



# SLC Equality, Diversity and Inclusion Strategy 2020 - 2023

People@SLC

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## Foreword

The Student Loans Company Limited (SLC) is delighted to introduce our Equality, Diversity and Inclusion (EDI) Strategy for the next three years (2020-2023). This strategy will set out our next steps to continue our ambitious journey to embedding diversity and inclusion into everything we do. This document also combines the Company's Annual EDI Report for 2019 together with our annual Equality Monitoring data.

SLC exists to enable people to invest in their futures through further and higher education, and we support and engage with increasing numbers of students and customers in repayment year-on-year. This is expected to continue to rise in the years to come. We recognise that the students and customers we support are from diverse backgrounds and we want to reflect that in our workforce. Through our Corporate Strategy, we have set making SLC a great place to work as one of our five strategic goals. We recognise that to achieve this, we need to provide a supportive environment for all employees so they feel included, valued and nurtured working at SLC, irrespective of their race, gender, ethnicity, sexual orientation, age, physical abilities, religious beliefs or socio-economic status. Inclusion is about the benefits that our people can bring from their differences and to do that we need to create an inclusive culture, where people feel valued and respected for who they are.

I am pleased with the excellent progress in diversity and inclusion I have seen as Chief Executive since I commenced my role in September 2018, but I am not complacent. It is essential that we continue to build on our successes to date. Diversity and inclusion is the responsibility of the whole leadership team and everyone at SLC is encouraged to read and discuss our new EDI strategy to help us work and take action together. To make SLC a great place to work, equality, diversity and inclusion are key.



Peter Lauener- Chair



Paula Sussex- Chief Executive

## Setting the Scene

SLC is a UK public sector organisation established to provide financial services (in the form of loans and grants) to over 1.5 million new and returning students annually, in colleges and universities across England, Northern Ireland, Scotland and Wales.

SLC is a non-profit making organisation. SLC was incorporated in 1989 as a company limited by shares under the Companies Acts and is wholly in public ownership; the four UK Government Administrations are its shareholders. Since April 1996, SLC has been classified as an executive non-departmental public body (NDPB).

SLC operates from five offices: there are two in Glasgow city centre, one in nearby Hillington, and two further offices in Darlington and Llandudno Junction.

SLC's Chief Executive leads a team of six Executive Directors – her Executive Leadership Team (ELT) – each heading up a directorate with a mix of employees from across SLC's offices in Scotland, England and Wales.

## Six Directorates

- Product, Customer and External Relations
- Operations
- Repayments and Customer Compliance
- Technology Group
- Chief Financial Officer
- People

## The Board

SLC's Board is responsible for setting the strategic aims and objectives of SLC, consistent with the policy, resources and overall strategic direction determined by Government shareholders. In summary, the Board's key responsibilities are to:

- Establish strategic aims and objectives and monitor performance against these
- Ensure that effective governance is in place around the use of public funds
- Regularly review financial information concerning the management of SLC
- Appoint, with the Minister's approval, the CEO and set their objectives.

Non-Executive Directors of the Board are appointed by the Secretary of State for Education. The Board is charged with ensuring that SLC adheres to the UK Corporate Governance Code and the appropriate governance requirements of the Central Government Departments Code of Good Practice.

## Corporate Governance

SLC has arrangements in place to ensure good corporate governance and its Framework Document, which can be found at [www.gov.uk/slc](http://www.gov.uk/slc), provides comprehensive detail of the

roles and responsibilities of its executives, board members and shareholders. Additionally, the document stipulates that the Company must have robust risk management arrangements in place and sets out standards and controls with which the Company must comply – (HM Treasury’s Managing Public Money underscores many of these).

## SLC’s Mission Statement

“We enable people to invest in their futures through further and higher education by providing trusted, transparent, flexible and accessible student finance services.”

The Mission Statement is more fully developed and articulated in the Company’s Corporate and Business Plan, which can be found at [www.gov.uk/slc](http://www.gov.uk/slc).

## SLC’s Vision Statement

“SLC is widely recognised as enabling student opportunity and delivering an outstanding customer experience in the efficient delivery of the four UK governments’ further and higher education finance policies.”

As well as the statement above, the vision is underpinned by five themes. These are the foundations of the Corporate Strategy – the company’s key, longer-term strategic goals:

### An Outstanding Customer Experience

We will deliver intuitive, seamless and transparent services aligned to the relevant part of the customer journey.

We will work with partners to ensure that students have access to trusted student finance expertise, providing clear, comprehensive and easily accessible advice.

We will maintain a strongly-engaged and collaborative relationship with higher and further education providers to support SLC's commitment to providing the best possible customer experience over the whole student life-cycle.

Our systems will ensure that clear and accessible information and application or payment interfaces are available allowing customers to interact with us and self-serve in a fully informed way. If they have to contact us they will be able to do so easily through their channel of choice and will have their query resolved by experts with full access to all required information.

## Enabler of Opportunity

We will be recognised as an enabler of student opportunity, delivering strong social value on behalf of our shareholders. This will continue to be based on a clear understanding of our objective to provide student finance reliably and securely, helping customers to invest in their futures and supporting the long-term economic growth of the UK economy. In executing that core mission, we will be viewed as competent, especially in our responsibility to maximise use of and safeguard the taxpayer pound.

## Leaner, Better, Doing More for Less

We will deliver student finance services safely through flexible, sustainable, and inherently secure technology solutions. Emerging opportunities, driven by advances across the technology sector, will be exploited to optimise delivery, provide a lower total cost of ownership and help protect SLC from cyber-attacks.

We will have confidence in the accuracy and integrity of our data, aligned to the customer and user needs. Real-time understanding of our consolidated data will improve operational efficiency and performance and enable the creation of new KPIs based on key outcomes.

Across SLC we will develop our culture of continuous improvement through lean, straight through, standardised processes. We will automate or outsource high volume, low complexity activity while moving SLC to become a smaller centre of excellence to manage more complex work. In Repayments, we will have improved collection performance through optimised coverage, minimised leakage and tailored, segmented debt management strategies.

## A Great Place to Work

SLC will be a great place to work and to develop. Implementation of a comprehensive People Strategy will create a more skilled, motivated and engaged workforce, aligned to current and future organisational needs. An improved employer brand, underpinned by a stronger external reputation, will help us retain and attract good people. We will have robust morale and organisational health. Our mission and vision will be delivered through the 'SLC Way', built on simple, fair and consistently adhered to policies and processes, and fair and attractive reward and recognition for our people. Tailored skills development and career progression will be core components in building our talent. A career at SLC will be rewarding, to support attraction, retention and equality. People will feel proud to work for SLC.

## Trusted Delivery Partner

Our shareholders will see us as a trusted partner in the efficient and agile delivery of Government policy and taxpayers will trust us with their money. We will support shareholders in simplifying and rationalising the policy landscape wherever possible, better aligning policy intent with efficient delivery and proven, tested user needs. SLC and policy teams in DfE and the devolved administrations will work in a joined up way, underpinned by

robust governance of the policy development and commissioning process tied to clearer, achievable delivery timelines.

