



Student
Loans Company

Equality Objectives Update Report 2014

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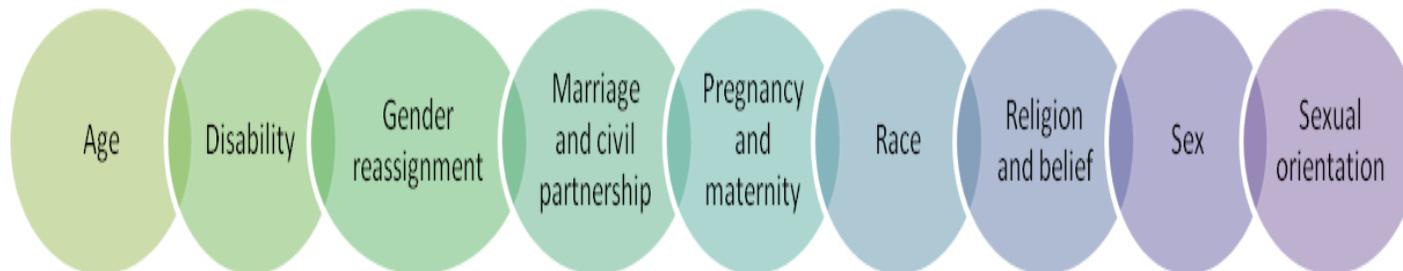
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Chairman's and Chief Executives Foreword

Chairman's Foreword

I joined SLC in February 2014 as Chairman. I am looking forward to providing support to SLC as it embarks on a major programme of transformation that embraces improved ways of delivering services to customers.

The Equality Objectives 2013-2016 ensure that SLC complies with legislation and re-affirms SLC's commitment to the public sector duties of: eliminating unlawful discrimination; harassment and victimisation; advancing equality of opportunity; and fostering good relations between people who share a protected characteristic and those who do not. This report will show how we have progressed against the Equality Objectives over the past year.



Chief Executive's Foreword

It has been just over a year since I joined SLC, and during that time I've been looking at ways of improving what we do and how we do it. I understand that Equality, Diversity and Inclusion is central to our business success. If we want to be recognised as a customer-focused centre of excellence we need to display leadership in meeting the needs of all our customers. We can only do this if we understand the needs and composition of our customers and incorporate this into designing our services and driving continuous improvement.

I recognise that Equality, Diversity and Inclusion in our workforce produces better decisions and problem solving through a wider range of perspectives. This creates less emphasis on conformity to past norms and improves flexibility and creativity. This allows us to deliver solutions that put our customers at the heart of what we do.

Each of us thrives when we are valued as an individual, by promoting Equality Diversity and Inclusion at SLC, allows us to invest in our people and draw on a wider pool of talent and experience and in turn, create an environment where employees and customers are valued, motivated and treated fairly. SLC wants to develop an organisational culture where Equality Diversity and Inclusion is used as a vehicle to expect excellence and invest in our employees to equip them to deliver a customer focused service.

Our Equality Diversity and Inclusion Objectives 2013-2016 were launched in May 2013 and set out our strategic plan for delivery on Equality Diversity and Inclusion. This annual review illustrates the progress we have made over the past year against the Equality Objectives in 5 key areas:

1. Disabled Students Allowance
2. Digital Accessibility
3. Our people
4. Management Information, and
5. Equality Impact Assessments

I am pleased to report that we have progressed in a number of areas. In reference to Disabled Students Allowance, we have looked at methods to streamline the DSA through Transformation along with improving guidance for our DSA customers; this allows us to

ensure that students move through the DSA process much more quickly by providing consistency and clarity.

By purchasing 200 licenses for the 'Web Essentials' course allows designers, developers, web site producers and any employees dealing with customers that are interested in accessibility to understand best practice with a fundamental understanding of digital inclusion. We have developed the SLC Youtube channel to improve accessibility and how we communicate with our customers to ensure that our customers can understand our products and services.

We have redesigned our Equality, Diversity and Inclusion compliance training module for the coming training year, to increase general awareness amongst staff of the importance of equality of opportunity, accessibility and providing an inclusive service.

We are committed to the development of high performing managers through the Leadership Talent Programme which is in the second year. The Programme develops managers across all levels of SLC. Our internal information evidences that women make up less of the proportion of the workforce at the higher levels of SLC. In 2012/2013, 60% of the candidates selected to go through the Leadership Talent Programme were female and in 2013/2014 this increased to 75%.

SLC is further developing internal data in order to identify any trends and gaps to drive continuous improvements for our customers and employees. This information is used to form part of our Equality Impact Assessments. We have developed our Equality Impact Assessment Training which we intend to roll out over the coming year.

However, we still have work to do to ensure we develop a culture, values and processes that also align and support our Mission and Vision and further embed Equality, Diversity and Inclusion at SLC.



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. We play a central role in supporting the Higher Education (HE) and Further Education (FE) sectors by ensuring timely and accurate payments of tuition fees to HE and FE providers.

