

Activity and reporting obligation: Assesment of 2023 and action plan for 2024

Last updated: 29.02.2024.

The “Aktivitets- og redegjørelsesplikt” (roughly translated: Activity and reporting obligation -ARP) was introduced by the Norwegian Government in 01.01.2020. See legislation here: [Act relating to equality inforand a prohibition against discrimination \(Equality and Anti-Discrimination Act\) - Lovdata.](#)

It states that employers in private enterprises with more than 50 employees shall work actively to promote equality and prevent discrimination through a specific working method laid down in [section 26 of the Equality and Discrimination Act.](#) CMI has more than 50 employees and is therefore obligated by law to work annually using this specific four-step method to promote equality and prevent discrimination in CMI.

The assessment outlined in this report uses the mandated four-step method to document and assess the previous year (2023). To be specify, steps 1-2. The Action plan is step 3: setting concrete steps for CMI to undertake in 2024 to actively promote equality and prevent discrimination. The Action plan will be evaluated (step 4) at the end of 2024.

What does work with equality and discrimination entail?

This is the basis employers are now required to work with:

- Gender
- Pregnancy, maternity leave or adoption, care tasks
- Ethnicity, religion, outlook on life
- Disability
- Sexual orientation, gender identity, gender expression
- Combinations of these basics

The ARP is twofold:

1. **Activity obligation:** work actively by using the four-step method to promote equality and prevent discrimination.
2. **Reporting obligation:** report every year in the Annual Report (Årsrapport) the statistics that shed light on our employee demographics and other equality/discrimination markers.

Four-step method is obligatory.

The four-step method laid down in [section 26 of the Equality and Discrimination Act](#) that is used for the Activity obligation is as follows:

1. Document the status quo and map potential risks (kartlegging av status og risiko)

2. Analyze the results found in step 1.
3. Identify and implement steps to address this (tiltak)
4. Evaluate results.

CMI first completed the Activity and Reporting Obligation (ARP) in 2020.

This plan for ARP for 2023-2024 is as follows (step 1-4 as listed):

1. Document the status quo and map potential risks: January 2024. This is to be done by the HR Director, and the Administration and Finance Director.
2. Analyze the results found in step 1: 19th of January 2024 by the HR Director in close collaboration with the Administration and Finance Director.
 - a. Share the results found in step 1 and preliminary analysis with CMiff.
3. Present the findings in step 1 in the Working Environment Committee (AMU/WEC) meeting the 22nd of January. Discuss risks and potential action points. Send the comments to the union, ask for a meeting with the union to discuss risks and potential action points [meeting held 14.02.2024; step 2].
4. Identify and implement steps to address this: in the February WEC/AMU meeting the 20th of February. The union representative joined this WEC meeting to contribute with the union input. The action plan draft should be completed by the HR Director and the Union representatives in close collaboration with the Working Environment Committee.
5. Finalize the action plan by the 15th of March 2024.
 - a. The Action plan will then be assessed by the HR Director, Administration and Finance Director and CMI Director to see if the steps are realistic and in line with CMI's overall strategy.
 - b. After the assessment the final action plan will be shared with the Unions, CMI management and the WEC/AMU.
6. Evaluate action plan progress and results: November 2024 by the HR Director. The evaluation is usually shared in a WEC meeting where the union representative is invited. Unions, CMI management and the WEC/AMU are entitled to receive a copy of the evaluation.

The 4-step method is to be done in close collaboration with the employee Union.

Set topics CMI is obligated to assess and focus on in the four-step method:

- Recruitment
- Promotion and development opportunities
- Facilitation and opportunity to combine work and family life
- Wages and working conditions
- Working environment, harassment, sexual harassment, and gender-based violence

Process:

We have used the [prepared forms](#) made by [The Norwegian Directorate for Children, Youth and Family Affairs](#) (Bufdir) and followed the mandated four-step method. HR and the Administration and Finance Director (Sjøberg) prepared Step 1 of the four-step method, and the Unions were given the opportunity to participate actively in Step 2. Step 3 (setting specific steps to promote equality in CMI) was a collaboration between HR, the Administration and Finance Director, the Working Environment Committee, and the employee Union at CMI (Aslak Orre representing CMiff- Forskerforbundet). The data

information is primarily sourced from our HRM-system Simployer, wage-system Visma and recruitment-system JobbNorge.