## Our Commitment to EDI

In 2019 we revised our EDI Policy, which sets out our commitment to tackle discrimination and promote equality and diversity in everything we do such as recruitment, training, management and pay and conditions.

SLC is committed to creating and sustaining a positive, supportive and inclusive workplace where everyone is treated fairly. SLC respects the diversity of all who work here and wants to enable all employees to achieve their full potential, to contribute fully, and to gain maximum benefit from the opportunities available.

As a public body, we have obligations under the Equality Act 2010 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”.**

SLC will comply with all relevant equality legislation and good practice to ensure differences including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation are respected.

SLC is committed to creating and sustaining a positive and supportive working environment for its employees, as well as providing a customer experience that reflects our company mission and vision. We want all of our employees to be treated fairly, with respect and dignity.

Our EDI strategy sets out our organisational objectives with a detailed action plan in relation to equality, diversity and inclusion:

- To build and maintain a diverse and inclusive workforce
- To cultivate and promote a workplace culture where everyone is included and is encouraged to be their true selves and feels accepted for who they are
- To work together towards an empowered and engaged workforce

Our EDI strategy is set for the next three years; however, we will keep it under continuous review to ensure its ongoing relevance and to set further actions where new priorities emerge.

## Investors in People

Our Investors in People (IIP) interim report in 2019 confirmed our Silver accreditation. The IIP remind us that culture is very pervasive, but it is also very malleable because it is made up of the actions, feelings and behaviours of individuals within our organisation. It is also noted that the Chair of the Equality and Human Rights Commission, David Isaac, recently commented that identity politics has been highly important in advancing the civil rights of many groups, but has warned that people's growing tendency to define themselves by faith, gender or race is undermining empathy. It is therefore very clear why, when diversity and inclusion is done right, differences are embraced. So it is fundamental that we do diversity and inclusion 'right'. In our last employee engagement survey the statement 'people from all backgrounds are treated fairly at the SLC' scored 7.9 out of 10, which was one of the highest scores and we are heartened by this.

We are working towards Investors in Diversity - a national equality standard with the National Centre for Diversity, which is an excellent framework to bring together all of an organisation's work around EDI. The second NCD survey is scheduled to be issued to all employees in early 2020. This will help us gauge the consequences of our diversity and inclusion effort and provides an opportunity to learn from and share with our peers.

## Our Equality Journey So Far

Since publishing our last EDI strategy (2016-2020), our equality journey has expanded year on year. We have been proactively working on our EDI agenda and we have shared our experiences along the way. We will continue to be inspired by those around us and strive for continuous improvement. We have made some excellent progress; we still have more to do, but it's important we celebrate what we have achieved so far. Some of our key achievements this year are summarised below:

With the 50 year anniversary since the Stonewall riots, it has been a special year for our **LGBT+ Network 'Arcus'**. They provide a supportive visible environment for LGBT+ employees as well as promoting a greater sense of understanding of LGBT+ issues. Anyone can join the network as an ally and take part in activities with the aim to encourage all colleagues to bring their whole selves to work so they feel accepted for who they are.





Arcus marked LGBT+ History Month in February and participated in Mardi Gla and Northern Pride in July. At the Glasgow Pride event in August 2019, we walked under the 'This Is Me Scotland' banner connecting the SLC with other organisations supporting wider inclusion. The network also organised 'Lets chat' sessions to raise awareness, and members of the network also shared their stories, creating an open and inclusive environment. Arcus have run numerous fundraising events to raise money for local charities, which have been massively successful due to the support from our employees. The network has had a key part to play in the development of our People policies including our Transgender Equality Policy and Guidance. We expect the network to continue to flourish and make a difference to our people at SLC.

The publication of **Thriving at work: the Stevenson/Farmer review of mental health and employers** in 2017 has informed our framework for supporting workplace mental health through implementing the six core standards. In addition, as a large public sector employer we are committing to adopting the additional four enhanced standards in our EDI strategy and action plan.



Supporting the mental health of all our employees remains a priority on our agenda. All managers have mandatory training to ensure they take early, sustained and proportionate steps in supporting people’s wellbeing. We emphasise a prevention first approach so employees are aware of how they access and seek advice and support when needed. We have delivered bespoke Managing Mental Health training to our managers in 2019, partnering with The Charlie Waller Memorial Trust and we continue to invest in Occupational Health and Employee Assistance Programmes (EAP) services and mental health first aiders within the organisation.

We have celebrated Time to Talk Day, Mental Health Awareness Week and World Mental Health Day annually. In May 2019, we were delighted to host a Mind stall once again during Mental Health Awareness week in our Darlington office.



Student Loans Company

proud to support  
time to change

# World Mental Health Day 2019

We remain a steering group member of 'This is Me Scotland' a network of organisations that are collaborating to build inclusive workplace cultures, reduce stigma and improve employee well being. In addition, our CEO, Paula Sussex and her executive leadership team all re- signed the 'Time to Change' pledge in Mental Health Awareness week 2019 to renew our commitments to improving the culture around mental health in the workplace.

The SLC has also celebrated **International Women's Day** with a different theme each year and in 2019 it was #Balanceforbetter to support gender equality. We held cinema style events across our sites again to encourage participation and raise awareness of building a gender balanced world. We want to emphasise to our employees that everyone has a part to play, demonstrated by colleagues from our Llandudno Junction office below. Our sites supported appeal donations for local charities including Women's Aid and Refugee Projects. We used these events to inform the launch of our new Corporate Social Responsibility policy in 2019, aimed at further engaging our employees, fostering a team spirit, bonding people together and making us closer as work colleagues generating a pride in who we are and how we work, which translates to a better service to our customers and stakeholders.



We have also taken part in other events including **Global Accessibility Awareness Day** to stimulate and provoke thinking and learning about accessibility and inclusion for anyone with any form of disability. We have also promoted Men's Health Awareness to our employees. Our calendar of events to highlight EDI will continue to expand, for example, we marked our first International Day of Persons with Disabilities on 3 December 2019.

## **Our EDI Objectives for 2020 -2023**

### **Objective 1: to build and maintain a diverse and inclusive workforce**

#### **What do we want to achieve?**

We want to ensure that our workplace is a place where all of our employees are safe from all forms of prejudice and are supported by positive attitudes and treated with respect and trust. We will continue to organise events for our employees to help them experience a truly welcoming community at SLC. We have launched a refreshed EDI policy in 2019 which sets out the organisation's commitment to tackle discrimination and promote equality and diversity in areas such as recruitment, management training and pay.

## **Recruitment is diverse and inclusive**

Building and maintaining a diverse and inclusive workforce begins in the recruitment and selection process. We want to recruit talent at all levels from the broadest range of backgrounds, skills, abilities and different ways of thinking to truly foster diversity and inclusion at SLC. We recognise the customers we serve come from diverse and wide ranging backgrounds and we want our workforce to reflect that.

To achieve a diverse workforce, managers and employees involved in the recruitment and selection process should be aware of SLC's recruitment practices and operate in a way that is unbiased. SLC revised its Recruitment and Selection policy in 2019 and is committed to ensuring that its policy and procedure is consistent, transparent, unbiased, and that candidates will be appointed on merit based decisions. This allows for a reliable and valid selection process where the best possible chance of success for all candidates regardless of their identity is given. An approach to recruitment that prioritises the elimination of bias will be encouraged and supported by the development of relevant training programmes, i.e. by educating managers and other employees on unconscious bias. To ensure these practices are followed, we aim to audit post-recruitment.

