



Equality, Diversity and Inclusion Annual Report 2019

Human Resources

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PART 1: EXECUTIVE SUMMARY

This report provides an overview of the Student Loans Company (SLC) progress against our equality objectives which were set in 2016. This is our third annual review of the EDI Strategy 2020 for report to our Executive Leadership Team and the Board before being published on our website www.slc.co.uk.

Some key highlights from 2018 have been:

- **Legislative Reporting:**
 - Captured gender pay data as at the 'snapshot' date of 31st March 2018. Report produced and published in line with the Gender Pay Gap Reporting Guidelines.
 - Deliver communication plan to engage, at the right time, with employees; PCS; stakeholders and media.
 - Gender Pay Gap Report produced and published.
 - Gender Pay Gap action plan approved.
 - Workforce equality profile data produced for the Company as a whole and by location (Glasgow, Darlington and Llandudno Junction). Building trend analysis data.

- **Employee Engagement and Events:**
 - Launch of the 'SLC Way' and eight behaviours.
 - Time to Change; the SLC continues to build on its commitment to work on mental health and progressing on its action plan.
 - Global Accessibility Awareness Day recognised for the fifth successive year.
 - Establishment of LGBT+ Network; 'Arcus'.
 - Company involvement in Glasgow and Northern Pride 2018. This is the first time the Company has been represented at Northern Pride.
 - Time to Talk Day, Mental Health Awareness Week and World Mental Health Day celebrated.
 - International Women's Day recognised for the first time.

- **Company Health & Wellbeing Strategy:**
 - Mental Health First Aiders embedded and active across the Company.
 - Regular themed communications for employees and managers via SLC Connect.
 - Developing new relationships with external organisations through steering group membership of 'This is Me Scotland' to share ideas and best practice. The SLC is leading the way on this in terms of our Mental Health First Aid initiative.

Background and context

The Equality, Diversity and Inclusion (EDI) Annual Report provides an assurance to the SLC Board and Executive Leadership Team that the Company is able to report against the general equality duty as outlined in the Equality Act 2010 which requires public bodies and those carrying out public functions to:

“Have due regard for the need to eliminate **unlawful discrimination, harassment and victimisation**; to **advance equality of opportunity**; and to **foster good relations** between people who share a protected characteristic and those who do not”.

PART 2: INTRODUCTION

As the new Chief Executive of the Student Loans Company (SLC), I am pleased to publish this annual report showing how we are meeting our equality responsibilities. The SLC publish equality objectives every four years and between now and March 2020 we will be scrutinising our EDI strategies ready for publishing our new equality objectives next March.

This report highlights the significance of our relationships and engagement with the lives of people, business, education providers, partners and stakeholders in the world we live in now and into the future. It is important that the initiatives and progress on equality, diversity and inclusion are embedded into the current SLC 2020 Strategy. This is of particular importance to the aspirations of the Company on organisational health and wellbeing, pay equity, career pathways and aspects of our corporate culture.

We need to harness talent across the widest possible base reflecting diversity in all its forms to develop an engaged, inclusive and talented workforce that contributes to the development of a high-performing organisation.

We want to build an organisation that is more dynamic and inclusive. The overarching purpose, and my personal commitment, is to make the SLC a great place to work and to be an employer of choice within the public sector.

Our senior leaders are committed to our diversity agenda and this is now reflected in their performance objectives, but our diversity commitment doesn't just come from the top – it is shaped by our people and their continuing commitment and contribution. So I'd like to take this opportunity to thank all my colleagues especially those who are giving their time to help develop this agenda.

This report highlights the progress we are making and where we are going next, to reach our goals. We are committed to making sure that the SLC meets its equality obligations and encourages all of us to work together to make maximum impact so that change is positive, embedded and sustainable.



Christian Brodie



Paula Sussex

Context of the Student Loans Company

The Student Loans Company (SLC) is a non-profit making Government owned organisation set up in 1989 to provide loans and grants to students at universities and colleges across the UK.

Core functions of the SLC

The Student Loans Company (SLC) administers government funded loans and, in some Administrations, grants to HE and FE learners, on behalf of England, Wales, Scotland and Northern Ireland, in line with the policy aims of the relevant Administrations. Currently the primary roles of the SLC are to:

- Deliver appropriate information to all customer groups at the right time and in the right form;
- Deliver financial support to eligible students and learners pursuing higher and further education in accordance with the student support regulations and relevant public policy objectives. In Scotland, this is done in partnership with the Student Awards Agency for Scotland (SAAS);
- Pay to Higher Education Institutions the public contribution towards tuition fees for England, Wales and Northern Ireland; and pay to Further Education Institutions the public contribution for England;
- Pay bursaries and scholarships on behalf of higher and further education providers;
- Work in partnership with HM Revenue and Customs (HMRC) to ensure repayments are collected on time from all those due to repay under the Income Contingent Repayment Loan Scheme;
- Manage the direct collection of voluntary additional repayments, repayments for those living overseas, and recovery of overpaid loans or grants;
- Provide expert operational advice and high quality data and information to support Administrations' policy making and analysis;
- Undertake specific tasks for individual Administrations, such as payment of Education Maintenance Allowances in Wales and Northern Ireland and administer on behalf of the private sector any sold portfolios of Income Contingent Repayment loans.

Our Policy Commitment to Equality, Diversity and Inclusion

The SLC is committed to creating and sustaining a positive and supportive working environment for its employees as well as offering a customer experience that reflects our vision, mission and behaviours.

The SLC believes that excellence will be achieved through recognising the value of every individual. We aim to create an environment that respects the diversity of employees and customers and enables them to achieve their full potential, to contribute fully, and to gain maximum benefit from the opportunities available. To this end the following basic rights are acknowledged for everyone who is part of the wider the SLC community:

- To be treated with respect and dignity
- To be treated fairly with regard to all procedures and assessments
- To receive encouragement to reach their full potential

These rights carry with them responsibilities and the SLC expects all of our employees and partners to demonstrate responsible practice and behaviour to uphold these rights. The SLC will comply with all relevant equality and good practice to eliminate discrimination as a result of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation or any combination thereof.

