



SLC Equality, Diversity and Inclusion Strategy 2020

23 March 2016

ABOUT THIS DOCUMENT

This document explains the importance of Equality, Diversity and Inclusion (EDI) to the Student Loan Company. It sets out our commitment to treating people fairly, respecting differences, understanding different needs, valuing people and meeting the public sector requirements of the Equality Act 2010.

We look back at the progress we have made on our 2012 - 2015 equality objectives and set out our objectives for the next four years from April 2016 to March 2020.

These equality objectives will be reviewed on an annual basis and progress will be reported to our Executive Leadership Team and Board before being published via our website www.slc.co.uk.

Contents

PART 1: SETTING THE SCENE

Foreword	2
About the Student Loans Company	3
Our Vision, Mission and Values	4
Our Policy Commitment to EDI	6

PART 2: OUR EQUALITY JOURNEY SO FAR

Progress against EDI objectives 2012-2015	7
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PART 3: THE WAY FORWARD

Our new EDI objectives	9
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PART 4: MEASURING SUCCESS

Monitoring and review of the EDI objectives	13
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PART 5: EQUALITY MONITORING DATA

Employee equality profile as at 31 st January 2016	14
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APPENDIX 1

Our year one – EDI action outcomes	21
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Version/Approval

NAME	POSITION	ROLE	DATE
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PCS/Scott Wilson	PCS	Reviewer	03/20/16
Christine McAllister	Head of Corporate Communications	Reviewer	04/02/16

PART 1: SETTING THE SCENE

FOREWORD

The Student Loans Company touches on the lives of people, business, education providers, partners and stakeholders in the world we live in now and into the future. As a Company we are committed to playing our part in creating a fairer society, where diversity is valued and respected, where people do not face discrimination and prejudice and a society where everyone can participate, flourish and have the opportunity to fulfil their potential.

As a Board and Executive Leadership Team we are committed to making sure that equality, diversity and inclusion (EDI) is part and parcel of the way we provide services, engage our employees, develop policies, make decisions, consult and involve our partners and stakeholders in our work. This will put EDI at the heart of our business as a long term commitment driven by the needs of our customers and employees.

Each of us thrives when we are valued as an individual and by promoting EDI this helps us invest in our people and create an environment where employees and customers are valued, motivated and treated fairly. SLC wants to develop an organisational culture where EDI is used as a vehicle to expect excellence and invest in our employees to equip them to deliver a customer focussed service.

Our equality objectives are there to help us build on our strengths and challenge us to constantly improve. This strategy describes our progress to date and outlines our objectives for moving forward over the next four years.



Non-Executive Chair
Christian Brodie



Chief Executive Officer
David Wallace

ABOUT 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.

Our core functions

We:

- provide expert operational advice and high quality data and information to support Government Administrations' policy-making and analysis;
- provide information, advice and guidance (IAG) on student finance;
- process applications and pay loans and grants to students and learners in higher education;
- make educational maintenance payments to students aged over 16 in Northern Ireland and Wales;
- pay tuition fees to higher and further education providers;
- pay bursaries and scholarships on behalf of higher and further education providers;
- work with HMRC to collect loan repayments; and
- manage direct collection from customers making voluntary additional payments, living overseas or repaying grant and loan overpayments

We do this by working with our stakeholder's e.g. the Departments for Business, Innovation & Skills (BIS), Education and Lifelong Learning (DELL, Scotland), Education and Skills (DfES, Wales) and Employment and Learning (DEL, Northern Ireland) to name but a few.

SLC currently has approximately 2800 employees located across four sites: Glasgow (city centre), Glasgow (Hillington), Llandudno Junction and Darlington.

OUR VISION, MISSION AND VALUES

Our Vision: is to be valued as a digital, customer-focused centre of excellence.

Digital captures the transition we're making from being an organisation that relies heavily on manual processes to one that will, for most customers, be wholly automated and accessed via the internet or mobile device.

Customer-focused reflects our aspiration to provide a high quality service to our customers, whatever their needs and preferences, allowing them to transact their business with us — whether it's accessing funding, making repayments or tracking their account — quickly, easily and conveniently. Customer feedback and requirements will shape the design of our systems and processes. It also marks our determination to get things right first time, so that we compare favourably with best-in-class customer service organisations.

Centre of excellence looks to the future. We already have a wide range of in-house expertise in assessment, payment and repayment services. As we replace our core systems, we will build the capacity to further develop and expand this expertise, enhancing the Company's growing reputation as a centre of excellence in these areas.

Our Mission: is to enable our customers to invest in their futures by delivering secure, accurate and efficient assessment, payment and repayment services.

It sets out what we do, how we do it and why we do it. It describes our current remit — why we exist and what we're doing today, tomorrow and in the months and years ahead:

What we do: we assess eligibility, we make payments and we provide repayment services for student finance. Everyone in the Company — whatever their role — is supporting these activities, even if they aren't directly involved in providing them.

How we do it: we focus on both the need to do things right first time with minimum fuss, so that customers get what they need from us easily and effectively. Part of this is ensuring that we have the right balance between our back office support functions and our front office functions which directly deliver services to customers. This includes the need to deal with personal information carefully and sensitively.