We do this by working with our stakeholders 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). We also work closely with the Student Awards Agency for Scotland (SAAS), Education and Library Boards in Northern Ireland, Higher Education (HE) and Further Education (FE) providers, HM Revenue & Customs (HMRC), Identity and Passport Service (IPS) Department of Work and Pensions (DWP) and other delivery partners.

SLC currently has around 2,000 staff on permanent contracts, located across four sites: Glasgow (city centre), Glasgow (Hillington), Llandudno Junction and Darlington. We also have up to 1,500 additional staff supporting us at peak times of the academic year through outsourced service providers and temporary or fixed term contracts.

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.

Our Vision, Mission and Values

Our Vision, Mission and Values underpin the strategic direction for SLC, our core purpose and the values which shape our organisational culture and priorities.

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 still 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. This will allow us to provide services beyond student finance and we will look to explore opportunities across Government and in new sectors.

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 are set out in our 'Leading the Way' framework, shaping the attitude, approach and positive ways of working we seek to embed in our organisational culture. We want to invest in our people to enable them to deliver the best possible, customer focused services.

Figures at a glance in Financial Year (FY) 2013-14

We provide the core transaction processing function for the administration of student finance for the UK (except for applications in Scotland). We are one of the largest Financial Services providers in the UK.

We have:

- processed around 1.6 million student finance applications;
- worked closely with 750 Higher Education Institutions (HEIs), 570 FE Learning Providers and 650 Learning Centres to validate and ensure student attendance;
- paid around £6.5 billion in maintenance loans and grants and around £6 billion to higher and further education providers;
- managed a loan book with a total gross value of £62 billion;
- collected around £1.7 billion in repayments; and
- held and managed the personal details of 6.8 million customers.

Legislation and the Public Sector Equality Duty

The Equality Act 2010

SLC has worked hard to ensure it is compliant with equality legislation in providing services, as an employer and as a public body. The Equality Act 2010 (the Act) replaced previous anti-discrimination laws with a single Act. It simplified the law, by 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 Public Sector Equality Duty (section 149 of the Act) came into force on 5 April 2011. The Equality Duty 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.

The Equality Duty is supported by specific duties, set out in regulations which came into force on 10 September 2011. The specific duties require public bodies to publish relevant, proportionate information demonstrating their compliance with the Equality Duty and to set themselves specific, measurable equality objectives.

SLC continues to gauge the impact of key decisions on people with protected characteristics. This helps to ensure our services, systems and processes do not discriminate against people. Equality Impact Assessments are a tool used by SLC, in evidence-based policy making and an important part of good decision making by an organisation. They can assist public authorities in fully understanding the relevance and effect of policies and in identifying the most proportionate and effective responses by taking into account diverse needs.

This report sets out to explain to the public, our customers and staff, our progress in addressing Equality Diversity and Inclusion in our diverse communities in the past year whilst also looking forward to greater achievements and meeting challenges in the year to come.

DSA Update

Disabled Students Allowance Objectives 2013-2016

1) DSA in 2016 is more streamlined reducing the administrative burden on students and SLC

Seven in every ten DSA applicants are also applying for some other kind of support. Operation of the DSA system is labour intensive and subject to delays because of the amount of manual processing of applications and invoices leading to a reduction of satisfaction levels.

How can we make this happen?

- I. There is an opportunity to streamline this process by increasing the amount of data which can be self populated and improving the accessibility of our online applications.

2) In 2016 students move through the DSA process much more quickly

Significant improvements have been made on delivering DSA processes within Service Level Agreements since Academic Year 2009/10. However the end to end process from application through eligibility, assessment and finally support still takes longer than for other types of support. While an additional amount of time is inevitable because of the need for additional evidence and assessment, the amount of unnecessary contact caused by undue delays still results in a reduction of customer experience and a cost for SLC.

How can we make this happen?

- I. Seeking opportunities to enable customers to move through the DSA journey more quickly.
- II. Constantly learning from our customers about how we can improve our information, advice and guidance on target support.

3) In 2016 students, SLC and stakeholders have more clarity and consistency on evidence requirements and thresholds

We consistently find that the evidence supplied to the DSA team could be made more robust and supplied in a more consistent way by specifically qualified professionals. We want to work to empower our decision makers by giving them the expert guidance they need to inform consistency and clarity on eligibility assessments.

How can we make this happen?

- I. Identifying a system to deliver accurate and up-to-date information about disability and eligibility requirements to our teams.
- II. Building and maintaining a robust decision making matrix for all DSA applications based on expert guidance.

4) DSA in 2016 remains sustainable by reducing error and fraud

The lack of a comprehensive procurement framework and the need for manual processing of invoices leads to an increased risk of error and a reduction in the ability to detect fraud. Addressing these issues will increase the integrity of the process ensuring that the limited available funds are getting to the students who need them.

How can we make this happen?

- I. Identifying opportunities to introduce new controls in the procurement and invoicing processes, for DSA.
- II. Identifying opportunities to reduce manual work involved in DSA invoicing.

