



Social Media Policy

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Charity Number: SCO 36198

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1. Introduction and Aim

City of Glasgow College recognises the impact and benefits of social media and encourages staff to engage, collaborate, learn and innovate through social media platforms. It can be used effectively to express and share ideas, news and successes; keep staff and students up to date with important College developments; and promote positive academic debate about teaching and research.

The College is aware that the majority of our staff use various social media platforms, whether personally or professionally or both. The purpose of this policy is to clarify the expectations for Professional Standards & Conduct to protect the College, staff and students' reputation and values while supporting the appropriate and safe use of social media. This document will also outline the consequences of violations of the policy and reporting and monitoring inappropriate social media use.

2. Scope

In this policy the term 'social media' is used to describe a broad range of digital platforms which allow the creation and sharing of content across a virtual community. Examples include popular platforms such as Facebook, Messenger, TikTok, X (formerly Twitter), LinkedIn, YouTube, Instagram, WhatsApp, and Snapchat, as well as other services such as personal blogs and discussion forums.

Using social media carries inherent risks. Its rapid and extensive reach means that misuse can affect staff, students, and the College's reputation. This policy applies to all staff, including Board members, temporary workers, agency staff, and individuals engaged with the College on a self-employed contract basis who use social media to communicate:

- content that identifies them as a City of Glasgow College employee
- content relating to others at/in City of Glasgow College
- content created in connection with their College employment or course and
- content about the College.

This policy applies to all social media communications made at any time, including outside of normal working hours, in any language, whether privately or publicly, and from anywhere, whether to an individual or wider audience.

Personal social media communications which do not, in any way, relate to the College and/or identify individual members of staff, the Board or students are outside the scope of this policy. Students' personal social media communications are also outside the scope of this policy, however, students are expected to adhere to the [Student Code of Conduct](#).

This policy applies equally to the use of social media using either College-issued devices, or personal devices. College-issued devices include PCs, MACs, laptops, iPads, tablets and smartphones.

This policy also applies to internal College IT systems which include a social networking aspect, such as Microsoft Teams and MyConnect.

All other City of Glasgow College policies including the Staff [Code of Conduct](#) also apply in the context of social media.

This policy can be amended/updated at any time.

3. Roles and Responsibilities

All staff are responsible for:

- reading and taking the time to ensure that they understand this policy;
- ensuring that any use of social media (professionally and personally) is carried out in line with this and other relevant policies, including the [IT Acceptable Use Policy](#) and the Staff [Code of Conduct](#);
- completing any relevant training as required;
- ensuring that relevant guidelines are followed; and
- reporting any incidents or concerns regarding social media use to their manager, supervisor or the Digital Content Officer (in the Brand & Communications department) or their HR advisor.

All Managers are responsible for:

- reporting any incidents or concerns regarding social media as mentioned above;
- authorising College-related social media posts where designated;
- completing relevant training as required, as well as ensuring their staff are appropriately trained where required, and
- addressing any issues of misuse of social media by those staff for whom they are responsible.

All City of Glasgow College-branded social media account owners (official and unofficial) are responsible for:

- completing any relevant training as required;
- operating accounts appropriately, and in accordance with this policy and relevant guidelines;
- seeking relevant authorisation for official City of Glasgow College accounts/posts where required;
- putting in place appropriate security on accounts including password management and where possible ensuring Multi-factor authentication (MFA) is used for College social media accounts, so that it's harder for that account to be compromised;
- ensuring that accounts have up-to-date content;
- responding to comments; and
- closing down unused accounts.

4. General Principles

4.1 Principles

College employees are only permitted to message students using official College platforms, such as Microsoft Teams, Canvas or College emails. WhatsApp groups – and other platforms with instant messaging functions – should not be set up for lecturers (or any other staff) to communicate with students as this represents a clear violation of this policy. This also pertains to any staff who are responsible for students overseas or on excursions in the UK.

