

Innovative

Caring

Inclusive

Collaborative

Equality, Diversity and Inclusion Policy

1. Introduction and Statement of Intent

Inclusion and opportunity are fundamental to Abertay University's purpose and values. Our core purpose is to offer transformational opportunities and to inspire and empower our students and staff to achieve their full potential, fostering a community where everyone is supported to succeed and thrive.

Our Values – to be **Inclusive, Caring, Innovative and Collaborative** – are at the heart of our culture and reflect Abertay's commitment to equality, diversity and inclusion. Through our aim to be **Inclusive**, equality of opportunity and inclusion are embedded in our ethos. We welcome staff and students from diverse communities and aim to put people at the heart of all we do. In addition, by aiming to be **Caring**, we believe in treating everyone with kindness and respect.

Abertay welcomes and supports staff and students from a wide range of backgrounds and personal characteristics and values the benefits this diversity brings to our community. We are committed to promoting and implementing equality of opportunity for our staff, students, applicants for work or study, alumni, and all in the Abertay community. We aim to sustain a fair and inclusive environment for work and study based on fostering good relations between all people, with a shared commitment to promoting dignity and respect for all and challenging and preventing prejudice, discrimination and harassment.

The University believes that the most effective way to promote equality of opportunity, eradicate discrimination and foster good relations between groups is to mainstream the consideration of equality into our functions. In this respect, the University expects all employees, students and visitors to have an individual duty to ensure that equality and inclusion is actively promoted.

2. Purpose and Scope

This policy sets out key aspects of the University's commitment to equality, diversity and inclusion (EDI) in the following sections:

[3. The Legal Framework](#)

[4. Policy Statement and Commitment](#)

[5. Roles and Responsibilities](#)

[6. Equal Opportunities in Employment and Equal Pay policy](#)

[7. Monitoring](#)

[8. Staff Training, Learning and Development](#)[9. Disability Support and Adjustments](#)[10. Concerns and Complaints](#)[11. Promotion of Equality, Diversity and Inclusion](#)

This policy applies to all members of the University community, including employees and workers (staff), job applicants, current and former students, student applicants, associates, visitors, contractors and partners, as applicable. The principles are relevant to all in the community. Other aspects apply to relevant groups (such as staff or students) as indicated.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

3. Legal Framework

3.1. Public Sector Equality Duty (General Duty)

Under the Equality Act 2010, the University – as a public authority – has a Public Sector Equality Duty (General Duty) to have due regard to three needs when exercising its functions. These are to:

- a. eliminate unlawful discrimination, harassment, and victimisation
- b. advance equality of opportunity between people who share a protected characteristic and people who do not share it
- c. foster good relations between people who share a protected characteristic and people who do not share it.

The **protected characteristics** for this purpose are: age; disability; gender reassignment; pregnancy and maternity; race (including colour, nationality and ethnic or national origins); religion or belief; sex; and sexual orientation. (Marriage and civil partnership is also a protected characteristic, but only in relation to discrimination in employment.)

3.2. Forms of Discrimination

- 1. Direct Discrimination** occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (discrimination by perception) or because they associate with someone who has a protected characteristic (discrimination by association).
- 2. Indirect Discrimination** occurs when a provision, criterion or practice is neutral on the face of it, but its impact particularly disadvantages people with a protected

characteristic, unless the person applying the provision can justify it as a proportionate means of achieving a legitimate aim.

Protection from indirect discrimination affecting one protected characteristic group also extends to people who do not share that characteristic but are disadvantaged in the same way ('same disadvantage').

- 3. Discrimination Arising from a Disability** occurs when a disabled person is treated unfavourably because of something connected with their disability and the treatment cannot be justified. Such discrimination can only occur if it is known that a person has a disability, or it can reasonably be expected that a person is disabled.

Under the Equality Act, a person has a disability if they have "a physical or mental impairment and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities". This definition covers a wide range of physical, mental and sensory impairments, which can include neurodivergent conditions such as dyslexia, mental health conditions such as depression, and chronic health conditions such as diabetes and epilepsy. The definition also includes people with cancer, HIV and multiple sclerosis from the point of diagnosis.