Why we do it: to provide finance to our customers to invest in their futures. We help them access funding to enhance their knowledge, improve their skills and increase their opportunities, contributing to economic growth.

Our Values

Achieve Performance Excellence

Everything we do is driven by our passion for excellence and commitment to develop the best service for our customers. We must all:

- adopt a 'can do' attitude and through our performance management processes challenge those with areas for improvement
- build effective working relationships and recognise the different needs of our stakeholders
- always look to improve and innovate – benchmarking performance against the best and learn from them

Be Passionate about our Customers

Understand our customers and ensure that what matters to them is at the heart of what we do. We must all:

- listen, show respect and take responsibility to resolve issues
- challenge how we do things and drive change through innovation
- aim for excellence by looking for and using best practice

Invest in our People

We are committed to investing in our people and growing talent. We must all:

- look for opportunities to develop our skills and expertise
- share our experiences and resources to help build leadership skills across the Company
- make a contribution and respect other points of view

Recognise Success

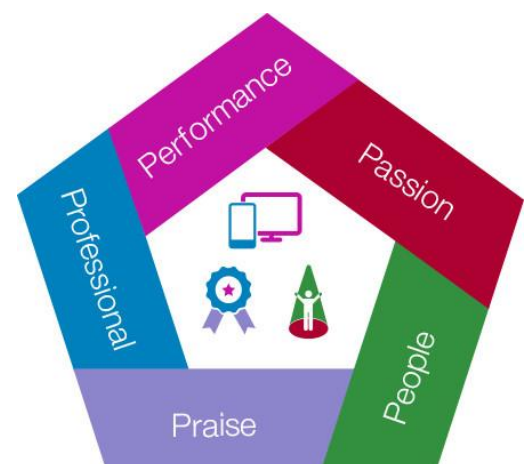
We recognise, promote and celebrate success at all levels. We must all:

- recognise success and praise colleagues' achievements
- promote and celebrate team achievement
- celebrate Company successes publicly – both internally and externally

Be Professional

Be professional in our behaviour and approach at all times. We must all:

- take pride in the Company and always behave in a way that generates confidence in us as an organisation
- work together as a team and support our colleagues
- use knowledge, experience and initiative to make well-informed decisions



OUR POLICY COMMITMENT TO EQUALITY, DIVERSITY AND INCLUSION

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 values. Our People Strategy is structured around the following 5 areas:

- Organisation Design
- Resourcing and Sourcing
- Organisational Development & Capability
- Reward and Recognition
- Location

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 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 SLC expects all of our employees and partners to demonstrate responsible practice and behaviour to uphold these rights. SLC will comply with all relevant equality legislation 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.

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 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 values.

PART 2: OUR EQUALITY JOURNEY SO FAR...

PROGRESS AGAINST EDI OBJECTIVES FOR PERIOD April 2012 – December 2015

Here is a snapshot of the improvements we made against our original equality objectives:

1. *A more streamlined Disabled Students' Allowance (DSA) process which reduces the administrative burden on students and SLC*

We have reduced the administrative burden on our disabled students by improving our advice and guidance. For example, we have worked with disability stakeholder groups to improve the content of our customer letters.

We have made improvements in reducing the end to end application assessment timescale for our disabled students by improving the format of information provided by the student and their GP. We are able to demonstrate this improvement in the form of a 26% reduction in applications being held up for a lack of appropriate medical evidence compared to the same point last year. We acknowledge that there are still improvements to be made and we will continue to strive to streamline DSA processes

We have reduced transactional costs and improved the processing of DSA supplier invoices by delivering a digital solution which allows invoices to be submitted electronically.

2. *Improving digital accessibility and meeting accessibility guidelines.*

We secured a number of training licences to help our designers, developers and web site producers to understand accessibility best practice and how this can be used to identify and solve usability problems for our customers.

To support the training we invited a number of our disabled users to provide help and assistance in our usability testing and this is something we would want to continue to do given the pace of digital change.

SLC has its own YouTube channel which includes a short series of subtitled and British Sign Language supported films on a range of topics important for students making prospective loan applications.

Towards the end of 2015 we achieved senior management approval for a new Accessibility Design and Communication Strategy. As part of this strategy we now have a number of "Accessibility Champions" across the business.

We recognise that there is still much to do in a changing digital climate which means that as a Company committed to '**digital, customer focused centre of excellence**' the landscape is constantly changing and evolving at pace. We therefore need to be sufficiently agile to respond to changing challenges while making sure that we strive to level the playing field for our customers who need additional support. This also means that our employees will need to have the right skills and abilities to support the Company.

3. *Being better at attracting, retaining and progressing a diverse range of employees in a culture which embraces new ideas and celebrates the contribution which diversity and inclusion make.*

We are able to capture our employee equality data via our Oracle system. We have published equality monitoring data annually since 2013.

