

Equality, Diversity & Inclusion Strategy

2023 to 2026



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01. Introduction – Message from Chris Larmer



Chris Larmer
Chief Executive
Officer

The Student Loans Company (SLC) is delighted to introduce our Equality, Diversity and Inclusion (EDI) Strategy for the next three years (2023-2026).

Through specific and measurable objectives, this strategy outlines the next steps in our journey to develop our EDI maturity; empower our people to embed Equality, Diversity and Inclusion into everything we do; and support our people to thrive.

Supporting SLC's people is my top priority as CEO, as I know they are the key to our success as a business. I am committed to continuing the good work already started via our People Strategy to make SLC a great place to work and to make sure we are providing opportunities for fulfilling careers for everyone within our organisation. So, for me, the purpose of this strategy is not just to demonstrate that SLC meets its equality obligations, but that we are building a positive, supportive, and inclusive workplace where everyone is treated fairly, can achieve their full potential, and feels comfortable to be themselves.

I, alongside my Executive Leadership Team, take full accountability for driving this strategy forward with our aim being to move beyond compliance to maturity, by which we mean that EDI is driven forward by the whole organisation and role modelled by all leaders.

Chris Larmer.



02. What does Equality, Equity, Diversity and Inclusion mean to SLC?

Equality

Equality to us means ensuring everyone is treated fairly with dignity and respect. It means challenging discrimination and removing barriers to ensure people are not treated less favourably because of a protected characteristic so that everyone has the same opportunities to fulfil their potential. We at SLC recognise that each person has individual needs and circumstances. We want to achieve **equity** so that individuals are provided with the specific tools they need to thrive.

Diversity

Diversity is recognising the benefits of different perspectives, values and lived experiences between people in the workplace and in our communities. It is about creating a culture and practices that welcome and value diverse backgrounds, thinking, skills and experience.

Inclusion

Inclusion is providing an environment where everyone feels included, valued and accepted. Everyone can contribute to decision making and has a voice. This may mean making adjustments where needed so that everyone can participate.



03. Equality Legislation – Understanding our duties and moving beyond compliance

We know that adherence with the Equality Act and Public Sector Equality Duty (PSED) is a legal obligation, but through this strategy we want to continue to move beyond compliance.

We want this strategy to build on our commitment to EDI and emphasise its importance to us as a public sector organisation. For us, EDI means attracting the best talent for diverse representation and supporting a productive workplace culture where our people can thrive, which in turn, provides the best service for our customers.

The Equality Act 2010 and The Public Sector Equality Duty

Due to our status as a government-owned organisation, we must demonstrate our commitment to the Equality Act 2010 and as a public body must comply with the PSED.

The Equality Act 2010 (the Act) replaced previous anti-discrimination laws with a single Act. It simplified the law, removing inconsistencies and making it easier for people to understand and comply with. It also strengthened the law in important ways, to help tackle discrimination and inequality.

The PSED (section 149 of the Act) applies to public bodies and others carrying out public functions. It supports good decision-making by ensuring public bodies consider how different people will be affected by their activities, helping them to deliver policies and services which are efficient and effective; accessible to all; and which meet different people's needs.

In summary, those subject to the equality duty must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the general equality duty. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The Equality Duty is supported by specific duties, the specific duties require public bodies to:

- Publish relevant, proportionate information demonstrating their compliance with the Equality Duty; and to
- Set specific, measurable equality objectives, at least every 4 years.

Protected Characteristics

Having a ‘protected characteristic’ means you have a right not to be treated less favourably or subjected to an unfair disadvantage by having that characteristic.

The ‘protected characteristics’ are as follows:

- age
- gender/sex
- disability
- gender reassignment

- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sexual orientation

Due regard

To ‘have due regard’ means that in making decisions and in our other day-to-day activities we must ‘consciously consider’ the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic,
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it,
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low,
- tackle prejudice,
- promote understanding.

We publish equality information and report progress against our EDI activity for compliance with the public sector equality duties annually. We also publish workforce information annually as part of our gender pay gap report.

