SDG
05
GENDER EQUALITY

EVIDENCE DOCUMENT | INDICATOR 5.6.2

Non discrimination policy for transgender people

METRIC 5.6 Women's progress measures

REFERENCE YEAR	COVERAGE	DATE PREPARED
2025	Students, applicants, faculty, officers and staff across all campuses	3 November 2026

ISSUING OFFICE	EVIDENCE ID
Directorate of Quality Assurance, Head Office	E-05-5.6.2

THE SIR 2027 REQUIREMENT

Does your university as a body have a policy of non-discrimination for transgender people?

01 Statement of Evidence

Bahria University's direct answer to the requirement

Yes. Bahria University has an institutional policy of non-discrimination covering transgender people through its Equality and Non-Discrimination Policy / Diversity, Equity and Inclusion Policy. The updated policy retains its 2024 title and records amendments dated 20 October 2025 under DHR. Paragraph 4 explicitly lists gender identity as a protected ground alongside gender and prohibits discrimination in education, employment, admissions and University services. Paragraph 14 confirms that each ground listed in paragraph 4 defines a Protected Class. The policy applies across University programmes and activities, provides complaint and resolution procedures, assigns implementation responsibilities and prohibits retaliation. Supplementary University Ethics and Health, Safety and Environment policies reinforce relevant protections. CMS records for 2025 provide documented evidence of students registered under gender X. The institutional policies, original clauses and implementation records are presented below.

02 Evidence and Activity Record

Dated facts and records that substantiate the statement

The updated EDI Policy provides the primary institutional protection. The University Ethics Policy and updated HSE Policy provide supplementary provisions. Each policy is presented through its opening pages, followed by relevant original clause extracts. Implementation records are retained at the end.

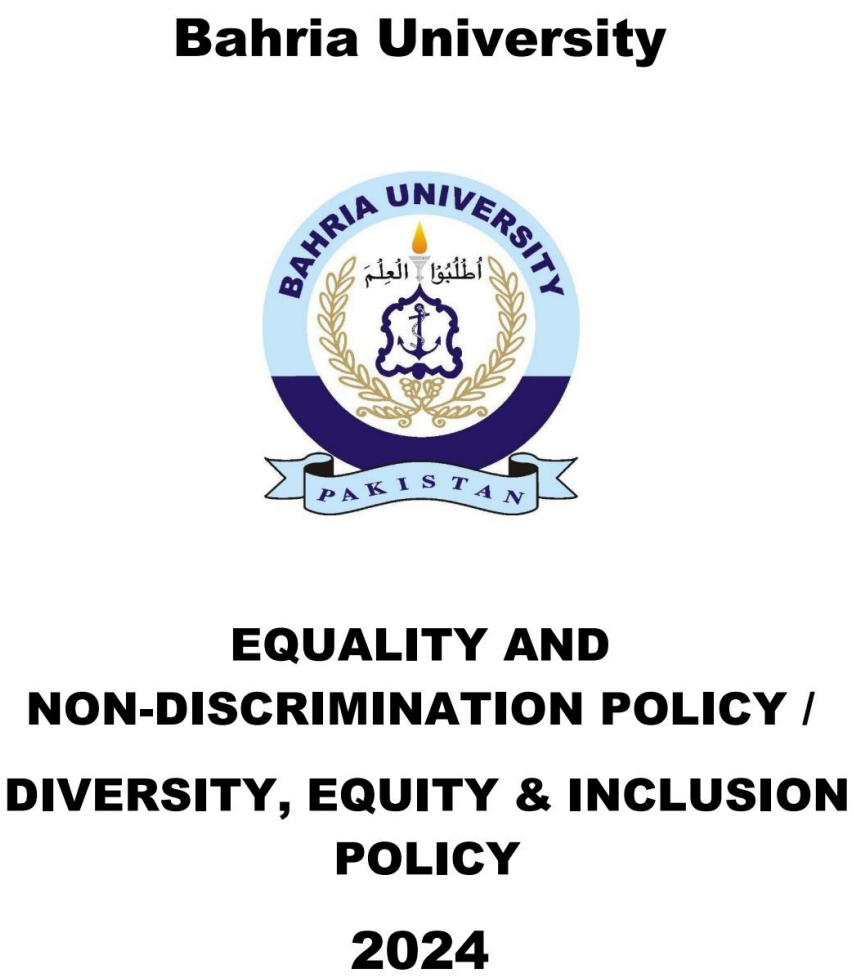
TABLE 1 Institutional protections for transgender people

University policy	Relevant provision	Application
Updated EDI Policy	Paragraphs 3, 4 and 14; amendment record 20 October 2025 under DHR	Gender identity expressly protected in education, employment and University services.
EDI procedures	Paragraphs 5–6 and 19–23	Anti-retaliation, reporting, resolution procedures, responsibilities and fair process.
University Ethics Policy 2026	Paragraphs 15.1 and 15.2	Equal access to opportunities and prohibition of discriminatory treatment.
Updated HSE Policy	Paragraph 2.16(a–d)	Equity, privacy and accessibility, including transgender persons with disabilities.
CMS implementation records	Spring and Fall 2025 gender X registrations	Admission and registered participation across three campuses.

