduct) in the organisation. The procedures and guidelines must be monitored and, if necessary, updated.

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2. University-wide activities

2.1 Harassment and sexual harassment procedures and guidelines

2.1.1 Goal: Reduce the risk of harassment

Description of continuous work:

To reduce the risk of harassment, SKH works continuously with preventive measures in this area. Among other things, SKH has an information brochure based on the Discrimination Act and SKH's guidelines for harassment and victimisation. The brochure is handed out at new student registration and to new employees and clarifies how students and employees can proceed if they feel exposed to or witness discrimination, harassment or victimisation. The brochure is available in both printed form and on SKH's external website and intranet. In serious cases, SKH brings in external consultancy support in the form of legal support or support from the occupational health service.

Development work:

After many years of information work on procedures regarding harassment and victimisation, the assessment is that there are conditions for the procedures to be implemented and known. One need that has emerged is that SKH would need to work with skills development such as various cases to handle situations that may arise in connection with unwanted behaviour. It is particularly important that managers within SKH receive skills development.

A review of the guidelines and leaflet will be carried out within two years.

Target group: Employees and students/doctoral students

Planned activities 2024-2026:

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
There is a risk that we are not sufficiently equipped to deal with different situations that may arise in the context of unwanted behaviour.	*Skills development according to the needs of the organisation in this area, in particular through management training.*	HR and Operations Managers	2024 and ongoing	Leadership group or Management Forum
There is a risk that we are not sufficiently equipped to deal with different situations that may	*Review harassment guidelines and leaflet*	Director of Management office	2025	Leadership group

arise in the context of unwanted behaviour.				

2.1.2 Goal: Students and employees should be aware of the university's work for and the meaning of equal rights and opportunities

<u>Description of continuous work</u>:

In order to raise awareness of SKH's work for equal opportunities and rights, and the content of the guidelines for harassment and victimisation, information is provided on the following occasions:

- Start of term; information and welcome days organised for new students.
- Induction for new staff (by manager and at induction days)
- Management training (HR)
- Introduction of visiting teachers (Head of Subject)
- Information sessions at the collegial meetings of the specialised units.
- Staff development days

New students receive the same information at the start of the term. The introduction of new employees has also been updated to include information about equal conditions, the Discrimination Act and the state's core values. Within SKH's programmes, there are a large number of teachers who teach for short periods, guest teachers. Procedures have been introduced to ensure that information in this area is given to guest teachers. Students and employees also have a responsibility to familiarise themselves with the procedures and contribute to a good study and working environment.

<u>Development work</u>:

There is currently no need to develop any specific activities in this area.

Target group: Employees and students/doctoral students

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3. Activities for SKH as a training provider

3.1 <u>Area 1:</u> Admission and recruitment procedure

In the area of admissions and recruitment, higher education institutions shall examine and, where necessary, implement measures to ensure that programmes attract applicants regardless of gender, gender identity or gender expression, ethnicity, religion or other beliefs, disability, sexual orientation and age.

Example: how do we describe the programmes in our marketing, in information materials and in contacts with potential applicants.

The selection and eligibility criteria must not only fulfil the requirement to be non-discriminatory, but must also be designed so that they do not pose a risk of discrimination. Examine how the admission process works in practice and how the university treats applicants during the recruitment process.

3.1.1 Goal: Ensure a non-discriminatory and inclusive admissions process that promotes widening recruitment.

<u>Description of continuous work</u>:

Admission of students is a key process in the systematic quality work and it is important to ensure that the process is discrimination-free, inclusive and promotes widening recruitment. SKH offers both internal and external staff who work with eligibility review and selection in the application and admission process training in discrimination, bias and norm-critical thinking in the exercise of authority. Experience, competence and gender equality in terms of who is appointed as members of the admissions groups are important to accommodate different perspectives. There is a preparation procedure for appointing the admissions groups where the Vice-Chancellor makes decisions on participants.