Our Journey so far

- SLC is committed to being a great place to work and to unlocking the potential of all colleagues, so SLC is proud that in 2022 our ongoing efforts to embed equality, diversity and inclusion received the highest level of recognition under the Government's **Disability Confident** scheme.
- SLC is also a member of the **Business Disability Forum** enabling us to draw upon best practice in reviews of our policies and practices to identify and break down barriers.
- SLC has successfully been retained its **Investors in Diversity Award**, first accredited by the National Centre for Diversity in January 2021 and now reaccredited in April 2023, highlighting the organisations commitment to improving Diversity.
- SLC is a member of **Employers for Carers** (EFC) showing our commitment to supporting carers in the workplace and recognising that our colleagues may care for family or friends who are elderly, ill or have additional support needs such as a disability.
- We have family friendly and inclusive policies including EDI, Employee Wellbeing, Family Leave, Flexible Working, Gender Identity, Transgender Equality and SLC's Apprenticeships as a Development Opportunity policies.
- We introduced an 'inclusive leadership' module to our leadership development programme; and for the first time included an 'inclusive champion' award as part of our People Star Awards, SLC's annual recognition awards, in 2023:
- We have reviewed and updated our Employee Engagement Survey to include additional EDI and Wellbeing questions for future benchmarking.
- Women represent the majority of SLC's colleague population (53.25%).
- 3.58% of our colleagues' report having a disability.
- 3.98% of our colleagues' report that they are from ethnic minority groups.
- Our 2022 mean gender pay gap is 12.08%, the median gap is 7.55%
- We are representative of the LGB population compared with national and local statistics with 4.65% of SLC colleagues reporting their sexuality as lesbian, gay or bisexual.



04. SLC's Demographic Data – What is our data telling us?

We know that in order to meet the needs of our customers, we need to represent them, which is why we aim to measure our workforce profile with both the local population and our customer base.

We have some data available on the gender, age and marital status of our customers. However, we have limitations on the data we currently hold. and further development of our data collection and analysis is required to obtain an accurate understanding of our customer demographics. Disability data that is held based on the total number of Disabled Student Allowance applications received, and we are mindful that this does not include customers such as sponsors, distance learning for disabled customers or customers who may have a disability who do not apply for DSA funding.

We also need to focus on increasing equality data monitoring for our workforce to obtain an accurate understanding of our workforce demographics as reporting rates for protected groups (ethnicity, disability and sexual orientation) are currently between 69% and 76%.



05. Protected characteristic representation compared to local demographics

The number of employees across SLC has decreased from 3,317 to 3,294 since 2020. The age profile across SLC shows that we have people of all ages working at SLC. The average age is 40 years old, remaining consistent with previous years. The mean age of SLC colleagues in 2022 was 38; this shows that we continue to have a young workforce when compared to other public sector employers, where the median age was 45 years old in 2020.

We lack representation across all localities in relation to disability status as well as Black, Asian and other minority ethnic groups. We need to commit to more action to increase representation for staff from ethnic minority backgrounds and disabled staff.



Gender

	SLC Darlington	ONS Darlington	% Difference
Female	54.53%	51.1%	+3.43%
Male	45.47%	48.9%	-3.43%

	SLC Glasgow	ONS Glasgow	% Difference
Female	52.16%	51.8%	+0.36%
Male	47.84%	48.2%	-0.36%

	SLC Llandudno	ONS Llandudno (Conwy)	% Difference
Female	54.74%	51.6%	+3.14%
Male	45.26%	48.4%	-3.14%



Marital Status

	SLC Darlington	ONS Darlington	% Difference
Single	44.33%	35.5%	+8.83%
Living With Partner	9.06%	-	-
Married or Living with Civil Partner	32.41%	44.2%	-11.9%
Divorced	4.28%	10.8%	-6.52%
Separated	1.57%	2.7%	-1.13%
Widowed	0.29%	6.8%	-6.51%
Not shared	1.28%	-	-
Unknown	6.78%	-	-

	SLC Glasgow	ONS Glasgow	% Difference
Single	37.87%	49.2%	-11.33%
Living With Partner	9.11%	-	-
Married or Living with Civil Partner	38.78%	31%	+7.78%
Divorced	3.25%	8.2%	-4.95%
Separated	2.05%	3.9%	-1.85%
Widowed	0.51%	7.6%	-7.09%
Not shared	1.77%	-	-
Unknown	6.66%	-	-

	SLC Llandudno	ONS Llandudno (Conwy)	% Difference
Single	43.07%	32.5%	+10.57%
Living With Partner	13.14%	-	-
Married or Living with Civil Partner	25.55%	45.6%	-20.05%
Divorced	5.84%	11.1%	-5.26%
Separated	0.73%	2.1%	-1.37%
Widowed	1.46%	8.6%	-7.14%
Not shared	0.00%	-	-
Unknown	10.22%	-	-



Religion

	SLC Darlington	ONS Darlington	% Difference
Christian	26.05%	52.1%	-26.05%
Religions other than Christian	5.49%	3.20%	+2.29%
None	43.40%	39.7%	+3.70%
Prefer not to say	2.78%	4.9%	-2.12%
Unknown	22.27%	-	-

	SLC Glasgow	ONS Glasgow	% Difference
Christian	28.53%	54.5%	-25.97%
Religions other than Christian	5.30%	7.50%	-2.20%
None	38.21%	31%	+7.21%
Prefer not to say	3.30%	7.1%	-3.80%
Unknown	24.66%	-	-

