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Person in charge	Head of Human Resources		
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EQUALITY AND NON-DISCRIMINATION POLICY 2024-2025

1 XAMK'S WORK FOR EQUALITY AND NON-DISCRIMINATION

1.1 Strategy and ethical principles

According to Xamk's strategy, we aim to be a responsible, good and desired place to work and study. We at Xamk take care of student and staff wellbeing. To promote this, we make sure to treat everyone in a fair and equal way.

We aim for high quality and impact in all our activities. Developing the competence of our staff is also important for us. In the coming years, we will invest, for example, in leadership and management competence and increase our international competence. We also aim to grow the number of our international staff and students.

Xamk has its own [ethical principles](#) which are based on Xamk's values. They guide us at Xamk - staff and students alike - to act responsibly and respectfully in our daily lives, both internally and in our relations with customers and partners. Promoting equality and non-discrimination, respecting others, and condemning all inappropriate behaviour, harassment, discrimination, intimidation, and violence are all important parts of the ethical principles. Our ethical principles also encourage open interaction and good management. In accordance with the ethical principles, we strive to recognise our impact on the surrounding society, and we value ethical standards with our partners as well.

In addition to the Equality and Non-Discrimination Policy, Xamk also has an [accessibility plan \(in Finnish\)](#), describing how Xamk's facilities, digital systems, learning environments, teaching methods, and study materials as well as the general attitudes enable the inclusion and equality of people with different personal characteristics and in different life situations. Xamk's accessibility is assessed comprehensively every four years using the accessibility criteria developed by the national OHO project as a framework. You can find the criteria and information on the project online at <http://www.esok.fi/oho-hanke>.

1.2 UN Global Compact and the principles of empowering women

Since November 2020, Xamk has been a member of the UN Global Compact, a corporate responsibility initiative aiming to promote responsible and sustainable business. By committing to the Global Compact, Xamk is involved in promoting the UN's objectives, declarations, and agreements and is committed to complying with the ten principles of the Global Compact related to human rights, labour, environment, and anti-corruption activities. From the perspective of the Equality and Non-Discrimination Policy, the most essential ones of the ten principles of the UN Global Compact are human rights and labour principles, in particular, **principle 1**: Businesses should support and respect the protection of internationally proclaimed human rights; **principle 2**: Businesses should make sure that they are not complicit in human rights abuses; **principle 3**: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; and **principle 6**: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Xamk has also signed the Women's Empowerment Principles (WEPs) developed by UN Women and UN Global Compact ([Women's Empowerment Principles, WEPs](#)) and has introduced the WEPs Gender Gap Analysis Tool to help us assess our performance levels and set ambitious targets to promote equality, diversity, and equal pay.

1.3 Obligations and legal basis

The Equality Act, the Non-Discrimination Act, the Criminal Code, the Constitution, and the Employment Contracts Act provide a framework for the objectives and measures required of the employer concerning the equal and fair treatment of their staff.

Non-discrimination

Under the Non-Discrimination Act (1325/201), **no one may be discriminated against on the basis of age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation, or other personal characteristics**. Discrimination is prohibited regardless of whether it is based on a fact or assumption concerning the person themselves or another person.

Direct discrimination means less favourable treatment of a person on the grounds of personal characteristics when compared with the treatment of others in a comparable situation. **Indirect discrimination** occurs when an apparently neutral rule, criterion or practice puts a person at a disadvantage compared with others on the grounds of personal characteristics. In addition to direct and indirect discrimination, the Non-Discrimination Act also defines discrimination as harassment, denial of reasonable accommodation as well as an instruction or order to discriminate. Proportionate different treatment that aims to promote equality or remove the disadvantages attributable to discrimination does not constitute discrimination.

The employer must, taking into account different grounds for discrimination, assess the realisation of equality **in recruitment and in the workplace**. An employer who regularly employs at least 30 persons must have

a plan for the necessary measures for the promotion of equality. These measures and their effectiveness must be discussed with the personnel or their representatives.

The education provider and the educational institution maintained by it shall evaluate the realisation of equality in their activities and how their activities affect different population groups and take necessary measures to promote the realisation of equality.