Information analysis from this data capture tells us that the total gender breakdown [54% female; 46% male] across the Company is more equal than is found in other public sector organisations where the breakdown is traditionally 70% female;30% male. We also have a lower percentage gender pay gap (5%) when compared with other public sector employers where the gender pay gap is 11.4%¹. The pay gap and the equality monitoring information will continue to be monitored, reported and analysed annually so that, as a Company, we are able to work towards our aim of a representative and diverse workforce.

In 2014 we carried out our first employee survey on equality, diversity and inclusion to complement the Company People Insight Survey.

We have improved the equality, diversity and inclusion (EDI) knowledge of our senior and middle managers by mainstreaming EDI into elements of the Leadership Development Programme where the concept of 'unconscious bias' and 'organisational bias' is explored to highlight the impact this can have on decision making and workplace operation. By the end of March 2016 over 100 middle and senior managers will have completed this training.

4. Equality analysis and impact assessment is a fully functioning sustainable process delivered as business as usual by the departments which have ownership for the work being assessed.

This has proved to be an area of challenge. We have recently revised the equality impact assessment (EIA) toolkit. This has now been subject to consultation with PCS. HR colleagues are road testing the paperwork as part of the review of HR policy and procedure.

5. Relevant high level diversity and inclusion indicators are mainstreamed so that they are considered by managers when they make the decisions which drive our business forward.

Progress on EDI is reported regularly as part of the Company Balanced Scorecard and Board Reporting.

¹ <http://www.equalpayportal.co.uk/statistics/>

PART 3: THE WAY FORWARD....

OUR NEW EDI OBJECTIVES

The Equality Act 2010 requires public sector organisations to publish equality objectives every four years. The Act positively challenges organisations through the public sector equality duty to know and understand how age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion/belief, sex, and sexual orientation impact on their business. The relationship between these 'protected characteristics' and the business acts as a reminder that the consequences of difference on effective employment and service delivery cannot be avoided.

We set out objectives for the period April 2016 – March 2020 and grouped them into the following key areas:

1. General business objectives

- Effective leadership
- Active use of data to review policies and procedures
- Promotion and communication of EDI commitment

2. Customer focussed objectives

- Understanding who our customers are
- Increasing the accessibility and usability of our online systems while keeping pace with technological advances
- Securing a level playing field for our customers who need specific and targeted support

3. Our people focused objectives

- We have empowered, engaged and well-supported employees
- A workforce which is representative of the communities we serve
- A workplace where people feel valued and are encouraged to maximise their potential

These areas have been identified as important in supporting SLC meet its own corporate objectives and at the same time demonstrate not only compliance with the general equality duties but a structure to review and improve our performance for people with characteristics protected by the Equality Act 2010.

MAPPING OUR EQUALITY OBJECTIVES WITH THE BUSINESS OBJECTIVES



GENERAL BUSINESS EDI OBJECTIVES

Inclusive leadership leads to business excellence. The way we do business is changing. Customers and employees are becoming more diverse. The development of the knowledge economy means flatter, less hierarchical structures in organisations. Increased agility is the necessary response to emerging markets, economic downturn and the cultural change inspired by social media and new ways of communicating.²

If we ask ourselves what this means for our leadership? We would expect that they need to be adaptable, to be able to manage workplaces of the future, to create cultures that are not only diverse but are able to leverage that difference for competitive advantage. It means that trust is essential to employee engagement and organisational performance.

These objectives and supporting activities aim to develop clear lines of accountability and responsibility for equality and diversity making sure that it is an integral part of the management of the Company and all other management functions to ensure that our work reflects good equality and diversity in practice.

OUR FOUR YEAR PLAN

Effective leadership	<ul style="list-style-type: none">• EDI structures and leadership roles are identified within the Company• processes are implemented for 'equality proofing ' business decisions; projects and proposals• scrutiny of equality, diversity and inclusion through internal audit and external benchmarking
Active use of data to review policy and procedures	<ul style="list-style-type: none">• develop an improved process to carry out Equality Impact Assessments of policy, practice and projects• make effective use of equality data to take appropriate remedial action where analysis reveals adverse outcomes for staff and/ or customers• integrate EDI within the procurement process more effectively
Promotion and communication of our EDI commitment	<ul style="list-style-type: none">• develop and enhance our methods of communication with all internal and external stakeholders• make sure that managers are equipped to continue to fulfill their obligations under the public sector equality duty• publish equality monitoring data; equality impact assessments and progress on actions

² <http://gender.bitc.org.uk/all-resources/research-articles/inclusive-leadership-culture-change-business-success>

CUSTOMER FOCUSED EDI OBJECTIVES

The Company recognises the need for our services and facilities to be accessible, adequate and appropriate to the needs of all users. This is further emphasised by the approval of the SLC inclusive design and communication strategy. Legal compliance and good practice in these areas helps us secure a level playing field for our customers who need specific and targeted support.

In the areas of our business where service delivery is reliant on contractors and other service providers we will ensure they are aware of and comply with the Company's policy on equality and diversity.

The outcomes we anticipate from these objectives are via SLC Inclusion Design and Communication strategy and will serve to continuously enhance our customer journey.