	SLC Llandudno	ONS Llandudno (Conwy)	% Difference
Christian	21.90%	50.8%	-28.90%
Religions other than Christian	0.73%	1.80%	-1.07%
None	56.93%	40.9%	+16.03%
Prefer not to say	1.46%	6.4%	-4.94%
Unknown	18.98%	-	-



Ethnicity

	SLC Darlington	ONS Darlington	% Difference
Black Asian Mixed and other ethnic groups	3.07%	4.99%	-1.92%
White	65.88%	94.4%	-28.52%
Prefer not to say	26.91%	-	-
Unknown	4.14%	-	-

	SLC Glasgow	ONS Glasgow	% Difference
Black Asian Mixed and other ethnic groups	5.35%	11.15%	-5.80%
White	65.49%	88.4%	-22.91%
Prefer not to say	22.55%	-	-
Unknown	6.61%	-	-

	SLC Llandudno	ONS Llandudno (Conwy)	% Difference
Black Asian Mixed and other ethnic groups	0.73%	2.73%	-2.00%
White	70.07%	96.9%	-26.83%
Prefer not to say	21.17%	-	-
Unknown	8.03%	-	-



Disability

	SLC Darlington	ONS Darlington	% Difference
Yes	4.35%	19.4%	-15.05%
None	77.44%	80.7%	-3.26%
Prefer not to say	0.21%	-	-
Unknown	17.99%	-	-

	SLC Glasgow	ONS Glasgow	% Difference
Yes	2.85%	22.6%	-19.75%
None	68.74%	77.3%	-8.56%
Prefer not to say	0.40%	-	-
Unknown	28.02%	-	-

	SLC Llandudno	ONS Llandudno (Conwy)	% Difference
Yes	5.11%	20.5%	-15.39%
None	65.69%	79.5%	-13.81%
Prefer not to say	0.73%	-	-
Unknown	28.47%	-	-



Sexual Orientation

	SLC Darlington	ONS Darlington	% Difference
Heterosexual	68.59%	91.42%	-22.83%
LGB	4.07%	2.63%	+1.44%
Other	0.43%	0.25%	+0.18%
Prefer not to say	2.93%	5.69%	-2.76%
Unknown	23.98%	-	-

	SLC Glasgow	ONS Glasgow	% Difference
Heterosexual	60.82%	95.4%	-34.58%
LGB	5.18%	3.00%	+2.18%
Other	0.23%	0.6%	-0.37%
Prefer not to say	3.71%	0.9%	+2.80%
Unknown	30.05%	-	-

	SLC Llandudno	ONS Llandudno (Conwy)	% Difference
Heterosexual	64.96%	89.22%	-24.26%
LGB	3.65%	2.50%	+1.15%
Other	2.92%	0.21%	+2.71%
Prefer not to say	2.19%	8.29%	-6.10%
Unknown	26.28%	-	-

To note:

SLC representation and ONS (Office for National Statistics) census data is split by the location of our three SLC offices; Glasgow, Darlington and Llandudno. The Scottish Census ran one year after the England/Wales Census so we have referred to the 2021? Census data for England and Wales and the 2011 data for Scotland to ensure consistency in the sample. We will benchmark as new data becomes available (data from the 2022 Scottish Census is expected in 2023).

We do not currently ask colleagues if they have caring responsibilities so can't benchmark against this measure.

All data issues identified above are highlighted as actions within our EDI objectives for 2023-2026.

SLC data correct at 31 December 2022.



06. Engagement and Listening

The development of this strategy has been informed collaboratively with insight and engagement from SLC colleagues numerous sources including:

- **SLC's Colleague Representative Group (CRG)** - A key colleague-led network, that is a trusted sounding board to explore, discuss, and provide feedback on people policies, health and safety, organisational design, and employee engagement. CRG members are from various grades, roles, directorates, and backgrounds from across SLC to be reflective of our diverse workforce.
- **PCS** - Our recognised Trade Union. PCS negotiate with SLC on pay, conditions and represent members with all workplace issues they face. SLC aims for early and regular engagement with PCS on all people initiatives, ensuring we hear the views of their its wide membership.
- **Staff Networks** - ARCUS, SLC's LGBTQ+ Network, supports and promotes equality, diversity and inclusion within the organisation.
- **SLC's Employee Engagement Survey** – Every year we ask colleagues to tell us what's working well and where we can improve. Our survey incorporates questions in relation to EDI and wellbeing, responses to these questions have been analysed to inform this strategy.
- **People Directorate** – Key teams within SLC's people directorate, including our Talent Acquisition team, Organisational Development and People Business Partners.
- **SLC's People Group** – A group of Senior Managers from across each of SLC's six directorates who are brought together to provide a business view on people issues.
- **National Centre for Diversity Feedback**– As part of the Investors In Diversity Award assessment process, a survey was conducted with colleagues and customers, and a report of recommendations was developed. The findings of the report have been incorporated into future areas of focus for the strategy.
- **SLC's Customer Experience team** – This team is responsible for ensuring SLC provides an excellent customer experience, helping customers invest in their futures by providing an intuitive, supported, and trusted service.