The SLC is committed to advancing equality of opportunity and fostering good relations for all its employees, customers, partners and stakeholders. For this duty to equality, diversity and inclusion to become real we will demonstrate effective leadership and management, as well as promoting a commitment from every employee.

In practice this means that we:

- Are committed to providing an environment where everyone is respected and treated fairly regardless of characteristics or distinctions such as: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religious belief/faith, sex and sexual orientation;
- Will develop a culture in which diversity is celebrated;
- Will not discriminate unfairly against anyone and will encourage positive action to promote equality and diversity;
- Will embed equality and diversity at the heart of our mission and behaviours.

PART 3: PROGRESS ON OUR EQUALITY OBJECTIVES

The following information provides headlines of our activities against our equality objectives:

Effective Leadership

- Work commenced in 2018 and is ongoing to build our attraction processes, emerging talent programmes and line manager skills to recruit and retain a diverse and inclusive workforce.
- Actively reviewing the structure of the SLC to identify how we could improve the culture of trust, accountability and empowerment.
- Evolving reward mechanisms more closely linked to staff needs, including flexible working and work-life balance.

Active use of data to review policy and procedures

- Development of a policy governance process to measure impact and effectiveness of our revised people policies.
- Development of guidance in supporting an inclusive Transgender workplace.
- Equality impact assessment documentation refreshed and fit for purpose to meet our duty under the public sector equality duty (PSED).

Promotion and communication of our EDI commitment

- Comply with the reporting requirements of the PSED and the gender pay gap reporting regulations.
- Retain Disability Confident Employer status.
- Continue building and embed our 'Time to Change' action plan to support mental health and wellbeing in the workplace.
- Engaging communications delivered to mark Global Accessibility Awareness Day (GAAD) in May 2018.
- Participation in Glasgow Pride and, Northern Pride 2018 for colleagues in Darlington and on-site Pride event in Llandudno Junction.
- LGBT+ employee network 'Arcus' embedded across the organisation.

Understanding who our customers are

- Online EDI training module.
- A range of Digital Learning Academy resources.

Increasing the accessibility and usability of our online systems whilst keeping pace with technological advances

- Online application access extended to our disabled student customers.
- Project development work in place to ensure compliance with Welsh language requirements for AY 18/19.

Secure a level playing field for our customers who need specific and targeted support

- The SLC inclusive design and communication strategy was launched in 2016 and is supported by a network of champions across the business.

- The Disabled Students Allowance function provides a direct service to disabled students applying for support to enable their access to education and further learning.
- Improved our customer facing systems to make them more inclusive for example enabling same sex sponsors to be linked as married/civil partnership.
- Work currently underway on both Gender Recognition and Transgender Policies for both our employees and customers.

Key highlights over the past year

Since the launch of our **LGBT+ Network Group 'Arcus'** in February 2018, over 100 colleagues have signed up to the network and agreed to 'Be Supportive', 'Be Active' and 'Be Visible'. Enthusiastic co-ordinators encourage, support and lead the network to engage with LGBT+ employees and allies, increase understanding and awareness of LGBT+ issues and contribute to the Company's EDI agenda.

The network wishes to foster an environment where lesbian, gay, bisexual and transgender employees have the confidence and support to be themselves at work. This will help to enhance the SLC's reputation, employee morale and customer satisfaction. The SLC participated again in the Glasgow Pride event and for the first time participated in the Northern Pride Parade in 2018. 'Let's Chat' sessions have been hosted across all sites to discuss various topics, such as why Pride is still needed and to mark Transgender Day of Remembrance. Over £700 has been raised by Arcus+ for local charities. Below is a picture of our staff at the Glasgow Pride event in July.



We continue the work of making **Health and Wellbeing** a core part of our culture, developing mental health awareness and adopting a prevention first approach in our health and wellbeing strategy. We are working to ensure everyone has access to the information they need to flourish and thrive. We invest in mental health initiatives such as Employee Assistance Programmes (EAP) and mental health first aiders and these remain a priority for 2019 as will be the need to set an example to employees and managers alike, by encouraging colleagues to seek help when needed. We will be participating in Time to Talk Day in February, Mental Health Awareness week in May and World Mental Health Day in October which helps raise awareness.

The SLC is also a steering group member of the Mental Health in the Business Community in Scotland network sharing experiences as we all consider how to take forward a focus on mental health within our respective businesses. We were delighted to host a meeting of the steering group in June 2018. The network has rebranded to 'This Is Me Scotland' in October 2018 and we look forward to taking part in the official launch at the Scottish Parliament scheduled in May 2019.



We received a good response to our Mental Health Awareness events held in May 2018. Above is a picture from the lunch and learn session delivered by Scottish Association for Mental Health (SAMH) at our Bothwell Street site in Glasgow. We also enjoyed sharing some engaging short films across all our sites on the topic of mental health.

A vertical poster with an orange background. At the top, there are two overlapping rectangular boxes: a light grey one with the text 'proud to support' and a darker purple one with 'time to change' in white. Below this, the text 'SLC & PCS are proud to support' is in a small, light font. The main title 'Mental Health Awareness Week' is in large, bold, white letters, followed by the dates '14 - 20 May' in a slightly smaller bold white font. The central text, in a light grey font, says 'Drop by anytime to view some engaging short films by Time to Change. We'll run them on the hour and every half hour starting at 12 noon, 12.30pm, 1.00pm & 1.30pm - ending 2pm. Feel free to bring your lunch.' Below this is a list of days and locations: 'Monday 14th - The Boardroom', 'Tuesday 15th - The Boardroom', 'Wednesday 16th - The Boardroom', 'Thursday 17th - The Boardroom', and 'Friday 18th - The Balling Room'. At the bottom, it says 'Evening showings are coming - watch this space!' and features the SLC logo (a tree icon and the text 'SLC Student Loans Company') in the bottom right corner.

proud to support
time to change

SLC & PCS are proud to support

Mental Health Awareness Week

14 - 20 May

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Evening showings are coming - watch this space!