We will continue to broaden our applicant pool to attract diverse talent by introducing a Returners to Work programme targeted at people returning to work after a long break, as well as building a relationship with Veterans Employment Transition Support (VETS Model). We are extending and expanding our 'Emerging Talent' programmes to attract diverse and aspiring people to SLC. This includes initiatives such as internships, apprenticeships and graduate programmes operating throughout different levels of the organisation. We will engage with external bodies like Women in STEM, The Princes Trust and Learning Providers to encourage applications from candidates with a wide range of socio-economic backgrounds. A mentoring network established in 2019 will also be expanded corporate wide alongside the new initiatives to support and retain talent at SLC and all employees participating in mentoring schemes will be allocated a coach or buddy. We will also have a presence at networking or recruitment events targeting young people.

The business case for diversity at SLC is strong and we value the benefits of having a range of perspectives in developing and shaping the future of the SLC. We recognise that work patterns are changing and we aim to provide and promote flexible working practices from the beginning of the recruitment process to accommodate for different needs.

We aim to provide effective support for women experiencing menopause as part of an inclusive and holistic approach to managing an ageing gender-equal workforce and will introduce a Policy on Wellbeing, incorporating best practice guidance on this important topic.

## **Equality in Retention**

We want to ensure that not only are we building a diverse and inclusive workforce, but equality in retention and satisfaction is also maintained. We will monitor the successful retention of all distinct groups of employees with protected characteristics to check if any equality-related issues are giving cause for concern. We will measure this by reviewing

relevant data, i.e. the use of equality monitoring data and feedback from employees through periodic engagement surveys.

### **A more representative workforce**

We are committed to identifying and eliminating the underrepresentation of any particular group of employees to ensure we are representative of the customers we serve. We believe that everyone deserves an opportunity. We will continue to produce annual workforce equality profiles, analyse trends and compare with populations across the key business bases of Glasgow, Darlington and Llandudno Junction. This will allow data to be collected and analysed to identify actions for improvement.

People with disabilities are the largest minority group in society. We will aim to maintain and build on SLC's Disability Confident accreditation. We are celebrating two years of Disability Confident at SLC, but our journey does not stop here. We are committing in this Strategy to becoming a Disability Confident Leader by 2023. This means that, not only are we striving to attract and retain employees with a disability and assist those with health conditions to achieve their full potential at SLC, but we are dedicated to act as a champion for Disability Confident within our communities. We will be encouraging and supporting other organisations and businesses to become positive about disabled people in employment. A range of measures will be used to make us a more representative workforce to help us achieve the criteria required to become a disability confident leader:

- Challenge - Subject SLC's self assessment to an independent validation. This will require SLC to show that we are delivering against our core actions and provide evidence to show our commitment e.g. implementation of inclusive policies and practices.
- Leadership - Encourage other employers to make the journey to become Disability Confident. This involves activities such as using social media to promote and share good practice on Disability Confident, networking and engaging with other employers to share good practice and hosting Disability Confident inspired events.

### **How will we achieve Objective 1?**

<b>Action Plan</b>	<b>Aspirational Target</b>
<b>Recruitment that is Diverse and Inclusive</b>	
Review job adverts to ensure inclusion, for example highlight availability of flexible working for certain job vacancies or advertise specific shift patterns to move away from traditional five days a week, 9am-5.30pm jobs that may be unattractive to certain groups of the workforce.	2021
A reliable and valid selection process, for example by educating on the effects of unconscious bias to managers and other employees involved in the recruitment process through training and e-learning.	Ongoing

Introduce a requirement on all interview panels to ensure a broad representation across interview panel members.	2021
Source diverse talent pools from a range of channels, for example advertising job vacancies on corporate website, different social media platforms, reach out to schools, colleges and universities across the UK, as well as participate in career fairs.	Ongoing
Sign up to the Tech She Can Charter to improve the gender balance in technology roles by focusing on improving the pipeline.	2021
Partner with external bodies such as PACE, VETS Model and Who Cares? Scotland to target recruitment opportunities for underrepresented groups.	Ongoing
Increase diversity in candidate screening by trialling blind recruitment where personal details will be removed during the initial screening process.	2021
Audit post recruitment to improve selection, for example surveying successful and unsuccessful candidates of their experience of the application and interviewing process.	Ongoing
Extend and expand our 'Emerging Talent' programme and develop a pipeline of talent from a diverse background.	Ongoing
As part of our 'Emerging Talent' programme target Foundational Apprenticeships for those in their final senior school years to enable young people to gain understanding of what we do and the roles available at SLC.	Ongoing
Ensure all our Recruitment literature is fully accessible and available in different formats.	Ongoing
<b>Equality in Retention</b>	
Take positive steps to attract, retain and develop staff from underrepresented groups.	Ongoing
Introduce mentoring scheme for all employees to increase support and encourage the participation from employees from ethnic minorities.	2021
Build on existing mentoring and coaching, training line managers in coaching and consider reverse mentoring to support women and others who wish to progress into senior roles.	2022



Extend the right to request workplace modifications to be reactive to requests from employees not covered by the Equality Act 2010, to support employees with health-related needs. This approach would build on the existing right to request flexible working.	Ongoing
Provide effective support for women experiencing menopause as part of an inclusive approach to managing an ageing gender-equal workforce and will introduce a Policy on Wellbeing.	2020
<b>A more representative workforce</b>	
Review diversity information to identify barriers to progression for underrepresented groups to generate action plan for future diversity and inclusion strategy.	Ongoing
Maintain and build on SLC's Disability Confident accreditation and work towards being a Disability Confident Leader. To become a leader, SLC will aim to: <ul style="list-style-type: none"> <li>• Make reasonable adjustments for disabled employees to reduce barriers</li> <li>• Value and listen to feedback from disabled employees</li> <li>• Celebrate those with a disability and give recognition, for example celebrating International Day of Persons with Disabilities, to create a culture of positive behaviour and respect towards those with a disability</li> <li>• Provide training and workshops to promote and share good practice</li> </ul>	2023
Use the Disability Confident logo on SLC's recruitment site.	2021
Ensure that any external recruitment agency we partner with also promotes the use of the Disability Confident logo on recruitment site.	2021
Continue to expand SLC's LGBT+ community network Arcus, for example taking part in PRIDE events, regular meetings.	Ongoing
Support any fledgling network groups such as a dedicated Diversity and Wellbeing Group driven by a diverse group of employees from all areas and levels	Ongoing

## **Objective 2: to cultivate and promote a workplace culture where everyone is included and is encouraged to be their true selves and feels accepted for who they are**

**What do we want to achieve?**

**An inclusive culture**



We believe that diversity includes everyone and that is why we challenge ourselves to do all we can to cultivate and promote an inclusive workplace culture. This means that diversity and inclusion will be embedded in the way we think and the way we work at SLC. We want to create an organisational culture that is not only accepting, but positive, about the differences in background, perspectives and ideas that people can bring to a team and to their work no matter when and who they work with.