<u>Development work:</u>

One development-oriented work in progress that could contribute to an admissions process at all levels of education that promotes widening recruitment is the work on the criteria for eligibility assessment and selection. For example, what kind of criteria we have and how well they correspond to what is necessary to complete the programme. The admissions teams have the important task of ensuring that the identified criteria that have been specified are consistent with the practical work in the admission tests and are assessable. This work is ongoing but is also a development process from year to year.

Work is also underway to review and redesign many of the programmes, which could have a beneficial effect on both widening recruitment and contributing to more diverse perspectives in the programmes (and widening participation).

SKH has worked with measures within widening recruitment based on the assessment group's recommendations in the UKÄ's thematic evaluation and will implement activities from the operational plan and other prioritised measures.

Target group: students/doctoral students and internal/external staff in admissions teams.

Planned activities 2024-2026

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
Risk that the criteria in the admission process are not relevant, clearly described or used in a transparent way.	*With support from UA and FoK, review the criteria in the admissions process and ensure that they are complied with in the admissions work. This is a recurring task that is part of the work and analysis of this year's admissions.*	Head of departments and Vice-rector for research	For the 2025 admission and on an ongoing basis	Internal monitoring within the departments
Risk that different perspectives are not recognised in the recruitment of students and doctoral candidates	*Follow-up on student applicants in the admissions process (e.g. short questionnaire)*	Director of the Administration (Management Office and UA, FoK)	In the 2024 admission	Operational dialogue
Risk of not broadening student groups	Implementing activities from the operational plan and other priority actions	Heads of department and the director of administration	According to VP and prioritised actions	Leadership group and Leaders' Forum

3.2   <u>Area 2</u>: Examination and assessment

In the area of examinations and assessments of student performance, the higher education institution needs to ensure, among other things, that course syllabuses and other rules for assessments do not risk impairing opportunities for any group, regardless of the basis of discrimination.

It is also a matter of examining whether there are risks in the practical work, and in the application of rules and procedures, that assessments of students' academic performance are consciously or unconsciously influenced by factors related to any ground of discrimination. Work in this area should also focus on staff training, if there is a need for it.

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3.2.1 Goal: Ensure the equivalence of assessments in education and training activities.

<u>**Description of continuous work**</u>:

At SKH, higher education pedagogical training (HPU) is regularly given that deals with equality and gender equality in educational activities. The training also includes a review of the legal framework governing universities and higher education institutions, the importance of legally secure processes and the design of curricula. At SKH, it is a strategic priority that the heads of subject (and vice-rector for research) enable all teachers and doctoral students within their subject unit to complete the programme. This is done through competence supply plans that are included in the operational planning and individual study plans for the doctoral students. HPU is also offered in English. There are also guidelines and online information on special educational needs.

<u>Development work:</u> Continued prioritisation of teachers undergoing HPU.

One activity to further increase awareness is to organise information sessions for SKH's teachers on the possibilities for adapted examination, pedagogical support, etc.

Develop internal guidelines for examination within a two-year period. This is expected to increase equal treatment and legal certainty.

Target group: teachers and students/doctoral students

Planned activities 2024-2026:

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
Risk of unequal assessment in training programmes	*The heads of department see HPU as a priority and plan the training in the teachers' duty rosters (tjänstgöringsplaner) and in the competence management plan.* *The department's doctoral students should also be offered the opportunity to attend HPU in order to teach (they may not, however, be examiners).*	Heads of subject, Vice-rector for research	Ongoing	Through the operational dialogues
Risk that the special educational support is not fully utilised	*Officers for students with special educational needs organise information sessions to increase the*	Director UA	2024	Internal evaluation UA

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	overall knowledge of teachers in this area.			
Risk of unequal assessment in examinations	*Guidelines for examination*	Director UA	2025	Internal evaluation UA

3.3   Area 3: Study environment

The term study environment refers to both the physical and the psychosocial environment. The physical study environment includes, for example, premises, aids and equipment. The psychosocial study environment includes issues such as treatment, address and various forms of socialising. The work also includes investigating risks of harassment or sexual harassment.