Step 1: Document the status quo and map potential risks (kartlegging av status og risiko)

Recruitment:

CMI primarily recruits via the JobbNorge system, and we have therefore based our analyses on data from this system. This report was taken the 17.01.2024. Per 17.01.2024, CMI had 267 applicants in 2023 through the JobbNorge system and 8 job announcements (9 positions in total). Please note that two recruitments in 2023 (with three positions): U4 Director and Poverty Researcher, were not completed in 2023.

6 positions were finalized per 17.01.2024. Please note that these are recruitment processes that commenced in 2023, some of the candidates hired will start in CMI in 2024). The following findings are based on reports on these applicants.

- Age:

Applications aged:	2023	2022	2021
20-29	20,6%	9,3%	N/A
30-39	47,9%	44%	39,3%
40-49	19,9%	32%	23,7%
50 plus	10,8%	13,4%	9,9%

Additionally, 0,7% av the applicants were under 20 years of age in 2023. The most significant difference in 2023 was the increase in applicants in the age of 20-29, which increased from 9,3% in 2022 to 20,6% in 2023. Additionally, there is a decline in candidates aged 40-49 (reduction from 32% in 2022 to 19,9% in 2023). This was most likely due to the position types that were announced (several junior positions).

Average Age, Hired candidates	2023	2022	2021
Female	32 (3 hires)	46 (one hire)	35,7
Male	32,66 (3 hires)	42,8 (five hires)	44
Both sexes	32,33	43,33 (six hires)	38,2

- Compared to 2022, we see a decrease in the age for hires in 2023. However, it is important to underline that the age span is from 23 to 46 years of age.
- When we look at all staff (including emeritus/emerita, associate researchers etc., relative to man-years) the age compensation of existing staff is as follows:
 - Aged 20-29: 2,89% [2022: 1,99%]

- Aged 30-39: 32,17% [2022: 30,73%]
- Aged 40-49: 29,2% [2022: 30,09%]
- Aged 50 +: 21,8% [2022: 20,98%]

- **Nationality (Citizenship):**

Citizenship (applicants)	2023	Citizenship (applicants)	2022	2021
Norway	21,42% (57 applicants)	Norway	12,6% (19 applicants of 150 applicants)	19%
EU/EEA (U.K. included, Norway excluded)	18,79% (50 applicants)	Applicants from countries outside of Norway	86% (129 applicants of 150 applicants)	81%
Outside the EU/EEA (excluding U.K.)	59,77% (159 applicants)	Number of Countries outside Europe and Scandinavia	72,9% (35 countries of 48 countries)	50,7%

- Of the 6 individuals we employed in 2023, 3 were from Norway, 1 from the U.K., 1 from Austria, and 1 from Peru.

- **Disability:** CMI has no applicants who registered a disability or immigrant background in 2023. That is to say that the applicants have not marked a disability or immigrant background in their applications, not that we have not had any applicants with disability/immigrant background.

- **Gender:**

Applicants/Hired candidates	2023	2022	2021
Male – Applicants	57,7%	65,3%	58,8%
Female – Applicants	40,8%	33,3%	41,2%
Male – Hired	50%	83,3%	27,2%
Female - Hired	50%	16,7%	72,7%

- The gender-balance in CMI is as follows (2024): 41,9% men and 58,1% women. Meaning this is a need for future effort to achieve gender-balance. However, it is worth mentioning that some units are predominately male, and others are predominately female.

- **Language:** We advertise in both English and Norwegian, but we only allow advertisement in Norwegian when proficiency in Norwegian is a requirement for the position. In 2023, we advertised 12,5% of our positions in Norwegian, this was 1 position in the administration. This position required one to be able to communicate with partners in Norwegian and be able to

navigate and read Norwegian legislation/compliance rules. We advertised 87,5% of our positions in English in 2023. English is CMI's working language.