We want SLC to be a place where people can be who they want to be and be proud of their true selves. We understand that if people have to hide or hold back what makes them who they are, they are unlikely to flourish in the workplace. We want our staff to thrive in their work and to inspire the people they work with. We also want to see SLC being recognised as a great place to work, that embraces people's differences and supports everyone to succeed. We have incorporated positive behaviours to promote an inclusive culture in our EDI Policy. A Transgender Equality Policy and Guidance has also been introduced in 2019 to ensure a fully inclusive trans workplace culture can be achieved and supported.

In our employee engagement survey in 2018, employees rated relationships with colleagues (8.2 out of 10) and support from management (7.8 out of 10). This demonstrates a culture of openness and supportiveness which we should be proud of. However, freedom of opinion was one of the lowest scoring areas (5.0 out of 10). We want our employees to be able to express themselves in order to be their true selves and this is an area we will be working to address. This is fundamental to one of the Company's key longer term strategic goals of making SLC a great place to work, and the vehicle for making this happen is the implementation of the comprehensive People Strategy.

### **Make SLC a great place to work for everyone**

SLC is committed to creating an environment that respects the diversity of employees and enables them to achieve their full potential, to contribute fully, and to gain maximum benefit from the opportunities available. Any form of discrimination, bullying or harassment is unacceptable and will not be tolerated. Our EDI Policy sets out SLC's approach to equal opportunities. This means that from recruitment to the termination of employment, SLC will comply with all relevant equality legislation and good practice. We aim to have improved training for line managers and employees to help them to recognise and report unwanted behaviours and to understand how to report any concern.

It is important to us that everyone is included in making SLC a great place to work and that is why we have asked and listened to our employees across SLC, who helped create the eight new SLC behaviours which were launched in 2018. The behaviours characterise how our people should conduct themselves at work and these include: asking questions; listen; think and align; take ownership; deliver; measure performance; give and take feedback' and develop self and others. We believe this will help to create a psychologically safe environment, where employees will feel accepted, respected and secure. When employees feel comfortable at work, people are more likely to suggest ideas and be more innovative. We recognise that there is no 'quick fix' for SLC and that is why we will continue to promote positive behaviours to encourage everyone to be their true selves and help SLC get better every day.

Employee wellbeing is a top priority. We know that stress and poor mental wellbeing are among the leading issues people are facing in the UK. We want to create an environment where people can be open and feel supported when it comes to talking about mental health. We believe that for our employees to be their true selves and thrive in the workplace, they must be supported to talk about their emotions and experiences. We want to encourage a prevention first approach to mental health, where employees are encouraged to think about their lifestyles and work life balance in the first place, as well as speaking out at an early stage. SLC will sign up to the Mindful Business Charter in 2020 to show our commitment amongst other organisations to remove avoidable sources of workplace stress and to promote better mental health and wellbeing to the UK workforce. The charter can help to create a cultural shift in daily working practices from improved communications to respecting rest periods. We believe small adjustments can have the potential to dramatically improve the day-to-day working lives of all our employees and contribute to improved attendance, retention, motivation and productivity.

In 2017, we launched a Mental Health First Aid Network (MHFA) across all SLC's sites to support employees in crisis or distress. This allows employees to seek and receive the help that they need so they can be the best they can be. We are proud of our achievements and involvement so far in the mental health sphere, but we will further challenge ourselves to make SLC a healthier place to work. In 2019, we re-signed the 'Time to Change Employer Pledge' to show our ongoing commitment to changing attitudes to mental health.

#### **Family friendly and flexible working procedures in place**

We want to achieve a state where every person involved in parental, adoption, maternity or paternity leave feels supported throughout and after they return from leave, regardless of gender. Our family friendly policies will be reviewed to ensure they reflect the needs of our workforce. We care about our employees' family and personal life and we want to make sure that new parents can get time off without detriment to their careers. We encourage regular communications between line managers and those who have taken time off work for family commitments to enable a smoother transition once returning to work and to remove any anxiety.

We want to create an environment in which people with caring responsibilities are not disadvantaged. We will aim to help employees to balance work with caring responsibilities by supporting flexible working where we can. To help support this, we will make it clear at recruitment and appointment processes of the availability of flexible working where this can be supported.

We have launched a 'Returners to Work' Programme to complement our Recruitment programme targeted at people returning to the workplace after a long break (typically two years or more). Our programme supports the drive for diversity in a number of ways.

Work-life balance is considered important - with flexible arrangements to suit different lifestyles. This means that we will consider every request for flexible working seriously, whilst considering the wider needs of the business. We want our employees to take advantage of flexible working and create a culture where different ways of working are accepted. We believe that where employees have the ability to control when and where

they work, whilst meeting business needs, can truly create a diverse and inclusive workplace.

### How will we achieve Objective 2?

Action Plan	Aspirational Target
<b>An inclusive culture</b>	
EDI to be implemented as a change programme in the same way as other change activity and link EDI strategy more directly with creating the culture employees want within the organisation.	Ongoing
Review and improve the mandatory diversity and inclusion awareness as part of induction programmes for new employees.	2020
Revisit the content of employee e-learning and introduce further e-learning, which looks at how to mitigate the impact of unconscious bias in the workplace and invites participants to think about micro incivilities.	2020
Have a specific focus on 'inclusive leadership' in our management leadership training, built on an evidence-based approach.	Ongoing
Organising and encouraging employee participation in regular SLC events throughout the calendar that celebrate diversity and inclusivity, for example International Women's Day (IWD March), Mental Health Awareness Week (May), Volunteers Week (June), Carers Week (June), PRIDE events (July), National Inclusion Week (NIW September) and International Day of Persons with Disabilities (November).	Ongoing
Create more accessible resources on diversity and inclusion on employee intranet (i-connect).	2020
Review our EDI policy when necessary to ensure fit for purpose and reflects our key objectives.	Ongoing
Monitor and review the Transgender Equality Policy and Action Plan launched in 2019 to support those going through gender reassignment or identify themselves as transgender or non-binary.	Ongoing
Partner with Nil by Mouth to run awareness raising workshops at our Glasgow site. Nil by Mouth's work is concerned with sectarianism and challenging intolerance and prejudice.	2022
Develop formal links with groups such as AMINA (Glasgow) to build links to minority ethnic communities.	2021