OUR FOUR YEAR PLAN

Understanding who our customers are

- capture disability data from DSA applications
- analyse the equality data and trends from customer insight exercises to support continuous improvement and learning from our customers and stakeholders
- deliver relevant training for staff on disability, accessibility and good customer experience

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

- monitoring the 'end to end' customer journey to support continuous improvement
- accessible and streamlined application processes for all our customers
- ensure extending online application accessibility to DSA customers
- meet relevant web and online accessible compliance standards

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

- deliver the SLC inclusive design and communication strategy
- establish a system of student funding which complies with religious observance e.g. Sharia compliant product

OUR PEOPLE FOCUSSED EQUALITY, DIVERSITY AND INCLUSION OBJECTIVES

SLC puts customers at the heart of everything we do; however, it is our people culture, skills, professionalism, knowledge and experience which shape the customer relationship. This is grounded in our 'Leading the Way' values and behaviour framework.

It is important that our aspiration of being an inclusive employer is demonstrated by our ability to achieve a workforce which is representative of the communities we serve. Being inclusive will help us to attract, retain and motivate our workforce. We aim to have a modern and diverse workforce that is skilled and committed to the Company. To help us do this we have identified the following objectives and actions which will support the Company People Strategy.

OUR FOUR YEAR PLAN

We have empowered, engaged and well-supported staff

- reward and promotion opportunities are consistently made to all employees with required skills and competences
- gender pay gap reporting analysis and action planning is carried out annually
- develop processes and systems to deal with dissatisfaction which command the confidence of all stakeholders and feedback to improve policy and practice

A workforce which is representative of the communities we serve

- annual workforce equality profile is produced, trends analysed and compared with populations across the key business bases of Glasgow, Darlington and Llandudno
- maintain accreditation of 'positive about disabled people in employment' and track the number and type of disability reasonable adjustments in place for staff

A workplace where people feel valued and are encouraged to maximise their potential

- equitable and transparent access to relevant learning and development opportunities so that staff can perform their roles effectively and fulfill their potential
- explore and act on the interest from staff on equality employee networks e.g. disabled employee network
- appropriate and relevant health and well-being initiatives made available for staff to improve their work and personal lives

PART 4: MEASURING SUCCESS

MONITORING AND REVIEW OF THE EDI OBJECTIVES

This will be achieved by:

- Publishing an annual report on the progress we make on the equality objectives and actions. This will also include an analysis of headline workforce and recruitment data.
- Monitoring our employee equality data and compare annual trends to identify relevant business actions to improve workforce representativeness.
- Building a year on year improved direction of travel which will help the business promote and highlight case studies of good practice.
- Benchmarking our performance using an acknowledged performance and measurement framework
- Engaging with our customers so that we listen and work together 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.

PART 5: EQUALITY MONITORING DATA - AS AT 31 JANUARY 2016

The SLC has a legal obligation to monitor and report on the employee profile by equality characteristic. Monitoring is the basic foundation for evaluating the extent of equality and diversity within the business. The Company will therefore routinely gather equality and diversity data from our employees and applicants for job vacancies. Equality data captured will be used to help us monitor the effects of policies, practices and activities on employees from all equality groups to identify what effect there is on different protected characteristics.

The Company will maintain appropriate employee information and monitoring systems to assist the effective implementation of its policy and EDI objectives. Information relating to applicants for employment and employees will be monitored by the SLC HR function.

Information will be treated sensitively and in accordance with the Company'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.

The Company will consult with the recognised trade unions and all relevant stakeholders and partners with respect to the equality policy and EDI objectives which will be reviewed and reported on an annual basis over the next four years.

The structure of the monitoring report

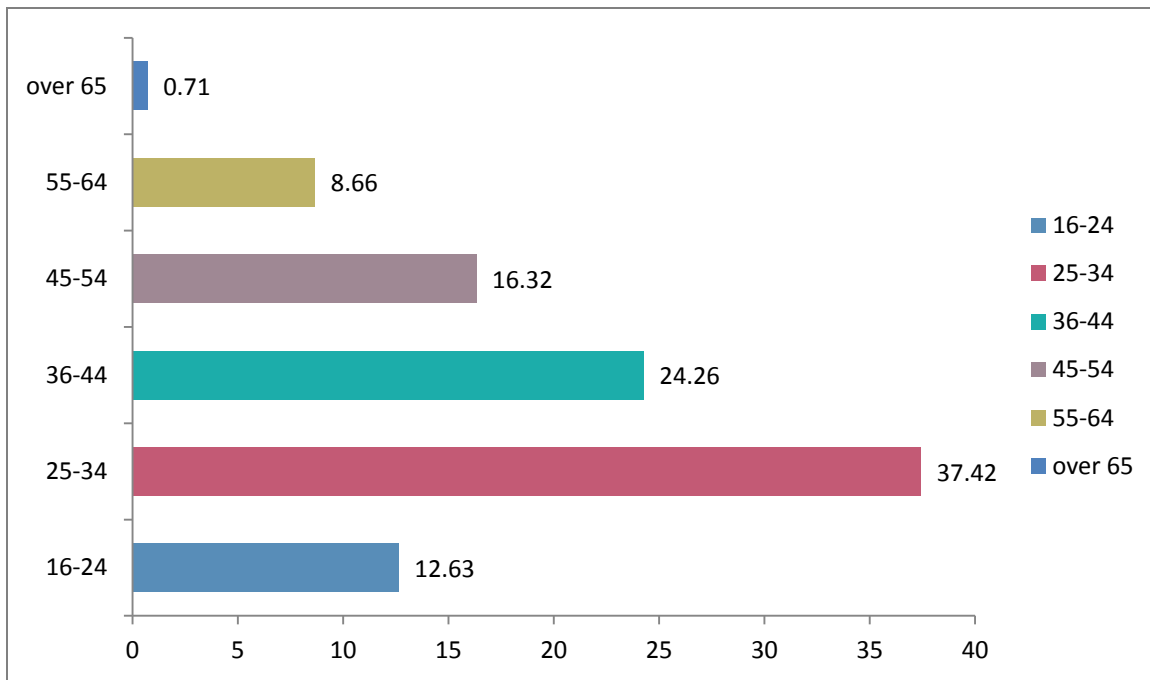
This report is being presented to include the 'whole' Company headline overview by equality protected characteristic. This information has been put together as at 31st January 2016 and will focus on the monitoring profile of our employees as at this date.

