

Superintendence
of Cultural
Heritage

Gender
Equality
Plan

2022-2026



SOVRINTENDENZA
TAL-PATRIMONJU KULTURALI
SUPERINTENDENCE OF CULTURAL HERITAGE

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Abbreviations

Superintendence of Cultural Heritage – SCH

Human Resources – HR

Gender Equality Plan – GEP

Gender Equality Plan Working Group

Equal Opportunity Officers

1. Andreana Boldarini
2. Alexandra Camilleri
3. Debra Jane Camilleri

Gender Equality Officer

4. Orietta Cardona
5. Andrea Trovarelli
6. Luca Tufigno

1.1 Introduction

This Gender Equality Plan (GEP) was developed for the Superintendence of Cultural Heritage (SCH) based on an analysis of an internal gender audit, meetings with stakeholder involved in the GEP implementation, as well as a review of the policies and practices presently applied by SCH.

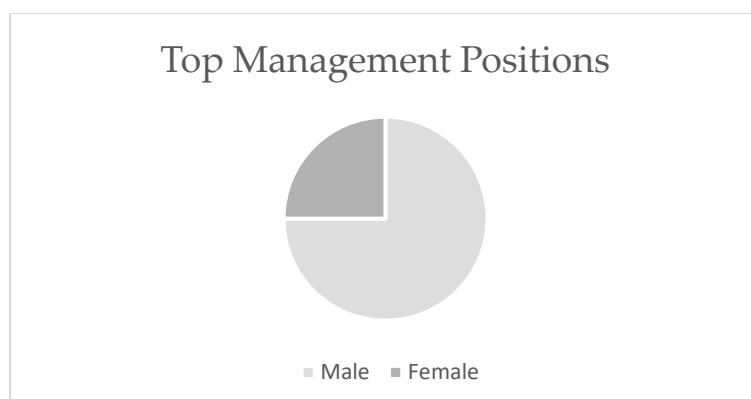
Whereas in comparison to other EU nations, (Eurostat 2018) Malta registers the third highest cultural employment in the EU, it also registers one of the lowest percentage of persons with tertiary education in cultural employment and is one the countries with the largest gender disparities in fulltime cultural employment.

1. Work-life balance and organisational culture

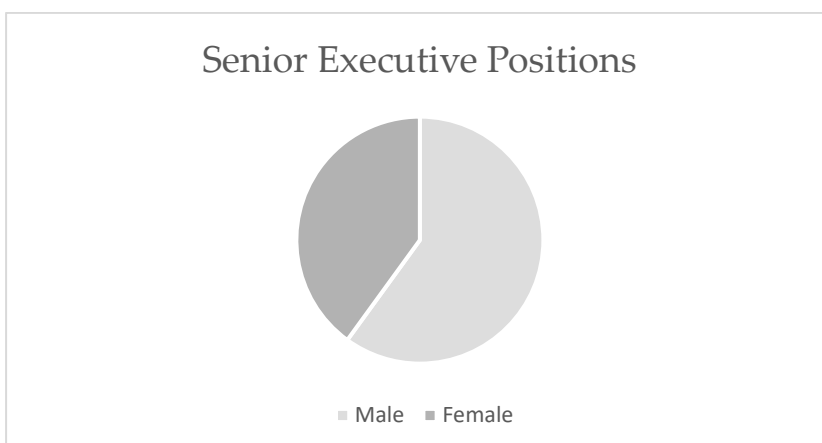
- a. The provision of good working conditions for all staff, including staff members with special needs, which will allow all staff, irrespective of gender, to have the flexibility for a healthy work-life balance and a safe working environment to enable staff to reach optimal performance levels.
 - These principles are also highlighted in the Employment and Industrial Relations Act (Cap. 452 of the Laws of Malta) and subsidiary legislation (Organisation of Working Time Regulations – SL 458.87), the Occupational Health and Safety Authority (Cap. 424 of the Laws of Malta) and subsidiary legislation (Workplace (Minimum Health and Safety Requirements) Regulations) – SL 424.15), the Government of Malta Policy Manual (manual of Work-Life balance measures).

2. Gender balance in Leadership and Decision Making

- a. Figure 1 illustrates the number of males and females in leading top management positions.



- b. Figure 2 illustrates the number the number of males and females holding Senior Executive Positions.