Step 3: Specific steps in recruitment to promote equality and prevent discrimination:

1. **Update the evaluation form** template used in CMI recruitment processes, so that there is a summary section that clearly outlines the assessment of the successful candidate. This will focus on the qualifications that have resulted in their selection for the position but will be written in a way that ensures anonymity [as the candidates have not been hired yet] and does not share personal information [due to GDPR]. This section can then be shared in the CMI Management Team meetings minutes. This should also be used for direct recruitment.
2. **Use precise terminology:** when writing the evaluation form and communicating recruitment decisions it is important to use precise and clear language. This is to avoid uncertainty around the selection process and criteria for a position at CMI.
3. **Information regarding recruitment process:** CMI already has an extensive recruitment process and policy in place. Information regarding this recruitment process should be conveyed even more clearly in the personnel handbook.
4. **Inclusive recruitment:** a section asking the recruitment committee to identify relevant, inclusive recruitment channels has been added to the job analysis form. It is important to ensure that recruitment processes in 2024 use this section to ensure inclusive recruitment (meaning the job announcement is made available to a diverse audience of applicants). As outlined in CMI's recruitment policy, the selection criteria set for the candidates should be based on the job analysis to ensure that the selected candidate is selected due to legitimate criteria, and not a candidate preference.
5. **Internal information:** continue to use the management team meeting minutes, the Friday Update and the 'Need-to-know' to share important information regarding processes and decisions with staff members.

Promotion and development opportunities

Promotion opportunities:

- **Criteria:** The criteria for promotion opportunities are detailed in our Special Agreement (Særavtale).
- **Status:** CMI has used committees with both internal and external members to assess promotions in 2023 for research positions; for promotions in the administration CMI has used committees with internal members. For Post Doc tenure track employees applying for Researcher 2 status, the Tenure Track Committee completes the evaluation. In addition, leadership positions can be filled by management decision.
- **Data findings:** Of the 12 promotions at CMI in 2023, 8 av them were women. Please note that two of the promotions were granted to the same female CMI employee.

#	Gender	Position	Promoted to	Assessment by
1	Female	Research Assistant	Adviser	Management decision
2	Female	Adviser	Senior Adviser	Internal committee

3	Female	Programme Adviser	Senior Programme Adviser	Internal committee
4	Male	Senior Researcher	Interim Research Director	Management decision (temporary leadership position)
5	Male	Senior Adviser	'Heads of' title and personnel responsibility	Management decision.
6	Female	Research Director	Interim U4 Director	Management decision (temporary leadership position)
7	Female	Adviser	Senior Adviser	Internal committee
8	Female	Senior Programme Adviser Principal Programme Adviser	Principal Programme Adviser Interim U4 Deputy Director	Committee with internal and external members Management decision (temporary leadership position)
9	Male	Post doc. researcher (project)	Senior Researcher	Applied in open call and was hired
10	Female	Head of HR	HR Director	Management decision
11	Female	Doctoral Researcher (PhD)	Post Doc. Tenure Track	Management decision

Step 3: Specific steps in promoting opportunities to promote equality and prevent discrimination:

1. **Clear promotion criteria:** the criteria for promotion are at times unclear for certain positions [i.e., the Administration], this should be addressed in the next Special Agreement negotiations.
2. **Information regarding promotion process:** Information regarding promotion decisions should be conveyed in the 'Need-to-know' summary, and not just in Post Meetings. For direct recruitment of internal candidates see action step under "Recruitment".
3. **Clarify expectations for temporary employees in PhD and Post Doc. position:** Information regarding what options temporary employees in early research career positions have in regard to working for CMI after their contract expires should be clearly stated in the personnel handbook.
4. **Internal information:** continue to use the management team meeting minutes, the Friday Update and the 'Need-to-know' to share important information regarding processes and decisions with staff members.