We have also included over the period 1st January 2015 to 31st January 2016 data on the recruitment profile differentiated by equality protected characteristic.

All horizontal information in the graphs will show percentage of the workforce.

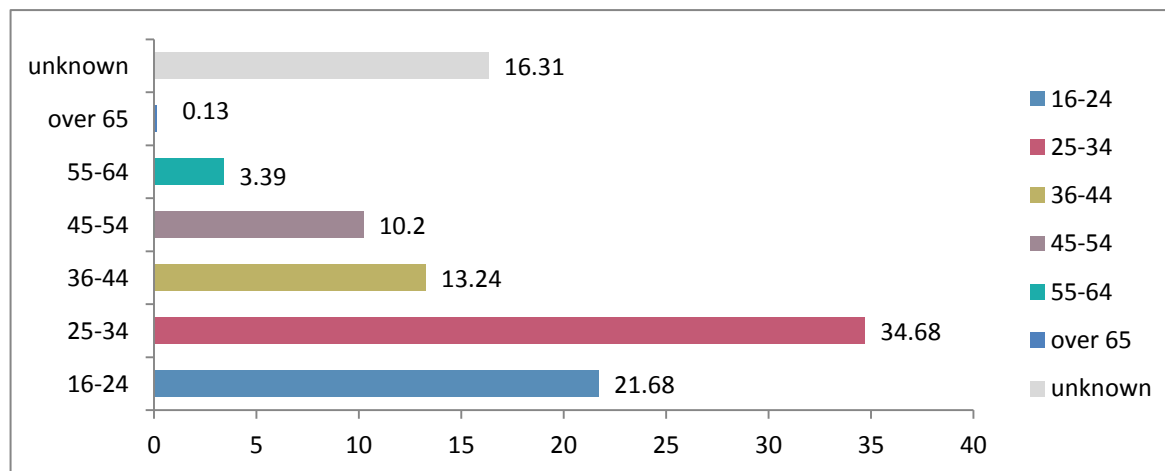
Age

The age profile across the Company shows that we have a 'young' workforce. This compares well with other public sector organisations particularly in the 16 – 24 age brackets.



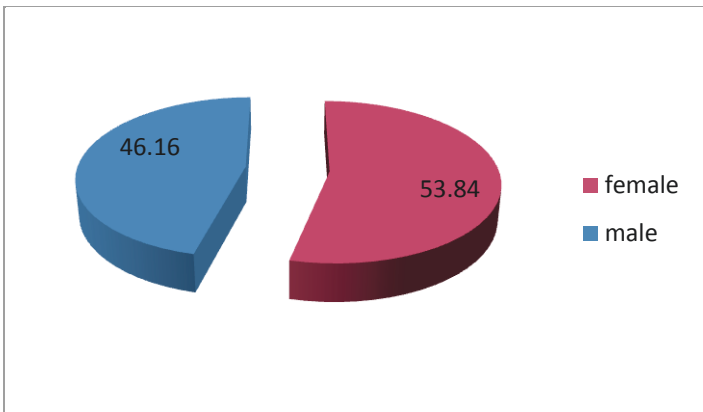
Age by recruitment application %

This profile is reflective of our workforce.



Employees by gender %

The company gender profile is more equal than is found in other public sector organisations.