 SLC
Student Loans Company

Since the launch of our **Mental Health First Aid** service in 2017, the SLC participated in new research on Mental Health First Aid in the Workplace¹ commissioned by the Institution of Occupational Safety and Health (IOSH) undertaken by the University of Nottingham, published in November 2018.

Their findings on the impact of Mental Health First Aid England training in the workplace shows it to be effective in increasing knowledge, confidence and skills necessary to support someone with mental health issues. The researchers identified several 'active ingredients' for success which includes mandatory recording of formal interactions and a network of active trained members which we are proud to have at the SLC. We have been able to share our experience and best practice with members of 'This Is Me Scotland' and look forward to sharing our ideas with the Contact Centre Association at an event at our Darlington site in March 2019 and developing new relationships.

The report identified key issues faced by mental health first aiders in the workplace including, difficulty managing the boundaries of the MHF Aider role. We are working with our network to create a clear definition of the trained person's role within the organisation, with guidelines for boundaries and safeguarding procedures as continual improvements are always being sought. We have anecdotal evidence

¹ MENTOR: MENTAL health first aid in The wORKplace: A feasibility study4 (Narayanasamy et al. 2018)

We marked the seventh annual **Global Accessibility Awareness Day** (GAAD) in May 2018. GAAD helps to raise awareness by get everyone talking, thinking and learning about accessibility and inclusion for anyone with any form of disability, for us that includes the way colleagues and customers access the information and services we provide in a format that suits their individual needs.

The GAAD logo appeared on all telephone screens, PC monitors and the Marketing team created valuable resources to provide information about how to make the information we produce accessible to all.

PART 4: RESULTS FROM THE EMPLOYEE ENGAGEMENT SURVEY

Background

The SLC Employee Engagement Survey was run in October 2018 and is a key component in our programme of transformation. It provided us with valuable and constructive feedback. After sharing results with the Board, top line results were shared with all staff in January and then managers held local team meetings with their staff. The full results give us an accurate picture of how staff feel about working at the SLC and provide us with information regarding thoughts about our culture, how we go about our work and are immensely powerful in shaping the way ahead for the SLC.

Headlines

- We received a 77% response rate (Between 60% - 80% is considered a good response rate for large organisations and was an increase from 67% from October 2017)
- Our overall engagement score is 5.7 out of 10. This score is based on responses to one single question in the survey: 'How likely is it you would recommend the Student Loans Company as a place to work?'
- Our overall satisfaction score is 5.9 out of 10. This score is based on responses to the question 'Overall, how satisfied are you working at the Student Loans Company?'

Our engagement scores were highest in the following areas:

- Peer Relationships (8.2 score)
- Goal Setting (7.8 score)
- Management Support – openness and caring (7.8 score)

The following areas scored lowest:

- Reward (3.4 score)
- Recognition (5.7 score)
- Freedom of Opinion (5.0 score)

Our people really care about the organisation and want to contribute positively by identifying areas where we can improve and also by recognising areas and colleagues who are doing a good job which is evident in the excellent response rate.

Action/Improvements

Priorities for the senior leadership team include pay, total reward, career path and culture. We are working to achieve this in a number of ways. Firstly, we are progressing vigorously the pay case, and at the time of writing are awaiting approval for this case.

Secondly, under the leadership of our new interim HR Director, Morven Spalding, we are working hard to develop a robust SLC People Strategy covering grading structure, total reward, succession and career paths, which will be integrated into our wider transformation plans for the SLC.

We are in the process of rolling-out the 'SLC Way'. The SLC Way is the culture and set of behaviours employees have told us they want to see at the SLC. We are confident that over the coming weeks and months as we make the SLC Way business-as-usual we will be improving the SLC as a place to work.

The insight from this survey is a key component in these plans, to ensure that we focus resources on areas where we most need to improve. The results provide teams with an opportunity to work on local actions and initiatives, both to drive engagement and improve employee experience. Our Chief Executive has committed to keeping all employees up to date on plans and actions as they develop.

We have followed up on these results by cascading individual Directorate and team reports to managers to share with their teams. Results provide insight, but actions drive change. We have committed to speaking to all staff across the organisation to gather their thoughts, and to consult directly with staff groups to ensure we capture all suggestions on ways to enrich the experience of working at the SLC.

Outcomes

The Chief Executive and Executive Leadership Team remain absolutely committed to following through on those things that we can fix whether they come through in the survey results, from the SLC internal Question Time sessions, staff consultation groups or from engagement with our recognised union PCS. . We recognise that there is no "quick fix" for the SLC and some of the issues lie outside of our control. The employee engagement survey is pivotal in a series of actions we are undertaking to change the culture and make the SLC a great place to work.