1 Equality and Non-Discrimination Policy

The updated University EDI Policy expressly includes gender identity in paragraph 4(l). Its scope covers admissions, faculty and staff induction, employment, University services and programmes, and activities opened to the public. Paragraph 14 confirms that every ground listed in paragraph 4 defines a Protected Class. Accordingly, protection is established directly through the University's own policy. The supplied nine-page policy has no separate table of contents; its complete cover and amendment record precede the relevant clause extracts.

1.1 EDI policy cover



Bahria University

BAHRIA UNIVERSITY
أَطْلُبُوا الْعِلْمَ
PAKISTAN

EQUALITY AND
NON-DISCRIMINATION POLICY /

DIVERSITY, EQUITY & INCLUSION
POLICY

2024

Page 1 of 9

Figure 1: Complete original EDI Policy cover retaining the 2024 title.

1.2 EDI policy amendment record

Copy No. ____

Record of Amendments

Amendment No.	Dated	Authority for Amendment	Articles Amended
01	20/10/2025	DHR	Paras 3, 4 (k–n), 14; new para 24

Note: Amendments are to be recorded, cross-checked and their incorporation in thedocuments authenticated (with name, designation and signature).

Figure 2: Complete original amendment register dated 20 October 2025 under DHR.

1.3 University wide scope

Paragraph 3 applies the policy across University programmes, student admissions, employment practices and operations, including the conduct of students, employees, visitors and others. DHR monitors compliance. This scope ensures that the protection of gender identity operates across the institutional activities identified in the policy.

SCOPE OF THE POLICY

3. This policy applies to all areas of Bahria University programs, activities encompassing induction of FMs, BUOs, BUSAS (including non-discrimination against women) and admission of students, employment practices and operations, including the conduct of all students and employees, as well as to the conduct of all guests, visitors, vendors, contractors, subcontractors and others who do business with Bahria University. This Policy also applies to every activity the University opens to the public, including access to its libraries and other learning resources, public lectures and events, executive education and vocational training, online and distance courses, and outreach beyond the campuses. These activities are open to all, regardless of ethnicity, religion, disability, immigration status or gender, or any other ground in para 4, subject only to identification and security rules that apply equally to every visitor. DHR shall monitor compliance, and complaints follow paras 19 to 21. All harassment is within the scope of this Policy under para 24.

Figure 3: Original updated paragraph 3 on institutional scope and compliance monitoring.

1.4 Gender identity as an expressly protected ground

Paragraph 4 prohibits discrimination in education and employment and explicitly lists gender identity among its protected grounds. Its employment provisions cover recruitment, appointment, pay, training, promotion, discipline and termination. The policy also prohibits gender discrimination in admission and University services. These institutional provisions support protection for transgender applicants, students and employees.

POLICY STATEMENT

4. Bahria University is committed to the principles of equal opportunity and non-discrimination in education and employment, including gender equality. Discrimination on the basis of the following, or any other legally protected basis, is unlawful and is prohibited by this Policy.

a. Age
b. Race
c. Colour
d. National origin

Page 3 of 9

Figure 4: Original policy statement, PDF page 3.

e. Gender
f. Religion
g. Caste
h. Creed
i. Disability
j. Political beliefs
k. Ethnicity
l. Gender identity
m. Refugee or asylum-seeker status
n. Immigration status

The University is committed to ending discrimination in the workplace on every ground in this para, in recruitment, appointment, pay, training, promotion, discipline and termination. No person shall be discriminated against on the basis of gender in employment, admission or any University service. Women's applications, entry, participation and graduation are dealt with under paras 2.1.6 and 2.1.7 of the Admission Policy.

Figure 5: Original continuation of paragraph 4, including gender identity, PDF page 4.

1.5 Protected class and protection from retaliation

Paragraph 14 states that each ground listed in paragraph 4 defines a Protected Class. Read with paragraph 4(l), this expressly includes gender identity. Paragraph 5 prohibits retaliation connected with discrimination complaints, investigations or opposition to discriminatory conduct, and paragraph 6 provides the reporting route.

14. **Protected Class** – A class of persons who are protected under applicable federal or Bahria University laws against Discrimination and Harassment on the basis, as described in the policy statement above. Each ground listed in para 4 defines a Protected Class.

Figure 6: Original paragraph 14 defining Protected Class by reference to each ground in paragraph 4.

5. Retaliation towards an individual for filing a complaint of discrimination including unequal treatment on the basis of gender or discriminatory harassment, participation in an investigation of such complaint and/or opposition to discrimination or discriminatory harassment in the educational or workplace setting is also a form of harassment and is therefore prohibited.