The College strictly prohibits the use of instant messaging platforms, such as WhatsApp, to contact students because use of these instant messaging channels cannot be adequately monitored by the College and this is particularly so when communication is carried out using personal devices. Any misuse of these channels can create substantial data protection and legal risks for the College. Ultimately, we must always prioritise that the College has a duty of care to protect our students from the risk of harm associated with the use of non-approved instant messaging platforms.

The College recognises that WhatsApp may be used by staff as a convenient method of communications. It is permissible for staff members to create and use WhatsApp groups to contact each other, provided that colleagues consent to being contacted in this

way. Membership of WhatsApp groups should be monitored and individuals removed from groups as appropriate. Information shared via a WhatsApp Group should be kept to minimum. Personal data about individuals and business confidential information should not be shared. Business decisions should not be recorded using WhatsApp. It is recommended that a retention period is set within a WhatsApp Group, via the application settings, to ensure that information is not held for longer than is necessary.

The College reserves the right to moderate its own social media communications channels and may remove content at its own discretion.

It is expected that staff will act in a responsible and ethical manner when using social media, always treating others with dignity and respect. Regardless of the privacy settings applied to each site, users should assume that any content posted on social media is publicly visible and permanent. If content is deleted, it may not be permanently removed. Each individual is personally liable and will be held accountable for the content that they post.

Staff must not use personal social media accounts to engage with students. For example, staff should never send a “friend” request to a student on Facebook, nor accept such a request from a student; and staff should never chat with students over WhatsApp, X (Twitter) or Messenger direct message (DM).

Use of social media must at all times be consistent with other College policies, such as the Information Technology Acceptable Use policy and the Data Protection policy. To protect City of Glasgow College staff, students, and the College’s reputation and values, all individuals must ensure they do not:

- Disclose confidential College information, including intellectual property, without proper authorisation.
- Share any College personal data or sensitive information about an individual or organisation without their consent, in compliance with the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018 (Data Protection Law).
- Breach confidentiality by revealing protected information related to College operations or third-party partnerships.

This ensures that the College remains compliant with Data Protection Law, safeguarding the privacy and rights of individuals and organisations.

Staff must not do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by making offensive or derogatory comments relating to sex, race, gender, gender reassignment, race, nationality, religion or belief, disability, sexual orientation, or age.

Staff must never use social media to bully or defame an individual; nor post content or links to content that is discriminatory or offensive.

Staff must avoid a breach of copyright or other intellectual property laws, for example by using other people's images or written content without permission and/or failing to give acknowledgement where permission has been given to reproduce something.

4.2 Expectations for Professional Standards & Conduct on Social Media

City of Glasgow College expects all staff to conduct themselves professionally and to uphold the institution's reputation both within and outside the workplace, including on social media platforms.

Staff are expected to interact respectfully and with civility towards colleagues, students, stakeholders, and the wider community on all social media platforms. Any form of harassment, discrimination, or bullying - whether overt or subtle - on social media will not be tolerated and will be subject to disciplinary action.

Staff must avoid posting any content that could bring the College into disrepute. This includes but is not limited to: public criticism, disparaging comments or inflammatory statements about the College, its policies, students, or staff. Constructive feedback should be communicated through appropriate internal channels rather than on social media.

4.3 Consequences of Violations

Any staff member found to be openly attacking or defaming the College on social media may be subject to disciplinary procedures as outlined in the College's [Disciplinary Policy](#). Depending on the severity of the breach and subject to investigation, this could lead to formal warnings, or even termination of employment.

In cases where social media conduct violates legal standards, such as defamation or breaches of confidentiality, the College reserves the right to pursue civil or criminal legal proceedings against the individual concerned.

Staff are encouraged to report any instances of unprofessional conduct on social media to their line manager or the HR department. All reports will be treated confidentially and investigated promptly.

As outlined in Section 8 of this policy (Monitoring and Privacy), the College may monitor social media activities where there is suspicion of policy violations. Such monitoring will be conducted in compliance with applicable laws and College policies to ensure privacy rights are respected.