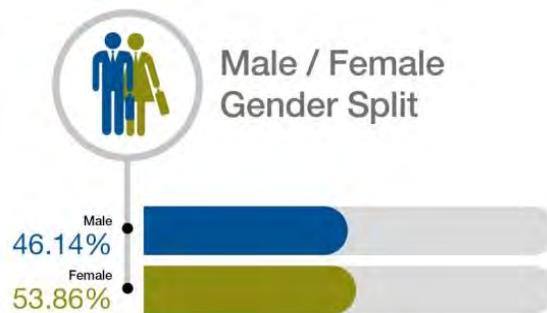
PART 5: GENDER PAY GAP

Introduction

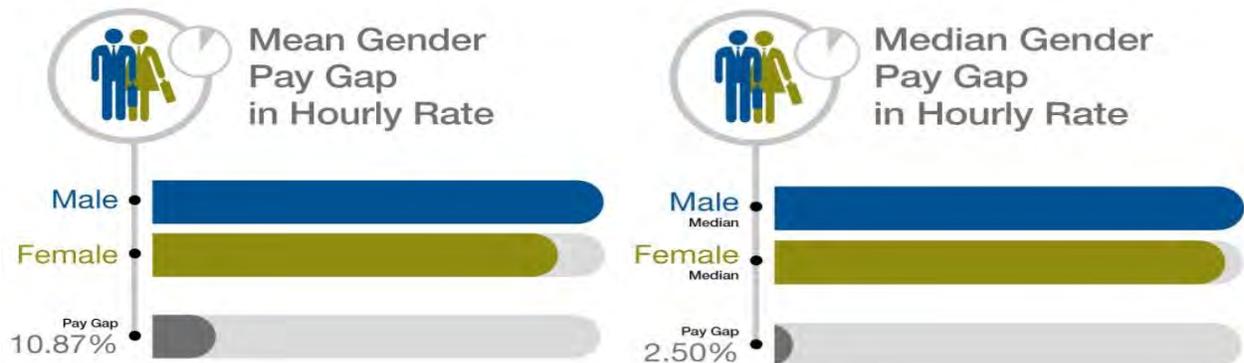
Gender Pay Gap legislation was introduced in April 2017 and requires all employers of 250 or more employees to publish their gender pay gap for workers in scope as of 31 March 2017. This is the second year of reporting and we present our data and action plan. The Student Loan Company (SLC) pay strategy supports the fair treatment of all staff irrespective of gender.

Gender Make-up of SLC

The Company profile is 53.86% of the SLC's workforce are female and 46.14% of the SLC's workforce are male.

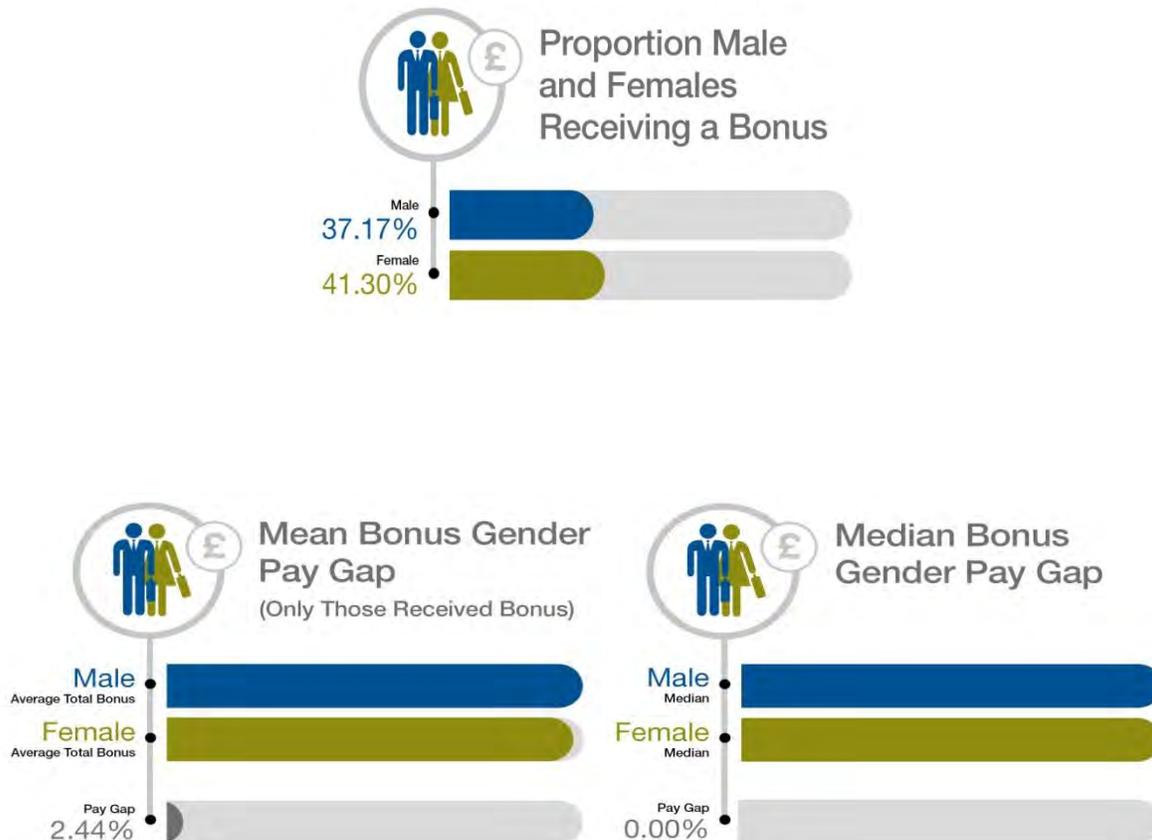


Gender Pay Gap



The mean female hourly rate is 10.87% lower than the mean male hourly rate. The median female hourly rate is 2.5% lower than the median male hourly rate.

Performance Related Pay – Bonus



41.30% of females received bonus pay.

37.17% of males received bonus pay.

The mean female bonus pay is 2.44% lower than the mean male bonus pay. The median female bonus pay is 0% lower than the male median bonus pay.

Pay by Quartiles

- 1= Top quartile
- 2 = Upper middle quartile
- 3 = Lower middle quartile
- 4= Lower quartile



The full report is available on the Company website www.slc.co.uk.

PART 6: EQUALITY MONITORING DATA

The following information sets out the equality profile of the Student Loans Company as at 31st December 2018.

This information is used to compare the profile with the Census and other national statistical research. The purpose of this comparison is to measure our workforce profile with that of the local population to indicate how representative an employer we are.

This is the third year we have disaggregated the data across our 3 main locations of Glasgow, Darlington and Llandudno Junction. This allows us to compare each local population base against the national data and that across the Company.