6. Any person who believes they have been subjected to this type of prohibited activity should immediately report it to the respective HCU (any Pro-Rector for BUHO).

Figure 7: Original paragraphs 5 and 6 on protection from retaliation and reporting.

1.6 Complaints procedures and responsibilities

Paragraphs 19–21 provide complaint, informal and formal resolution procedures. Formal procedures determine whether discrimination, harassment or retaliation occurred and identify disciplinary or corrective action. Paragraph 22 assigns implementation responsibilities to University and campus leadership, DHR, DSA, Deans, Principals and Heads of Department.

PROCEDURES

19. Any member of the university community who has been either a target of or a witness to discrimination, including unequal treatment on the basis of gender or harassment can file a complaint through proper channel. When someone raises a concern about discrimination or harassment, the university official, to whom the matter was reported, will try and resolve the issue through informal negotiations between the two parties. If this fails to achieve an amicable resolution of the reported issue, the matter be reported to the next higher officer for taking it up formally with the concerned parties.

20. **Informal Resolution**

a. Informal resolution has the goal of ending offensive behavior and resolving the concern rather than assessing blame and exacting a penalty. If a concern can't be resolved informally, or if the behavior is so serious or persistent as to warrant disciplinary action, it should be handled through formal procedures.

21. **Formal Procedures**

a. The purpose of formal action is to determine if the BU policy on discrimination, harassment and retaliation has been violated and, if so, to enact disciplinary actions and/or prescribe a course of action that will resolve the situation. Disciplinary actions may include but are not limited to a written reprimand, probation, suspension, dismissal or expulsion (BU Statutes Chapter 9 and BU Academic Rules Chapters 13, 14 & 15 refer).

b. Formal procedures are set in motion when a signed written complaint is filed. The complaint must contain the name and signature of the complainant, details of the situation precipitating the complaint, and a statement of desired outcome.

c. The process for filing a complaint, investigating and hearing complaints and grievances against individuals depends upon the status of the accused (faculty, academic staff, university staff, or student). The BU Statutes Chapter 9 and BU Academic Rules Chapters 13, 14 & 15 guide these processes.

RESPONSIBILITIES

22. Pro-Rectors, DGs, DHR, Directors CUs, CU Head of HR Department, DSA, Deans, Principals of Schools & Concerned HoDs have the responsibility to maintain and consistently manage the implementation of this policy.

Figure 8: Original paragraphs 19–22, procedures and implementation responsibilities.

1.7 Fair process and privacy

Paragraph 23 requires impartiality, fair process, privacy, policy visibility, transparency and avoidance of conflicts of interest. These provisions govern the handling of concerns raised under the institutional non-discrimination framework.

a. **Impartiality**. All persons charged with responsibility for implementing these procedures will discharge their obligations with fairness, rigor, and impartiality.

b. **Fair Process**. Principles of fair process should be observed throughout the process. This includes timely resolution of the process, proper notice to parties, and the ability to respond to allegations.

c. **Privacy**. All activities under these procedures will be conducted with regard for the legitimate privacy and reputational interests of all parties involved. Once a formal complaint is filed, all parties, including witnesses, will be notified of the expectation that they keep information about the case – including any documents that they may receive or review – confidential. They will also be notified that sharing such information might compromise the investigation or may be construed as retaliatory. Medical and counseling records are privileged and confidential documents that parties will not be required to disclose. The parties remain free to share their own experiences, other than information that they have learned solely through the procedures and processes under this Policy. To avoid the possibility of compromising the investigation, it is generally advisable to limit the number of people in whom the parties confide.

d. **Respondents are Presumed Not Responsible**. A respondent is presumed not to be responsible for an alleged Policy violation until a final determination regarding responsibility is made.

e. **University Values**. The procedures for this Policy are to be construed in accordance with broader University policies, including the University-Wide Statement on Rights and Responsibilities.

f. **Clarity and Visibility**. All members of the University community are expected to be aware of the University's Non-Discrimination Policy, understand what conduct is prohibited under the Policy, and understand what their rights and responsibilities are under the Policy and Procedures.

g. **Transparency**. Throughout the course of an investigation into a formal complaint, the Investigator will provide frequent updates to both the complainant (the person bringing the complaint) and the respondent (the person about whom the complaint has been made).

h. **Timelines**. The HCU/Pro-Rector concerned, may impose reasonable timeframes to enable timely resolution of the matter. The investigatory process typically will not exceed 90 ordinary business days, absent extenuating circumstances.

i. **Avoiding Conflict of Interest**. The University commits to eliminating any conflicts of interest in the process. In situations where either the complainant or the respondent names as a party or witness the University official(s) who are designated as facilitating or overseeing any stage in the Informal Resolution or Formal Complaint Processes, the Local Designated Resource, in consultation with appropriate School officials, will determine a

Page 7 of 9

Figure 9: Original paragraph 23 on procedural safeguards.