Support multi-generational teams as part of our commitment to EDI, for example where specific segments of the workforce are highlighted as having loss of engagement, these groups will be prioritised for any multi-generational activity.	2021
<b>Make SLC a great place to work for everyone</b>	
Incorporate 'SLC way' and the eight behaviours in everything we do so they are at the forefront of employee attitudes to promote positive behaviours.	Ongoing
Make the link between the organisation's eight behaviours and EDI strategy more specific.	Ongoing
Be overt about SLC's ambitions around becoming a great place to work and an employer of choice, for example by enabling teams to have discussions about the business case for diversity.	Ongoing
Create a healthy culture of trust and psychological safety at SLC by respecting different views of individuals.	Ongoing
Continue to ensure supports are in place for those with different cultural backgrounds, for example prayer rooms.	Ongoing
Monitor the number of employees using the grievance procedures complaining about harassment or bullying.	Ongoing
Promote a prevention first approach to mental health for our employees.	Ongoing
Encourage the use of our EAP Service and Mental Health First Aid service and review usage of both.	Ongoing
Introduce an Employee Wellbeing Policy to promote positive physical and mental health for all.	2020
Establish and build a Wellbeing network to continue to break down the stigma associated with mental health in the workplace.	2021
Sign up to See Me Pledge in Scotland building on our Time to Change Commitment made in 2017.	2021
Sign the Mindful Business Charter ( <a href="https://www.mind.org.uk/news-campaigns/news/mind-supports-mindful-business-charter/">https://www.mind.org.uk/news-campaigns/news/mind-supports-mindful-business-charter/</a> )	2021
To remove unnecessary sources of workplace stress and promote better mental health and wellbeing in the workplace. To achieve this, we aim to:	

<ul style="list-style-type: none"> <li>• Insert in title of emails the level of importance i.e. whether they need to be read or actioned promptly and ensure it is reflective of the emails content.</li> <li>• Include working hours or availability as part of email signatures - allows others to be aware of working patterns and shows respect for rest periods.</li> <li>• When instructing on a task, negotiate a deadline with the individual rather than imposing one.</li> <li>• When instructed on a task, be confident to flag when a deadline is unrealistic or unachievable.</li> <li>• Ask for and provide feedback to others on a regular basis.</li> </ul>	
Continue to train line managers so they are comfortable having difficult conversations about mental health and other issues.	Ongoing
Maintain current level of activity around mental health and ensure that support is available consistently at every location.	Ongoing
<b>Family friendly and flexible working procedures in place</b>	
Review flexible working policy.	Ongoing
Reduce flexibility stigma - that is bias towards those who work flexibly and fear that working flexibly can lead to negative career outcomes.	Ongoing
Review family friendly policies - maternity, adoption, parental and paternity leave policies to ensure fit for need.	Ongoing
Sign up to the 'Happy to talk flexible working' standard.	2021
Recognise those who have caring responsibilities by introducing a carer's passport initiative and offer tailored support to individuals: <ul style="list-style-type: none"> <li>• eligible employees will receive a carer's passport</li> <li>• the passport enables holders to have a conversation with line managers and document the flexibilities requested</li> <li>• this will minimise the need to re-negotiate approved flexibilities every time an employee moves post or is assigned to a new line manager</li> <li>• passport will be accessed every year to ensure effectiveness</li> </ul>	2022
Sign up and model the Carers Charter to enhance the rights of carers and join the success of the civil service. The Charter involves: <ul style="list-style-type: none"> <li>• the implementation of an 'adult carer support plan' and a 'young carer statement' to enable us to understand the circumstances of the individual</li> <li>• provide support, for example this may include access to information and advice, support from local community.</li> </ul>	2022

Sign up for the Carer Positive award for employers in Scotland who have a working environment where carers are valued and supported	2021
To be part of the annual campaign to raise awareness of caring during carers week to enable our employees who are carers to get connected.	2021
Ensure the right support is given to those returning to work i.e. those returning from a career break, maternity, adoption, parental or paternity leave.	Ongoing
Ensure supports are in place for those with different caring responsibilities e.g. suitable facilities for breastfeeding mothers to express and store milk.	Ongoing

### Objective 3: to work together towards an empowered and engaged workforce

#### What do we want to achieve?

##### Recognising and rewarding the hard work

Our reward principles are intended to be fair, transparent and consistent and act as a key enabler in ensuring we have a highly skilled, engaged and properly rewarded workforce. We recognise that people are our biggest asset, so it is important that all our employees know what they should be doing and are recognised for their work. Our Performance Development Process includes objective setting, and we aim to use this as a way to develop, maintain and improve skills, knowledge and performance of our staff. We are committed to promoting equal opportunities in all our employment practices and aim to provide an environment, where everyone is treated fairly and recognised and rewarded for the work they do regardless of their identity, background or gender.

We will monitor the diversity of our management and leadership programmes and also undertake initiatives such as mentoring and case studies to encourage participation from a diverse group of employees.

We want to introduce transparency to promotion, pay and reward processes. Transparency means being open about processes, policies and criteria for decision making. This means that employees are clear in what is involved, and that managers understand their decisions need to be objective and evidence based because these decisions can be reviewed by others, for example the appointment of a diversity task force. Introducing transparency to promotion, pay and reward processes can reduce pay inequalities.

SLC's gender pay gap was 10.27% as at 31 March 2019. Our own data analysis suggests that, as in other organisations, a major driver of the gender pay gap at SLC is the unequal distribution of female staff across grades. In other words, by addressing unequal representation, SLC should be able to reduce, if not close its gender pay gap.

We value the hard work from our staff, and we want to recognise everyone’s success. We will continue our work to address the gender pay gap through reconsidering our long term approach to pay and reward. We will continue our gender pay gap reporting analysis and action planning annually.

**Promote, support and communicate our EDI commitment**

We will ensure that our diversity and inclusion efforts are highly visible themes within our organisation and to the public. We will ensure that diversity and inclusion themes are prominently featured throughout our corporate communications to promote and engage our staff of our commitments towards a diverse and inclusive workplace.

At the SLC, not only do we want to be great in the things we do, but we want to work with and influence other organisations across the public sector to improve diversity and inclusion. We want to support and encourage improvements when it comes to diversity, where it is appropriate for us to do so. We will seek to encourage transformative changes and setting long term goals to achieving a diverse and inclusive UK workforce.

**How will we achieve Objective 3?**

Action Plan	Aspirational Target
<b>Recognising and rewarding the hard work</b>	
Transparency in promotion, pay and reward processes to reduce pay inequality.	2020
Commit to becoming a Living Wage employer.	2023
Appoint diversity task force to monitor talent management processes and diversity within SLC. This can improve accountability, for example the diversity task force would be in position to ask for more information on why decisions were made.	2021
Review current reward structure and develop a ‘fit for purpose’ pay and grading approach.	Ongoing
Reporting and analysing gender pay gap annually.	Ongoing
Taking action to close the gender pay gap, as outlined in our GPG Report.	Ongoing
Reporting and analysing the pay gap for ethnic minority employees.	2021
Ensure our Emerging Talent programmes are used to upskill current employees as well as new recruits allowing apprentice and graduate programmes to be available to all.	Ongoing
<b>Promote, support and communicate our EDI commitment</b>	
Highlight storytelling that celebrates inclusivity and diversity in internal and external communication channels on a regular basis.	Ongoing

Communicate our EDI ambitions throughout SLC and encourage more employee involvement through a new Diversity and Wellbeing Forum.	2021
Have specific stakeholder forums for EDI to share good practice and test out new ideas.	Ongoing
Invite stakeholders and partners to EDI events, where we can learn from and share with our peers.	Ongoing
Networking and engaging with other employers to share good practice and hosting Diversity and Inclusion inspired events.	Ongoing
Work in partnership with other organisations who are Investors in Diversity (IiD) accredited to engage with hard to reach groups.	Ongoing



## Governance and Measuring Success

Progress against the Equality, Diversity and Inclusion Strategy will be monitored as part of SLC's Corporate Governance. Within SLC's governance structures, the Board has established a Remuneration, People and Organisational Design Committee as a Committee of the Board to support it in its responsibilities in formally reviewing regular compliance reports, diversity data and Employee Engagement developments, and will formally receive updates on progress with the Equality, Diversity and Inclusion Strategy.