Equality

Under the Act on Equality between Women and Men (609/1986), every employer **must promote gender equality** within working life in a purposeful and systematic manner. Direct and indirect discrimination based on gender is prohibited, and the employer shall act in order to promote gender equality. Education providers and employers are also obliged to **take pre-emptive action** in a purposeful and systematic manner **against all discrimination based on gender identity or gender expression**.

Education providers must ensure, firstly, that women and men have equal opportunities for education and professional development and, secondly, that teaching and research activities as well as learning materials support and are in compliance with the Act on Equality between Women and Men. Education providers are also required to prepare an equality plan in cooperation with staff and students that aims to develop their activities. The equality plan must include an assessment of the current equality situation within the institution, the necessary measures to promote equality, and a review of the extent to which measures previously included in it have been implemented and of the results achieved. Special attention must be given to student selections, the organisation of teaching, learning differences and the evaluation of study performance, and to measures to ensure the prevention and elimination of sexual harassment and gender-based harassment.

In order to promote **gender equality**, the **employer** must act in such a way that job vacancies attract applications from both women and men, promote the equitable recruitment of women and men in the various jobs and create for them equal opportunities for career advancement, promote equality between women and men in the terms of employment, especially in pay, develop working conditions to ensure they are suitable for both women and men, facilitate the reconciliation of working life and family life for women and men by paying attention especially to working arrangements, and act to prevent the occurrence of discrimination based on gender.

If an employer regularly has a personnel of at least 30 employees working in employment relationships, the employer shall prepare an equality plan according to which the equality measures are implemented. The equality plan must include an assessment of the equality situation in the workplace, necessary measures planned for introduction or implementation with the purpose of promoting equality and achieving equality in pay, and a review of the extent to which measures previously included in the plan have been implemented and of the results achieved.

1.4 Implementation of the Equality and Non-Discrimination Policy

Xamk's Equality and Non-Discrimination Policy is prepared for two years at a time. In addition, the Policy is reviewed annually and updated as necessary. The Policy is drawn up in cooperation with HR services, the

Sustainability Coordinator, and shop stewards. Students can also influence the content of the Policy during its preparation phase. The Management Team processes and approves the Policy. Before its publication, the Equality and Non-Discrimination Policy will also be discussed in the work community advisory board.

2. WORKING CULTURE, MANAGEMENT, AND COMMUNICATION

2.1 Working culture

Human interaction is necessary to ensure that the work community operates well. It involves encountering diversity and diverse differences of opinion and accepting and respecting them. At Xamk, we treat everyone with respect. We respect and value the diversity of our community, meet everyone as individuals, and treat everybody equally.

Xamk has zero tolerance for harassment and inappropriate behaviour. Everyone has the responsibility and right to intervene constructively and in a solution-oriented manner in any incidents they witness. For this purpose, in addition to the guidelines on harassment and inappropriate behaviour, Xamk has a safety observation notification system, which can also be used to make development proposals. Any shortcomings detected will be addressed without delay.

2.2 Management, decision-making, and supervisory work

Equality and non-discrimination are at the core of Xamk's management culture. Management and supervisors serve as an example for both staff and students. Everyone must feel like they are being treated fairly and that they are appreciated.

Xamk encourages open dialogue and decision-making and follows the principles of good governance. Management and supervisors take equality, non-discrimination, and people's diversity into account in the planning of operations and decision-making. This is supported by appreciative interaction and an encouraging and participatory culture of feedback and initiative. The supervisor promotes the openness and two-way communication of the work community. Supervisors are also responsible for ensuring that the tasks and resources are allocated equally. It is important for us at Xamk to promote and support the wellbeing of our community members and our working ability.

In addition to equal pay for staff, Xamk pays attention to career development, the opportunity to participate in decision-making, and equality between personnel groups. In addition to staff, it is also important to promote participatory interaction for students. Equality surveys targeted at both staff and students are carried out regularly, and the results are used to develop our operations.

2.3 Equality and non-discrimination competence and communication

Equality and non-discrimination themes are included in the supervisor training and the orientation of new staff. Xamk's ethical principles are part of the responsibility training of Xamk employees. The competence and awareness related to equality and non-discrimination issues among all staff members will also be increased through regular training and campaigns.

