

# STATE RESEARCH INSTITUTE CENTRE FOR INNOVATIVE MEDICINE

## EQUAL OPPORTUNITIES POLICY

### CHAPTER I

#### GENERAL PROVISIONS

1. The Equal Opportunities Policy (hereinafter – the Policy) of the Centre for Innovative Medicine of the State Research Institute (hereinafter – IMC) regulates the principles of promoting non-discrimination, equal opportunities and gender equality at IMC, the procedure for submitting and examining reports of discrimination and violations of equal opportunities, and the measures for protecting and assisting persons who have reported discrimination and violations of equal opportunities.
2. The Policy applies to employees working at IMC.
3. The Policy applies with respect to the protected grounds of discrimination established in the Law on Equal Opportunities of the Republic of Lithuania and the Labour Code of the Republic of Lithuania.
4. The concepts used in the Policy are understood as defined in the Law on Equal Opportunities, the Law on Equal Opportunities for Women and Men of the Republic of Lithuania, the Labour Code, and the Law on Social Integration of Persons with Disabilities of the Republic of Lithuania:

**4.1. Employee** – a natural person working at IMC under an employment contract.

**4.2. Discrimination** – direct and indirect discrimination, harassment, sexual harassment, or an instruction to discriminate on the grounds of sex, race, nationality, ethnic origin, language, origin, social status, religion, faith, beliefs or views, age, sexual orientation, disability, state of health, family or marital status, or membership of a political party or association.

Discrimination may be direct, indirect, or discrimination by association. Discrimination by association is considered to be the discrimination of a person due to an actual or presumed connection with another person on the grounds of that other person's sex, race, colour, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, state of health, ethnic origin, religion, or other characteristics unrelated to the employee's professional qualities, including on several of these grounds combined. Discrimination also includes an instruction to discriminate, discrimination based on a mistaken perception, harassment, sexual harassment, and failure to provide an accessible environment for persons with disabilities. Discrimination based on a mistaken perception is considered to be a restriction on the exercise of rights, or the granting of privileges, preference or advantage, on the grounds of sex, race, colour, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnic origin, or religion, based on a mistaken belief that a person has or does not have one or more of the characteristics listed. An accessible environment means the necessary and appropriate changes and adaptations required to ensure that persons with disabilities can receive information through accessible means of communication and participate in the activities of IMC.

**4.3. Comparative assessment of qualifications** – when selecting candidates for a particular position, an assessment of their qualifications and competencies, professional achievements, and suitability for the position, comparing them with one another.

**4.4. Equal opportunities** – the implementation of human rights enshrined in international human and civil rights instruments and in the legal acts of the Republic of Lithuania, irrespective of sex, race, nationality, citizenship, ethnic origin, language, origin, social status, religion, faith, beliefs or views, age, sexual orientation, disability, state of health, family or marital status, or membership of a political party or association.

**4.5. Violation of equal opportunities** – failure to comply with the principles established in this Policy and/or the measures for their implementation, and/or the failure to perform, or improper performance of, related obligations.

**4.6. Principle of equal opportunities** – the fundamental provision governing the implementation and monitoring of equal opportunities and diversity.

**4.7. Indirect discrimination** – an act or omission, a legal provision or evaluation criterion, or an apparently neutral condition or practice, which is formally the same for everyone but which, when implemented or applied, results or may result in an actual restriction on the exercise of rights, or in the granting of privileges, preference or advantage, on the grounds of sex, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, state of health, ethnic origin, religion, family or marital status, unless such act, omission, legal provision, evaluation criterion, condition or practice is justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

**4.8. Trust line** – an internal reporting channel administered by IMC, intended for the anonymous and confidential reporting of legal violations committed by IMC employees or business partners that pose a threat to, or infringe, the public interest.

**4.9. Policy** – the IMC Equal Opportunities Policy, this document.

**4.10. Report** – information provided in any form (orally, in writing, by telephone, or by e-mail) by a reporting person regarding an alleged, ongoing, or intended violation of equal opportunities.