5. Official CoGC Social Media Accounts

The College maintains official accounts for social media sites such as Facebook, X (Twitter), Instagram, LinkedIn and SnapChat. Links to these accounts can be found via the College website. These sites are monitored by the Brand & Communications team and are the preferred accounts for users to communicate and interact with City of Glasgow College.

Responsibility for the suitability of information posted on these sites lies with the author, who must ensure that the material is appropriate for all users who might access it. The College will remove any content found to be inappropriate and may block users from posting on these sites if it becomes necessary.

Staff can contribute to the social media activities of City of Glasgow College by writing for blogs, contributing content to official College social media accounts, or by helping with the running of official social media accounts.

Any staff contributing to these social media activities are representing the College and must at all times follow the published guidelines for use of official College social media.

Any requests to set-up a new official College social media account, should in the first instance be directed to the Brand & Communications team (Digital Content Officer). If the social media profile is affiliated with a specific course, permission must also be obtained from the relevant Associate Dean. The Digital Content Officer should be granted full admin rights to any new social media accounts that are approved.

Permission from the Brand & Communications department must be obtained before using City of Glasgow College branding in any form of social media.

Final approval for the creation of a new official College social media account must be given by the Director of Communications

6. Using Personal Social Media Accounts

Social Media can be an effective way for staff to connect with peers in College and beyond, and to support their work by providing opportunities for collaboration. The College encourages this and is happy for staff to celebrate their connection with the College.

Staff should be aware their activity on social media is likely to be linked with the College, regardless of whether they are acting in a professional or personal

capacity, and whether they are using a professional or personal account. When using social media in a personal context, staff are still expected to uphold City of Glasgow College values, respect other employees, students and stakeholders, and protect confidentiality, privacy and security. It is important therefore for any staff using a personal account in a professional capacity to make it clear they are acting on behalf of themselves and not the College. In particular:

- Staff should not use account names that suggest the account is an official City of Glasgow College account.
- The City of Glasgow College logo should not be used without official authorisation.
- Where a personal social media account indicates a role/association with City of Glasgow College, a disclaimer such as “The views expressed here are my own and not City of Glasgow College’s” should be included.

Maintaining separate online profiles for work and personal lives may require additional work and it would be a matter of personal choice for the individual. However, staff choosing to use social networking sites for mixed purposes (i.e. work and leisure), need to make sure that any use for work reasons complies with Data Protection Law. Privacy settings should be set to maximum on personal accounts and professional accounts to avoid potential hijacking of accounts.

7. Using Social Media as a Learning and Teaching Tool

Where possible, the preferred method of online communication between staff and students is the Virtual Learning Environment (Canvas), Microsoft Teams or College email. Teaching staff should use Canvas when publishing course resources and materials.

The College provides a number of collaborative tools that are available to all, including Microsoft Teams and MyConnect and Canvas. Staff are encouraged to make use of these tools whenever possible. Staff should not use external social media platforms as an alternative/supplementary tool for learning and teaching, professional and personal boundaries must be fully recognised and respected.

Students may decide they wish to use their own personal social media accounts and tools for collaboration. Staff should not participate in or engage with such private groups, and they must not encourage or require students to join them.

8. Monitoring and Privacy

As noted in the [IT Acceptable Use Policy](#), the College reserves the right to monitor employee internet and social media usage in accordance with information security standards.

User data is treated as confidential and private. Valid reasons for checking staff internet usage include:

- Suspicions that an employee is in breach of College policy;
- Requests for access/ monitoring from Police or Security Services;
- Requests made under the Data Protection Act (2018) or Freedom of Information Act 2000 (Scotland 2002)
- Requests to establish facts as part of a misconduct investigation
- Requests from the employee themselves and
- To facilitate the operation, repair and essential maintenance of College IT systems.