Areas of focus for 2023-2026

SLC's areas of focus for the next three years based on data, insight and analysis are outlined below:

Data – In order to accurately understand the needs of our colleagues and customers, we know we need accurate data to support effective decision making and develop meaningful action plans to increase our diversity profile. We want to have visibility of the diverse make up of our workforce and customers so that we can be representative of them. Although we currently have some data provisions in place, we know there is more to do by being able to access data metrics efficiently and effectively and increase equality reporting effectiveness with the reduction of 'unknown' and 'prefer not to say' returns.

Recruitment, Retention and Progression – From initial data analysis we know there is more we need to do to be representative of our local demographics and the customers we serve. In relation to our diversity profile, we know that we need to focus on recruiting and retaining more people that report having a disability and those that report their ethnicity as being Black, Asian or other minority ethnic groups.

We have slightly improved representation of staff from ethnic minority backgrounds. Representation was slightly increased from 3.07% in 2020, to 3.98% in 2022, but approximately 30% of our ethnicity data is still unknown with 24% of our colleagues choosing to not disclose their ethnicity. We also have reduced representation reported for disabled staff from

4.58% in 2020, to 3.58% in 2022 and our unknown data has increased to over 24% which is why we need to focus on encouraging equality data reporting to obtain an accurate understanding of our workforce demographics.

In relation to progression and career development, although women represent the majority of SLC's colleague population (53.25%), women are underrepresented in senior positions with the majority placed within Grades 9-14 and men representing majority of higher salary Grades 15-22. There are no colleagues from Grade 20 and above that report having a disability, and there are no colleagues above G20 that have a reported ethnicity other than white.

As part of our future activity, as well as Gender Pay Gap Reporting, we will be looking to implement voluntary reporting for both Disability and Ethnicity to better understand any potential or perceived barriers faced in relation to recruitment, retention and progression within the organisation and developing appropriate action plans to mitigate and highlighted issues.

Leadership – We know that our colleagues want to have leaders who are invested in promoting EDI initiatives and want to see more diverse representation in SLC's senior leadership. Our leaders need to be accountable and showcase how they are actively role modelling and promoting EDI initiatives, as well as being able to make fully informed decisions through the provision of effective data and insights.

Development

As part of our future activity we want to ensure that our colleagues understand their responsibilities in relation to EDI and are empowered to create an inclusive environment where everyone can thrive. Feedback from our colleague groups, Employee Engagement and The National Centre for Diversity surveys highlighted that managers also want to build their cultural awareness and confidence to effectively support their teams. Topical themes that have been highlighted as areas for development are wellbeing and mental health awareness, unconscious bias, transgender awareness, neurodiversity, and menopause.

Inclusive workforce and culture

The response rate from our Employee Engagement survey highlights that our minority groups want to share their views with SLC; with a response rate of 84% for LGB colleagues, 82% for colleagues with a reported disability, 71% of our colleagues from Black Asian and other minority ethnic groups. Those between 27 and 76 years of age all had over 80% response rate with those aged between 58 and 76 had the highest response rate overall. One of the key themes from feedback we have received is that people want more ways to be able to contribute their views and report inappropriate behaviour.

We will look to provide informal and formal methods for reporting bullying, harassment and inappropriate behaviour as well as reviewing our customer and colleague networks and developing a framework that allows them to fully contribute to and inform decision making. We know that we are fully representative of our LGBT+ colleagues across all localities, feedback from our employee engagement survey

highlighted that 88% of our LGB colleagues agreed or strongly agreed that they felt comfortable to be themselves at work.

Feedback from SLC's LGBTQ+ ARCUS network has identified future areas of focus including equality reporting for trans colleagues, increasing awareness on how to report inappropriate behaviour, promoting the network as part of onboarding processes and enabling the network be involved in LGBT awareness training and wellbeing initiatives. We will further support SLC's LGBTQ+ staff network Arcus to promote SLC as a great place to work, educate the workforce, support colleagues and promote fairness and respect throughout the organisation.

We also want to cement our position as a Disability Confident Leader. Our comparative data from colleagues that report a disability shows they experienced different outcomes from those who do not report a disability in relation to career progression and highlighted areas are around improving accessibility, the need for managers to be equipped to support colleagues with adjustments, wellbeing requirements, hidden disabilities, neurodiversity and mental health needs. Our colleagues also tell us there is appetite to have a disability colleague network, all of which have been incorporated into our action plan as areas of focus.