3. Gender Equality in Recruitment and Career Progression

- a. Gender balance in recruitment and career progression ensuring equal opportunities at the stage of recruitment and subsequent career progression for all levels of staff, including top management grades.
- These principles are highlighted in the Employment and Industrial Relations Act (Cap. 452 of the Laws of Malta) ad subsidiary legislation (Equal Treatment in Employment Regulations – SL 452.95), and Section 2.5 of the Government of Malta Policy Manual (Manual on Industrial Relations and the Selection and Appointment Process under Delegated Authority in the Malta Public Service [Version 4.17])

4. Integration of Gender Dimension into Research and Teaching Content

- a. Recognising matters concerning gender diversity and inclusivity, and subsequently create awareness within employees at all levels.

5. Measures against Gender-based Violence including Sexual Harassment

- a. Non-discriminatory treatment based on the grounds of religion or religious beliefs, disability, age, sex, sexual orientation, political orientation and racial or ethnic origin.
- These principles are also highlighted in the Employment and Industrial Relations Act (Cap. 452 of the laws of Malta) and subsidiary legislation (Equal Treatment in Employment Regulations – SL 452.95), the Equality for Men and Woman Act (Cap. 456 of the Laws of Malta), the Gender Identity, Gender Expression and Sex Characteristics Act (Cap. 540 of the Laws of Malta).

- b. Gender matters in addressing gender-based violence that empower staff, amplify their voices, offer opportunities of redress, and promote acceptance of all gender identities and sexualities.
 - These principles are highlighted in Article 29 of the Employment and Industrial Relations Act (Cap. 452 of the Laws of Malta), the Equality of men and Women Act (Cap. 456 of the Laws of Malta), Article 251A of the Criminal Code (Chapter 9 of the Laws of Malta).

Circular 15/2012 issued by the Office of the Prime Minister (OPM) also highlights the importance on gender mainstreaming asserting that gender mainstreaming “will enhance the ability of employers to make the best use of human resources and improve productivity and competitiveness whilst giving employees the benefit equally in society. In practice it requires a pro-active approach, the need to identify those areas where any degree of inequality could potentially arise, assess the underlying causes of such inequalities and take necessary steps to bring about change.”

Gender equality was also highlighted as one of the main priorities in the National Cultural Policy 2021, which sets out to re-examine the fundamental role of culture in public policy. In order to uphold this principle, Government shall ensure that participative processes in cultural governance, particularly to gender equality, are developed and promoted with the implementation of this policy. This is in line with the EU Work Plan for Culture as well.

In response to the guidelines of the European Institute for Gender Equality (EIGE), which aim to “identify and implement innovative strategies to promote cultural change and equal opportunities”, this GEP aims to identify gaps in SCH’s current policies and practices and to introduce new measures that better support gender equality within the SCH. Although SCH already adopts numerous measures that promote gender equality, the actions identified are presented in Section 1.2 along with a plan of action presented in Section 1.3.

1.2 Challenges and Objectives

The challenges related to gender equality and diversity were identified and discussed during multiple meetings held between the Superintendent of Cultural Heritage, Mr Kurt Farrugia, members of the HR Department, members forming part of top management team as well as from feedback gathered during staff committee meetings held between July 2021 and September 2021. The SCH has also appointed six gender equality officers who throughout the period covering this GEP, shall be overseeing and following up on progress on the challenges which the SCH shall be

implanting between the years 2022 to 2026. The SCH's gender equality officers are listed in 'Gender Equality Plan Working Group'.

The challenges and actions identified are outlined in Section 1.3 and are followed by the actions that the SCH will be taking to collect and monitor data.

1.3 Challenges and Action Plan

Action 1: To set up a Gender Equality Action Group within the Superintendence of Cultural Heritage

Key Area	Objectives	Challenges	Direct Target	Indirect Target	Timeline				
					2022	2023	2024	2025	2026
Gender Equality Action Plan	To promote and implement the Gender Equality Plan, an Action Group is to be appointed with representatives from all SCH Units.	To appoint at least one Gender Equality Officer from each unit.	All Staff	N/A	x				

The successful implementation of a Gender Equality Plan requires the support of an action group that will monitor and implement it.

Goals: A Gender Equality Officer from each Unit will be appointed within the initial year of the plan.

Action Plan: The setting up of a Gender Equality Action Group will monitor the set action plan.