Discrimination arising from a disability may be avoided by the provision of reasonable adjustments.

- 4. The Duty to Make Reasonable Adjustments** for disabled people applies to employers and providers of education, goods and services. The duty includes:

- Where a provision, criterion or practice, or a physical feature, puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled, reasonable adjustments must be made to avoid the disadvantage.
- Where a disabled person would, but for the provision of an auxiliary aid, be at a substantial disadvantage in comparison with persons who are not disabled, reasonable adjustments must be made to avoid the disadvantage by providing the auxiliary aid.
- Where requirements relate to the provision of information, reasonable adjustments include ensuring that the information is available in an accessible format

- 5. Harassment and Victimisation** are defined as follows and prohibited under the Equality Act:

- Harassment: unwanted conduct that has the purpose or effect of creating and intimidating, hostile, degrading, humiliating or offensive environment for, or violating the dignity of, the complainant. People are protected from harassment if they have, are perceived to have, or associate with someone with, a protected characteristic.

- Sexual harassment: unwanted conduct of a sexual nature.
- Treating a person less favourably because they have submitted to or rejected sexual harassment or harassment related to sex or gender reassignment.
- Victimisation: treating a person less favourably because they have asserted their legal rights under the Equality Act or helped someone else to do so.

3.3. Scottish Specific Duties

In addition to the General Duty, the University has Specific Duties under regulations in Scotland, which aim to embed equality into decision making and ensure effective performance of the General Duty. These are to:

1. Report on mainstreaming the equality duty at least every two years
2. Publish equality outcomes and report progress
3. Assess and review the equality impact of policies and practices
4. Gather, use and publish workforce equality information
5. Publish gender pay gap information and equal pay statements
6. Use information on board members' characteristics gathered by Scottish Ministers
7. Consider equality in award criteria and conditions in public procurement
8. Publish in a manner that is accessible

In relation to 2., the Scottish Funding Council and Equality and Human Rights Commission have set National Equality Outcomes for the tertiary education sector in Scotland. The University is committed to addressing these National Equality Outcomes, alongside any other EDI outcomes and actions identified, and reporting on progress.

The policy reflects good practice as well as statutory obligations under national legislation. The University will adopt practices required under future legislation.

4. Policy Statement and Commitment

The University believes that all employees and students have the right to expect fair treatment, and that it has a responsibility to ensure that no individual is disadvantaged because of their protected characteristics or any other personal characteristic that has no bearing on their ability to work, study or participate in the University community.

The University is committed to ensuring that:

- 4.1 All members of the Abertay community are treated with fairness, dignity and respect.
- 4.2 This policy is applied in compliance with and in the spirit of the relevant legislation.

- 4.3 This policy is communicated to all employees, students and Court members, and appropriate action is taken in accordance with University procedures against anyone who infringes this policy.
- 4.4 External contractors, partners and visitors are made aware, within reason, of their responsibility in relation to EDI and required to comply with Abertay policies.
- 4.5 It does not discriminate on grounds of any protected characteristic:
- i. in respect of recruitment, selection, deployment, training and development, career development, promotion, pay and reward, or dismissal of employees (see also [section 6. Equality opportunities in employment and Equal Pay policy](#))
 - ii. in respect of the admission, selection, teaching, assessment, progression or support of students
 - iii. in the provision of and access to facilities or services, or in the exercise of public functions.
- 4.6 Under-represented groups are encouraged to apply to work and study at the University. Where necessary, positive action may be applied.
- 4.7 Equality of opportunity is enhanced and good relations fostered between people who share a protected characteristic and those who do not.
- 4.8 Monitoring is carried out regularly, and covers the University's workforce, student population and applicants for work or study to assess the University's progress in promoting equality (see [section 7. Monitoring](#)).
- 4.9 Appropriate training, development and guidance in EDI is provided for all relevant employees (see [section 8. Staff Training, Learning and Development](#)).
- 4.10 All members of the Abertay community have equal access to University facilities and services wherever possible, and steps will be taken to make reasonable adjustments where appropriate to ensure that this can be achieved. (See [section 9. Disability Support and Adjustments](#)).
- 4.11 Staff and students are encouraged to notify the University of any disability or impairment, to enable appropriate support and adjustments, and to share details of their personal characteristics for EDI monitoring purposes (see sections [9. Disability Support and Adjustments](#) and [7. Monitoring](#), respectively).
- 4.12 Learning and teaching material, where practical, includes positive, diverse, non-stereotypical content.
- 4.13 Publicity material reflects the diversity of the University community, and language used in University documentation and correspondence aligns with the spirit of this policy.