We hope in strengthening our reporting mechanisms, having an emphasis on Equality Impact Assessments and increasing engagement with customer and colleague networks, we will continue to make positive change to enable our people to thrive and our customers feel valued.



07. Our Strategic Framework

SLC's EDI Strategic commitments – Supporting our people to thrive

It is our aim at SLC to develop policies and services that enable people to invest in their futures, whether that is externally through providing further and higher education for our customers, or internally by supporting our workforce to thrive.

We want to be an organisation that treats customers and colleagues fairly, attracts and retains diverse talent, enables our people to role model EDI and promotes an inclusive culture, supporting our mission to be an employer of choice and a great place to work.

Based on our assessment of our current EDI maturity, we have identified the following five key strategic aims against which we will prioritise our activity over the next three years:

- **Diversity data:** We will understand the needs of our workforce and customers through transparent data, reporting, insight and analysis to support evidence based and data led decision-making.
- **Recruitment, retention and progression:** We will support our ambition to be a diverse and inclusive workforce that attracts individuals from a range of backgrounds and is representative of our local demographics and the customers we serve.
- **Inclusive leadership:** We will support our leaders to effectively role model Equality Diversity and Inclusion from the top down and create an environment where everyone can thrive.
- **Organisational development:** We will support the effective development of our people to promote inclusion, build cultural awareness, develop cultural confidence, and better understand the needs of our customers.
- **Inclusive culture:** We will support equity in SLC, embedding processes that identify and remove disproportionate impacts for underrepresented groups and create an inclusive culture.

Our 2023-2026 Objectives

The following strategic objectives have been developed based on workforce data, colleague engagement and external assessments.

Strategic Pillar	Strategic Commitment	EDI Objectives
Data	We will understand the needs of our workforce and customers through transparent data, reporting, insight, and analysis to support evidence based and data led decision-making.	<ul style="list-style-type: none"> • We will develop intuitive data collection processes to analyse our workforce demographics to be representative of our localities and customer base. • We will aim to understand the diverse needs of our workforce, increasing knowledge and building confidence in equality reporting. • We will implement reporting mechanisms to encourage transparency, and support proactive, data led decision making.
Recruitment, Retention, Progression	We will support our ambition to be a diverse and inclusive workforce that attracts individuals from a range of backgrounds and is representative of our local demographics and the customers we serve.	<ul style="list-style-type: none"> • We will attract diverse talent and promote SLC as an employer of choice. • We will ensure fair, inclusive, and transparent recruitment and selection processes. • We will promote the retention and progression of talent within SLC, ensuring equity of opportunity to enable diversity at all levels.
Leadership	We will ensure our leaders are accountable, make data led decisions, and actively lead Equality, Diversity, and Inclusion initiatives throughout the organisation.	<ul style="list-style-type: none"> • We will support our leaders to effectively role model Equality Diversity and Inclusion from the top down and create an environment where everyone can thrive. • We will build the capability and confidence of our leaders to be culturally aware and effectively promote EDI initiatives.
Organisational Development	We will support the effective development of our people to promote inclusion, build cultural awareness, develop cultural confidence and better understand the needs of our customers.	<ul style="list-style-type: none"> • We will equip our workforce with tools and knowledge to better understand legal implications and responsibilities of Equality related issues. • We will develop colleagues' cultural awareness and knowledge of inclusive behaviours to better understand the needs of our diverse colleagues and customers. • We will support the development of our managers to build cultural confidence, promote an inclusive culture and better understand the diverse needs of their teams and customers.
Inclusive Culture	We will support equity in SLC, embedding processes that identify and remove disproportionate impacts for underrepresented groups and create an inclusive culture.	<ul style="list-style-type: none"> • We will prioritise the retention of colleagues within SLC, ensuring our people are treated with fairness, dignity and respect. • We will effectively engage with our workforce and customers, enabling them to contribute to an inclusive culture and improve our services. • We will continually monitor our policies, procedures and services to promote inclusivity and reduce potential discrimination or barriers to access.



08. Measuring Our Maturity – Where do we want to be and why?

As an organisation we know we want to create an inclusive supportive culture for all where we value diverse perspectives and empower people to share their lived experiences and use their voice to improve our workplace and services. We want to move from compliance progress into having a mature, inclusive culture.