3 STAFF EQUALITY AND NON-DISCRIMINATION

3.1 Recruitment

Recruitment processes at Xamk are transparent and fair. Applicants have equal opportunities to be selected in accordance with the Equality and Non-Discrimination Act. The job requirements are explained openly, and the recruitment criteria are as transparent as possible. Fixed-term employment relationships are concluded only for justified reasons.

Applicants' merits are always assessed by at least two persons, and the aptitude assessment carried out by an external party is used at least when selecting persons for indefinite employment relationships. Vacancies are always advertised internally on the intranet and on the external website. We support the career development of our staff, for example, by enabling job rotation, staff exchange, and the utilisation of competence across unit boundaries.

In permanent teaching and RDI positions, the application process is also done in English, unless there is a position-related obstacle to this.

3.2 Career development

Xamk values the diversity of different age groups and the versatile expertise they bring to the organisation. Xamk employees are encouraged to keep an eye out for open positions and apply for them according to their interests and competence. The preliminary model of the researcher's career path has been approved by the Management Team, and negotiations on the practical operating model are ongoing. In the future, the goal is to expand the operating model related to the planning of the career path to other tasks.

The goal is for Xamk to also have a diverse age structure. Therefore, older workers are seen as an important resource, and attention is paid to the transfer of tacit knowledge. The special needs of older workers are taken into account individually, and their health is monitored in accordance with the action plan through age group examinations in occupational health care.

3.3 Salary

The pay criteria at Xamk are equal, clear, and based on the collective agreement. The same salary is paid for work with similar levels of difficulty. An annual pay survey is carried out at Xamk, the purpose of which is to increase transparency and openness in tasks with the same requirements. The pay survey is reviewed by the work community advisory board with personnel groups.

3.4 Training

Xamk supports the competence and career development of its staff, taking equality and non-discrimination into account. An orientation plan is drawn up for new employees. Supervisors review competence development needs annually in connection with development discussions and monitor the fulfilment of competence requirements. Employees are offered diverse training opportunities. All personnel groups have the right to spend the same number of working hours on training to develop their professional skills.

3.5 Reconciling free time, work, and family life

If possible, we aim to organise work tasks so that part-time work is possible if the person so wishes. Part-time family leaves are available annually. Part-time work, job alternation leave, and other flexibility arrangements are granted equally.

There are many reasons for part-time work. Part-time employment is often agreed upon at the employee's initiative - for example, parents of young children may feel that it suits their life situation, or a person approaching retirement age may need slightly shorter working hours.

4 STUDENT EQUALITY AND NON-DISCRIMINATION

4.1 Student admission

Everyone has the opportunity to apply for a student place and be admitted to study at Xamk, regardless of their background, personal characteristics, or life situation. The assessment criteria for student learning are transparent and treat students equally.

Xamk offers studies in different forms, such as online, contact, and blended studies, which makes completing studies easier for, e.g., students with families or who work. Regardless of the form of studying, we aim to provide all students with equal access to support and guidance services and the necessary orientations.

4.2 Equal and non-discriminatory learning environment and support services

Xamk's learning environment is tolerant, safe, and fair. Students have the opportunity to be heard and influence the development of their studies and study environment. Learning environments enable accessible and equal opportunities for studying. This is taken into account when planning operating models and physical learning environments.

High-quality guidance and support services support learning and the progress of studies. In addition to the functionality of the processes, the resources of the services are adequate and correctly allocated. Guidance and advisory services follow the principles of gender sensitivity, meaning that the defining characteristics are individual tendencies, competence, and opportunities, regardless of gender.

4.3 Opportunities for influencing and advocacy

In order to promote equality and non-discrimination and to increase interaction, the students' voices are heard in Xamk's decision-making. Student Union Kaakko is an important partner in ensuring this. Among other things, the student union coordinates the selection of student representatives. Student representatives are members of the Board of South-Eastern Finland University of Applied Sciences Ltd, various management groups, teams, and development forums.

5 HARASSMENT

Harassment is behaviour that is deliberately and effectively offensive to dignity. Harassment often involves a threatening, hostile, or aggressive atmosphere.

Anyone who has experienced harassment or inappropriate behaviour should bring up the matter and inform the person who they felt was inappropriate towards them as soon as possible. The employer must intervene without delay after being informed of the situation either from the victim of harassment, through the [Falcony incident reporting system](#), or through an occupational safety and health representative, employee representative, or occupational health care.

