



Interreg



Co-funded by
the European Union

Central Baltic Programme

STRONGER TOGETHER

STEP BY STEP GUIDELINES FOR CREATING AN ANTI- DISCRIMINATORY POLICY

These guidelines are designed to assist employers in developing and implementing an anti-discrimination policy while preparing for the employment of people with intellectual disabilities or other special needs. These guidelines are suitable for organizations in Latvia, Sweden, and the Central Baltic region.



This activity was supported as part of STRONGER TOGETHER, an Interreg Central Baltic Programme 2021-2027 project co-funded by the European Union.



TABLE OF CONTENTS

Introduction	3
Understanding inclusivity	4
Creating an inclusive workplace	5
Job analysis and modification	6
Recruitment and interview process	8
Onboarding and training	10
Creating a supportive environment	11
Workplace culture and sensitization	12
Creating long-term support systems	14
Feedback and adaptation	16
Celebrating success and sharing stories	18

>> INTRODUCTION



The project "*Stronger Together*" is implemented by three organisations: Valmiera Development Agency, Coompanion Östergötland Economic Association (Coompanion Östergötland Ekonomisk Förening), and the Samaritan Association of Latvia. All the organisations involved in the project are actively working to improve the public and business environment. The implementation of this project aims to create a more inclusive labour market by encouraging employers to implement anti-discrimination policies and create employment opportunities for people with intellectual disabilities or other special needs.

These step-by-step anti-discrimination guidelines have been developed to promote an inclusive and equitable work environment, where every employee is respected and valued, regardless of their disability, gender, age, race, ethnicity, religious beliefs, sexual orientation, or any other grounds for discrimination.

The aim of these guidelines is to provide employers with specific steps to establish an anti-discrimination policy within their company, as well as practical examples of how to prepare their organisation for the employment of people with special needs.

The development of the guidelines is based on European Union (EU) legislation and principles, which support the reduction and elimination of discrimination both within companies and across society.

By following these step-by-step guidelines, employers can create a supportive, inclusive, and discrimination-free workplace, ensuring equal opportunities for all employees.



Inclusivity in the workplace means creating an environment where all employees, regardless of their backgrounds, abilities, or characteristics, feel valued, respected, and supported. An inclusive workplace fosters a culture of equality, ensuring that every individual has access to the same opportunities for professional growth and development.

KEY COMPONENTS OF INCLUSIVITY:

1. **Promote diversity in representation** by actively including individuals of different races, ethnicities, genders, ages, abilities, sexual orientations, and socioeconomic backgrounds in all areas of the organisation.
2. **Ensure equity in access and support** by identifying barriers and offering targeted resources so that all employees have fair and equal opportunities to succeed.
3. **Foster a culture of belonging** where every employee feels welcomed, accepted, and safe to express their authentic selves without fear of judgement or discrimination.
4. **Develop cultural competence across teams** by encouraging learning about different cultural norms, communication styles, and lived experiences to support respectful and effective collaboration.
5. **Provide inclusive support and resources** through mentorship programmes, training opportunities, and employee resource groups tailored to the needs of diverse employees.
6. **Lead inclusively at all levels** by empowering leaders to model inclusive behaviours, champion fair practices, and actively challenge bias or discrimination within teams.

Legal Aspect: Under the **EU Employment Equality Directive (2000/78/EC)**, employers are required to prevent discrimination based on disability, age, gender, religion, or sexual orientation. This legal framework ensures equal treatment in the workplace and mandates reasonable accommodations for individuals with disabilities. **Charter of Fundamental Rights of the European Union (Article 21 Non-discrimination and Article 26 Integration of persons with disabilities)**. The Union recognises and respects the right of persons with disabilities to benefit from measures designed to ensure their independence, social and professional integration and participation in the life of society.

Example: Employers should conduct regular training sessions to educate employees about inclusivity, helping them recognise different disabilities, understand how they affect individuals, and learn how to interact respectfully and supportively with colleagues. These sessions should also emphasise the importance of creating a welcoming workplace for all.



A truly inclusive work environment not only complies with legal requirements but also enhances collaboration, productivity, and employee well-being.