- 4.14 Breaches of this policy are dealt with through the relevant staff or student complaint/grievance and/or discipline procedure. The University takes a strict approach to serious breaches of this policy, taking prompt action over alleged discrimination, harassment or victimisation. (See [section 10. Concerns and Complaints](#)).
- 4.15 Equality Impact Assessment (EqIA) is carried out on all University policies, procedures and projects to avoid detriment to protected characteristics groups and to promote equality and inclusion. The University will provide guidance for those carrying out EqIA and will publish completed EqIAs on the website.
- 4.16 Equality, diversity and inclusion are promoted actively, in line with our values and our statutory duty. (See [section 11. Promotion of Equality, Diversity and Inclusion](#)).

5. Roles and Responsibilities

University Court: is responsible as the legal authority for ensuring that the University meets its statutory obligations and has a specific responsibility to ensure that non-discriminatory systems are in place to provide equality and diversity of opportunity for staff and students. Court is responsible for approving this policy and for ensuring compliance with Abertay's EDI policies and procedures in relation to Court business, including approval of University strategies and policies.

People, Health and Equality Committee is responsible, on behalf of Court, for overseeing the governance of all people matters to ensure that the University creates, supports and maintains a positive and inclusive culture, where staff and students are valued and treated fairly and consistently with dignity and respect, and for overseeing the management of all EDI activities of the University as they relate to the duties and responsibilities of Court.

Senior Leadership Team (SLT) members are responsible – collectively, and individually in their own areas of responsibility - for leading implementation of the EDI Policy, ensuring that due regard is given to EDI and that EDI consideration is mainstreamed in all functions, including the development and enactment of strategies, plans, policies and practices.

The EDI Leadership Group reports to SLT and is responsible for ensuring that there is an overview of EDI activities and developments and a coordinated approach to EDI at Abertay, including the University's responses to internal and external EDI objectives and requirements. Members of the EDI Leadership Group are responsible for providing expert advice and guidance to inform University EDI policies, plans and approaches.

Line managers (including SLT members as line managers) are responsible for role modelling the University Values and the EDI principles and commitments set out in this policy and in the University Strategy, and for encouraging and supporting their staff and students to do likewise, and to reach their full potential. They are responsible for ensuring

that their staff comply with this policy, including completing required training, and for taking appropriate action in relation to any EDI issues or complaints raised, including harassment or discrimination, and any instances of non-compliance with EDI policy by staff or students. Line managers must also undertake any required learning and development and ensure that recruitment and selection, grading, promotion and pay reviews, and decisions regarding staff benefits are carried out in accordance with the University's policies and procedures and to ensure equitable and non-discriminatory treatment.

Lead Voices are staff volunteers who advocate for and speak on behalf of staff from different protected characteristic groups to ensure that colleagues feel heard, valued and empowered. Along with the recognised Trade Unions, Lead Voices play an important role in ensuring effective voice¹ for staff, contributing to Abertay's diverse and inclusive community.

Abertay Students' Association representatives play an important role in representing students' experiences and views in relation to EDI.

All staff are responsible for implementing the EDI policy and appropriate EDI practice in their areas of responsibility, e.g. teaching staff are responsible for ensuring that the curriculum, assessment and teaching methods have due regard to the General Duty to eliminate discrimination, promote equality of opportunity and foster good relations. Staff are responsible for knowing and complying with the University's EDI policy and procedures; for treating all in the University community with dignity and respect; for behaving in an inclusive and caring manner - in line with the University's values; and for completing all compulsory EDI training and development. Staff are encouraged to provide information for EDI monitoring purposes, on a voluntary basis.