We want to be representative of our local communities and the customers we serve. From feedback, insights, and analysis of local demographic and workforce data we know that we need to focus on the following areas to move the dial and shift our EDI Maturity:

- Encouraging equality data reporting to fully understand the true demographic make-up of our workforce.
- Collating more meaningful data on our customer demographics to fully understand and meet their needs.
- Supporting our leaders to effectively role model EDI from the top down to create an environment where our people can thrive and our customers feel valued.
- Empowering our people through enabling the power of their voice, having numerous effective colleague networks that contribute to decision making.
- Empowering our customers through effective networks to contribute to the successful delivery of our services.
- Developing EDI awareness and building cultural confidence.
- Ensuring we have processes in place to effectively equality impact assess our policies, processes, and services, mitigating barriers to access.
- Providing a supportive, empathetic, and inclusive workforce culture for all protected groups, with a focus on providing an accessible environment for colleagues, prioritising wellbeing, and mental health, and supporting our disabled, LGBT, carers, and neurodiverse colleagues in the organisation.
- Obtaining gender parity in senior grades (15 and above) where men currently represent most senior roles and actively focus on reducing our gender pay gap.
- We need to be more representative of and improve outcomes for colleagues that report having a disability or report their ethnicity as Black, Asian, or other ethnic minority groups, as these protected groups are under-represented SLC across all localities and in senior roles above grade 20. We aim to increase equality data reporting to obtain more effective and transparent data analysis to report on and improve outcomes and representation for these protected groups.

SLC has developed an EDI maturity matrix through which we have benchmarked our current level of maturity to identify areas of focus for our strategic goals for the 2023-2026 EDI strategy and openly track performance and progress.

We will measure success benchmark against other Civil Service organisations <https://www.gov.uk/government/publications/civil-service-diversity-inclusion-dashboard/civil-service-diversity-and-inclusion-dashboard> as well as partner recommendations as part of the National Centre for Diversity and Disability Confident Leader accreditation assessments.



A Diverse Workforce

Driving Force	Legal/ EDI Team/ People	EDI Team/ People Team	Leadership	Whole Organisation
Maturity Level	★ Compliant	★★ Defined/ Programmatic	★★★ Mature	★★★★ Leading/ Integrated
Diversity Data	<ul style="list-style-type: none"> Data disclosed to data collectors is kept private and the confidentiality of individuals responses maintained. Data collated for compliance reporting only. 	<ul style="list-style-type: none"> The organisation is clear about what sources of data (internal and external) are relevant and useful. The organisation understands obligations under GDPR. Goals are clearly defined and measurable. The organisation has assessed all existing policies/strategies to establish priority actions. 	<ul style="list-style-type: none"> Plans are underway to mitigate gaps in data and develop enhanced EDI metrics. Human rights-based principles inform the design, collection and use of equality data. Data reporting is transparent and mapped across the employee life cycle (attraction, retention and progression). Data is regularly and consistently updated and used in decision making to set/ amend priorities across the organisation. 	<ul style="list-style-type: none"> The organisation has a sophisticated understanding of it's diversity profile, with insights into the full range of protected characteristics or under represented groups at risk of potential discrimination. Diversity outcomes are benchmarked externally. Objectives are regularly monitored and reviewed. Progress is transparent, tracked and published in an accessible manner.
Recruitment, Retention, Progression	<ul style="list-style-type: none"> Actions are largely reactive; any additional focus is on the recruitment of diverse talent. Largely homogenous workforce. Accessibility is a key consideration when designing all aspects of the recruitment process, including job advertisements, application forms and aptitude tests. Organisations recruitment policies state their commitment to supporting career progression for all employees. 	<ul style="list-style-type: none"> Diversity is seen in relation to demographic numbers and targets in place. Minority employees adapt or leave. The organisation has identified which groups are under represented in the workforce and potential barriers to access. Recruitment initiatives aim to widen the pool of applicants. Selection panels are diverse. The organisation actively communicates and implements policies to support career progression. 	<ul style="list-style-type: none"> Movement towards greater diversity in the workforce profile. Proactive actions and timeframes to increase recruitment, retention and progression of a diverse workforce established, including engagement with targeted groups. Concrete steps taken to eliminate bias from the selection process. 	<ul style="list-style-type: none"> The workforce is representative of wider society and/or the people it serves. Workforce is demographically and cognitively diverse with diversity of thought is recognised to be an organisational asset. Structured programmes are in place to support the ongoing recruitment, retention and development of under represented groups.