**4.11. Sexual harassment** – unwanted conduct of a sexual nature, expressed verbally, in writing, or physically, directed at a specific person, the purpose of which is to violate that person's dignity, and which creates an intimidating, hostile, degrading, or offensive environment.

**4.12. Social status** – a person's status determined by their family status, education attained, qualifications or studies undertaken at educational and research institutions, property owned, income received, need for state support as established by legal acts, and/or other factors related to the person's financial situation.

**4.13. Direct discrimination** – treatment of a person, on the grounds of sex, race, nationality, ethnic origin, language, origin, social status, religion, faith, beliefs or views, age, sexual orientation, disability, state of health, family or marital status, or membership of a political party or association, whereby that person is treated less favourably than another person is, has been, or would be treated in comparable circumstances, except where restrictions permitted by legal acts apply.

4.14. Other concepts used in the Policy are understood as defined in the Law on Equal Opportunities of the Republic of Lithuania, the Law on Equal Opportunities for Women and Men of the Republic of Lithuania, the Labour Code of the Republic of Lithuania, and the Law on Social Integration of Persons with Disabilities of the Republic of Lithuania.

## CHAPTER II

### IMPLEMENTATION OF EQUAL OPPORTUNITIES IN THE ACTIVITIES OF IMC

5. Discrimination is prohibited at IMC. IMC ensures Equal Opportunities for Employees and does not tolerate Direct or Indirect discrimination in any area of its activities.

6. IMC promotes a working environment that reflects the diversity of society and applies the principles of tolerance and respect for diversity in its activities.

7. In implementing equal opportunities for persons seeking employment, IMC ensures that:

7.1. persons seeking employment at IMC are subject to non-discriminatory selection conditions and criteria, based solely on the professional requirements applicable to the candidate;

7.2. when advertising vacancies at IMC:

7.2.1. gender-sensitive language is used (e.g., indicating that a "researcher (male or female)" is being sought);

7.2.2. the accessibility of job advertisement information is ensured for persons with disabilities and/or persons with individual needs who are seeking employment;

- 7.2.3. IMC's commitment to promoting equal opportunities for its employees is indicated;
- 7.2.4. the possibility of adapting the selection procedure for persons with disabilities and/or individual needs who are seeking employment is indicated;
- 7.2.5. more than one method of enquiring about the vacancy, accessible through different senses, is indicated (e.g., the e-mail address and telephone number of the contact employee).
- 7.3. the selection procedure for persons seeking employment at IMC is carried out without discrimination;
- 7.4. persons with disabilities and/or individual needs who are seeking employment, having informed in advance the IMC structural unit responsible for activity management, are provided with accessible conditions to participate in the selection process (e.g., premises accessible to the person where the selection takes place, permission for a sign language interpreter to participate in the job interview, etc.);
- 7.5. discriminatory criteria are not applied when deciding on the recruitment of a person seeking employment, the future working time arrangement, the type of employment contract to be concluded, or other criteria;
- 7.6. having informed in advance the IMC structural unit responsible for activity management, the accessibility of information is ensured for employees with disabilities when signing the employment contract and other recruitment documents, and opportunities are provided to become familiar with the documents in alternative forms of communication (e.g., plain language, etc.).
- 7.7. goodwill and mutual trust among Employees are promoted, and an inclusive, productive atmosphere that fosters diversity is created.
- 7.8. the rights of Employees are respected and protected, they are treated fairly and with respect, and working conditions that are safe and suited to their needs are created.
- 7.9. the best use and development of Employees' abilities is promoted, and Employees are not discriminated against in any form.
- 7.10. Employees must be honest, objective, and open to diversity, must not humiliate other Employees, and must adhere to the highest principles of Equal Opportunities and respect for human rights.
- 7.11. Employees, in their dealings with one another and/or with third parties, must behave with respect and professionalism. Insulting and/or degrading comments, epithets, or statements concerning protected grounds of discrimination are prohibited at IMC.
- 7.12. Employees' working conditions, remuneration, additional benefits, and other aspects of work organisation are established with a view to ensuring Equal Opportunities and helping Employees to reconcile work, private life, and family responsibilities.
- 7.13. every Employee, irrespective of sex, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, state of health, ethnic origin, membership of a political party or association, religion, family or marital status, has the right to receive remuneration for work that depends on the functions performed, the quality of work, and professional and vocational abilities, but not on characteristics of the Employee unrelated to the work performed.
- 7.14. IMC is responsible for the implementation of the principles of Equal Opportunities, the dissemination of information, and the ongoing review of progress.
- 7.15. a violation of this Policy and/or the principles of Equal Opportunities may be regarded as a gross breach of work duties.