At a Corporate level, activity will be overseen by a Diversity Champion/Specialist working with and through a newly formed Diversity and Inclusion Panel, formed of employee representatives from across the Company. Day to day priorities will be driven by the Executive Director People@SLC and the People Team will provide regular updates on our workforce data in support of our Objective 1 and 2 actions.

Our LGBT+ Network, Arcus, and other fledgling diversity networks will have a key role in acting as employee led mechanisms to identify employee concerns and feelings.

We will regularly monitor and review our EDI strategy objectives to ensure they are fit for purpose and truly help shape SLC towards a diverse and inclusive workforce. We will make improvements on an ongoing basis where there is a clear case for change or where new priorities emerge.

This will be achieved by:

- Publishing an annual EDI report against this EDI strategy document on the progress we make on the equality objectives and actions we have set.
- Compare our monitoring data with regional representational data to see how far our workforce reflects the local communities we have a presence in.
- Closely monitor our employee equality data and compare annual trends to identify relevant business actions to improve workforce representativeness, for example whether the people we are recruiting are very similar to one another or very different from the pool of people we're recruiting from.
- Compare the position and treatment of workers with certain protected characteristics within our workforce compared with those without those characteristics.
- Our equality data will help plan positive action campaigns, for example targeted at existing employees or externally at the local communities with the aim of increasing the talent pool from which we recruit.
- External and internal benchmarking of our performance against other organisations and use of measurement frameworks provided by the National Centre of Diversity.
- Compare our monitoring data with industry standard and see how we are doing compared to others in our sector.
- Engage with all our employees so that we listen and work together towards a diverse and inclusive workforce.
- Keeping an open mind to change and take recommendations, where we will continue to make improvements year on year.
- Use our internal and external communications to embed EDI at the heart of what we do.

## Equality Monitoring Data

SLC will comply with legal obligations to monitor and report on the employee profile by equality characteristics, in line with the Equality Act 2010. We want to create an environment where people from diverse backgrounds can contribute to the growth of SLC and everyone has an equal chance to succeed. To enable us to achieve this, we believe monitoring is the basic foundation for analysing the current extent of the equality and diversity within the organisation.

We will gather equality and diversity data from our employees and applicants for job vacancies on a regular basis. This will give us a greater understanding of the needs of SLC and more importantly the impact of our workforce policies, practices and activities on employees from all equality groups. From this, we can identify what effect there is on different protected characteristics and be better informed of future actions to eradicate those disparities.

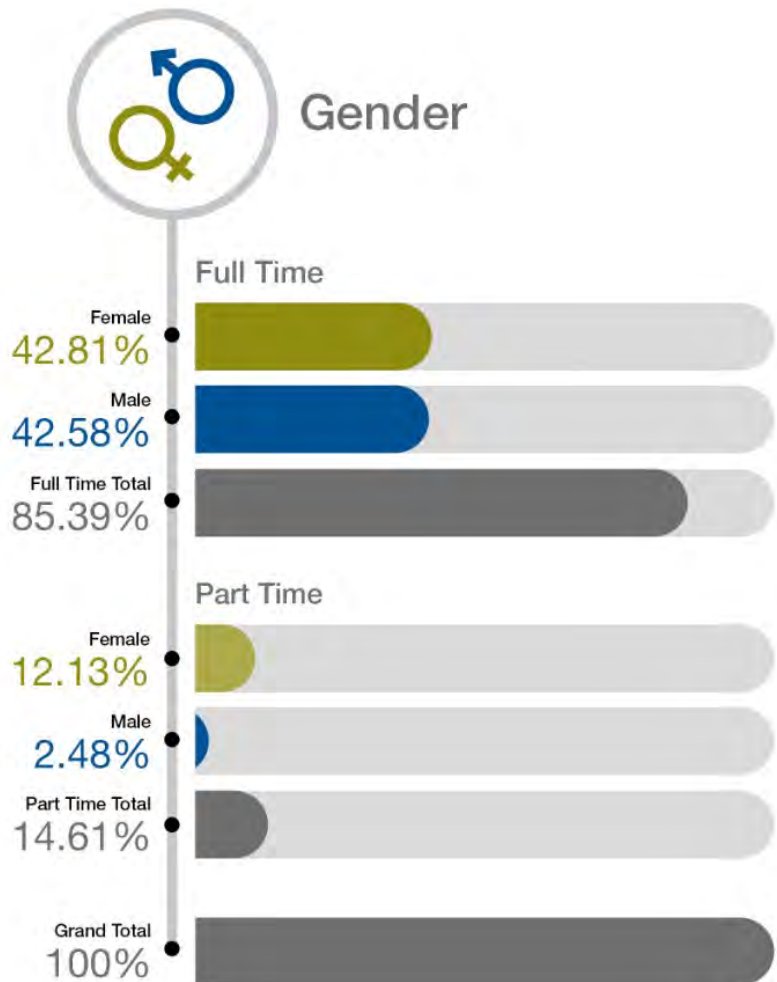
Each year, we publish a monitoring report that outlines the profile of our workforce. Information relating to applicants for employment and employees will be monitored by the SLC People function. The information we collect will be treated in a sensitive manner and in accordance with the SLC's data protection policy. The effectiveness of this policy will be kept under review and amended to reflect developments in equality legislation and best practice.

Over the next three years, SLC will consult with its recognised trade union and all relevant stakeholders with respect to the equality policy and EDI strategy and objectives, which will be reviewed and reported on an annual basis.