9. Legislation

All social media use must comply with existing UK legislation. Any illegal or unlawful acts that can be committed using words or images can equally be committed using social media. Posts on social media that violate those general principles could potentially be in breach of legislation such as:

- Data Protection Act 2018
- UK General Data Protection Regulation 2020
- The Defamation Act 2013
- Equality Act 2010
- Offences (Aggravation by Prejudice) (Scotland) Act 2009
- The Communications Act 2003
- The Sexual Offences Act 2003
- Freedom of Information (Scotland) Act 2002
- Anti-Terrorism, Crime and Security Act 2001
- Regulation of Investigatory Powers Act (RIPA) 2000
- Human Rights Act 1998
- The Protection From Harassment Act 1997
- Malicious Communications Act 1988
- Copyright, Designs and Patents Act 1988
- The Contempt of Court Act 1981

- The Offences Against the Person Act 1861.
- The Online Safety Act 2023
- The Prevent duty (Counter-Terrorism and Security Act 2015)
- The Adult Support and Protection (Scotland) Act 2007

Other legislation relating to social media use include the following:

- Regulation of Investigatory Powers Act 2000 and
- Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000.
- Article 8 of the European Convention on Human Rights (listed in Schedule 1 of the Human Rights Act 1998), covers the right to respect for private and family life. As such, when monitoring social media use by employees or students, members of staff should avoid doing anything that might constitute an invasion of their privacy.

10. References

10.1. Policy Framework

Associated Policies and Procedures	Title
Policy	IT Acceptable Use
Policy	Data Protection (for Staff and Students)
	Data Protection – Privacy Notice
Policy and Procedure	Staff - Disciplinary Procedure
Procedure	Staff - Code of Conduct
Policy	Staff - Complaint Handling
Policy	Equality, Diversity & Inclusion
Policy	Fraud Prevention
Policy	Grievance
Policy	Prevent
Policy	Safeguarding
Policy	Student - Bullying and Harassment
Policy	Student - Disciplinary Procedure
Policy	Student - Complaint Handling
Policy	Use Your Own Device

11. Document Control and Review

Approval Status	Approved
Approved by	Development Committee
Date Approved	February 2025
EQIA Status	EQIA Conducted Yes: <input checked="" type="checkbox"/> No:
Review Date	February 2028
Lead Department	Brand & Communications
Lead Officer(s)	Will McLeish
Board Committee	
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12. Revision Log

Version Date	Section of Document	Description of Revision
Version 1 06 Aug 2014	All	First Version of City of Glasgow College Social Media Policy
Version 1.1	All	Updated to include change of job roles in organisation
Version 1.2	All	Updated to provide change of job roles in organisation and provide further clarity on expectations for professional conduct on social media and consequences of violations of the Social Media Policy.
Version 1.3	All	Updated to reflect changing nature of social media platforms and providing clarity on the importance for staff to only use official College platforms to contact students.

The Public Sector Equality Duty (PSED) and protected characteristics are detailed at the end of this form. Refer to the EqIA Guidance Document for more Information on how to complete this form.

Title of Policy, Procedure, or Relevant Practice:	Social Media Policy	Lead Officer:	Michael Logan
Type of Policy, Procedure, or Relevant Practice:	New: <input type="checkbox"/> Existing/Reviewed/Revised: <input checked="" type="radio"/>	Date of Assessment:	15/10/2024

Step 1: Outcomes and Potential Impacts

What are the intended consequences (outcomes) of the policy, procedure or practice?

The City of Glasgow College social media policy is designed to ensure that staff use social media responsibly, in line with the college's values and legal requirements. The policy provides clear guidelines to protect the college's reputation, maintain professionalism, safeguard privacy, and prevent misuse that could lead to reputational, legal, or security risks.

It also helps promote positive engagement, transparency, and consistent messaging across social platforms.

This Policy and Procedure is essential to avoid any reputational damage for the College and to ensure that the College is able to promote positive use of social media and set out the consequences of violations of the policy.

Step 2: Consideration of Evidence and Information

2A. What information do you plan to use as the basis of this EQIA?

(What information is available and if information is lacking, how will you address this shortfall?)