### **CHAPTER III**

#### **MEASURES FOR IMPLEMENTING THE PRINCIPLES OF EQUAL OPPORTUNITIES AND DIVERSITY**

8. In implementing the principles of Equal Opportunities, IMC:

8.1. when recruiting, applies uniform selection criteria and conditions based on objective and impartial work-related professional criteria, except where, due to the specific nature of a particular type of professional activity or the conditions under which it is carried out, a certain personal characteristic constitutes a genuine and determining occupational requirement, provided that the aim is legitimate and the requirement is proportionate;

8.2. provides equal working conditions and an equally safe and healthy working environment for the performance of the required work functions, provides the work equipment and tools, and protective equipment, necessary to perform the work, depending on the nature of the activity, provides opportunities for flexible working conditions, and grants equal benefits;

8.3. provides equal opportunities for professional development at work, further training, retraining, gaining practical work experience, participating in training programmes, realising professional and vocational potential, and developing a career based on professional competencies, experience, and abilities;

8.4. grants additional benefits determined on a uniform basis;

8.5. applies uniform criteria and procedures for evaluating Employees' performance;

8.6. applies uniform criteria for dismissal from employment;

8.7. pays equal remuneration for the same work or work of equal value;

8.8. plans actions to promote diversity among Employees and assesses their effectiveness;

8.9. ensures that Employees do not experience Discrimination, Harassment, or Sexual harassment in the workplace, and that no instructions to discriminate are given;

8.10. provides Employees and other interested persons with the opportunity to report possible violations of the principles of Equal Opportunities, and undertakes to examine such reports in accordance with the established procedure;

8.11. ensures that an Employee who has reported a possible violation of Equal Opportunities is not persecuted and is protected against hostile treatment or negative consequences. These circumstances may not constitute grounds for terminating the employment relationship with such an Employee;

8.12. takes appropriate measures to ensure that persons with disabilities have access to employment, may work, pursue a career, or undergo training, including appropriate adaptation of premises, provided that such measures do not impose a disproportionate burden on the employer.

9. In implementing the principles of Equal Opportunities, Employees:

9.1. are guided in their activities by the provisions of the Policy;

9.2. do not tolerate discrimination, humiliation, harassment, violence, or insults directed at themselves, other Employees, or other persons;

9.3. inform the employer of possible violations of the principles of Equal Opportunities and diversity.

## **CHAPTER IV**

### **PROCEDURE FOR SUBMITTING AND EXAMINING REPORTS**

10. Employees or other interested persons must report a possible violation of the principles of Equal Opportunities using the contact details specified in point 11 of the Policy, no later than one (1) month from the date on which the violation of equal opportunities was committed or became known.

11. Reports of possible violations of Equal Opportunities may be submitted by e-mail to [pranesk@imcentras.lt](mailto:pranesk@imcentras.lt).

13. A report of a possible violation of Equal Opportunities must include the following information: the name, surname, and position of the Employee who allegedly committed the violation of Equal Opportunities, the specific possible violation of Equal Opportunities and the circumstances thereof, and the process that gave rise to the possible violation of Equal Opportunities and diversity.