CREATING AN INCLUSIVE WORKPLACE



An inclusive workplace ensures that all employees, regardless of their background, abilities, or characteristics, have equal access to opportunities, resources, and support. It is built on clear anti-discrimination policies, proactive leadership, and a commitment to diversity. Employers must take deliberate action to foster an environment where everyone feels valued, respected, and empowered to contribute fully.

KEY COMPONENTS OF CREATING AN INCLUSIVE WORKPLACE:

1. **Implement workplace policies** that explicitly prohibit discrimination and outline procedures for addressing any incidents of unfair treatment.
2. **Prioritise accessibility** in both physical workspaces and digital platforms, ensuring that employees with disabilities can perform their duties without barriers.
3. **Train managers and supervisors** to recognise and challenge biases, promote fair treatment, and support employees from diverse backgrounds. Leadership plays a crucial role in shaping an inclusive culture.
4. **Establish open communication channels** to encourage employees to express concerns and offer suggestions for improving inclusivity.
5. **An inclusive workplace also embraces:**
 - flexible work arrangements;
 - customized job roles where necessary;
 - initiatives such as mentorship programs to support underrepresented groups.

By fostering an inclusive workplace, organisations not only comply with legal standards but also create a more innovative, productive, and positive work environment where every individual can thrive.

Legal Aspect: Under the **EU Accessibility Act (2019)**, businesses must ensure that both their digital (where applicable) and physical environments are accessible to people with disabilities, enabling non-discriminatory participation in the workplace.

Example: Prioritise educating employees about working with colleagues who have different special needs, such as intellectual disabilities, autism, or physical disabilities. Organise a seminar for employees with open discussions and a Q&A session led by professionals. By implementing such an educational programme, employees become more aware, supportive, and proactive in creating an inclusive workplace for colleagues with different special needs.



By fostering an inclusive workplace, organisations not only comply with legal standards but also create a more innovative, productive, and positive work environment where every individual can thrive.



To effectively employ individuals with special needs, organisations should conduct job analyses to identify tasks that can be adjusted or modified. Job analysis and modification are crucial steps in fostering an inclusive workplace. These processes involve evaluating the essential requirements of a job and adapting the role or working environment to better accommodate diverse employees, including those with disabilities, caregivers, and individuals from underrepresented groups.

JOB ANALYSIS

Job analysis is the process of gathering, documenting, and analysing information about a job's requirements, tasks, responsibilities, and necessary qualifications. This process helps identify areas where jobs might need to be adjusted to become more inclusive.

KEY COMPONENTS OF JOB ANALYSIS:

1. **Identify the essential functions of each role** by focusing on outcomes rather than specific methods, allowing flexibility in how tasks are performed.
2. **Review qualifications and requirements** to ensure they are not unnecessarily limiting for certain groups, such as individuals with disabilities or non-traditional backgrounds.
3. **Assess the work environment** to determine whether physical or digital spaces pose barriers to access or performance.
4. **Evaluate scheduling requirements** to identify if rigid hours or shift patterns may exclude candidates with caregiving responsibilities or health conditions.
5. **Consult current employees and stakeholders** to gather feedback about their job experiences and uncover any existing barriers to inclusion.

Employers can redesign job descriptions to align with different abilities and provide necessary assistive tools or technology to facilitate job performance.

JOB MODIFICATION

Once the job analysis is complete, the next step is job modification—adjusting job requirements, the work environment, or the job itself to make it more accessible and equitable for a diverse range of employees. These modifications help create opportunities that suit the strengths of each employee while maintaining overall workplace efficiency.

KEY COMPONENTS OF JOB MODIFICATIONS:

1. **Restructure tasks where needed** by simplifying complex responsibilities or redistributing certain duties to better match individual strengths and needs.
2. **Offer flexible work arrangements** such as remote work, adjustable hours, or job-sharing to accommodate employees with different circumstances or health-related needs.
3. **Adapt the physical workspace** to improve accessibility—this may include adjustments like accessible restrooms, quiet areas, adjustable desks, or improved lighting.
4. **Tailor training and development methods** by using multiple formats (e.g. visual guides, hands-on demos, simplified instructions) to support different learning styles and cognitive abilities.
5. **Provide ongoing support systems** through mentorship, job coaching, or peer guidance to help employees succeed in their roles and feel fully included in the team.