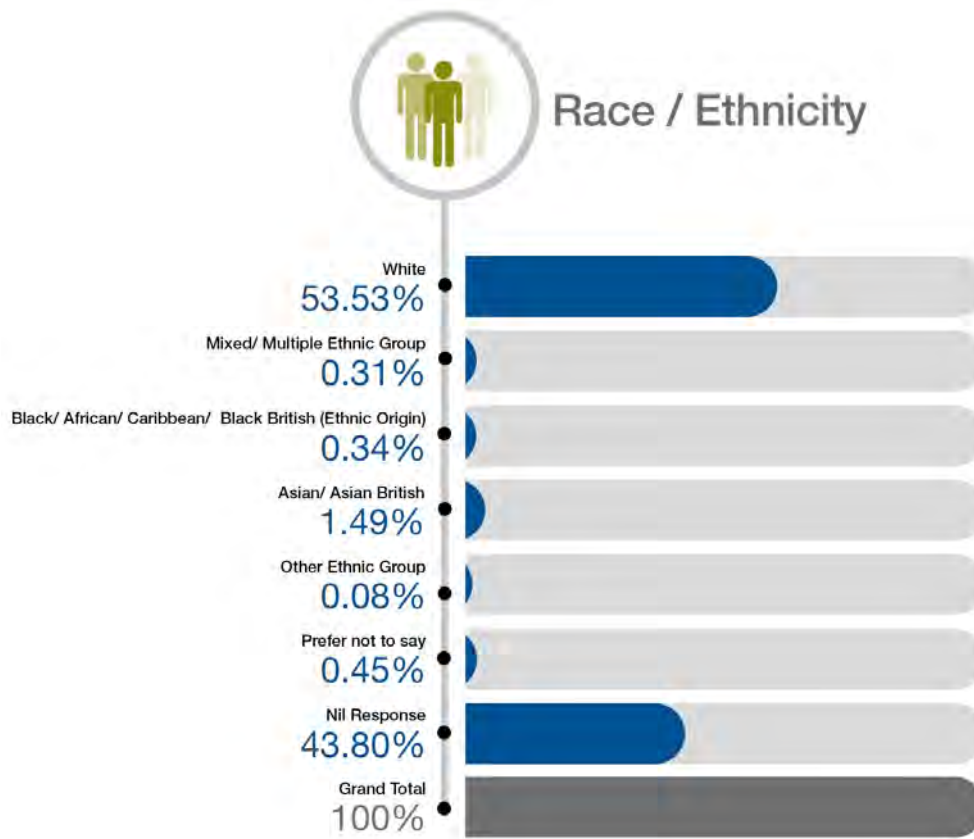
The performance data has been broken down by eight equality strands: age, gender, race and ethnicity, religion and belief, disability, sexual orientation, gender reassignment and marriage and civil partnership. This information has been put together as at 31 August 2019 and will focus on the monitoring profile of our employees as at this date.



The age profile across SLC shows that we have people of all ages working at SLC, however the average age remains 37 years which shows that we have a young workforce when compared to other public sector employers where the average is 47 years.



The company gender profile is more equal than is found in other public sector organisations. The percentage of men working at SLC is 45.06% and the percentage of women is 54.94%, which is slightly higher than the average percentage of women in the UK workforce of 47% according to the Business in the Community research. The part time figures show a disparity remains between men and women working less than full time hours. We are reviewing our Flexible Working policy as part of the People Strategy to encourage both men and women to take advantage of different working patterns that work for both SLC and the individual.



The table above shows the ethnic breakdown of our employees.

There has been a decrease since last year from 62.29% to 53.43% of employees saying their ethnicity is white. Also from the data, 2.2% of our employees are from each of the ethnic minority groups, which is a slight decrease from last year at 2.7%.

There has been an increase of nil responses from 34.38% to 43.80% since last year. We must do more to make employees feel comfortable in reporting their ethnic origin to gain a better picture of our ethnicity profile at SLC.

According to the 2011 Census the England and Wales population profiles of working age people are as follows<sup>1</sup>:

- White ethnic groups 85.6%
- Asian 8.1%
- Black 3.4%
- Mixed Ethnicity 1.8%
- Other Ethnic Group 1.1%

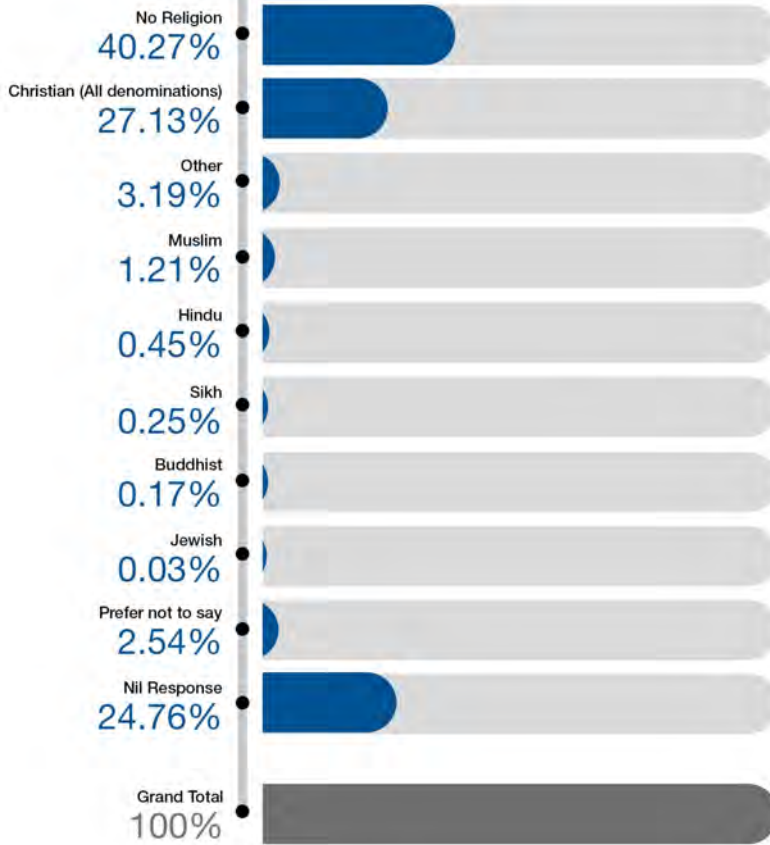
Across Scotland the minority ethnic population is 4%<sup>2</sup>.

<sup>1</sup> <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/demographics/working-age-population/latest>

<sup>2</sup> <https://www.scotlandscensus.gov.uk/ethnicity-identity-language-and-religion>

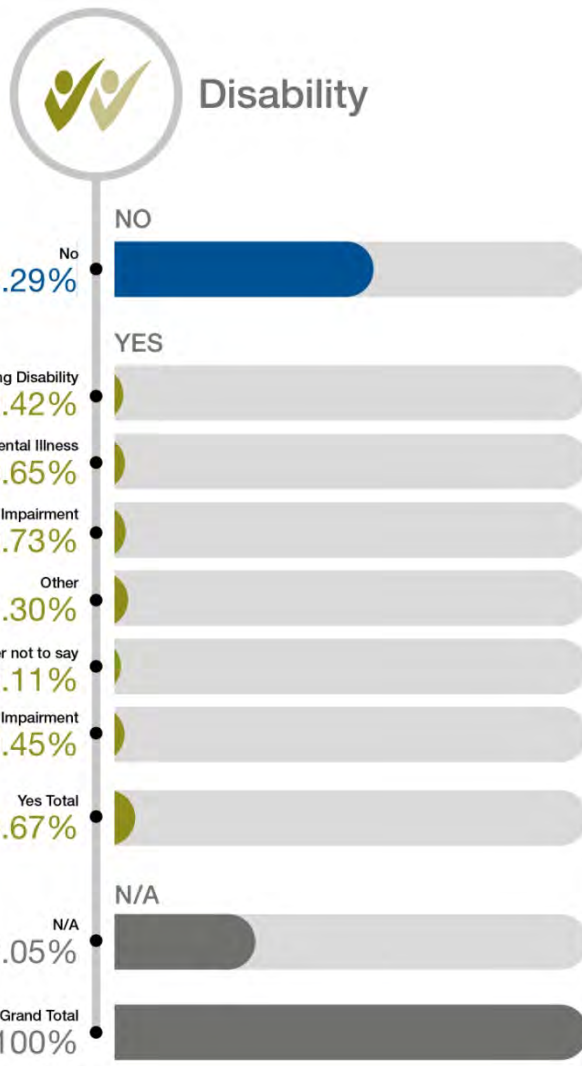


## Religion and Belief



### Religion and Belief

This year we hold data for 72.7% of our employees, which is a slight decrease from 73.3% last year. The continued decrease in nil responses trend continues going from 28.70% last year to 24.76% this year and we interpret this as positive progress. The percentage of employees who prefer not to reveal their religion or belief has reduced from 3.09% last year to 2.54%.