14. A report of a possible violation of Equal Opportunities is examined by an Investigation Commission established by order of the IMC Director, in accordance with the procedure established by its rules of procedure.

Information concerning such a report is subject to confidentiality and may not be provided to persons who are not involved in the possible violation or its investigation. The data of the person who submitted the report, and other information that would directly or indirectly allow that person to be identified, are processed solely for the purpose of performing work functions.

Upon receipt of a report, an Investigation Commission is established without delay, but no later than within three (3) working days from the date of receipt of the information, by order of the IMC Director, and is briefed on the report received. The report must be examined within as short a time as possible, but no later than within one (1) month from the date of receipt of the report. At its first meeting on the report, the Commission assesses whether the information provided in the report is sufficiently clear and, if necessary, contacts the person who submitted the report to clarify the circumstances of the case indicated in the report, and sets a date for the next meeting, to which persons connected with the circumstances indicated in the report are invited (the person whose actions were reported, the person who submitted the report, and, if necessary, persons providing testimony or explanations). The person who submitted the report and the person whose actions were reported are heard separately during the examination of the report.

Once the Commission has assessed all the data collected during the examination of the report, a decision is taken as to whether the report is well-founded and whether the circumstances indicated in it have been confirmed. The person who submitted the report and the person whose actions were reported are each separately informed in writing of the decision taken.

If it is established that the report was well-founded, the Commission shall submit a reasoned proposal to the IMC Director to address the matter of applying disciplinary or official liability to the person who committed the violation. Such a proposal shall be accompanied by data and information substantiating the factual circumstances.

15. From the date on which a report is submitted, it is prohibited to threaten the person who submitted the report because of the submission of the report, or to take or attempt to take any measures of negative impact against that person (for example, threatening reprisals, restricting career opportunities, unreasonably questioning competence, suspending training, negatively assessing work performance or providing negative feedback about the employee, reducing remuneration, etc.). The prohibition on causing negative impact to the person who submitted the report applies to all IMC employees.

16. If the person who submitted the report works with, or is subordinate in an employment relationship to, the person against whom the report was submitted, the Commission must consider what measures it would be appropriate to take in order to protect the complainant from possible negative impact. The Commission shall submit proposals to the IMC Director in this regard.

17. If the information received concerning discrimination gives reasonable grounds to believe that a criminal act, an administrative offence, or another violation may have been committed, by decision of the Commission, and having obtained the written consent of the person who submitted the report, this information shall be forwarded without delay to the authority competent to investigate it.

18. Persons also have the right to report discrimination directly to the person responsible for their recruitment or appointment, or to the authority competent to investigate such violations.

## **CHAPTER V**

### **IMPLEMENTATION OF THE POLICY**

19. In order to ensure the effective implementation of the Policy, a plan of measures for implementing the Policy is approved by order of the IMC Director, setting out the measures aimed at improving the situation regarding equal opportunities at IMC, the objectives of these measures, the implementation deadlines, and the persons responsible for their implementation.

20. The plan of measures for implementing the Policy is drawn up taking into account the information available to IMC, assessments carried out of the situation regarding equal opportunities at IMC, and proposals from other institutions.

## **CHAPTER VI**

### **FINAL PROVISIONS**

21. All IMC employees must be made familiar with the Policy through the document management system and, in performing their work functions, must be guided by the principles established in this Policy.

22. The personal data of Employees and persons seeking employment at IMC are processed for the purposes of investigating discrimination at IMC and carrying out actions provided for in legal acts, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), and other legal acts governing the protection and processing of personal data. Documents referred to in the Policy, or other documents submitted substantiating the circumstances indicated in a report of discrimination or a violation of equal opportunities, are stored in accordance with the procedure established by the Law on Documents and Archives of the Republic of Lithuania, for the periods established by the Chief Archivist of Lithuania.

23. The Policy is approved and amended by order of the IMC Director.

24. Employees are periodically informed about the results of the implementation of the Policy.

25. The Policy is published on the IMC website.