Development opportunities:

- Some concrete steps taken to support employee development in 2023:
 - The CMI Management team has completed a Leadership Team Training with AFF (spread over 5 days).
 - Additionally, the new personnel leaders have been offered the law-mandated leadership training in HEC (“Lovpålagt HMS-opplæring for ledere og arbeidsgivere”). This has been held by our Occupational Health Service (Bedriftshelsetjeneste).
 - Our Head of Accounting and Payroll has also attended leadership training courses through Bergen Næringsråd (“Lederforum”).
 - The template for the Employee Development Conversations has been adjusted using feedback from staff and the AMIS (working environment survey) carried out in November 2022.
 - In addition, several Admin staff attended courses offered by Simployer, HR-Norge and other relevant providers.
- **Language development:** CMI offers Norwegian language training to new employees who move to Norway.

Step 3: Specific steps in Development opportunities to promote equality and prevent discrimination:

1. **Information regarding development opportunities:** Information regarding development options and opportunities should be conveyed in the personnel handbook. This may help staff ask for relevant development opportunities in the annual employee development conversation (EDC).
2. **Onboarding of international staff:** continue to improve the onboarding process for international staff.
3. **Training:** Project leadership training should be offered to staff in PI positions. In addition, CMI should invest in training of early career staff and administrative/communications staff. Relevant, collective, training should be offered to all personnel leaders at CMI at least once a semester to ensure competent and sustainable leadership of the institute.

Promotion to and development of leadership at CMI:

- **Gender:** The gender balance within the management team is acceptable at CMI (2023: 3 men* and 5 female) [From January to September, one male member was the U4 Director. From October-December the new male member was the interim Research Director].
- **Nationality:** 6 Norwegian citizens, 1 US citizen and 1 British citizen per 01.09.2023; 7 Norwegian citizen and 1 US citizen from the 01.10.2023.
- **Leadership training:** Leadership training has been a focus in 2023 and will be a priority going forward into 2024. It is important that we have a systematic development focus, where the leaders and the employees work together on development - so that it is easier for leaders to identify leadership potential among all their employees.
- **Recruitment:** the U4 Director left his position at CMI in September 2023. In the transitional period a fellow Research Director stepped in as the interim U4 Director. This also resulted in one interim Research Director and one interim U4 Deputy Director position from 01.10.2023-31.12.2023. In Addition, the HR Director position was established in June 2023 and was included in the CMI management team. The recruitment process to replace the U4 Director is ongoing but was not completed in 2023.

Step 3: Specific steps in recruitment/promotion to leadership positions to promote equality and prevent discrimination:

1. **Internal candidates:** if internal candidates are directly recruited to a leadership position, sufficient information regarding the reasons for this decision should be shared with staff.
2. **Training for staff:** leadership training should be offered to senior staff who are interested in developing their leadership skills, so that they are able to qualify for available leadership positions at CMI in the future.
3. **Training for leaders:** continue to offer leadership training to staff with leadership responsibilities.

Facilitation and opportunity to combine work and family life

- Pregnancy and small children: Travelling on research trips in the third trimester or during pregnancy can be challenging. Many pregnant women also need adjustments made (tilrettelegging) to their workplace or hours during pregnancy.
 - Some concrete steps taken to support employees expecting a child in 2023:
 - CMI has entered into an agreement with International S.O.S. who offer safety and training advice to at risk groups – as well as 4 counseling sessions per year per employee. This entails that pregnant employee can receive risk assessment advice and travel advice before travelling, and support during their travels.
 - Information regarding pregnancy and insurance coverage for pregnant employees has been made available in the personnel handbook in 2023: “Travelling when pregnant (insurance)” <https://handbooks.simpoyer.com/en-US/article/101396>
 - HR has also invited all pregnant employees and employees with expecting partners to an individual conversation to help navigate both CMI and NAV’s expectations and benefits during pregnancy.
 - One concrete action completed in 2023 is the Employee Life Cycle and Phases Policy (livsfasepolitikk). This looks at what support and benefits staff can expect/ask for in the different phases of one’s life. See Employee life phase policy in the personnel handbook: [Employee life cycle and phases - an overview - Handbooks portal \(simpoyer.com\)](#)
- Working time: Policy for not having a meeting outside of core time and before 12 AM (lunch). This is meant to both respect non-core hours and give room for work that requires concentration before lunch.
 - In 2023, all new staff have been informed about this policy and what CMI working hours are during the onboarding process (specifically in the introduction day).
- Culture: it is a challenge to separate work and family life when one has home office. This is something the leadership is aware of.
 - CMI has kept in place a home office policy where all staff are offered up to two days of home office per week (in Norway) and offer a desk/chair grant to purchase necessary ergonomic office furniture.
- Economy on travel
 - CMI offers the EuroCard credit card to travelling staff to allow CMI staff to pay for expenses on travel without having to pay out-of-pocket.