All students are responsible for acting in accordance with this policy and treating others in the University community with dignity and respect. Students are encouraged to provide information for EDI monitoring purposes, on a voluntary basis.

All in the University community are responsible for supporting the University to meet its commitment to EDI and avoid unlawful discrimination. Everyone is encouraged to challenge and report unacceptable behaviour or practices, raise any concerns through appropriate channels and contribute positively to helping to prevent or resolve any issues.

¹ "Appropriate channels for effective workers' voice" is one of the Scottish Government's Fair Work First criteria.

6. Equal Opportunities in Employment and Equal Pay policy

The University is committed to equality and fairness in all our employment policies and practices. The University will avoid unlawful discrimination in all aspects of employment including recruitment, promotion/regrading, opportunities for learning and development, pay and benefits, discipline and performance management.

Recruitment processes will include measures to promote diversity, such as using diverse interview panels and advertising roles through channels that reach under-represented groups and applying transparent grading processes for new roles.

Person specifications and job specifications will be limited to those requirements that are relevant to the effective performance of a job. Candidates for employment or promotion will be assessed objectively against the requirements identified. Consideration will be given to any reasonable adjustments that may be required for disabled candidates. Disability and personal circumstances will not form the basis of employment decisions except where it can be objectively justified.

Equal Pay: We support the principle of equal pay for work of equal value and are committed to ensuring that our pay structures and reward processes are free from bias. For the purposes of this policy, pay includes any salary and any other consideration, whether in cash or kind, which employees receive directly or indirectly, in respect of their employment with the University including pensions and other benefits and entitlements.

Our recruitment and reward processes have been designed to be free from bias and are based on objective criteria. Our pay and grading structure is underpinned by the HERA (Higher Education Role Analysis) system which enables different roles to be compared on an objective basis by HERA trained analysts. In addition, our pay review processes for professorial and other grade 10 and senior staff are underpinned by EDI principles and subject to annual review by the Remuneration Committee.

To demonstrate commitment to equal pay in practice, and meeting the Scottish Specific Duty in relation to pay gaps and equal pay, the University will:

1. Undertake equal pay reviews at least every two years, including analysing and publishing pay gaps and consideration of occupational segregation in relation to sex, ethnicity and disability.
2. Monitor pay statistics and other related information for use in equal pay reviews and EDI reporting. Monitoring will include complaints/grievances from employees about unequal pay.
3. Respond to identified equal pay issues and employee complaints/grievances in relation to equal pay as a matter of priority, as and when received from individual employees or through a recognised trades union. (See section **10**. for the complaints process.)

4. Review pay policies and procedures at least every three years taking into consideration guidance and good practice from appropriate external organisations.
5. Present findings of equal pay reviews and policy reviews to appropriate committees and meetings including People, Health & Equality Committee and the Joint Liaison Group.

7. Monitoring

Equality monitoring is the process we use to collect, store and analyse data about diversity. It is useful to highlight possible inequalities, investigate their underlying causes and remove any unfairness or disadvantage. Monitoring provides the data for the review of policies and for identifying areas requiring improvement and understand the impact of policies and procedures on people with protected characteristics.

The University collects equality monitoring information for a number of reasons broadly related to the Public Sector Equality Duty under the Equality Act 2010.

The University will gather anonymised statistical information on relevant protected characteristics of staff and students in respect of the following:

- Staff: general composition of the workforce, recruitment and selection, promotion/regrading and development, pay (as noted in section 6.) and relevant wellbeing and employee engagement measures, including staff survey data.
- Students: general composition of the University's students, admissions, retention, progression/success, and relevant wellbeing and satisfaction measures.

Information will be reported to the People, Health and Equality Committee and incorporated into the University's biennial Equality Mainstreaming Report as appropriate.

The University will take any appropriate action to address any problems that may be identified as a result of the monitoring process.

Information provided for monitoring purposes will be used only for these purposes and will be dealt with in accordance with data protection regulations.

8. Staff Training, Learning and Development

The University requires all employees to undertake EDI training as specified on the Learning and Development intranet pages. Information on EDI policies and resources will be provided to all new staff as part of induction and all long-term, salaried staff are required to complete specified online training. The University will monitor compulsory training, liaising with employees and line managers as necessary to ensure completion.