The survey may include, for example, the jargon used by students and teachers and whether there are any racist, sexist or otherwise derogatory comments or jokes. The concrete measures we need to take will depend on the problems identified by the survey.

3.3.1   Goal: Ensure a safe and welcoming study environment

Description of continuous work:

Every two years, SKH conducts a study environment survey in the form of a questionnaire for all students. The survey contains questions about both the physical and psychosocial study environment and also questions about the risk of discrimination in the various areas of the Discrimination Act. The survey gives students the opportunity to influence their study environment and point out any insecurities. The student survey also asks whether students know where to turn if they are subjected to undesirable behaviour. The results of the study environment survey are followed up through presentations for students, staff and in AMK and NUF. The results are dealt with in SKH's work environment plan and in the local work environment plans.

Development: No development work at present, the procedure for handling the results of the survey is considered to work well.

  Target group: Students

3.3.2   Goal: Ensure the specialised pedagogical support at SKH.

Description of continuous work:

At SKH there is a designated officer for students with special educational support needs. The officer provides advice and information to both students and employees, and can write statements to students and prepare decisions

or recommend educational measures. Information is given to new students in the week of the start of the semester and through information on the web. The Nais system support has been implemented for applications for special educational support.

Development:

In the long term, pedagogy in particular may need to be reviewed to better support education on an artistic basis.

Target group: Students and prospective students.

Planned activities 2024-2026

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
There is a risk that the pedagogical support is not well adapted to artistic education.	*Review the pedagogical support based on artistic education.*	Director UA	2025	Leadership group or ÄLG

3.3.3 Goal: Increase the availability of specialised educational support

Description of continuous work:

To ensure that students and doctoral students (within their programme) with disabilities know what rights to special educational support are available, information about this is provided in connection with the start of the term, both through comprehensive information for new students on the web and oral information in the week of the start of the semester. This information is also given to doctoral students during their introduction. System support for TorTalk (speech synthesis programme) is available through IT. Guidance can be provided by the Library.

Reading of course literature is ordered via the Library, which contacts the Swedish Agency for Accessible Media (MTM).

Development work:

There is currently no need to develop any specific activities in this area.

Target group: Students

3.3.4 Goal: Increase accessibility in and to university premises

Description of continuous work:

SKH's premises are continuously inventoried and evaluated. In the annual work environment round, issues of accessibility are raised and made visible. The shortcomings in accessibility that are observed must then be described in an action

plan. Measures are then taken in accordance with this. In all new construction, remodelling or renovation, the accessibility perspective must be taken into account. Major measures need to be linked to the budget and the respective budget manager and investment plan.

Development work:

One development that has been identified is to include the accessibility perspective in work environment surveys.

Target group: students and prospective students.

Planned activities 2024-2026:

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
Risk that the purpose and follow-up on the issue of accessibility perspectives in the checklist for work environment rounds is unclear.	*Follow up how the issue of accessibility has been implemented in the work environment surveys. Ensure the handling and follow-up of the results.*	Director FAS	2024	AMK

3.4   Area 4: Studies and parenting

Higher education institutions must make it easier for students to combine studies with parenthood. This involves, for example, how the institution organises teaching, when it is scheduled, whether certain elements can be carried out remotely or whether there are special needs in terms of premises.

3.4.1   Goal*:* Make it easier for students to combine studies and parenthood

Description of continuous work:

The course syllabus states the possibility of making up and supplementing absences from compulsory elements and examinations. The Canvas learning platform and increased opportunities for distance learning can be assumed to create the possibility of conducting parts of the programme at a distance, which can make it easier for students who are parents to take part in educational elements and information about courses at a distance.