Action 2: To extend the possibility of teleworking for all staff members irrespective of gender and/or family responsibilities

Key Area	Objectives	Challenges	Direct Target	Indirect Target	Timeline				
					2022	2023	2024	2025	2026
Work-life Balance and organisational culture	To promote and implement measures that aim at improving the balance between work and personal life.	To extend the possibility of teleworking for all staff members irrespective of gender and/or family responsibilities.	All Staff	Staff member's families	x	x	x	x	x

The SCH already follows centrally published teleworking / remote working policies (to be revised in April 2023) which enable office employees to enter into a voluntary agreement with the SCH wherein work which is normally performed at the employer's premises, is carried out remotely on a regular basis.

Goals: Continue adopting an internal procedure for remote working which allows all staff members to benefit from it.

Action Plan: The SCH is set to improve and enhance modern workplaces and increase employee flexibility and in light of the lessons learned during the COVID pandemic, the SCH will extend the opportunity of remote working to all its members of staff (were applicable) in an effort to increase employee flexibility and provide a better balance between work and family life, in line with the latest Policy and Guidelines on Remote Working as per the Public Service Management Code (as of the day of compilation of this document).

Subject to the completion of the probationary period, those employees applying for remote working must be able to perform their tasks and duties accordingly. This measure shall be implemented from 2022 and shall continue to be accessible until 2026, or until management requires otherwise.

The implementation of the Remote Working Policy will be adopted where employees whose job performance and skills, as well as the nature of their job, are suitable to be carried out away from traditional office set-ups without impacting the operating performance of the employee within the department, subject to the approval of the Head of Department.

Action 3: To ensure an equal representation of males and females on recruitment, interview and review boards

Key Area	Objectives	Challenges	Direct Target	Indirect Target	Timeline				
					2022	2023	2024	2025	2026
Gender Equality in Recruitment and Career Progression	To promote processes to support gender sensitive recruitment and career progression opportunities.	To ensure an equal representation of males and females on recruitment, interviewing and review boards	All Staff	N/A	x	x	x	x	x

Presently, recruitment panels are made up of two or more persons as part of the selection and recruitment process. All interviewers and selection committees are fully versed with equality issues and would have been given a copy of such policy. Whenever possible, such recruitment and election panels were gender balanced however it was identified that at times, such panels were composed of only male members. The SCH will also ensure that all Reviewing Panels will be composed of members of all genders.

Goals: Ensuring equal representation of both males and females in interviewing panels.

Actions: In its efforts, the SCH will ensure that recruitment panels are made up of at least three or more panel members and will include both males and females. As such, this change in process will address the issue of gender representation and participation of both males and females in the recruitment and selection process of the SCH, and in its efforts, the SCH will further promote equality, diversity and inclusion in matters concerning recruitment & selection and promotion decisions.

Action 4: Staff returning to work after availing themselves of parental leave, will have their service in grade reckoned for up to 12 months therefore, their years in service will continue to accumulate in their favour when applying for career progression.

Key Area	Objectives	Challenges	Direct Target	Indirect Target	Timeline				
					2022	2023	2024	2025	2026
Gender Equality in Recruitment and Career Progression	To promote processes to support gender sensitive recruitment and career progression opportunities.	Staff returning to work after availing themselves of parental leave, will have their service in grade reckoned for up to 12 months therefore their years in service will continue to accumulate in their favour.	All Staff	Families of staff	x	x	x	x	x

The SCH offers an array of measures to better support the work life balance of its employees.:

- Parental leave is an unpaid entitlement and is applicable to employees on the grounds of care of own/adopted child/children or when taking legal custody of child/children to enable them to take care of that child for a period of twelve (12) months, which period may be utilised until the child has attained the age of ten (10) years.
- Adoption leave is an unpaid entitlement and is applicable to employees on the grounds of international adoptions that involve lengthy processing abroad for a period of three (3) months.
- Leave for foster children is an unpaid entitlement is applicable to employees on the grounds of fostering a child/children for a period of twelve (12) months. Should the occasion arise for a further foster placement, additional unpaid leave may be allowed, provided that not more than a total of twelve (12) months special unpaid leave is availed of in every period of four (4) years.

Although employees on parental/adoption/foster children leave are still notified of any new positions which may arise from time to time, such leave was not considered in the calculations of years of service of the respective employee. In this light, it could be the case that at times when an employee avails himself of such leave, they would be at a disadvantage to meet the eligibility criteria as outlined in the internal call for application, relating to the work experience required for the new position.