EDI Training and Development

Driving Force	Legal/ EDI Team/ People	EDI Team/ People Team	Leadership	Whole Organisation
Maturity Level	★ Compliant	★★ Defined/ Programmatic	★★★ Mature	★★★★ Leading/ Integrated
Inclusive Leadership	<ul style="list-style-type: none"> Leaders are familiar with the concepts of equality and discrimination and seek to comply with relevant statutory obligations. 	<ul style="list-style-type: none"> The leadership team have publicly committed to reducing inequality and promoting diversity and inclusion via the organisations strategic plan and it's implementation. 	<ul style="list-style-type: none"> EDI is a personal priority for the CEO and ELT. Leadership/managers are committed, role model inclusion and are held accountable for actions/ outcomes through tangible evidence e.g. record actions, KPI's and timeframes. Monitoring and evaluation processes occur regularly and include internal and external stakeholders. Senior staff role model inclusive practice. 	<ul style="list-style-type: none"> Leaders are recognised as models of good practice among external stakeholders for championing EDI. EDI integrated into wider strategic planning process. Forums established by public bodies to share and build on best practice.
Training & Development	<ul style="list-style-type: none"> Training and development opportunities are made available to all staff. Accessibility is a key criteria in the procurement of all aspects of training and development services. 	<ul style="list-style-type: none"> Review of existing CPD arrangements is conducted to determine gaps in accessibility. Ad hoc or standalone initiatives such as EDI awareness or Unconscious Bias training in place. 	<ul style="list-style-type: none"> Bespoke training and development opportunities are provided to minority groups e.g. mentoring. Inclusive leadership training is available to senior staff. Intercultural awareness training is available and participation is encouraged. 	<ul style="list-style-type: none"> Training for all protected groups is available. Safe space cultural conversations are encouraged to increase cultural knowledge and lived experiences. Diverse thinking /leadership styles are recognised and supported. EDI competency training is reviewed and updated regularly.



An Inclusive Culture

Driving Force	Legal/ EDI Team/ People	EDI Team/ People Team	Leadership	Whole Organisation
Maturity Level	★ Compliant	★★ Defined/ Programmatic	★★★ Mature	★★★★ Leading/ Integrated
Inclusive Workplace & Culture	<p>“EDI has to be applied for compliance and due to legislative requirements, so we do what is needed.”</p> <ul style="list-style-type: none"> • No engagement from under represented groups in surveys. • Policies: Employment policies and procedures comply with equality legislation. • Some informal or legacy staff groups in place, not fully visible to whole organisation. • EIA - Process in place. 	<p>“We fully understand the benefit of implementing EDI initiatives.”</p> <ul style="list-style-type: none"> • Some resistance from majority emerging. • Some engagement from under represented groups in surveys. Action plan developed to increase engagement with URGs. • Policies: There are examples of discrete EDI initiatives which go above and beyond legal compliance. • Diverse networks are established and visible. • EIA - Process in place. Training developed. 	<p>“Our leaders role model EDI effectively.”</p> <ul style="list-style-type: none"> • Systemic cultural barriers surface and plans in place to mitigate. • Engagement from most under represented groups in surveys. • You said, we did reports in place. • Policies: The organisation has a coherent set of policies and practices that enhance EDI e.g. reasonable adjustments, equal pay and flexible working policies. • Staff are widely familiar with such policies/practices and feel supported to take advantage of them. • EIA - Process in place. Training developed. F2f drop ins offered. 	<p>“EDI is everyone’s responsibility and is ‘how things are done.’”</p> <p>External brand matches internal one.</p> <ul style="list-style-type: none"> • Survey analysis: Engagement from all under represented groups. Action plan developed to increase engagement with all groups. • The organisation has wide ranging EDI policies and procedures available which are actively promoted to all staff. • Flexibility mainstreamed and uptake of flexible working arrangements is not seen as detrimental to ones career. • EDI is embedded into the organisations core values and culture, detailed in strategic plans and annual work plans. • EIA process embedded. Training developed. F2f drop ins offered. EIA completion rates monitored/recorded for audit purposes.

Our assessment shows that SLC currently sits predominately in the ‘compliant’ and ‘defined’ spaces in relation to current EDI maturity levels in SLC. This strategy aims to move us beyond compliance, and move towards a ‘mature’ space with increased understanding of EDI across the organisation and leaders empowered to be the driving force in embedding an inclusive culture for our people and our customers:

Theme	Strategic Objective	Rationale – why we want to move the dial	Current Maturity	Maturity Level - Aim – Year 3	Success Measures
Diversity Data	We will understand the needs of our workforce and customers through transparent data, reporting, insight, and analysis to support evidence based and data led decision-making.	Increase SLCs understanding of our workforce and customer base to better meet their needs.	Compliant	Mature	<ul style="list-style-type: none"> • Equality reporting figures are increased for the following protected groups: Ethnicity, disability, sexual orientation and religion. • We regularly update on progress against our equality objectives, incorporating measurable goals and outcomes into governance reporting. • We hold data for all protected groups for our workforce and customer base. • We monitor external data sources to effectively evidence representation. • Pay gap reporting is expanded to ethnicity and disability reporting as well as gender pay gap reporting.