Improving our equality monitoring is one of the Company's Equality Outcomes and working with colleagues in management information we have been able to increase the level of confidence in the data captured.

Our data is used to provide Company employee information as part of the equality impact assessment process and contribute to Company decision making.

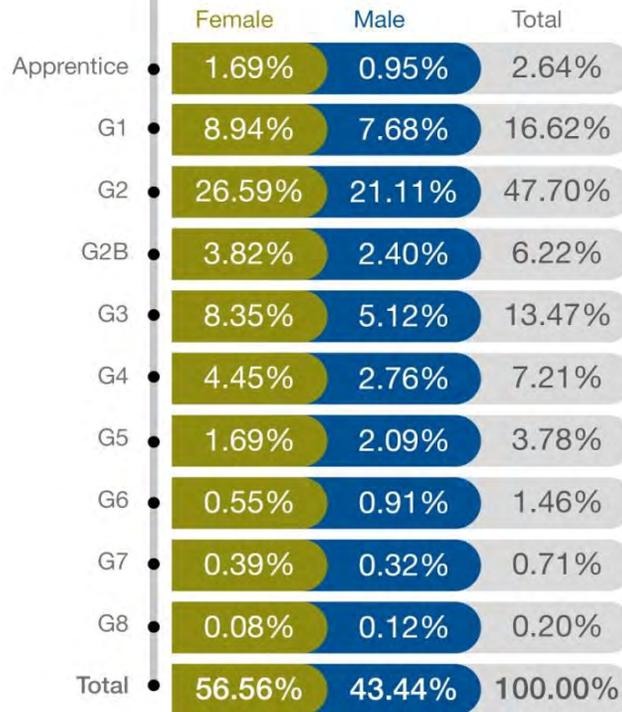
The full analysis including data by location can be accessed on the Company website.



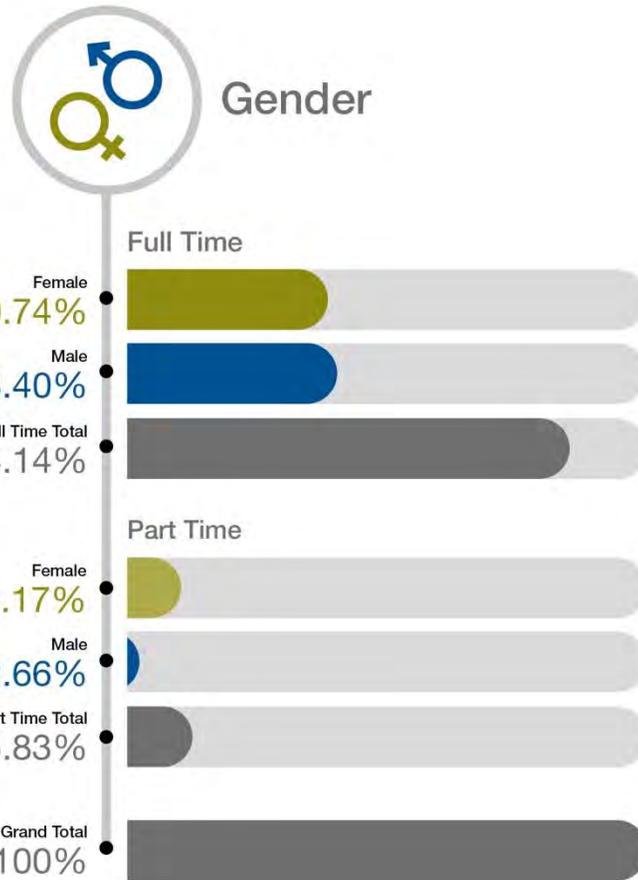
We have people of all ages working at the SLC. The average age which remains the same as last year suggests a young workforce when compared with other public sectors where the average is 47 years.



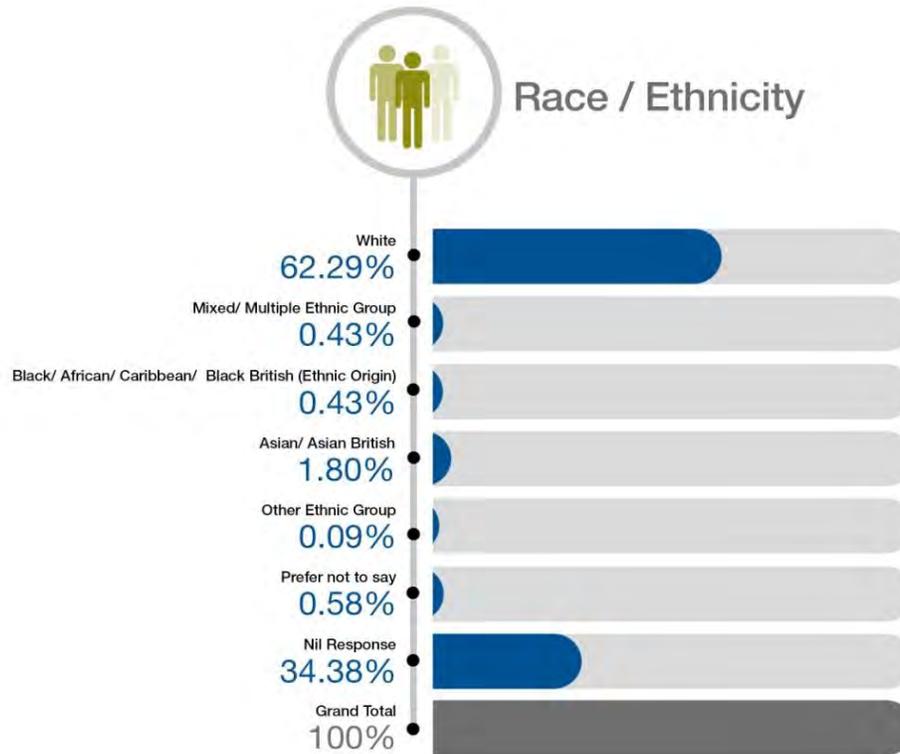
Grades Breakdown (Female/Male)



Since last year, the balance for Apprentices has shifted to women whereas it was slightly tipped to men last year. Then from G1 to G3 there are a higher percentage of women to men which is the same as last year. There is a shift in balance to men for G4 to G6 which is the same as last year. However at G7 which is our senior management grade we see a shift in balance to women which is a change from last year. At G8 which is senior leadership, the balance shifts slightly to men but the gap since last year has been narrowed.