By proactively analysing and modifying job roles, organisations create a fair, supportive work environment that maximises the potential of every employee. This approach not only strengthens workplace inclusivity but also enhances overall efficiency, morale, and innovation.

Legal Aspect: According to the **EU Directive on Equal Treatment in Employment (2000/78/EC)**, employers are required to provide reasonable accommodation unless it causes undue hardship to the business.

Example: Conduct a job analysis to identify necessary adjustments, such as simplifying task instructions and providing a structured daily routine. Implement job modifications, including clear visual schedules, mentorship support, and regular check-ins, to enable the employee to work effectively while feeling supported in an inclusive environment.



By fostering an inclusive workplace, organisations not only comply with legal standards but also create a more innovative, productive, and positive work environment where every individual can thrive.





RECRUITMENT AND INTERVIEW PROCESS



An inclusive recruitment and interview process ensures that all candidates, regardless of their background or abilities, have equal opportunities to access employment. Employers must design hiring procedures that eliminate biases and provide reasonable accommodations for individuals with special needs. This includes offering multiple application formats, ensuring accessibility in job advertisements, and clearly communicating the organisation's commitment to diversity and inclusion.

KEY COMPONENTS FOR INCLUSIVE RECRUITMENT:

When posting a job opening, employers should consider the following strategies to ensure the process is inclusive and accessible to all candidates.

1. **Use inclusive and neutral language** in job advertisements to ensure accessibility and appeal to a wide range of candidates.
2. **Clearly define essential and preferred qualifications** to avoid excluding capable candidates with non-traditional backgrounds or experiences.
3. **Offer multiple application formats** (e.g. written CV, video introduction, or online form) to support diverse ways of presenting qualifications.
4. **Implement blind recruitment practices** by removing identifying information (such as name, gender, age, or ethnicity) during initial screening stages.
5. **Expand outreach channels** by collaborating with organisations, universities, and community groups that engage with underrepresented populations.

KEY COMPONENTS OF AN INCLUSIVE INTERVIEW PROCESS:

The interview process should be adapted to accommodate different needs, allowing candidates to showcase their abilities effectively.

1. **Train hiring managers on inclusive interviewing techniques** to focus on skills, potential, and relevant experiences, not assumptions or bias.
2. **Provide alternative assessment methods** such as practical tasks, job simulations, or work trials to support different communication and thinking styles.
3. **Offer reasonable accommodations** like extended time, simplified instructions, or the presence of a support person upon request.
4. **Conduct interviews in accessible and low-stress environments** to support candidates with sensory, mobility, or cognitive needs.
5. **Communicate transparently with candidates** by clearly outlining the interview format, timeline, and next steps to build trust and reduce uncertainty.

Legal Aspect: Under the EU Employment Equality Directive (2000/78/EC) and the European Pillar of Social Rights, employers are required to ensure non-discriminatory hiring practices and provide reasonable accommodations throughout the recruitment process. This includes adjustments such as extended interview time, allowing support persons to accompany candidates, or using clear and simple language in assessments.

Example: In the recruitment and interview process, use clear, simple language in the job advertisement and allow alternative application formats, such as a short recorded introduction video instead of a formal CV. During the interview, the company conducts a practical assessment in a quiet, low-stress environment, allowing the candidate to demonstrate their skills rather than relying solely on verbal responses, while also permitting a support person to accompany them.



By implementing an inclusive recruitment strategy, organisations can attract diverse talent, foster workplace equality, and comply with legal obligations. A fair and accessible hiring process strengthens an organisation's reputation, promotes innovation, and contributes to a more dynamic and productive workforce.





A well-structured onboarding and training process in an inclusive workplace ensures that all employees, regardless of their background, abilities, or identities, feel welcomed, valued, and equipped for success.

An inclusive onboarding programme should provide clear guidance on job expectations, workplace culture, and available support systems.

A strong commitment to inclusivity during the initial stages of employment helps retain talent, improve job satisfaction, and enhance overall workplace cohesion.