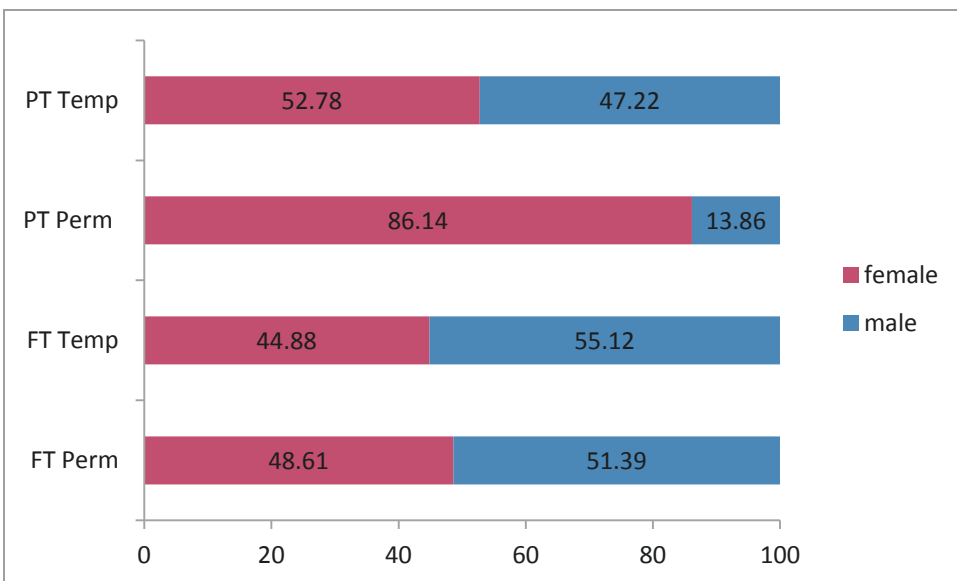


Gender by recruitment application

As a Company we have a mix of permanent and temporary employees some of whom will work for us for a fixed period of time; often this is to meet busy periods of the year.

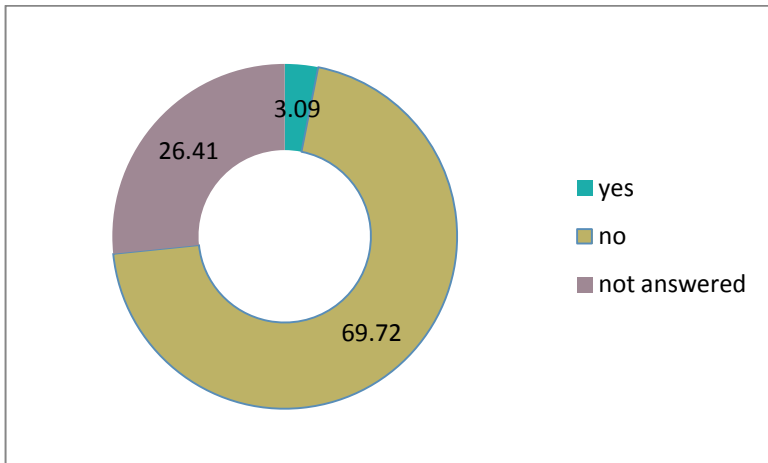
This data has been broken down to reflect the range and types of recruitment across the Company; fixed term permanent; fixed term temporary; part-time permanent and part-time temporary.

The gender profiles are comparable with the exception of part-time permanent. This latter category echoes the pre-dominance of part-time permanent work as being an area which is attractive to women as evidenced by the application differential below.



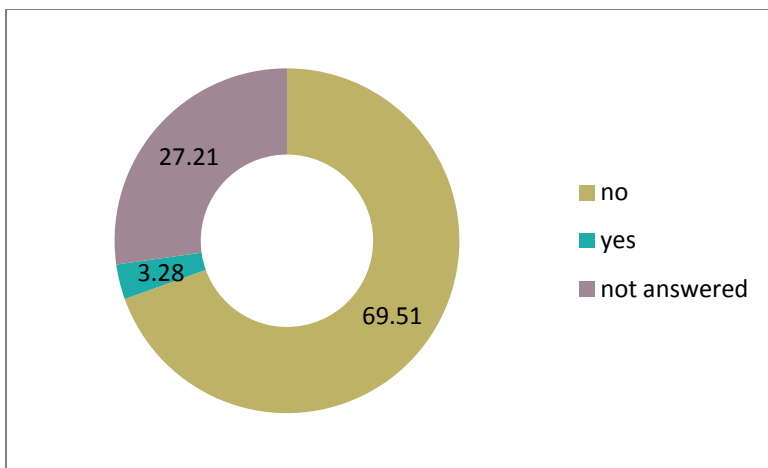
Disability

This profile is similar to that across the public sector generally and is an indicator that action to reduce the percentage of 'not answered' information is required.



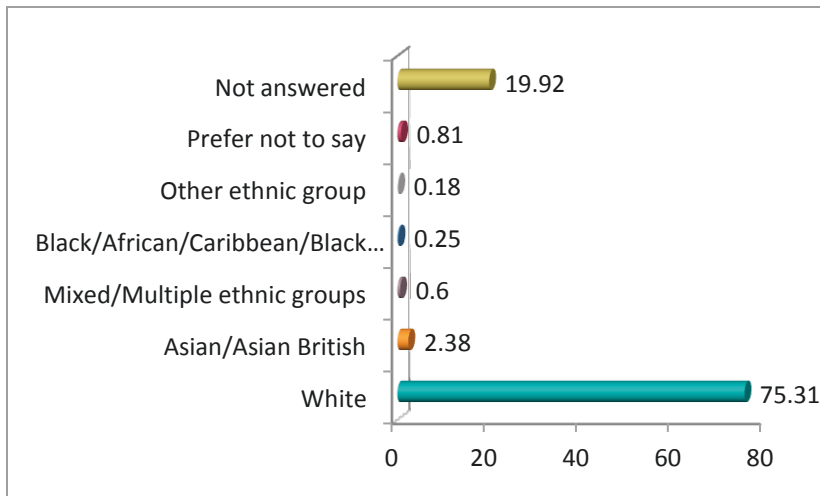
Disability by recruitment application

Again almost the same picture is reproduced by this data suggesting more action to promote the Company commitment to being a 'positively disabled employer'.