Further learning and development support will be provided for those involved in recruitment or other management or decision-making processes where equal opportunities issues are likely to arise, including decisions about pay and benefits. Support is provided by People Services for anyone involved in dealing with complaints of bullying or harassment, discrimination or other matters relating to EDI.

9. Disability Support and Adjustments

The University is committed to creating an accessible and inclusive environment for all in line with recognised best practice in disability inclusion.

All staff and students are encouraged to share information if they have a disability or impairment or become disabled during their time at the University in order that appropriate actions can be undertaken and/or appropriate support can be provided.

If an employee experiences difficulties at work due to a disability, they should contact their line manager and/or People Services to discuss any reasonable adjustments (to the work environment, equipment, resources, etc.) that would help overcome or minimise the difficulty. If a student experiences difficulties during their studies due to a disability, they are encouraged to contact the Advisory service.

The University is committed to providing access to guidance and resources to support disability inclusion and proactive support through measures such as Tailored Adjustment Plans developed in partnership with staff to ensure individual needs are met.

The University will ensure that all digital platforms, learning materials, and recruitment systems meet recognised accessibility standards, enabling equitable access for all users.

The University is legally obliged to make reasonable adjustments to overcome barriers to using services or to employment or education caused by disability. The duty to make reasonable adjustments may include the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

When a disability is raised, the University will consider the circumstances carefully and endeavour to make reasonable adjustments where possible. In situations where a particular adjustment is not deemed reasonable the University will provide an explanation and try to find alternative solution(s) where possible. Managers should seek guidance from People Services in relation to staff and from the Advisory service for cases relating to students.

10. Concerns and Complaints

Staff and students are encouraged to report any incidents or complaints through the [Tell Us system](#), which may be by name - to allow reports to be followed-up - or anonymous, which will still enable monitoring and appropriate action where possible.

If an employee believes they have been treated unfairly or discriminated against (including in relation to equal pay), they may raise the issue informally with their line manager in the first instance, or alternatively may discuss it with People Services, with a view to seeking to resolve matters informally. If the matter is not resolved or an employee wishes to raise an issue formally, they may use the University's Grievance Procedure. If the matter involves bullying or harassment, the Bullying or Harassment Reporting Procedure should be referred to.

If a student believes they have been treated unfairly, they may wish to discuss the issue with the person involved informally in the first instance. Alternatively, through the Tell Us system, they may report the matter to a student adviser for discussion and support or raise a formal complaint. Additional support can be provided from the Students' Association.

The University will take any complaint seriously and will seek to resolve the issue. Individuals will not be penalised for raising a complaint or grievance, even if it is not upheld, unless the complaint is both untrue and made in bad faith.

11. Promotion of Equality, Diversity and Inclusion

The University has a statutory duty to have due regard to promoting equality of opportunity and good relations between protected groups, and this aligns with three of our core values of Inclusivity, Caring and Collaboration. The University is therefore committed to active promotion of equality, diversity and inclusion as a fundamental aspect of the University culture and ethos.

We will take steps to communicate that the University welcomes, values and supports under-represented and discriminated-against groups. The University will actively support staff networks, Lead Voices and others championing EDI.

Promotion activities will include communications, practices and events that highlight our inclusive and caring community, visibly and positively, on an ongoing basis. We will celebrate and promote EDI through events, campaigns, and awareness activities that foster inclusion and belonging. This will include marking national and international awareness events and periods, such as Pride and Black History Month, as well as local Abertay activities at any time.

12. Related Policy Documents and Supporting Documents

Legislation	Equality Act 2010 ; Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 ; Public Sector Equality Duty: specific duties in Scotland EHRC
Strategy	University Strategy 2025-2030 and all supporting strategies
Policy	N/A
Procedures	Bullying or Harassment Reporting Procedure; TellUs ; Grievance Procedure; Complaints Procedure
Guidelines	Equality Impact Assessment Guidance
Local Protocol	N/A
Forms	Equality Impact Assessment form

13. Additional Information

Audience	Public
Applies to	All University Members
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