2 University Ethics Policy

The University Ethics Policy 2026 provides supplementary protections in paragraphs 15.1 and 15.2. It prohibits denial of opportunities, privileges or participation on grounds including gender and any other protected characteristic, prohibits discriminatory treatment and bars retaliation. The policy is a subsequent supplementary instrument; its 2026 date is retained. The policy has no separate table of contents.

2.1 Ethics policy cover

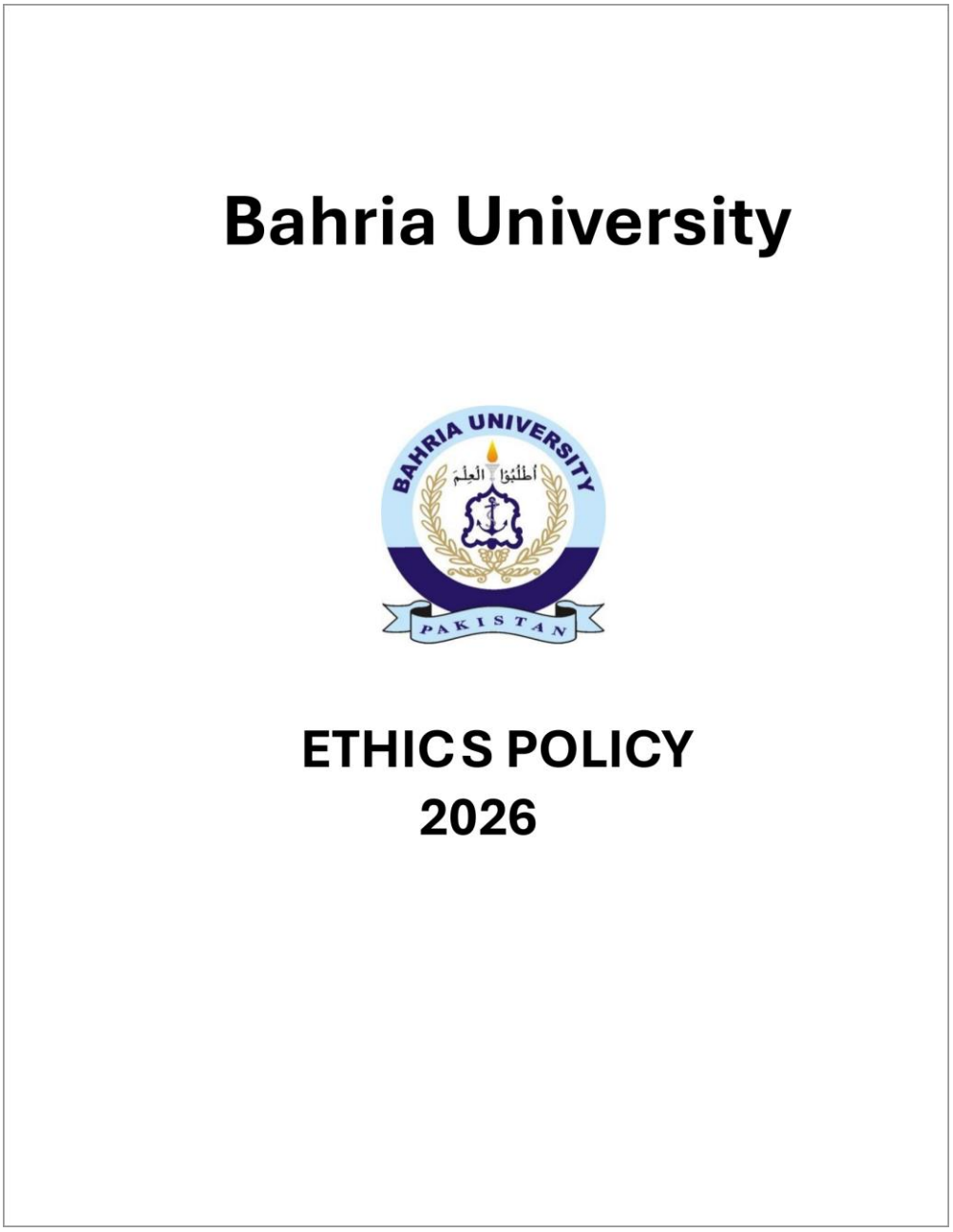


Figure 10: Complete original Bahria University Ethics Policy 2026 cover.

2.2 Equal opportunities and non discrimination

Paragraphs 15.1 and 15.2 reinforce equal access to University opportunities and participation. They prohibit unequal evaluation, disciplinary action or denial of opportunities based on protected characteristics and protect those reporting discrimination from retaliation.

15. Respectful and Inclusive Environment

15.1 Bahria University is committed to fostering a safe, inclusive, and respectful academic environment that upholds the principles of equality, diversity, and non-discrimination. In accordance with the **University's Equality and Non-Discrimination / Diversity, Equity & Inclusion Policy (2024),** no individual shall be denied access to opportunities, privileges, or participation in University programs on the basis of gender, religion, race, ethnicity, disability, or any other protected characteristic.