The percentage of women working for the Company is slightly higher than the UK average of 47% (Business in the Community research). The part time differential reflects national labour force survey data (ons.gov.uk). Recent research from BITC indicates that 43.6% of women with dependent children are in employment. According to ONS research from 2017 mothers aged between 16 and 49 are still less likely to be in employment than women without dependent children of the same age.



The table above shows the ethnic breakdown of the SLC people.

There has been a decrease since last year from 76.15% to 62.29% of staff saying their ethnicity is white. Our chart shows the nil response is 34.38% which is an increase from 19.61% last year. 2.7% of our staff are from the BAME community, which is a decrease from last year at 3.5%. There has been a slight decrease since last year in staff preferring not to say from 0.73% to 0.58%.

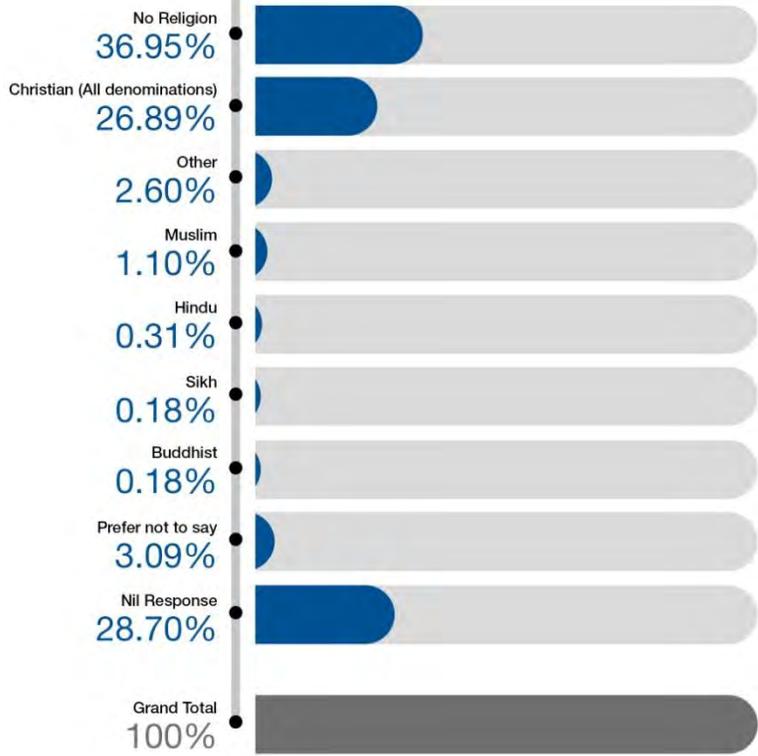
The England and Wales population profiles by ethnicity at 2011:

- White 87.2%
- Black/African/Caribbean/Black British 3%
- Asian/Asian British: Indian 2.3%
- Asian/Asian British: Pakistani 1.9%
- Mixed Race 2%
- Other 3.7%

Across Scotland the minority ethnic population is 4%.



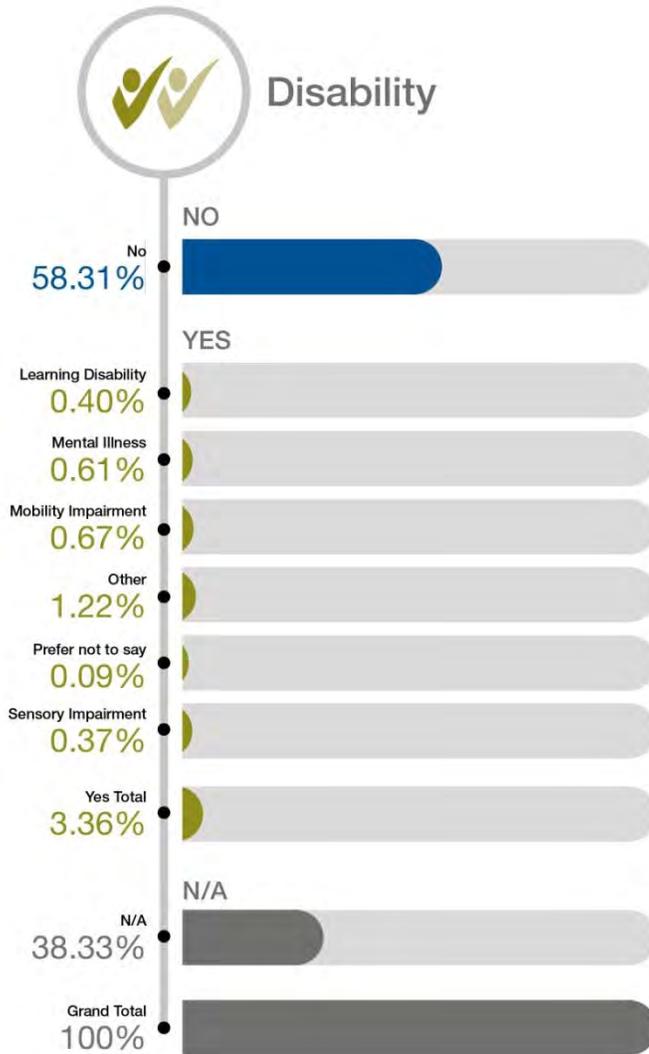
Religion and Belief



We hold data for 73.3% of our people which is an increase from 66.01% last year. This shows us that 26.89 % of employees are Christian. 36.95% have no religion or belief/are atheist. 3.09% prefer not to say. 1.10% are Muslim which is an increase from last year at 1.03%. 2.6% are Other. We have groups of employees who are Sikh, Hindu, Buddhist which form less than 1% each. In the 2011 Census Christianity was the largest religion at 59% of the population. The next largest was Muslim with 4.8% of the population.