City of Glasgow College is a diverse institution. City s supportive of the LGBT+ population and the college community contains a significant proportion of ethnic minorities (c.20%) and over 15% have a physical or learning disability. We welcome students from 130 countries each year and are committed to embedding Equality, Diversity and Inclusion.in the organisation. Our website was recently audited by the Digital Cabinet Office for accessibility compliance and we continue to ensure all our digital channels comply with relevant ED&I legislation.

2B. Please indicate potential positive, neutral and negative impacts in relation to each protected characteristic.

(What does the information indicate about potential **positive, neutral and negative** impacts on people who share protected characteristics? Are the needs of people with different characteristics met? Does the policy, procedure, or practice affect some groups differently?)

Protected Characteristic	Check the relevant box and provide an explanation for each option chosen, with reference to evidence, or information. Note: in some cases, impacts can be both positive and negative.		
Age	Positive <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/> It is not anticipated that age could result in a differential equality impact in the application of this Policy and procedure.	Negative <input type="checkbox"/>

2B. cont'd - Please indicate potential positive, neutral and negative impacts in relation to each protected characteristic.

Protected Characteristic	Check the relevant box and provide an explanation for each option chosen, with reference to evidence, or information. Note: in some cases, impacts can be both positive and negative.		
Disability	Positive <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/> It is not anticipated that the application of this Policy could result in a differential impact on people who have a disability.	Negative <input type="checkbox"/>
Gender Reassignment	Positive <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/> It is not anticipated that the application of this Policy could result in differential impact on people who have undergone or who intend to undergo gender re-assignment.	Negative <input type="checkbox"/>

2B. cont'd - Please indicate potential positive, neutral and negative impacts in relation to each protected characteristic.

Protected Characteristic	Check the relevant box and provide an explanation for each option chosen, with reference to evidence, or information. Note: in some cases, impacts can be both positive and negative.		
Marriage & Civil Partnership	Positive <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/> It is not anticipated that the application of this Policy could result in a differential impact on people based on their marital status.	Negative <input type="checkbox"/>
Pregnancy & Maternity	Positive <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/> It is not anticipated that the application of this Policy could result in a differential impact on people who are pregnant or who have recently taken maternity leave.	Negative <input type="checkbox"/>

2B. cont'd - Please indicate potential positive, neutral and negative impacts in relation to each protected characteristic.

Protected Characteristic	Check the relevant box and provide an explanation for each option chosen, with reference to evidence, or information. Note: in some cases, impacts can be both positive and negative.		
Race	Positive <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/> It is not anticipated that the application of this Policy could result in a differential impact on people based on their race.	Negative <input type="checkbox"/>
Religion or Belief	Positive <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/> It is not anticipated that the application of this Policy could result in a differential impact on people of different religions or beliefs.	Negative <input type="checkbox"/>

2B. cont'd - Please indicate potential positive, neutral and negative impacts in relation to each protected characteristic.

Protected Characteristic	Check the relevant box and provide an explanation for each option chosen, with reference to evidence, or information. Note: in some cases, impacts can be both positive and negative.		
Sex	Positive <input type="checkbox"/>	Neutral <input type="checkbox"/> It is not anticipated that the application of this Policy could result in a differential impact on people based on their gender	Negative <input checked="" type="checkbox"/>
Sexual Orientation	Positive <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/> It is not anticipated that the application of this Policy could result in a differential impact based on a student's sexual orientation.	Negative <input type="checkbox"/>

Step 3: Consider Alternatives and Mitigation

3A. Are you able to reduce any potential negative impacts identified above?

Yes: No:

**For 3B and 3C, please detail relevant protected characteristics and refer to evidence/information.
Note: In some cases, both “yes” and “no” may be suitable responses.**

3B. If “Yes”, what arrangements could be implemented to reduce any potential negative impacts identified above?

3C. If “No”, it may be appropriate if the policy, procedure, or relevant practice affects groups differently where this is a proportionate means of achieving a legitimate aim. If this is the case, please provide explanatory details to objectively justify this decision.