15.2 Any form of harassment, discrimination, intimidation, bullying, or exclusion that interferes with an individual's ability to work or study, or creates a hostile environment, is strictly prohibited. Discriminatory treatment - including unequal evaluation, disciplinary actions, or denial of opportunities based on protected characteristics - constitutes a violation of University policy. The University also strictly prohibits retaliation against individuals who report discrimination or participate in related investigations, recognizing retaliation itself as a form of misconduct.

Figure 11: Original University Ethics Policy paragraphs 15.1 and 15.2.

3 Health Safety and Environment Policy

The updated HSE amendment register records the first edition on 15 November 2021, the second edition on 22 November 2025 under Director Admin, and the third edition on 22 July 2026. The complete cover, amendment record and all four contents pages follow. Paragraph 2.16 directs special attention to equity, non-discrimination, privacy, accessibility and transgender persons with disabilities. This is supplementary protection for persons with disabilities; the broader prohibition of gender-identity discrimination is established by the EDI Policy.

3.1 HSE policy cover


BAHRIA UNIVERSITY
ISLAMABAD

BAHRIA UNIVERSITY
أُطْلُبُوا الْعِلْمَ
PAKISTAN

BU HEALTH, SAFETY AND ENVIRONMENT POLICY

i

Figure 12: Complete original updated HSE Policy PDF page 1: cover.

3.2 HSE policy amendment record

RECORD OF AMENDMENTS

Amendment No	Dated	Authority	Clause (s) Amended	Status
1st Edition	15 Nov 2021	Admin/Safety/2021/3224	-	superseded
2nd Edition	22 Nov 2025	Director Admin	Para 6.17 (second sentence added); Para 6.17.3 (new); Para 6.20.1 (new)	New Print
3rd Edition	22 July 2026	BU-HO/Admin/2026/827	Para 6.17 (second	New Print

Note: Amendments are to be recorded, cross-checked and their incorporation in the document authenticated (with name, designation, and signatures).

ii

Figure 13: Complete original updated HSE Policy PDF page 2: amendment record.

3.3 HSE policy contents page 1 of 4

TABLE OF CONTENTS

CHAPTER 1 - INTRODUCTION TO SAFETY POLICY		**1**
1.1	Safety Policy	1
1.2	Policy Statement	1
1.3	Policy Framework	1
1.4	Aim	1
1.5	Preamble	1
1.6	Applicability	1
1.7	Conflict in Orders/ Duties	1
1.8	Understanding Safety	2
1.9	Occurrence	2
1.10	Reporting an Occurrence	2
1.11	Investigating an Occurrence	2
1.12	Risk Management Process	2
1.13	Steps of Risk Management	2
1.14	Safety Check-List	4
1.15	Reference Publications	4
1.16	Feedback	4
CHAPTER 2 - ORGANIZATION AND MANAGEMENT		**5**
2.1	HSE Organization	5
2.2	HSE Management Hierarchy	5
2.3	HSE Officer	5
2.4	Standing HSE Committee (SHC)	6
2.5	Fire Officer	6
2.6	Section In-charges and Onus of Responsibility	6
2.7	Risk Assessment	6
2.8	Reporting Channel	6
2.9	Scrutiny of Civil Works	6
2.10	Duties / Responsibilities	6
2.11	HSE Audit	10
2.12	Work Permit and Conduct of Contractors	10
2.13	HSE Awareness through Community Support Programme	10
2.14	Promoting HSE at Campus	10
2.15	Administration of Persons with Disabilities (PWDS)	11
CHAPTER 3 - FIREFIGHTING		**13**
3.1	Fire Hazard	13
3.2	Firefighting Concept within Bahria University	13
3.3	External Agencies Coordination	13
3.4	Risk Assessment	13
3.5	Layout Plan of Buildings	13
3.6	Fire Audit	13
3.7	External Audit	14
3.8	Combustible Material	14
3.9	Use of Wood and other Inflammable Materials	14
3.10	Gas Leakage Safety	15
3.11	Dangerous Conditions (Fire Safety)	15

Figure 14: Complete original updated HSE Policy PDF page 3: contents page 1 of 4.