KEY COMPONENTS OF DESIGNING AN INCLUSIVE ONBOARDING AND TRAINING EXPERIENCE:

1. **Provide clear and accessible orientation materials** that outline job expectations, workplace policies, and available support in a format suitable for diverse needs.
2. **Assign a buddy or mentor** to guide new employees through their first weeks, offering consistent support and encouragement.
3. **Use multiple training formats** such as visual aids, written guides, and hands-on demonstrations to accommodate different learning styles and cognitive abilities.
4. **Simplify language and structure content** to make onboarding materials easy to follow for all employees, including those with learning differences.
5. **Allow flexible timeframes** for completing training to reduce pressure and support deeper understanding.
6. **Schedule regular check-ins and feedback sessions** to ensure ongoing support, address challenges early, and build employee confidence.

Legal Aspect: The EU Strategy for the Rights of Persons with Disabilities (2021-2030) promotes inclusive education and lifelong learning to ensure accessibility to training and skills development.

Example: Pair the employee with a mentor, an experienced colleague who provides guidance, encouragement, and hands-on training to help them adjust to their new role. To accommodate different learning styles and abilities, provide visual training materials with step-by-step images, hands-on demonstrations, and simple, written instructions to reinforce key tasks. Conduct regular check-ins with the manager, where the employee can ask questions, discuss challenges, and receive constructive feedback.



By implementing a structured onboarding process with mentorship, tailored training, and continuous support, the company creates a positive work environment, helping the new employee build confidence, develop skills, and integrate successfully into the team.



CREATING A SUPPORTIVE ENVIRONMENT



A truly inclusive workplace goes beyond hiring practices and job modifications—it requires a supportive environment where all employees feel respected, valued, and empowered.

Employers must cultivate a culture of acceptance by fostering open communication, encouraging teamwork, and ensuring that individuals with special needs receive the assistance they require to thrive.

KEY COMPONENTS FOR CREATING A SUPPORTIVE ENVIRONMENT:

1. **Promote inclusive values** from the top by encouraging leaders to actively support diversity, equity, and inclusion across the organisation.
2. **Establish clear and respectful workplace policies** that reinforce fairness, psychological safety, and zero tolerance for discrimination or harassment.
3. **Train managers and team leaders to recognise the diverse challenges** employees may face and to respond with appropriate support or reasonable adjustments.
4. **Introduce support mechanisms** such as peer mentoring, employee resource groups, or mental health resources to help individuals feel connected and understood.
5. **Ensure workplace flexibility and accessibility** by offering custom job support, adaptable schedules, and inclusive communication tools for all employees.

Legal Aspect: Under the **EU Employment Equality Directive (2000/78/EC)**, employers are legally required to ensure that individuals with disabilities and other protected characteristics are not subjected to discrimination in the workplace. This includes creating a work environment free from harassment and making reasonable adjustments to accommodate different needs.

Example: Implement a buddy system, where experienced employees volunteer (or receive incentives) to support and guide their colleagues with special needs throughout their workday. Instead of sending a long, complex email, an employer could provide a simple checklist with images and key points for an employee who has difficulty processing written information.



By prioritising a supportive work environment, organisations can enhance employee well-being, increase retention rates, and foster a culture of inclusion. A workplace that actively promotes diversity and equity benefits not only employees but also overall productivity, innovation, and corporate reputation.



WORKPLACE CULTURE AND SENSITIZATION



A truly inclusive workplace is built on a culture of respect, diversity, and equality. Organisations must actively promote an environment where all employees, regardless of their abilities, backgrounds, or identities, feel valued and included. Workplace culture is shaped by leadership, policies, and daily interactions, making it essential for employers to implement ongoing initiatives that promote awareness and sensitivity to diversity. Sensitisation involves educating employees about different abilities, cultural backgrounds, and perspectives to foster understanding and prevent unconscious biases.

KEY COMPONENTS OF AN INCLUSIVE WORKPLACE CULTURE:

1. **Demonstrate leadership commitment** by ensuring managers and executives actively promote inclusive values and lead by example.
2. **Encourage open and respectful communication** by creating psychologically safe spaces for dialogue, feedback, and idea-sharing.
3. **Promote mutual respect and collaboration** by recognising and valuing diverse perspectives, backgrounds, and abilities within teams.
4. **Ensure equal access to growth** opportunities by applying fair and transparent criteria in promotions, training, and evaluations.
5. **Apply zero-tolerance policies for discrimination** by clearly outlining expected behaviours and providing confidential, effective reporting mechanisms.