Development work:

At SKH, students' attendance is often assumed as a requirement in the courses, which makes this a complex issue. As stated above, it is possible to make up and supplement absences. At many of the subject units, a review of procedures and foresight in terms of planning and scheduling is underway. This is expected to make things easier for students who are guardians.

Target group: Students

Planned activities 2024-2026:

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
Risk that the SKH's form of education makes it more difficult to combine parenthood with studies.	*Review the organisation of teaching time and, if possible, schedule it between 9-16.* *Creating stability and foresight through scheduling and study guide procedures*	Heads of department	2024 and ongoing	Operational dialogue

3.5   Area 5: Teaching methods and organisation of education and training.

The area of teaching methods and the organisation of education includes how the university conducts teaching: lectures, seminars, distance learning, online courses, etc. It may also involve reviewing when and where teaching takes place.

The work on active measures in this area involves examining whether there is any risk that the form and organisation of teaching may have a negative impact on any group of students and, if so, whether there is a connection with one or more grounds for discrimination.

3.5.1   Goal: Ensure that teaching methods contribute to all students having equal opportunities to complete the programme

Description of continuous work:

If a student is not able to participate in the examination, the possibility of re-examinations is defined in both the guidelines for course syllabi and in the course syllabi. When deciding on a new/revised syllabus, it must be clearly stated in all syllabuses how and when the re-examination takes place.

The use of the learning platform Canvas may also be assumed to create the opportunity to carry out parts of the programme remotely, which can facilitate,

among other things, students who for various reasons may need to take part in educational elements remotely.

Development work:

Development of digital teaching methods.

In the long term, the content of courses in higher education pedagogy (HPU) may need to be reviewed with regard to the link to equal conditions and equality.

Target group: students and teachers/doctoral students

Planned activities 2024–2026:

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
Risk that teachers do not have sufficient expertise in the field of equal opportunities	*Developing the content of HPU courses*	Teacher responsible for HPU	2024	Operational dialogues

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4. Activities for SKH as an employer

4.1 <u>Area 1:</u> Working conditions

In this area, SKH must investigate whether there are any risks of discrimination with regard to the physical, social and organisational working conditions of the activity. Physical working conditions include, for example, the design of premises, furniture and technical aids.

What affects social working conditions are, for example, the norms and beliefs that exist in the organisation and the jargon that occurs, for example, in the lunchroom. Organisational working conditions include the distribution of work and the organisation of work. We will also review the distribution of full-time and part-time work and of fixed-term and permanent contracts.

4.1.1 Goal: Ensure a safe, inclusive and welcoming work environment

<u>Description of continuous work:</u>

Every two years, SKH conducts an employee survey covering all employees. The survey contains questions about the physical, organisational and social work environment as well as questions about the risk of discrimination in the various areas of the Discrimination Act. Through the survey, employees at SKH are given the opportunity to influence their work environment and point out any risks of discrimination, among other things.

The survey also asks whether employees know where to go if they experience unwanted behaviour.

In addition to the employee survey, work environment rounds are carried out regularly where questions about accessibility are raised and made visible. The shortcomings in accessibility that are observed must then be described in an action plan. Measures are then taken in accordance with this. In all new construction, remodelling or renovation, the accessibility perspective must be taken into account.

<u>Development work</u>:

One development that has been identified is to include the accessibility perspective in work environment surveys.

Target group: Employees

Planned activities 2024-2026:

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
Risk that the purpose and follow-up on the issue of accessibility perspectives in the checklist for work	*Follow up how the issue of accessibility has been implemented in the work*	Director of FAS	2024	AMK

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environment rounds is unclear.	*environment surveys. Ensure handling and follow-up of the results.*			

4.2   Area 2: Pay and other employment conditions

Are there risks of discrimination in guidelines and criteria for pay and other employment conditions? How are our guidelines and policy documents applied in practice? SKH needs to ensure that this is not done in a way that risks discriminating against anyone.
Here, the work must be based on all the grounds for discrimination, unlike the annual salary survey, where the work is only based on the discrimination ground of gender.