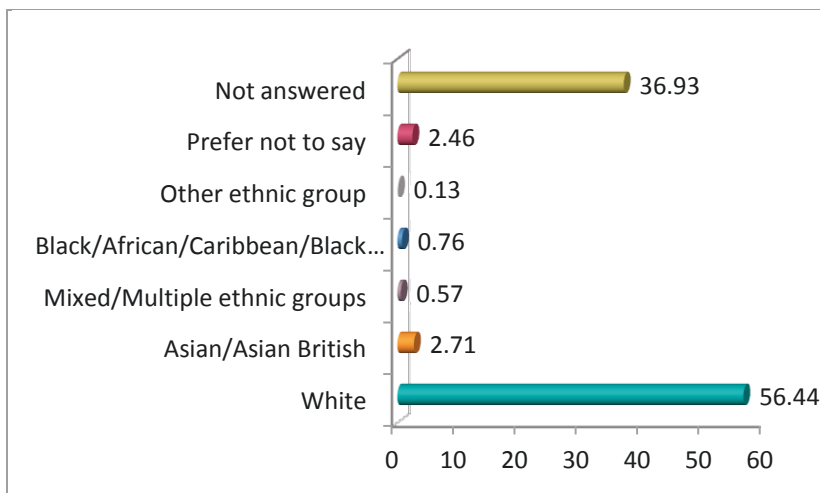


Employees by ethnicity

Across the UK the percentage of the population from the Black and Minority Ethnic (BME) community is approx. 13%. The data below represents the overall company profile and as we develop more sophisticated analysis we will present the information by business location compared with local BME population. Again we will also develop actions to improve the not answered percentage.

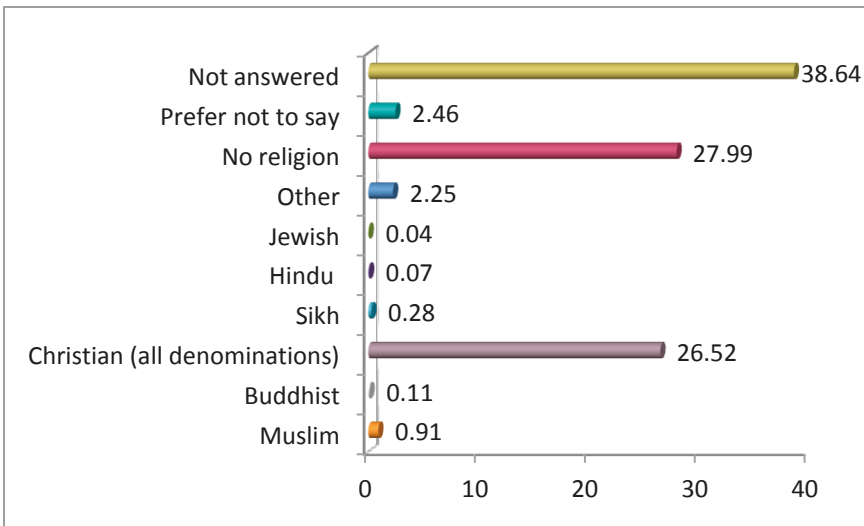


Ethnicity by recruitment applications

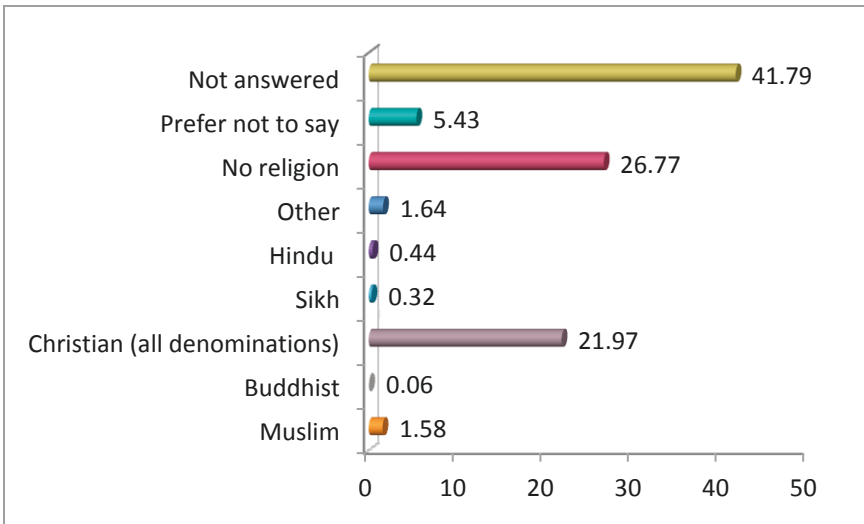


The following information on religion & belief and sexual orientation protected characteristics are recent additions to the workforce profile analysis and we expect the response rate to improve in the future in order to provide an improved future trend analysis. As for the other reports we will need to develop actions to improve the level of under reporting.