KEY COMPONENTS OF SENSITISATION IN THE WORKPLACE:

1. **Provide regular awareness training** focused on inclusion, disability awareness, and unconscious bias to build understanding across teams.
2. **Organise inclusive events and campaigns** that celebrate diversity and encourage participation in learning about different cultures, abilities, and experiences.
3. **Encourage open discussions about diversity and inclusion** during team meetings or dedicated sessions, allowing employees to ask questions and share perspectives.
4. **Use real-life stories and testimonials** to help humanise experiences and challenge assumptions, fostering empathy and allyship.

Legal Aspect: Under the **EU Employment Equality Directive (2000/78/EC)**, employers are required to prevent discrimination and promote equal treatment in the workplace. This includes ensuring that all employees are aware of their rights and responsibilities in maintaining a fair and inclusive work environment. Organisations should also implement a **zero-tolerance policy for harassment and discrimination**, reinforcing the importance of workplace equality.

Example: Organise diversity and inclusion events where employees can hear firsthand experiences from individuals with special needs and learn about best practices for inclusivity. This initiative helps employees better understand different perspectives, reduces stigma, and fosters a more inclusive workplace culture.



By cultivating an inclusive workplace culture and investing in ongoing sensitisation, organisations create an environment where diversity is embraced, bias is actively challenged, and every employee feels respected, supported, and empowered to thrive.



CREATING LONG-TERM SUPPORT SYSTEMS



A truly inclusive workplace doesn't stop at hiring or onboarding—it requires sustained support that grows alongside employees' evolving needs. Long-term support systems ensure that individuals with diverse abilities, responsibilities, or challenges continue to thrive and develop over time. These systems should be proactive, structured, and integrated into daily organisational practices. As workplaces adopt new technologies like AI for decision-making, it is equally vital to ensure these tools support, rather than hinder, inclusion.

KEY COMPONENTS OF LONG-TERM SUPPORT SYSTEMS:

1. **Establish mentorship programmes** that connect employees with experienced colleagues for continuous guidance, encouragement, and career support.
2. **Conduct regular performance reviews and check-ins** to assess progress, identify new needs, and adjust support measures accordingly.
3. **Develop personalised professional development plans** that recognise employees' individual goals and offer accessible learning opportunities.
4. **Maintain open communication channels** so employees can safely voice concerns, request accommodations, or suggest improvements to workplace support.
5. **Collaborate with external support networks** such as disability advocacy groups or job coaching services to provide specialised assistance when needed.
6. **Offer access to mental health and well-being resources** through employee assistance programmes and peer support systems to promote holistic inclusion.

AI-powered systems can help personalise training programmes, track employee progress, and streamline accessibility adjustments. However, if not carefully monitored, they can also reinforce biases that may unintentionally disadvantage certain groups.

KEY COMPONENTS OF RESPONSIBLE AI USE:

1. **Audit AI tools regularly** to identify and eliminate bias in recruitment, performance evaluations, and promotions.
2. **Ensure transparency in AI-based decisions** by clearly explaining how automated systems influence employee outcomes.
3. **Use AI to support—not replace—human judgement** by combining data insights with empathetic, human-centred decision-making.
4. **Train staff on ethical AI use** so teams understand the limitations and responsibilities of technology in inclusive workplaces.

Legal Aspect: Under the **EU Employment Equality Directive (2000/78/EC)**, employers must provide reasonable accommodations on an ongoing basis and ensure that individuals with disabilities have equal access to career growth opportunities. Companies should integrate long-term support into their human resources policies to guarantee sustainable workplace inclusion. Under the **AI Act (Regulation (EU) 2024/1689)**, which establishes harmonised rules on artificial intelligence across the EU, organisations must ensure that AI systems used in employment-related decisions comply with fundamental rights, safety standards, and transparency requirements. Employers should take proactive measures to identify and mitigate AI-driven biases and ensure that automated decision-making processes do not result in discrimination or unfair treatment.

Example: A company establishes a long-term mentorship programme, pairing employees with special needs with experienced colleagues who provide continuous guidance. The Human Resources department (if applicable) conducts biannual reviews to assess the effectiveness of accommodations and adjusts workplace support based on employee feedback. This approach ensures that employees receive ongoing assistance and have the opportunity to develop their skills and career paths.