4.2.1   Goal: Ensure that pay and employment conditions are free from discrimination and on equal terms.

Description of continuous work:

Employment conditions for employees at SKH are regulated by collective agreements (SACO-S, OFR/S and SEKO). Salary setting is individual and is based on SKH's salary policy (SKH 2016/181/1.2.4) and guidelines for assignment supplements and local collective agreement on doctoral salaries ("doctoral ladder"). The salary policy states that it shall be set on objective grounds. The salary policy also states that salaries shall be set regardless of any of the grounds for discrimination (gender, transgender identity or expression, ethnicity, religion or other beliefs, disability, sexual orientation or age) or form of employment and/or scope of employment.

Development work:

There is currently no need to develop any specific activities in this area.

Target group: Employees

4.3   Salary mapping

The employer must carry out a pay survey and document the work every year. The purpose of the survey is to detect, remedy and prevent unjustified differences in pay between women and men.

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4.3.1 Goal: detect, address and prevent unjustified pay differentials between women and men.

<u>Description of continuous work:</u>

Salary surveys are carried out together with the parties in accordance with the applicable rules. The procedure is adapted together with the parties to obtain as complete a picture as possible as a basis for assessing any inappropriate pay differences. In cases where inappropriate pay is discovered, an action plan is drawn up to remedy the situation.

<u>Development work</u>:

After each salary survey, the approach is analysed and the parties agree on any development areas for the next salary survey. Because of this, we do not see that any development activity needs to be specifically planned.

Target group: Employees

4.4 <u>Area 3:</u> Recruitment and promotion

In this area, SKH will examine whether there are risks of discrimination or other obstacles to equal rights and opportunities in recruitment and promotion.

This may involve examining how and where vacancies are advertised, how the adverts are designed, how job interviews are conducted and what influences who gets the job. It also involves reviewing our procedures and criteria for promotion. What qualities are rewarded? Does everyone have equal opportunities for promotion or is there any risk of discrimination?

4.4.1 Goal: To ensure a non-discriminatory and equal recruitment process.

<u>Description of continuous work</u>:

The recruitment process is a key process in the systematic quality work and it is important to ensure that the process is free of discrimination and takes place on equal terms. SKH is constantly working to refine the recruitment process from an inclusive and broadening perspective. Among other things, by reviewing job adverts so that they have an inclusive language and only contain relevant criteria.

<u>Development work</u>:

Skills development for managers in the organisation on recruitment. Skills development for the members of the recruitment teams.

Target group: Employees and applicants for posts

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Planned activities 2024-2026:

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
Risk of a non-inclusive recruitment process	*Provide opportunities for capacity building activities for the permanent members of recruitment teams.*	Director of HR	2024	Internal evaluation HR
Risk of a non-inclusive recruitment process	Skills development for managers in the organisation on recruitment.	Director of HR	2024 and ongoing	Internal evaluation HR

4.5   Area 4: Training and other skills development

In this area, SKH will investigate and analyse whether the training and skills development offered benefits all employees equally, regardless of the basis of discrimination.

What are the different opportunities for education, training and other skills development in the workplace? Is there any difference in who gets and who doesn't get opportunities for skills development? Is there any connection with the grounds of discrimination?

4.5.1   Goal: Ensure that employees at SKH are given equal opportunities for skills development based on the needs of the organisation.

Description of continuous work:
It is important that the opportunities for skills development and further training are carried out in a systematic way so that everyone has equal opportunities based on the needs of the organisation. Within SKH, managers have a responsibility to ensure that employees' skills development is based on factual decision-making and matched with employees' skills and development needs. Needs and wishes are reviewed annually through the staff development meetings (PU-samtal) that are carried out and documented. SKH carries out an annual staff development day, often with a theme of equal opportunities. A management development programme has also been introduced, where some of the training opportunities relate to equal opportunities from different perspectives. Within the Research Centre, it is a prerequisite for the work that all employees are given the opportunity to attend the internal training, courses and seminars they wish to attend. In order to further systematise the possibility of skills development and further training, work has been carried out to systematise skills supply plans in a more strategic and appropriate manner as part of the operational planning at SKH.
Skills management plans are included as part of the Departments' operational plans.