The picture across the Company of those expressing a religion is:

- Glasgow 32%
- Darlington 31%
- Llandudno Junction 22%



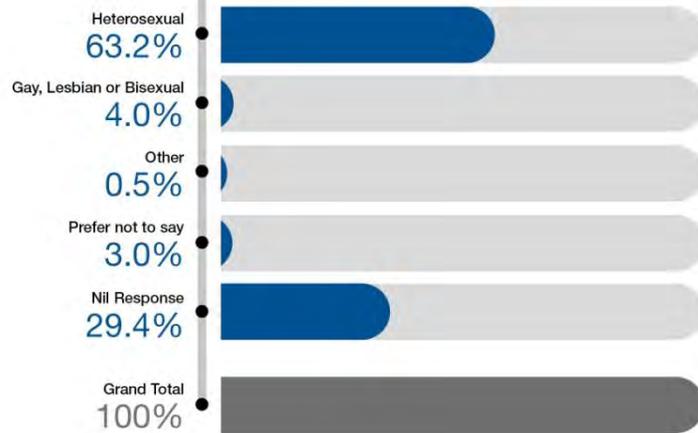
We hold data for 61.67% of our people which shows that 3.36% of the SLC employees have indicated they have a disability. This is a slight decrease from 3.44% last year.

An estimated 19% of the UK working age population has a disability, using the Equality Act definition, according to the latest data published by the Department for Work and Pensions. According to the Labour Force Survey 2012, 46% of working age disabled people are in employment; this compares with 76% of the working non-disabled population.

We remain committed to ensuring that we support people affected by mental and physical wellbeing issues and have a number of initiatives to deliver this commitment including membership of the national Disability Confident Scheme.



Sexual Orientation



We had 70% of the SLC employees share their sexual orientation which is an increase from 62% last year. 4% of employees said they are gay, lesbian or bisexual (LGB). 2.0% of the UK population are lesbian, gay or bisexual (ONS 2017) this is the most recent data source however, the LGBT foundation has estimated the figure to be between 5% - 7%.

Within the Company this represents an increase on last year's report where 3.2% of people identified as LGB.

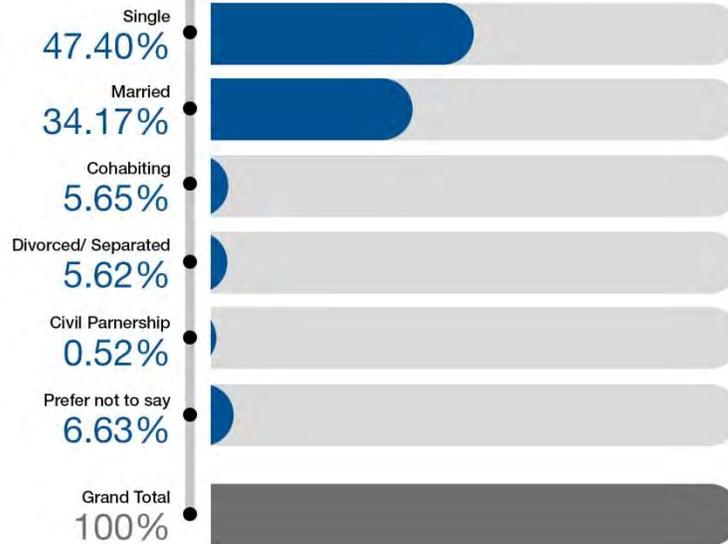


Monitoring numbers of transgender people is a very sensitive area and privacy must be ensured throughout the monitoring process. As the information points to only a small group of people, SLC report the number as *.

With respect to gender reassignment SLC has taken further measures in order to tackle discrimination, harassment, advance equality and foster good relations. This includes the promotion of the LGBT+ Network Group 'Arcus', providing training for staff on how the equality duty applies to transsexual people and providing effective guidance for managers on dealing with the process of transition.



Marriage & Civil Partnership

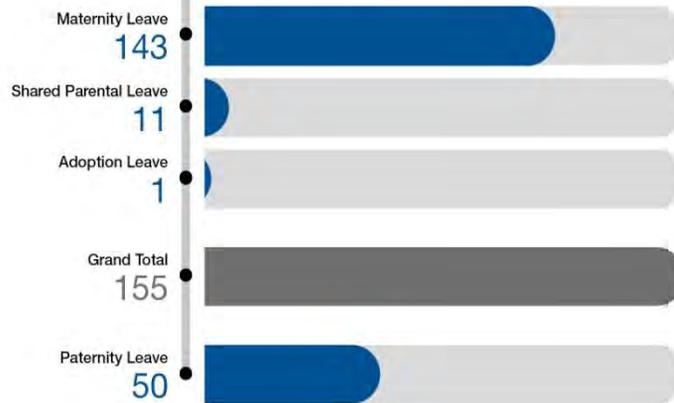


We hold data about marriage and civil partnership for 93.37% of our people. 34.17% are married, a slight decrease from last year of 34.79%. 0.52% are in civil partnerships, a slight increase from last year of 0.50%. 5.65% are cohabiting, a decrease from last year of 5.87%. 5.62% are divorced/separated, a decrease from last year of 5.84%. 47.40% are single, an increase from last year of 45.63%. Those preferring not to say has decreased from 7.37% last year to 6.63% this year.

In 2017, the number of civil partnerships formed in England and Wales was 908, an increase of 2% compared with 2016, this is the second annual increase since the introduction of marriages of same-sex couples was announced in 2013.