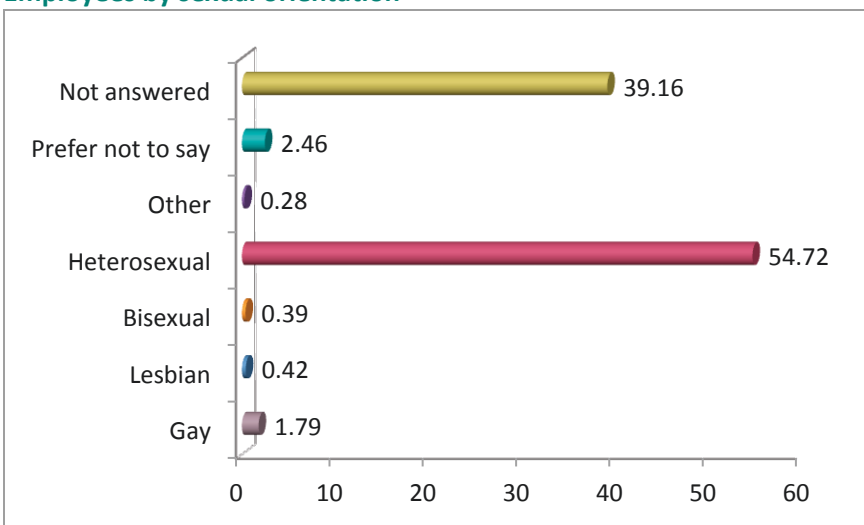
Employees by religion



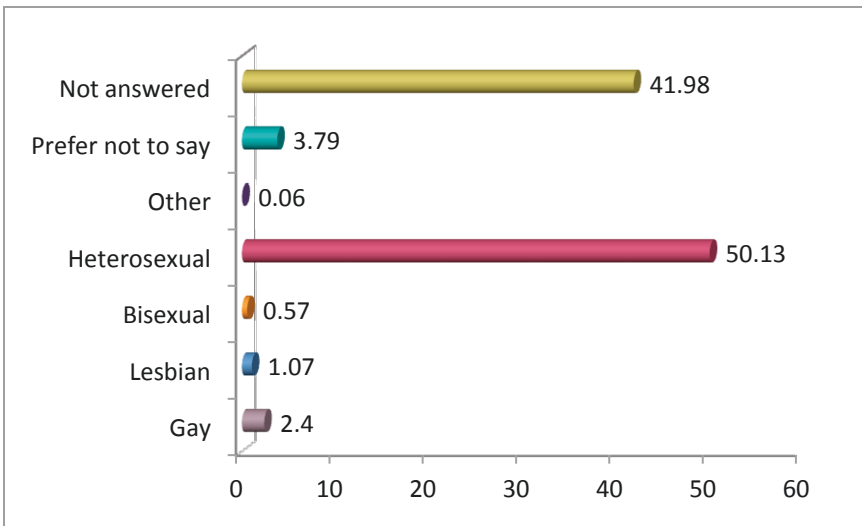
Religion and recruitment application



Employees by sexual orientation



Sexual orientation and recruitment application



Gender pay gap

At the moment there is no requirement to produce gender pay gap data under the English/UK equality regulations. The information below has been produced in line with the Scottish public sector equal requirements and demonstrates that the overall gender pay gap using base pay only across SLC is 5%.

Gender	FTE's – January 2016
F	£21,017
M	£22,165
% gap	5%

Consultation is currently taking place on new gender pay gap reporting regulations which will extend the UK Equality Act 2010 to include Gender Pay Gap reporting. The proposals as outlined in the consultation suggest that the definition of pay will include a range of additional payments excluding overtime e.g. shift and/or bonus payments.

This change to legislation is intended to take place from October 2016 and we will be required to publish by 30th April 2017.

OUR YEAR ONE – EDI ACTION OUTCOMES

Effective leadership

- EDI action owners group established
- EIA process for use in project development in place
- External benchmarking tool identified

Active use of equality data

- Improved analysis from equality data
- EDI integrated within procurement

Promotion of EDI

- Annual Report published
- Inclusive Design and Communication Strategy - year one progress update

Understanding who our customers are

- Training for our staff on disability and accessibility as a standard

Increasing the accessibility and usability of our online systems

- Monitoring the 'end to end' customer journey to support continuous improvement.

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

- Activity and projects on good practice are promoted.
- Case studies created

We have empowered, engaged and well-supported staff

- Gender pay gap information is included in the equality data annual monitoring report

A workforce which is representative of the communities we serve

- Equality monitoring data is analysed to identify improvement actions
- A system is in place to record reasonable adjustments

A workplace where people feel valued and are encouraged to maximise their potential

- A programme of Health & Wellbeing initiatives is in place.