Xamk has clear instructions for students in case of harassment and conflicts. The student union protects the students' interests as a statutory task. The student union's staff members include an expert in advocacy and harassment contact persons who have been trained for the task. The task of the harassment contact persons is to listen without judgement and, when requested, intervene in harassment situations. The operation of harassment contact persons is fully confidential. Students also have a functional feedback and feedback-on-feedback system. The contact details of the harassment contact persons and more detailed instructions for reporting harassment can be found on the Kaakko website: [Harassment contact persons – Student Union Kaakko](#)

Whistleblowing channel

Xamk has a [Whistleblowing channel](#) through which you can confidentially report suspected offences, violations, or abuses. The Whistleblowing channel is a tool for maintaining the ethical principles and trust. Our entire organisation and our employees are required to comply with the ethical principles and legislation applicable to our organisation in their daily work. If an employee or a person otherwise in contact with our organisation suspects violations, they can submit an anonymous report on the matter through the whistleblowing channel.

6 CURRENT STATUS AND MONITORING

6.1 Assessment of equality and non-discrimination at Xamk

Under the Non-Discrimination Act, the employer must, taking into account different grounds for discrimination, assess the realisation of equality and the related risks in recruitment and in the workplace. The education provider and the educational institution maintained by it must also assess how their activities affect different population groups.

In higher education institutions, age discrimination may target people of different ages, and discrimination may target any age group. Age must not be a deciding criterion for admission, assessment of student learning, recruitment, or career development. Particular attention must be paid to the equality and non-discrimination of older people, young people, or recent graduates and those of reproductive age.

As Xamk strives for internationalisation, the diversity of students and staff will also increase. The multicultural nature of the higher education community increases when members of the community come from different native languages, origins, or nationalities. Especially those belonging to visible minorities are vulnerable to racism and discrimination. A multicultural community requires tolerance, non-discrimination, and education to function. Different religions, beliefs, and opinions must also be respected and their diversity accepted. Education and information are used to dismantle prejudices and prevent discrimination. In addition, concrete measures should be taken to ensure the realisation of calm facilities for prayer use or the possibility of special diets in accordance with beliefs.

Persons with disabilities and with otherwise limited functional capacity may easily be underestimated in recruitment, studies, and the workplace. There is a need to increase understanding that a person who needs aids or other support in order to function is a valuable member of the higher education community whose competence is a resource. No one may be discriminated against due to disability, limitation of functional capacity, or health. We aim to provide students with the necessary individual teaching arrangements on request to enable them to complete their studies. Every person's state of health is a private matter, and each person can decide for themselves what help or special arrangements they would like to have and what they tell others about their health or disability. The education provider and the employer must make reasonable adjustments to the person with a disability. In Xamk, accessibility is assessed every four years.

At Xamk, we understand that gender is diverse, and everyone's experience of gender is individual. Everyone has the right to their own gender identity and gender expression, and equality cannot only be reduced to the equal status and rights of women and men. It is important to identify and intervene in discrimination

and harassment based on a person's gender identity or gender expression. In the name of equality, concepts related to gender diversity must be adopted in communications. The diversity of sexual orientation must also be taken into account in communications. No one may be discriminated against on grounds of gender or sexual orientation, and no one is obliged to disclose their sexuality or family relationships if they do not directly affect their work.

Attention must also be paid to multiple discrimination and the challenges it poses to equality. Often, discrimination and anti-discrimination measures are only examined from the perspective of one reason for discrimination, but in reality, an individual may be discriminated against because of several characteristics.