Pregnancy and Maternity



Over the past year:

143 employees took maternity leave
 11 took shared parental leave
 50 employees took paternity leave
 1 employee took adoption leave.

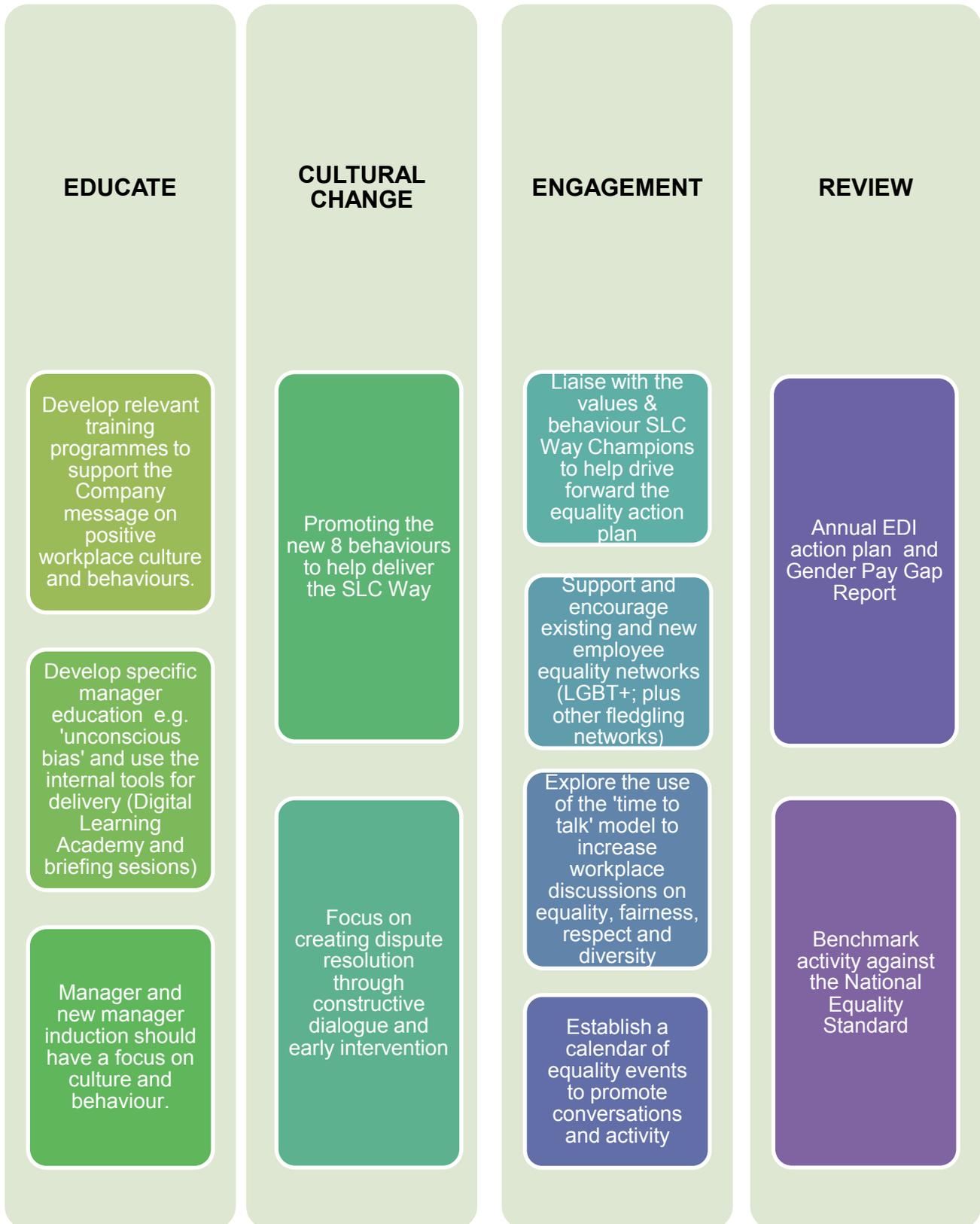
Employees going on maternity leave in 2018 increased from 117 in 2017 to 143 in 2018.

The uptake of shared parental leave remains the same at 11 as the previous year. Shared parental leave, which allows both parents to share up to 50 weeks of leave and 37 weeks of statutory pay after their baby arrives, was introduced by the UK government in April 2015 in the hope it would boost gender equality in the workplace.

The numbers of employees taking paternity leave has increased from 27 in 2017 to 50 in 2018. The number taking adoption leave has remained the same from 2017 at 1 in 2018.

We delivered pilot drop-in sessions for pregnant women and new or expectant parents of any gender in 2018.

PART 7: EQUALITY, DIVERSITY AND INCLUSION ACTION PLAN



Measuring Progress

This will be achieved by:

- Publishing an EDI annual report (inclusive of workforce and recruitment equality data) on the progress we make on the equality objectives and actions.
- Monitoring our employee equality data and compare annual trends to identify relevant business actions to improve workforce representation.
- Reporting our gender pay gap information and analysis before March 2020.
- Improving employee engagement:
 - Support for employee networks and other internal Champion groups.
 - Encouraging internal conversations on fairness, equality, diversity and inclusion.
 - Promoting activity to highlight the importance of individual health & wellbeing to the Company aspirations on organisational health.
 - Reviewing our diversity questionnaire and seeking to increase declaration rates to ensure we are role modelling best practice in this area.
- Promote and highlight case studies of good practice for sharing with other employers and external networks.
- Benchmarking our performance.
- Engaging with our customers and stakeholders to create 'a level playing field' particularly for our customers with specific support needs.
- Keeping EDI on the business radar by using our internal and external communication systems and processes.
- Seek and develop new relationships with other non departmental public bodies and external organisations to inform our EDI strategies.
- Supporting senior managers and teams to plan for and demonstrate mainstreaming of the Equality Act 2010 PSED at local levels.