Development: Develop a programme for introducing new managers and

maintaining their skills.
Target group: Employees

Planned activities 2024-2026:

Risk assessment	Development-oriented activity	Person responsible	Clear when	Follow-up
Risk that new managers do not receive equivalent induction and competence development.	Develop a programme for introducing new managers and maintaining their skills.	Director of HR	2024 and ongoing	Internal evaluation HR

4.6   <u>Area 5:</u> Parenting and work

As an employer, SKH must make it easy for parents to combine work and parenthood. This area involves reviewing how the organisation works for parents and whether there is a need for measures to make it easier for employees to combine work and parenthood.

4.6.1   Goal: Ensure that it is possible to reconcile work and parenthood as an employee of SKH.

<u>**Description of continuous work:**</u>

At SKH, employed T/A staff have flexible hours, which makes it easier for employees to combine work with the role of an active parent. Planning of university-wide meetings also takes place within reasonable times that are adapted to active parenthood. At SKH, everyone is also encouraged to take advantage of the opportunity to be on parental leave.

<u>Development work:</u>

There is currently no need to develop any activities in this area.

Target group: Employees

5.　Annual process, responsibilities and follow-up at SKH

The work to promote equal rights and opportunities and prevent discrimination through active and promotional measures must be documented on an ongoing basis. SKH compiles the documentation of the work with the active measures in this three-year action plan. The activities in the action plan are reviewed annually and, if necessary, an update is made. SKH's operational plans include additional activities.

The active, preventive activities in this plan have been divided into **continuous activities** and **development-oriented activities**. The continuous activities describe the work already underway in each area. The development-oriented activities describe the improvement initiatives to be implemented during a specific period of time and aim to develop the work in a particular area. The development-oriented activities can be found in the tables under each area, with the responsible managers listed, and are used as a basis for and complement to operational plans. The action plan and operational plans are followed up during the year, primarily through the Vice-Chancellor's operational dialogues with the departments, with the managers in the Administration (FLG), and in the Work Environment Committee (AMK).

5.1　Analysis of risks

Risks of discrimination in the study and work environment are investigated and documented through

- operational dialogues,
- study environment survey,
- employee survey,
- Work Environment Committee (AMK)
- Vice-Chancellor's termly meetings with student unions.

In addition, the heads of department have regular departmental meetings with the college and student representatives, as well as separate meetings with students in which risks in the work and study environment can be identified. The staff development meetings (PU-samtal) conducted annually between managers and employees can also form the basis for identifying risks.

5.2　Operational planning and documentation

- The Management Office is responsible for compiling the university-wide documentation and updating this document. All heads of operations at SKH are responsible for ensuring that completed measures and proposals for new activities are reported when preparing the next plan. Follow-up and documentation for the new plan is collected in the operational dialogues, the Management Group and AMK and through the referral procedure.
- Documentation of active measures is made on the various occasions when risks are examined, as well as in the follow-up of results in employee and

study environment surveys, in operational dialogues and collectively through annual follow-up of the adopted operational plan.

- SKH's active measures plan is a three-year plan, but is monitored annually and updated if necessary.
- The annual process is linked to the systematic work environment management (SAM) plan process and the operational plan process.

5.3   Interaction with students and staff

Collaboration with the students takes place by discussing the plan in AMK, where the students are represented. Before the plan is decided, the proposal is sent out for consultation, including the student unions and employee organisations, and a draft decision is sent out five days before the decision is made. Collaboration with the employee organisation also takes place when the plan is taken up for MBL negotiations.