3.4 HSE policy contents page 2 of 4

3.12	Unwanted Fire Alarm Signals (UFAS)	15
3.13	Actions in Case of Fire Display	16
3.14	Fire Warning System	16
3.15	Duties of Firefighting Officer.	16
3.16	AOR Firefighting Officer BUIC	16
3.17	Composition of Firefighting Teams	16
3.18	Fire Fighting Equipment	17
3.19	Types of Fire and Recommended Fire Extinguishers	17
3.20	Maintenance Responsibility	17
3.21	Maintenance of Portable Fire Extinguishers	17
3.22	Fire Extinguishing Ball	18
3.23	Fire Extinguishing Ball Installation	18
3.24	Fire Pumps	18
3.25	Fire Hose Reels	18
3.26	Alternate Power Supply to Fire Main Pumps	18
3.27	Display of Fire and Emergency Services Contact Numbers	18
3.28	High Fire Risk Areas	19
3.29	Fire and Rescue Vehicle	19
3.30	Laboratories Safeties	19
3.31	Server Rooms Safeties	19
CHAPTER 4 - EMERGENCY EVAUATION		**20**
4.1	Emergency Evacuation Plan and Drills	20
4.2	List of Occupants	20
4.3	Buddy System	20
4.4	In-charge Emergency Evacuation	20
4.5	Access to Buildings	20
4.6	Special People Rescue	21
4.7	Exit Routes	21
4.8	Emergency Muster Area(s)	21
4.9	Calling Numbers for Assistance	21
4.10	Actions on Receiving Fire/Emergency Alarm and Earthquake	21
4.11	Use of Lifts	22
4.12	Emergency Evacuation – Day Care Center	22
4.13	Emergency Evacuation Training	23
CHAPTER 5 - TRAINING		**24**
5.1	Training Organization	24
5.2	Scope of Training	24
5.3	Training Facilities	24
5.4	Role of Students Support Center	24
5.5	HSE Training of Faculty and Staff	24
5.7	Weekly Fire Exercise and Lectures	25
5.8	Emergency Evacuation Drills	25
5.9	Documentation of Training	25
CHAPTER 6 - ENVIRONMENT PROTECTION		**26**
6.1	Importance	26
6.2	Bahria University Environment Policy	26
6.3	Organization	26

iv

Figure 15: Complete original updated HSE Policy PDF page 4: contents page 2 of 4.

3.5 HSE policy contents page 3 of 4

6.4	Environmental Management Plan (EMP)	27
6.5	The Purpose of the EMP	27
6.6	Components of the EMP	27
6.7	Scope of EMP	28
6.8	Water Management	28
6.9	Waste / Storm Water Management	28
6.10	Waste Water Minimization and Re-use	29
6.11	Septic Tanks	29
6.12	Solid Waste Management Plan	29
6.13	Principles of Solid Waste Management	30
6.14	Instructions for Solid Waste Disposal	30
6.15	Developing Effective Material Management (from Raw to Waste)	31
6.16	Use of Polythene Shopping Bags	31
6.17	Combating Plastic Pollution in BU	31
6.18	Improving Noise Quality at Campus	31
6.19	Plantation	31
6.20	Pollution Control Technology Management	31
6.21	Reducing Environmental Footprints	31
6.22	Roles and Responsibilities	32
6.23	Director Quality Assurance	32
6.24	Director Campus/ CU HODs	32
6.25	Sustainability Governance	32
6.26	SDG Alignment, Monitoring & Reporting	32
6.27	Local Environment Coordinator	33
6.28	Potable Water Testing	33
CHAPTER 7 - HEALTH		**34**
7.1	Importance	34
7.2	Objective	34
7.3	Policy Framework	34
7.4	Organization	34
7.5	Prevention	34
7.6	Health Care Facilities	37
CHAPTER 8 - MENTAL HEALTH		**39**
8.1	Mental Health	39
8.2	Definition of Mental Health Difficulties	39
8.3	Key Points	39
8.4	Purpose of the Policy	39
8.5	Scope and Limitations	40
8.6	Physical and Mental Health Support Available to Students	40
8.7	Recognizing Mental Health Difficulties	40
8.8	Role of BU Faculty and Staff in Taking Action	40
8.9	Return to Study	40
8.10	Data Maintenance and Confidentiality	41
8.11	Data Linkage with Medical Center	41
8.12	Data Analysis	41
ANNEXES		
A	Occurrence Report Performa	42
B	Risk Assessment Matrix	44

Figure 16: Complete original updated HSE Policy PDF page 5: contents page 3 of 4.

3.6 HSE policy contents page 4 of 4

C	Safety Check-Lists	45
D	Rights of Persons with Disability (PWDs) Act - 2020	52
E	Gas Leakage Safety Instructions	66
F	Guidelines for Calculating Number of Firefighters	69
G	Types of Fire and Recommended Fire Extinguishers	71
H	HEC Policy/ Guidelines for Universities on COVID-19	72
I	Dengue Prevention	83
J	Hostel Hygiene Check List	85
K	Personal Hygiene - Guidelines	87
L	Sickbay Staff Responsibilities	89
M	Sickbay SOPs	92
N	References/ Authorities	97

Figure 17: Complete original updated HSE Policy PDF page 6: contents page 4 of 4.

3.7 Equity privacy and accessibility

Paragraph 2.16 requires the identified provisions to be given special attention and implemented in letter and spirit. Its express inclusion of transgender persons with disabilities connects non-discrimination with privacy and ease of access across University premises.