Section 6(1) of the Equality Act 2010 states that a person has a disability if: that person has a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on that person’s ability to carry out normal day-to-day activities. Given this definition, 3.67% of employees have indicated that they have a disability. This is a slight increase from last year of 3.36%.

In recent findings, it has been found that 18% of the working age population, which is 16-64, have reported that they have a disability<sup>3</sup>. This accounts for 7.6 million people of working age and the Government in 2017 has set a target of 4.5 million people with disabilities to be in employment by 2027<sup>4</sup>.

We remain committed to break down employment barriers for disabled people and people with health conditions at SLC by our involvement in a number of initiatives, for example our commitment to becoming a Disability Confident Leader within our EDI Strategy.

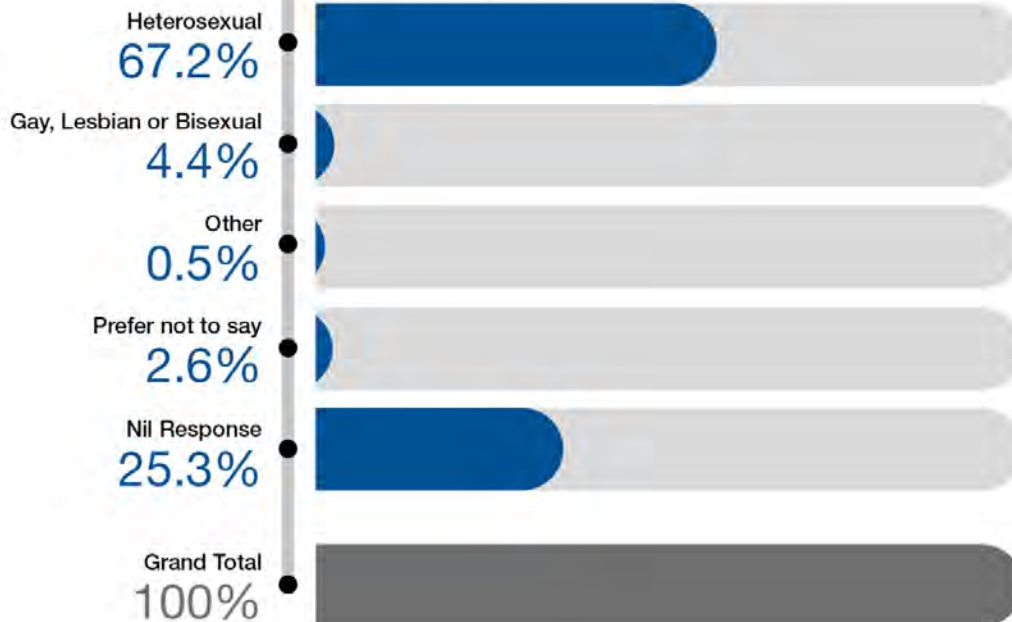
<sup>3</sup> House of Commons Library (January-March 2019)

<https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7540#fullreport>.

<sup>4</sup> <https://www.gov.uk/government/news/strategy-seeks-one-million-more-disabled-people-in-work-by-2027>.



## Sexual Orientation



Last year we had 70% of our employees sharing their sexual orientation, this year we can see an increase to 72.1%. 4.4% of employees said they are gay, lesbian or bisexual (LGB), which is a slight increase from 4% last year. The most recent public data source (ONS 2017) indicates that 2.0% of the UK population are lesbian, gay or bisexual, however the LGBT foundation has estimated the figure to be between 5%-7%.

We have had a slight decrease in both nil and prefer not to say responses, since last year, from our employees on their sexual orientation, and we interpret this as a positive progress in employees feeling they can be their true selves at work.



## Gender Reassignment

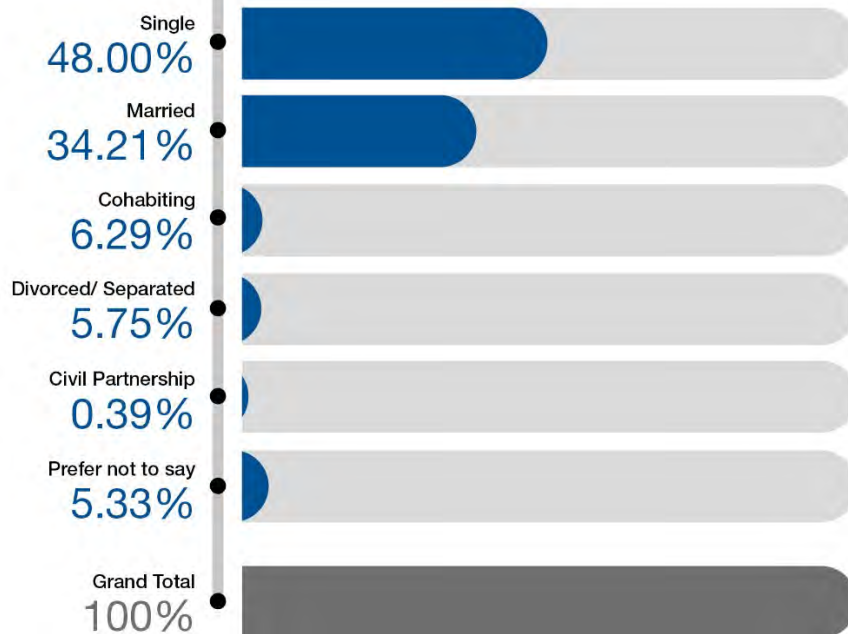
We understand that monitoring numbers of transgender people is a very sensitive area and data is handled very carefully throughout the monitoring process. As the information points to only a small number of people within SLC who claim to be transgender, SLC reports the number as \*.

We will continue to take further measures to provide support and guidance to employees who are or have gone through a gender transition process. This includes support from line managers to the individual, as well as developing and establishing transgender inclusive policies and practices into SLC's everyday working practices.





## Marriage & Civil Partnership



We hold data about marriage and civil partnership for 94.64% of our people. 34.21% are married, a slight increase from last year of 34.17%. 0.39% are in civil partnerships, a decrease from last year of 0.52%. 6.29% are cohabiting, an increase from last year of 5.65%. 5.75% are divorced/separated, an increase from last year of 5.62%. 48.00% are single, an increase from last year of 47.40%. Those preferring not to say has decreased from 6.63% last year to 5.33% this year.

There were 956 civil partnerships formed in England and Wales in 2018, an increase of 5.3% compared with 2017; this is the third annual increase following a large decrease between 2013 and 2015 after the introduction of marriages of same-sex couples in 2014<sup>5</sup>.

<sup>5</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/marriagecohabitationandcivilpartnerships/bulletins/civilpartnershipsinenglandandwales/2018>