(Note: you may be required to obtain legal advice to verify your decision. If you suspect this may be the case, please contact Equality, Diversity & Inclusion for direction.)

Step 4: Compliance with the Public Sector Equality Duty (PSED)

4A. Does the policy, procedure or relevant practice comply with the three parts of the PSED?

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Yes: No:

For 4B- 4D, please detail relevant groups who share a protected characteristic and refer to evidence/information.
Note: In some cases, both “yes” and “no” may be suitable responses.

4B. If “Yes”, how?

The policy and procedure complies with the PSED. For example the policy states that "Staff must not do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by making offensive or derogatory comments relating to sex, race, gender, gender reassignment, race, nationality, religion or belief, disability, sexual orientation, or age".helping eliminate discrimination, improve equality and foster good relations between persons who have a protected caractoristic and those who do not.

4C. If “No”, what are the negative impacts and the associated risks?

4D. If “Yes” or “No”, what changes could be implemented to better comply with the PSED?

Step 5: The Involvement of Individuals, Groups and Organisations Representing Protected Characteristics

5A. Who has been involved in the undertaking of this assessment?

(Please detail the staff/student/stakeholder groups, in particular those representing protected characteristics)

Consultations have been undertaken with the Deputy Principal, Director of Communications, the Vice Principal, Corporate Development & Innovation Vice Principal - People and Corporate Support, Director of IT and Digital Content Officer.

5B. If you have further involvement to carry out, please list who you are going to involve, when and why?

Step 6: Making a decision and outcome

6A. What is your decision? (Please select an option from below)

- A. A positive impact is explicitly intended and very likely.
- B. A negative impact is not expected. There is clear potential to have a positive impact by minimising or eliminating barriers and inequalities that currently exist.
- C. A negative impact is not expected, but positive impact is also unlikely.
- D. A negative impact is probable or certain for some groups but the policy as a whole can nevertheless be justified as a proportionate means of achieving a legitimate aim.

(Note: you may be required to obtain legal advice to verify your decision. If you suspect this may be the case, please contact Equality, Diversity & Inclusion for direction.)

6B. Are you able to introduce the policy, procedure, or relevant practice without making any changes?

Yes: No:

6C. If "Yes", clearly explain upon which basis this decision was made

The Social Media Policy is scheduled for 'Discussion and Decision' in October then will go to SMT and the BOM for approval so further amends can not be ruled out at this stage.

6D. If "No", what changes will you make before implementation?

Step 7: Taking action and monitoring

7D. Once implemented, how will the policy, procedure, or relevant practice be monitored, by whom and by when?

The policy will be managed by the Vice Principal, Corporate Development and Innovation who is responsible for authorising new requests to fly flags.

Step 8: Approval and Publishing

- **The information contained within this EqIA needs to be confirmed and approved as the completed EqIA will be published on the College web-site.**
- **As such, EqIAs must be approved by a Dean/Director or above.**
- **Following completion, send the electronic copy to both the Quality Unity Administrator and the Equality, Diversity & Inclusion Manager.**
- **An electronic signature is acceptable, as long as a scanned or paper copy follows.**

Name:	Michael Logan
Position:	Head of Communications & Marketing
Signature:	Michael Logan
Date:	15/10/2024

Miscellaneous

Please insert any supporting information, evidence sources, or data here.

Summary of the Public Sector Equality Duty (PSED) of the Equality Act 2010

Components	Due Regard
A public authority must, in the exercise of its functions, have due regard to the need to:	Having due regard specifically involves taking steps to:
a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Act. (Fairness)	
b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. (Opportunity)	a) Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic * b) Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. (Respect)	a) Tackle prejudice. b) Promote understanding.

'Due regard' comprises two linked elements: proportionality and relevance. The weight that public authorities give to equality should be proportionate to how relevant a particular function is to equality. In short, the more relevant a policy, procedure or practice is to equality and people, then the greater the regard that should be paid.

The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and Civil Partnership *
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

* Although Marriage and Civil Partnership applies to section a) in employment only, this will be considered for all stakeholders.