2.16 Following additional points are to be paid special attention and implemented in letter and spirit (**Ref: Rights of PWDs Act,** enclosed at **Annex D)**.

a. Equity and non-discrimination of PWDs.
b. Right to privacy.
c. Women, children, elderly people and transgender PWDs.
d. Ease of access and mobility.

Figure 18: Original updated HSE paragraph 2.16(a–d), printed page 11.

4 Implementation through student admission and registration in 2025

The University's Campus Management System (CMS) records each student's gender as male, female or X, the category the University uses for transgender students, whose gender is other than male or female; students recorded as X are admitted and registered through the same system as all other students. The CMS Registered Students' Strength report, filtered to gender X for every 2025 semester at every campus, shows four registrations in Spring 2025 and four in Fall 2025, at the Islamabad E-8, Islamabad H-11 and Karachi campuses, in five departments. Because a continuing student appears in each semester of registration, the registrations represent at least five distinct students, one of whom entered Semester 1 in Fall 2025.

The record shows the non-discrimination policy at work in admission and registration: the University's systems provide for transgender students, and transgender students were admitted and studied across its campuses in 2025. To protect the privacy of the students concerned, department, programme and semester number are withheld; the CMS screenshots show the filters applied and the totals for each campus.

Campus	Spring 2025 registrations	Fall 2025 registrations
Islamabad E-8 Campus	3	3
Islamabad H-11 Campus	None recorded	1
Karachi Campus	1	None recorded
All campuses	4	4

Source: Bahria University Campus Management System, Students, Registered Strength; Gender = X; all other filters = All; extracted 3 November 2026. The Lahore Campus, the Institute of Professional Psychology and the Health Sciences Campus, Karachi, returned no students recorded as X in 2025.

4.1 CMS records for Islamabad E8 Campus

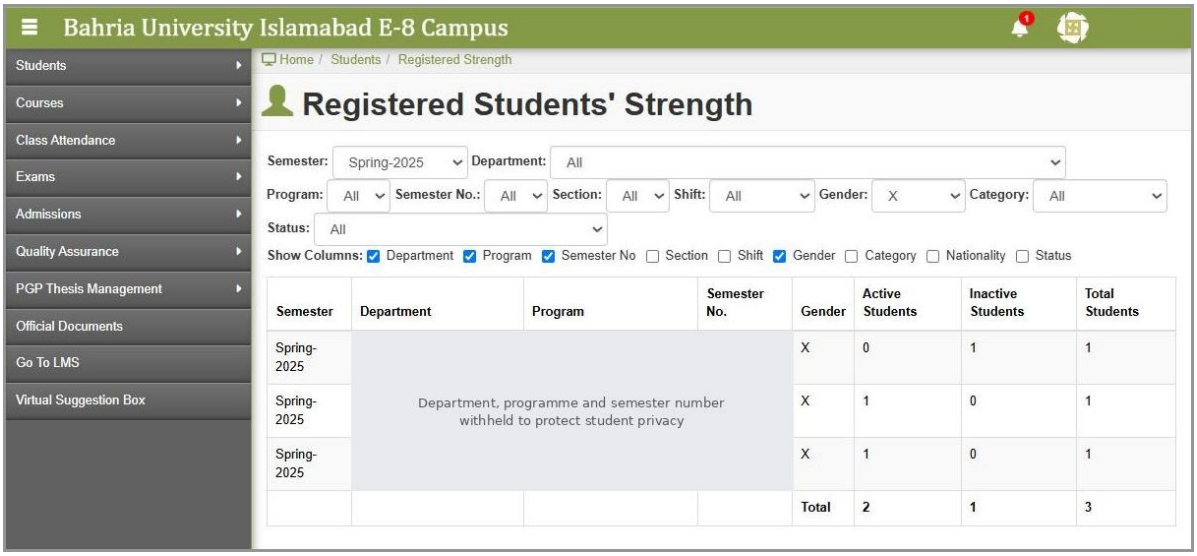


Figure 19: Bahria University CMS, Islamabad E-8 Campus, Registered Students' Strength, Spring 2025, Gender = X: three students (department, programme and semester number withheld; captured 3 November 2026).