By embedding long-term support systems and using technology responsibly, organisations create sustainable inclusion that empowers all employees to grow, contribute, and succeed over time.





Feedback and adaptation are essential processes in promoting an inclusive environment and ensuring that anti-discrimination policies remain effective. By regularly evaluating and adapting workplace inclusion strategies, organisations can maintain ongoing success in their anti-discrimination efforts. Through active adaptation, organisations can adjust policies, practices, and strategies to address emerging needs, promote fairness, and ensure continuous support for all individuals, regardless of their background, gender, race, or other characteristics.

KEY COMPONENTS OF INCLUSIVE FEEDBACK PRACTICES:

1. **Encourage open and honest feedback** by fostering a culture where all employees feel safe to speak up and share their experiences and suggestions.
2. **Provide multiple feedback channels** such as anonymous surveys, regular 1:1 meetings, and digital suggestion boxes to reach different comfort levels and communication styles.
3. **Train managers and team leads** to receive feedback without defensiveness and to respond constructively, promoting a culture of trust and mutual respect.

KEY COMPONENTS OF ADAPTATION AND CONTINUOUS IMPROVEMENT:

1. **Monitor the impact of inclusion efforts** through regular evaluation of policies, training programmes, and workplace practices.
2. **Act on feedback received** by implementing clear processes for reviewing input and translating it into tangible improvements in systems, tools, or behaviours.
3. **Involve employees in change initiatives** to ensure that adaptations reflect lived experiences and promote shared ownership of inclusive progress.
4. **Engage leadership in the adaptation process** by having them set clear goals, allocate resources, and lead by example when responding to identified challenges.

Legal Aspect: Under the EU Employment Equality Directive (2000/78/EC), employers are expected not only to prevent discrimination but also to ensure the effectiveness of their inclusion strategies over time. Adapting policies and procedures in response to employee feedback is part of this obligation to maintain fairness and equality in the workplace.

Example: An organisation implements a quarterly inclusion pulse survey, allowing employees to anonymously provide input on their experiences. Based on the results, leadership revises the disability accommodation process, simplifies the request form, and introduces a clearer response timeline. Managers receive training on how to follow up on feedback in team meetings.



By actively seeking feedback and committing to continuous adaptation, organisations build a culture of trust, resilience, and lasting inclusivity where every voice contributes to positive change.





CELEBRATING SUCCESS AND SHARING STORIES



Recognising and highlighting success, as well as sharing stories of positive experiences, play a crucial role in reinforcing an organisation's commitment to diversity, equity, and inclusion. Acknowledging individual and collective achievements helps build a supportive and empowering environment where everyone feels valued. It also demonstrates the impact of anti-discrimination policies and initiatives, showcasing their effectiveness while motivating continued engagement from all members of the organisation.

KEY COMPONENTS OF CELEBRATING SUCCESS AND STORYTELLING:

1. **Highlight inclusive achievements** in internal communications, such as newsletters, team meetings, or digital platforms, to increase visibility and recognition.
2. **Share employee stories and experiences** that showcase how inclusive practices have made a difference – using formats like interviews, videos, or testimonials.
3. **Encourage peer-to-peer recognition** by providing opportunities for colleagues to acknowledge each other's contributions to an inclusive workplace.
4. **Incorporate storytelling into events and campaigns** by inviting guest speakers or spotlighting personal journeys that reflect the organisation's values.
5. **Create platforms for employees to share their voices voluntarily and safely**, ensuring that participation in storytelling is empowering and never forced.

Legal Aspect: The European Disability Strategy encourages businesses to promote good practices in inclusive employment and share success stories to inspire other companies.

Example: Feature employee success stories in company newsletters or on social media platforms to showcase the positive impact of inclusive hiring and workplace practices.



Inclusion is not a one-time initiative—it is an ongoing commitment that lives through daily actions, continuous learning, and shared experiences. By celebrating success and giving space to authentic stories, organisations not only honour progress but also strengthen the foundation of an inclusive culture. Every voice and every milestone matters. Together, we build workplaces where diversity is valued, equity is upheld, and belonging is a shared reality for all.