Theme	Strategic Objective	Rationale – why we want to move the dial	Current Maturity	Maturity Level - Aim – Year 3	Success Measures
<p>Recruitment, Retention, Progression</p>	<p>We will support our ambition to be a diverse and inclusive workforce that attracts individuals from a range of backgrounds and is representative of our local demographics and the customers we serve.</p>	<p>We want to increase diversity as an organisation to make better decision making, creativity, increased employee engagement, productivity and more effective services.</p>	<p>Compliant</p>	<p>Mature</p>	<ul style="list-style-type: none"> • Measures to monitor recruitment metrics in place (attraction and attrition throughout recruitment journey). • We can demonstrate that we attract more diverse candidates for vacancies. • Steps to reduce bias in recruitment is evidenced. • Exit surveys completed and analysed. • Evidence of targeted positive action activity including focused succession planning and targeted development for women in leadership, women in tech, ethnic minority groups and those who report having a disability. • Evidence of increased % representation in SLC for: <ul style="list-style-type: none"> -Women in leadership grades 15-22 -Women in Technology Group -Employees that report having an ethnic minority background and/or a disability across the organisation as a whole -Employees that report having an ethnic minority background and/or a disability in senior leadership roles for grades 20 and above. • Reduction in mean and median Gender Pay Gap by 2026.

Theme	Strategic Objective	Rationale – why we want to move the dial	Current Maturity	Maturity Level - Aim – Year 3	Success Measures
Inclusive Leadership	We will ensure our leaders are accountable, make data led decisions, and actively lead Equality, Diversity, and Inclusion initiatives throughout the organisation.	We want employees to know that EDI genuinely matters and is a priority of the leadership team through their actions.	Defined	Mature	<ul style="list-style-type: none"> • EDI incorporated into organisational values and behaviours. • Flexible working senior role models for 'better new normal' can be identified. • Senior Leaders actively support and be involved in sponsorship and/or mentorship programmes which support staff development. • Senior Leaders take ownership of the delivery of their Disability Confident Leadership commitments. • ELT support the development of SLCs Colleague Network Framework including agreement for protected time, budget and board sponsorship.
Training and Development	We will support the effective development of our people to promote inclusion, build cultural awareness, develop cultural confidence and better understand the needs of our customers.	Broaden and deepen understanding of EDI benefits and how to support diverse teams.	Compliant	Mature	<ul style="list-style-type: none"> • Maintain or improve 97% completion rates for mandatory EDI training. • EIA Training in place. • ROTM Inclusion and Wellbeing sessions incorporated, positive feedback reported. • Bitesize cultural e-learning developed for all protected groups. • Analysis of cultural e-learning used to inform targeted and interactive cultural learning initiatives. • Develop dedicated programs for the progression of underrepresented groups in SLC - Disability, Ethnic Minorities and Women in leadership. • Employee Engagement Survey reports better understanding and increased cultural confidence.

Theme	Strategic Objective	Rationale – why we want to move the dial	Current Maturity	Maturity Level - Aim – Year 3	Success Measures
Inclusive Workplace and Culture	We will support equity in SLC, embedding processes that identify and remove disproportionate impacts for underrepresented groups and create an inclusive culture.	We want to ensure we mitigate barriers to access for our policies, procedures and services, give our employees a voice to create a culture that supports better outcomes.	Defined	Mature	<ul style="list-style-type: none"> • Employee Feedback – Improved scores for EDI and wellbeing survey questions, comparative analysis benchmarked annually to understand and improve employee experiences. • Diverse staff networks that support decision making and are visible. • Disability Confident Action plan in place, incorporating accessibility requirements and effective reasonable adjustment process developed in partnership with Business Disability Forum and sharing best practice. • Employers for Carers action plan in place. • EDI Communications Plan in place that supports effective diverse story telling. • Rates of bullying, discrimination and harassment and recorded, analysed and reduced. • Evidence that appropriate policies and procedures are Equality Impact Assessed. • External Accreditations – Continue to gain and maintain EDI recognised accreditations and industry standards. • Relationships built and strengthened with external stakeholders and communities to support sharing of best practice.



09. Leadership and Governance

Progress against the Equality, Diversity and Inclusion Strategy is monitored as part of SLC's Corporate Governance. Within SLC's governance structures, the Board has established a Remuneration Committee (RemCo). Updates on progress of the Equality, Diversity and Inclusion strategy and tracking against the maturity matrix will be reported to SLC's Executive Leadership Team and RemCo every six months.

At a corporate level, activity is overseen by the Policy, Equality and Wellbeing Manager, within the People Team.

We will annually monitor and review our EDI objectives annually to ensure they are fit for purpose and truly help shape SLC towards a diverse and inclusive workforce.



Student Loans Company

SLC is established as a company
limited by shares under the Companies Act
with its registered office at
Memphis Building, Lingfield Point,
McMullen Road, Darlington, DL1 1RW