- In addition, all approved travel expense claims are reimbursed every Friday – meaning that staff are able to be reimbursed in a timely fashion. This is important to ensure that staff with economic challenges in their private life can travel for work without this becoming a financial burden.
- In some cases, CMI can also pay an advance to allow staff to pay travel expenses in advance.

Step 3: Specific steps in Facilitation and opportunity to combine work and family life to promote equality and prevent discrimination:

1. **Travelling for work when pregnant:** There can be a risk for staff members who travel for work while pregnant, depending on their health and the country of destination. CMI must ensure that employees have enough information regarding how they can combine work and pregnancy in the personnel handbook. The new support that International SOS can offer pregnant employees planning a trip or during a trip must be included in the personnel handbook. The fact that ISOS can also share information regarding pre-approved clinics in the country of destination and check if they offer sufficient pre-natal care in case of an emergency should be included.

Wages and working conditions.

- Terms for wage-change:
 - Determination of salary follows the Special Agreement. The Special Agreement has not been changed in 2022.
 - The Annual wage negotiations were completed in the fall of 2023, those involved were the CMI Director, the Administration and Finance Director and the CMIff representatives. Individual wage negotiations are processed together with the annual wage negotiations.
- Trade union:
 - have the right to be consulted on positions with a duration of 2 years or more, in addition to law-mandated consultation rights.
 - There is only one active union at CMI currently, this is CMIff (Forskerforbundet).
- Temporary employment: CMI has a high use of temporary employment. But these are primarily positions such as PhD candidate, Post Doc, and Research Assistants.
- Steps taken to improve the working conditions in 2023:
 - The AMIS processes (group processes in developing action plans) have garnered many suggestions to how the onboarding process can be improved, and how CMI can better support junior staff. Additionally, many members of staff used the opportunity to give feedback in the text section of the AMIS survey carried out in November 2022.
 - We also sent out a separate feedback survey on onboarding the 16th of October 2023. The feedback from this survey and AMIS has been used to adjust the introduction day PowerPoint and to establish a survey for new staff to calibrate their transitional onboarding needs more accurately.

Step 3: Specific steps in wage conditions to promote equality and prevent discrimination:

1. **Wage reporting:** continue to report on wages on the basis of gender in the annual ARP process.

Step 3: Specific steps in working conditions to promote equality and prevent discrimination:

1. **Wheelchair access:** Explore options for making the roof top terrace wheelchair accessible, so that employees dependent on wheelchair access may join in lunch and social events hosted on the terrace.
2. **Identify and describe contemporary terminology:** It is important that relevant contemporary terminology used to discuss inclusion, equality and discrimination are identified and described. This is to ensure a shared understanding of the terms we use when addressing how to promote equality and prevent discrimination. Having a shared language is key when establishing a shared cultural understanding and being able to discuss difficult subjects. It will also help in addressing when words are experienced as microaggressions.
3. **Define “inclusiveness” (an inclusive workplace):** CMI strategy for 2023-2028 has identified an inclusive workplace as a structural priority. It is therefore suggested that the staff are invited to collectively define ‘inclusiveness’ as a CMI principle and value in a staff seminar. This could lead to a shared understanding of this key goal when working towards a more inclusive workplace.
4. **Train personnel leaders in psychological safety and in addressing difficult topics:** it is important for CMI to have a working environment that is psychologically safe. Many of our staff members have temporary positions (i.e., PhD and Post Docs.), and these may feel insecure due to job security issues. It is important that these staff members feel valued by CMI management and experience individual development even when CMI is not in a position to offer them a permanent position. It is also key to ensure that personnel leaders receive training in how to address difficult topics (‘the difficult conversation’) equipping them to correct unwanted behavior.
5. **Establish a conflict-of-interest policy:** it is important to have policies in place to guide staff in making wise decisions regarding conflict-of-interest issues.
6. **Onboarding:** explain organization structure to new staff (unions, working environment committee, how decisions are made in CMI, established policies). This is important to create transparency regarding the decision structure within CMI.
7. **Working Environment Committee postbox:** a postbox will be established where staff members may submit suggestions to the WEC (AMU) committee. These may be submitted anonymously.