Breakdown of the placement of men and women in different positions at Xamk:

	2022			2021			2020		
	miehet	naiset	yht.	miehet	naiset	yht.	miehet	naiset	yht.
Henkilöstö yht	331	560	891	344	570	914	321	543	864
HTP-henkilöstö yht	206	349	555	218	356	574	197	340	537
Atk-henkilöstö	16	4	20	15	5	20	16	5	21
Kirjastohenkilöstö	5	18	23	5	19	24	5	22	27
Huoltohenkilöstö	8	3	11	9	4	13	10	4	14
Hallintohenkilöstö	27	58	85	27	57	84	21	57	78
Opetuksen tukihenkilöstö	22	77	99	20	69	89	15	71	86
TKI-henkilöstö	126	170	296	140	182	322	127	160	287
Muu (ravintolat)	2	19	21	2	20	22	3	21	24
Opetushenkilöstö yht	125	211	336	126	214	340	124	203	327
Yliopettaja	13	20	33	15	21	36	15	17	32
Lehtori	96	185	281	94	187	281	94	181	275
Tuntiopettaja	16	6	22	17	6	23	15	5	20

Pay comparison

At Xamk as a whole, the average salary of women (duty-specific salary without bonuses) is, on average, slightly lower than that of men. The average salary of women in 2022 was 97.8% of the average salary of men. For teaching staff, the average salary of women was slightly higher than that of men. The table does not include contractual salaries (supervisors).

Naisten keskipalkka/miesten keskipalkka henkilöstöryhmittäin,%	2022	2021	2020
Opetushenkilöstö	100,3	100,6	100,3
HTP-henkilöstö	96,5	95,6	95,5
Yhteensä	97,8	98,1	98,5

6.2 Monitoring and support material

The information required by the Equality and Non-Discrimination Policy is compiled annually in a personnel report, which also includes the results of the pay survey.

The personnel report monitors:

- number and structure of staff

- distribution of staff by personnel group
- gender distribution of staff
- share of full-time and part-time employment
- staff turnover
- age distribution of staff
- sick leaves and accidents
- salaries and compensation
- staff training days and structure

The effectiveness of the measures included in the Policy is monitored by means of an annual work community survey and a biannual equality survey.

Results and development proposals are reviewed by Xamk's Management Team, the work community advisory board, and the occupational safety and health committee. The results of the survey are published for staff on Lux.

For students, the equality and non-discrimination situation is monitored once every two years by means of a survey conducted in autumn. In addition, students' equality and non-discrimination are assessed through student statistics.

Harassment cases are monitored to the extent that they are reported, for example, through the incident reporting system. Harassment cases are recorded by the Head of Preparedness and Safety and the Occupational Safety and Health Manager.

In autumn 2023, Xamk assessed the progress of its equality and non-discrimination work by using the UN Women and the UN Global Compact's WEPs **Gender Gap Analysis Tool** for the first time. The tool assesses equality in four different themes: leadership, workplace, marketplace, and community. Issues covered by the assessment include gender equality strategy, equal pay, recruitment, and equality in supply chains. The realisation of commitment, implementation, measurement, and transparency is assessed for each theme.

This first assessment was carried out using personnel data from 2022. Xamk scored 60/100 and achieved the commendable Achiever level. Globally, only around 4% of companies have reached the best level, Leader (75/100 or more). According to the results, the biggest room for improvement at Xamk was in promoting equality and non-discrimination outside the organisation in the surrounding society, supply chains, and stakeholders. There is also room for improvement in the proportion of women in senior management.

The results of the Gender Gap Analysis Tool are not public and are intended only for internal use by the organisation. However, the tool makes it possible to monitor the organisation's own progress if it is used annually. The next time Xamk uses the tool, it will assess data from 2023 in the summer of 2024.

Results of the staff and student equality survey 2023

The staff equality survey is conducted once every two years as a separate survey in connection with the work community development survey. In 2023, the survey yielded 442 responses. The student equality survey is also conducted once every two years as a separate survey. In 2023, the survey was carried out for all Xamk students for the first time, whereas the target group in previous years' surveys had been students who had completed approximately 50% of their studies. The student survey yielded a total of 801 responses.

In 2023, minority status was added as a background question, and non-binary was added as a gender option in both surveys. The goal of this was to promote diversity in the higher education community and make every employee and student's voice heard. More detailed questions about the reporting of harassment or inappropriate conduct were also added to the survey, as well as whether the outcome of the reporting was satisfactory. These questions provide information on the possibilities of staff and students to intervene in harassment or inappropriate conduct.

