

Example HR Policy Template: AI and Disability Inclusion (Scotland)

1. Policy Title

AI and Disability Inclusion Policy

2. Purpose

This policy sets out the organisation's approach to ensuring that all AI-assisted recruitment, assessment, and employment practices are fully inclusive of disabled people, compliant with Scottish and UK equality law, and aligned with national Scottish policy frameworks on fairness, inclusion, and ethical AI.

The organisation commits to:

- Removing barriers faced by disabled applicants and employees, in line with Scotland's adoption of the Social Model of Disability.
- Ensuring that all AI tools are transparent, fair, accessible and responsibly deployed, in line with the Scottish AI Strategy 2026–2031 and Scottish AI Playbook.

3. Scope

This policy applies to all:

- Employees
- Job applicants
- Contractors and agency workers
- HR, recruitment, and IT personnel
- Any AI-based systems used in recruitment, training, HR decision-making, performance review, or workforce management

4. Legal and Regulatory Framework (Scotland)

This organisation complies with:

4.1 Equality Act 2010 (UK-wide)

- Prohibits disability discrimination and mandates reasonable adjustments throughout recruitment and employment.

4.2 Scottish Public Sector Equality Duty (PSED)

For public bodies (and voluntarily adopted by private employers for best practice):

- Duty to eliminate discrimination, advance equality of opportunity, and foster good relations.
- Requires impact assessments, including AI-related decision-making impacts.

4.3 Scottish Government Policies on Disability and Employment

Including the Fairer Scotland for Disabled People Employment Action Plan, which promotes barrier removal and co-design with disabled people.

4.4 Professional Standards

Guidance from the Law Society of Scotland on accessible, inclusive hiring practices.

5. Policy Principles

5.1 Social Model of Disability

We recognise that disability arises from societal barriers, not individual impairments, and commit to identifying and removing digital, procedural and attitudinal barriers created or amplified by AI systems.

5.2 Ethical, Inclusive and Transparent AI

We align with Scotland's national AI values:

- Fairness
- Accountability
- Transparency
- Inclusion

5.3 Co-Design with Disabled People

Disabled applicants, employees and Disabled People's Organisations (DPOs)/Scottish Union of Supported Employment's Experience Network will be invited to shape decisions regarding AI-based recruitment and training tools.

5.4 Reasonable Adjustments

For any AI-supported task, assessment, or training module, applicants and employees will be offered:

- Alternatives to AI-based assessments
- Flexible formats and time adjustments
- Supportive technologies
- Clear routes to request adjustments

6. AI Use in Recruitment

6.1 Accessible Job Design and Advertising

We will:

- Ensure job requirements are role-specific, not generic (avoid criteria that create unnecessary barriers).
- Provide accessible job adverts and online materials.

6.2 Accessible Online and AI-Assisted Application Processes

All recruitment platforms must:

- Be compatible with screen readers, voice dictation and keyboard navigation.
- Avoid mandatory video-analysis or gesture-tracking unless an alternative is available.

6.3 Alternative Assessment Options

Candidates may choose non-AI formats such as:

- Written answers or practical tasks
- Phone interviews/Online interviews – human-led
- Live human-led interviews

6.4 Clear Communication About AI Use

Candidates will receive clear, early information explaining:

- What AI is used
- What skills it assesses
- How to request adjustments

7. AI Use in Employee Development and Training

7.1 Accessible Learning Platforms

All AI-driven learning and training tools must include:

- Captions, transcripts and audio descriptions
- Adjustable pacing and time
- Compatibility with assistive technologies

7.2 Fair and Transparent Performance Analytics

AI-based performance tools must not penalise:

- Variation in typing speed
- Variations in communication style
- Assistive technology use
- Disability-related fluctuations

All automated flags must be subject to meaningful human review.

8. Procurement of AI Systems

8.1 Vendor Requirements

Vendors must provide evidence of:

- Accessibility testing (e.g., WCAG conformance)
- Fairness and bias testing
- Human-oversight mechanisms
- Data transparency and documentation

This aligns with Scotland's AI Playbook emphasis on trustworthy, inclusive AI.

8.2 Equality Impact Assessment

All new AI systems must undergo a Scottish-specific Equality Impact Assessment (EQIA) including disability impacts, as required by the Scottish PSED.

9. Auditing, Monitoring and Review

9.1 Regular Accessibility Audits

The organisation will conduct annual audits reviewing:

- Algorithmic fairness
- Accessibility features
- Disabled user experiences
- Impact on recruitment and promotion outcomes

9.2 Engagement With Disabled People

Audit findings will be reviewed with:

- Employee disability networks (SUSE Experience Network)
- Disabled People's Organisations

9.3 Continuous Monitoring

AI systems will be re-audited following system updates or if adverse impacts are identified, in line with EHRC expectations that AI systems must be kept “under constant review.”

10. Governance and Accountability

- HR, IT and senior leadership share joint accountability for compliance with this policy.
- A Responsible AI Lead (or equivalent) will oversee audits, EQIAs and vendor checks.
- Employees may appeal AI-influenced decisions through internal HR processes.

11. Training and Awareness

All employees involved in recruitment and management will receive training on:

- Inclusive hiring
- Reasonable adjustments
- Scotland's AI values and ethical standards
- How AI tools work and their limitations

12. Review Cycle

This policy will be reviewed annually or sooner if:

- Relevant Scottish Government policy changes
- New guidance is issued by the EHRC
- New AI systems are introduced