Goals: To provide a better opportunity for career progression.

Action: In considering this matter and to further eradicate any barriers which might be hindering staff members from availing themselves of this measure, the SCH has decided that employees availing themselves of parental leave, shall continue to accumulate their service in grade in their favour. Such new measure, which is normally availed of by female employees, will further support the role of females within the SCH.

Action 5: Communication and implementation of gender sensitive content in all formal communication

Key Area	Objectives	Challenges	Direct Target	Indirect Target	Timeline				
					2022	2023	2024	2025	2026
Integrating the gender dimension	To promote inclusivity and address gender issues.	Communication and implementation of gender sensitive content in all formal communication.	All Staff	N/A	x	x	x	x	x

A review of the SCH’s policy as well as internal documentation and communication has uncovered the need to pro-actively address matters relating to the effective use of gender sensitive language in all formal communication. Making use of gender-neutral pronouns is an important tool to ensure a more inclusive working environment in which individuals can feel free to express their gender identity. Although the SCH already makes use of gendered pronouns such as ‘he/she’ in its official documents, such pronouns are generally drafted in the traditional order of ‘he’ before ‘she’, therefore placing more importance on the male gender rather than the female gender. Furthermore, the SCH recognises that such language might not be gender inclusive, as it conforms to the binary gender system. In view of this, the SCH recognises that the additional use of inclusive pronouns such as ‘they/them’, will ensure that non-binary persons are not excluded and that all its staff members are addressed through language as persons of equal value, dignity, integrity, and respect. In addition to the employ of non-binary pronouns, when the gender is not relevant for communication the SCH also promotes the use of other measures, which strengthen inclusiveness, including the use of gender-neutral words like "humankind, humanity, artificial, human-caused", the use of pronouns like "one", "who", and the plural antecedents in order to avoid gendered pronouns.

Goals: To be more inclusive on the basis of gender through the use of gender sensitive communication.

Action: To amend any gender sensitive content in all SCH formal communications.

1.4 Data Collection and Monitoring

For the purpose of this GEP, the data in relation to each challenge shall be collected as follows:

- **Action 1: *To set up a Gender Equality Action Group within the SCH***

During the first year of the GEP, each Unit within the SCH will appoint one officer to act as an Equality Officer. The selected officers will form the Gender Equality Action Group and will be responsible for the monitoring of the GEP.

- **Action 2: *To extend the possibility of remote working for all staff members irrespective of gender and/or family responsibilities***

Applications are open to all SCH staff members. Segregated data is collected upon application and a report is issued on an annual basis.

- **Action 3: *To ensure an equal representation of males and females on recruitment and interviewing boards***

The SCH HR Department staff has been made aware of this requirement and when a recruitment file is opened, gender segregated data of the members of the selection panel is collected and a report is issued on an annual basis. Any shortcomings will require a justification.

- **Action 4: *Staff returning to work after availing themselves of parental leave, will have their service in grade reckoned for up to 12 months therefore their years in service will continue to accumulate in their favour***

Both staff and the SCH HR Department staff have been made aware of this new measure. A record of staff members availing themselves of parental leave is already kept by the HR Department and a report shall be issued on an annual basis should there be any staff members on parental leave who apply for new vacancies whilst availing themselves of this entitlement.

- **Action 5: *Communication and implementation of gender sensitive content in all formal communication***

Existing and new employees shall receive training in relation to inclusivity on the basis of gender. A training session for existing staff members will be held in the fourth quarter of 2022 and all new existing staff will also receive this training as part of their induction process. A record of training delivery shall be kept at the HR Department and on a bi-

annual basis, the Gender Equality Officers shall monitor that all staff have received this training.

Gender-neutral official documentation and correspondence issued by the HR Department shall be vetted by the Director of HR and a sample of such documents shall be taken on a bi-annual basis so as to monitor that the use of gender-sensitive communication is being applied.

Furthermore, in order to normalize the use of gender pronouns in the workplace, the SCH offers the possibility to create customized email signatures for those who request it and invites its employees during meetings to introduce themselves with the pronouns they consider appropriate, so the entire team understands the importance of maintaining an inclusive environment

The SCH is the regulatory body for culture falling under the portfolio of the Ministry for the National Heritage, the Arts and Local Government. The SCH also endorses the Equality Policy drafted by the Office of the Principal Permanent Secretary.



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