Working environment, harassment, sexual harassment, and gender-based violence

- **Travel safety** - safety for staff in the field is a challenge as many of the countries CMI travels to have different views on gender and sexuality.
 - CMI entered into an agreement with the risk management company, International SOS (ISOS) in 2023, in order to be able to give CMI staff a more comprehensive travel safety structure. This offers both support before, during and after travel, as well as medical and safety responses.
 - The personnel handbook has been updated on several occasions (for example for coverage of travel medication and vaccines).
- **Training:**
 - Our Travel Adviser has held two courses in travel guidelines and regulations, to help staff become more acquainted with CMI’s policy and processes.
 - Several members of staff were sent on HEAT courses in 2023 to increase travel safety.

- CMI set diversity and inclusion on the agenda during our staff retreat the 2nd of June and invited an external speaker to share with us on this topic.
- HR offers two inclusion training courses each year, one per semester. This was also the case in 2023. Training on differential treatment due to pregnancy and parental leave was held in May 2023 and training on general discrimination in the workplace in November 2023.
- Adjustments have been made to CMI's Code of Conduct, Inclusion, Discrimination, and Assessment clarifying CMI's stance on Harassment and Sexual Harassment. This was published in May 2023: [Code of Conduct \(Inclusion, Discrimination and Harassment\) - Handbooks portal \(simplover.com\)](#) Here sexual harassment is defined as: any form of unwanted sexual attention that has the purpose or effect of being offensive, frightening, hostile, degrading, humiliating or troublesome. It also states that CMI has a zero tolerance for sexual harassment.
- CMI has also revised the whistleblowing policy to make it easier to navigate how one can proceed if one is a victim of sexual harassment; the definition of bullying and discrimination/harassment was included in the revised policy. The revised whistleblowing policy was presented to all staff on the 15th of December (mandatory staff seminar), and the leadership received training in these changes on the 13th of December.
- CMI has written a personnel case process and clarified CMI's expectations to leaders to address issues early on. A leadership course where this new process as well as the revised whistleblowing policy is scheduled for the 13th of December. [CMI's Personnel case guidelines and process \(what can you expect in formal follow-up cases?\) - Handbooks portal \(simplover.com\)](#)
- **Working environment committee (AMU/WEC):** this committee has been very active in 2023, but has not received any feedback regarding harassment, sexual harassment, or gender-based violence.
 - In 2023 the AMU/WEC have focused on stress and stress-management, in addition to work-life balance.
 - The working environment was also a focus during the Annual Staff Seminar, where the two lectures offered on the 2nd of June were on inclusion and stress management.
- **Working environment survey (AMIS):** The AMIS survey was completed in 2022 and was used as a foundation for working environment processes in 2023.

Step 3: Specific steps in working environment, harassment, sexual harassment, and gender-based violence to promote equality and prevent discrimination:

1. **Safety of staff on work trips to countries where there are different views on gender, gender-identity/-expression and sexuality:** information regarding the support that International SOS can offer employees planning a trip or during a trip must be included in the personnel handbook. This allows LGBTQ+ staff members to ask for support and guidance from ISOS in planning a trip, instead of relying on HR or other internal CMI members who may not have enough experience or understanding to give this support. It also ensures that staff members may decide how much they wish to share with their employer (CMI), as ISOS will not share information regarding these services.

2. **Onboarding:** ensure that all new staff are given information regarding CMI's Whistleblowing policy, Code of Conduct, Ethics and Integrity, and the Norwegian legal definition of harassment and sexual harassment.
3. **Training:** continue to offer inclusion training once a semester at CMI (internal training).