According to Xamk's **staff**, women and men are treated equally in the workplace. Of the respondents, 87.6% fully or partly agreed with this statement. In the open-ended responses, there were several requests to develop supervisory skills to achieve an equal and non-discriminative working community. In addition, there were requests for more transparency and increased staff involvement in decision-making. The respondents also wished for joint instructions on equality, transparency, and non-discrimination. Approximately 13% of the respondents had experienced discrimination or unequal treatment, which is slightly more than in the previous two years. Most of these situations have occurred in the assignment of work duties and division of workload. Of the respondents who had experienced or observed harassment, approximately 62% had reported the harassment. Only in about a third of the reported harassment cases did the person who reported the harassment feel that the reporting led to any measures.

Of Xamk's **students**, 79.1% fully or partly agreed that women and men are treated equally at Xamk. In the open-ended responses, students wished for gender sensitivity and the breaking of gender stereotypes, especially when it comes to different fields of education. The respondents also suggested more training on equality and inclusiveness for staff and students. Of the respondents, 9.6% had experienced discrimination or unequal treatment. The number has more than doubled from the previous survey (2021/4.7%), although the survey's target group is also larger than before, which may have affected the results. Discrimination and unequal treatment have been experienced most in course-related assignments, obtaining study counselling, group assignments, and obtaining access to flexible study opportunities. The reason for discrimination or unequal treatment was most often seen to be the student's personal characteristics, opinions, gender, or educational background. Of the persons who had experienced harassment, only 41% had reported the harassment. Of the respondents who had observed harassment, only 30% had reported the harassment. In both experienced and observed harassment cases, approximately 30% of the respondents felt that the reporting had led to measures. Less than 30% of those who reported, on the other hand, were satisfied with the outcome of the reporting.

Based on the results of the survey, it can be said that there is a need to provide more information about the different channels through which a harassment report can be made. The processing of harassment reports must be more consistent and systematic to reach a proper result in each harassment case.

6.3 Measures and assessment of the previous Policy

The objectives of the previous Equality and Non-Discrimination Policy and the assessment of their realisation:

Objective	Responsible party	Schedule	Realised
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Appointment of an equality contact person	Workplace Wellbeing Coordinator, Sustainability Coordinator	January 2023	x
Training/orientation <ul style="list-style-type: none"> - for recruiters - for supervisors - entire organisation 	HR Development Coordinator, Sustainability Coordinator	October 2023	Training implemented for supervisors and information provided to the entire organisation
Updating the equality survey	Workplace Wellbeing Coordinator, Sustainability Coordinator	January 2023	x
Updating the Equality and Non-Discrimination Policy	Workplace Wellbeing Coordinator, Sustainability Coordinator	regularly every six months	x

7 MEASURES TO DEVELOP EQUALITY AND NON-DISCRIMINATION

Objectives, shared responsibilities, and monitoring plan of the Equality and Non-Discrimination Policy 2024–2025:

Objective	Background	Implementation	Monitoring indicators	Responsibility
Prevention of discrimination	Strategy: equal and fair treatment	<ul style="list-style-type: none"> - Ethical principles to be included in staff orientation - Ethical principles for student orientation - Training and campaigns: anti-racism and inclusion 	Updating staff orientation, updating the orientation of new students, number and implementation of campaigns	Sustainability Coordinator, Communication

Increasing staff diversity	Strategy: internationalisation	-Diversity clause for job advertisements - Adding an aim to the recruitment guidelines of the diversity of interviewers, if possible -Checking the formatting of job advertisements (gender neutrality)	Job search statistics, new recruitments	HR
Promoting gender equality at every level of the organisation	WEPS Gender Gap Analysis Tool: proportion of women in senior management	Considering gender equality in changes in senior management composition	% of men and women in senior management	
Dismantling of gender stereotypes in studies	The need identified in the 2023 student equality survey	The aim is to use communication methods to shape ideas about traditionally male and female-dominated fields	Application statistics	Communication
Clarifying the process of dealing with harassment cases	The need identified in the 2023 equality survey	A process description to be created for the incident handling process	Process description attached to the Equality and Non-Discrimination Policy	Sustainability Coordinator, Student Union Kaakko
Ensure that (working) conditions and facilities are suitable for everyone regardless of gender	The need has been identified e.g., in a student thesis (Piispa, 2022)	Ensuring adequate facilities (including dressing rooms and sanitary facilities) where possible, regardless of gender		Property Services