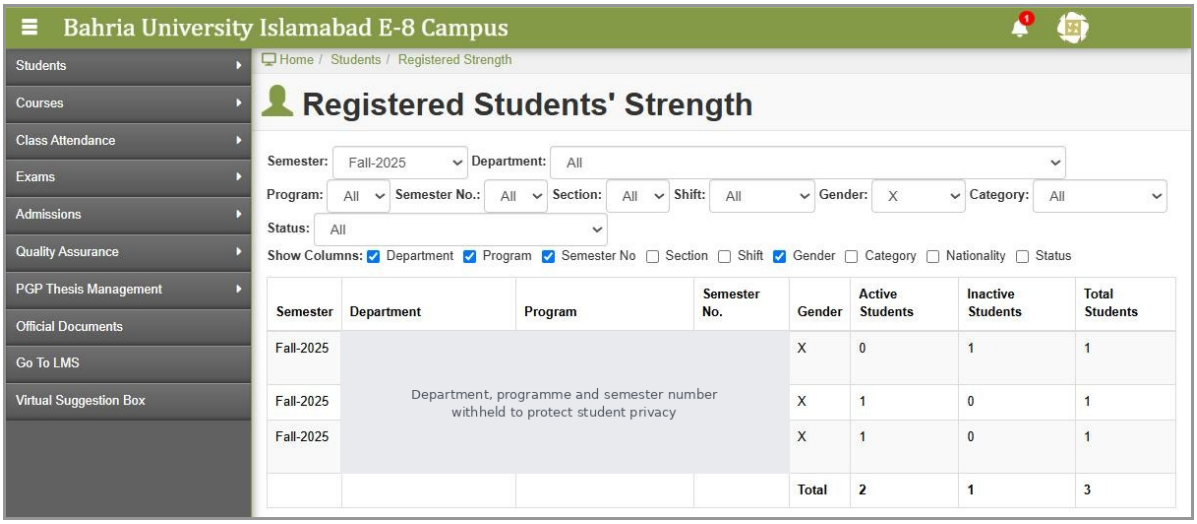


Figure 20: The same report, Islamabad E-8 Campus, Fall 2025, Gender = X: three students.

4.2 CMS records for Islamabad H11 and Karachi campuses

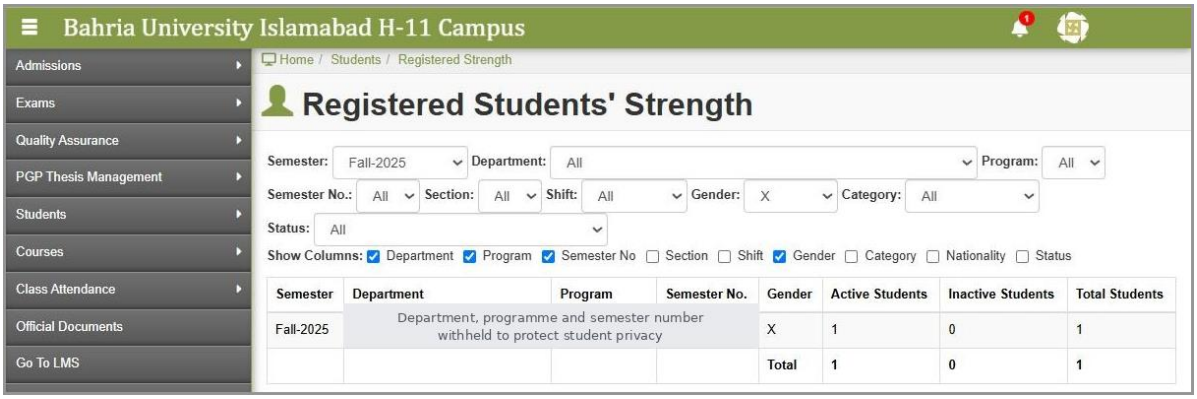


Figure 21: The same report, Islamabad H-11 Campus, Fall 2025, Gender = X: one student.

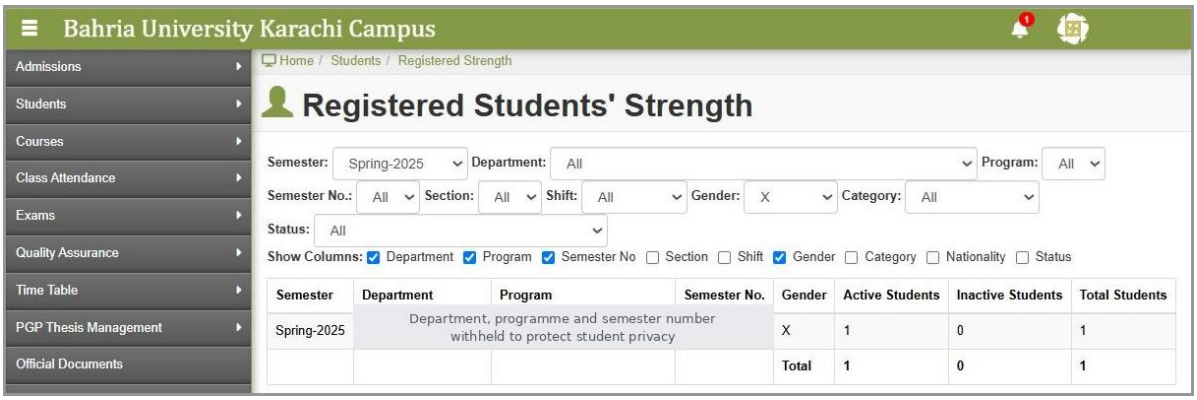


Figure 22: The same report, Karachi Campus, Spring 2025, Gender = X: one student.