Summary of progress from 2013 to 2014

Transformation

Our Transformation programme is central to the delivery of our Vision to be a digital, customer focused centre of excellence, delivering services in alignment with the Government's Digital Strategy.

Full business transformation supported by a core systems replacement removes many of the challenges we face in delivering for our customers, stakeholders and Government sponsors. In FY 2013-2014 we have been adopting new ways of working including agile techniques and delivery models which have allowed us to deliver earlier customer and business benefit more often. This process will continue over the next three years.

We have been working hard to replace our aging and end of life technologies with proven, industry standard banking and security solutions while retaining the option to build or buy the business rules engine, business process management and integration software

components. Core Systems Replacement (CSR) — fundamental to SLC Transformation — is designed to support rapid delivery with a new and flexible digital interface while continuing to use our legacy ledger system up to the point where it can be fully replaced.

In FY 2013-2014, we have been developing and implementing detailed business and technical roadmaps that are supporting the delivery of our Corporate Objectives. We are ensuring a robust monitoring and evaluation strategy that tracks benefits throughout the Transformation programme. In FY 2013-2014 we have built an experienced in-house team and also engaged two proven strategic transformation partners to assist with building organisational delivery capability and technology platforms to support successful delivery of the programme.

Consideration of streamlining DSA processes through Transformation

As part of the Transformation programme DSA has undergone a lengthy review. In consultation with our transformation partner, colleagues from around the business reviewed the end-to-end service in detail to identify pain points for customers. This led to developing a number of concepts to streamline the service for our customers whilst aligning the DSA process to our vision of becoming a digital, customer focussed centre of excellence.

Initially, the focus was on the concept of a digital Needs Assessment Report, which would allow Needs Assessment Centres to submit structured Needs Assessment Report for students electronically. This would streamline the entitlement process and allow a student to obtain their entitlement information online. It was felt that this would significantly improve the user experience for students, staff and stakeholders. Further work is expected to begin on DSA transformation in 2015.

Mental Health Evidence Pro-forma

To assist students with mental health difficulties obtain the evidence needed to progress their DSA application, the DSA Team have created a pro-forma in consultation with UMHAN. The University Mental Health Advisers Network is a national UK charity that includes a network of people providing practical support to students experiencing mental health difficulties and people in Higher Education Institutions (HEI) who experience mental health difficulties. Currently, we receive mental health evidence that does not meet requirements which leads to delays for the student. This measure has been introduced to reduce the administrative burden on DSA students and allow them to move through the process much more quickly.

Providing improved guidance on student receipts and claims

We are constantly learning from our customers about how we can improve our information, advice and guidance on target support. The DSA Team has worked with our Marketing and Communications teams to improve the guidance we provide to customers

regarding reimbursement for items they have purchased. This was initiated as a result of analysis which demonstrated that a significant proportion of claims receipts did not meet evidential requirements and could not be processed. The new guidance will ensure that students have the right information and therefore move through the DSA process more quickly.

Providing consistency in relation to Non-Medical Help Services

Previously, there was a lack of a framework for both SLC and students to compare services and assess quality and value for money for Non-Medical Help Services. The SLC Disabled Students Stakeholder Group (DSSG) recognised that there was an issue regarding the procurement of Non-Medical Help services which are paid for through Disabled Students Allowance (DSA). Research was initiated by SLC and the reforming of Non-Medical Help Services was instigated by SLC and fully supported by the Department of Business and Skills (BIS).

The research was commissioned due to the widely inconsistent understanding of Non-Medical Helper roles and responsibilities and the disparity in the associated costs being charged for similar activities performed by a Non-Medical Helper. The research revealed a very wide range of activities and activity descriptors with over 100 different activity titles. Sometimes it appeared that different activity titles were used to cover very similar activities; at other times the same titles were used to convey different activities. There was also considerable diversity in terms of the training, qualification and skills required of Non-Medical Helpers by different providers. There was considerable variation in relation to the costs charged for Non-Medical Helper services. It was also apparent that there were several different models of costing these services so it was not always easy to compare like with like.

Therefore, it was decided to create and issue guidance setting out standard activity titles, and associated cost bands, and require Needs Assessment Centres and Non-Medical Helper suppliers to adhere to these. These costs bands describe what Student Finance England/BIS will contribute towards Non-Medical Helper costs, rather than what suppliers may charge. Creating and enforcing adherence to standard activity titles and costs, with accompanying definitions will assist in the process of creating consistent standards in Non-Medical Help and provide a framework to enable future quality initiatives, and potentially assist in providing a more streamlined and digital Non Medical Help/DSA service in future.

In developing 'Non-Medical Help Services Reference Manual', SLC was advised by the DSSG, a group consisting of a wide range of stakeholders which includes the National Union of Students (NUS), BIS and the Disabled Students Allowance Quality Assurance Group. A full list of members can be accessed using the following link: <http://www.slc.co.uk/stakeholders-partners/stakeholder-working-groups/sfe-disabled-students-stakeholder-group.aspx>

The introduction of the 'Non-Medical Help Services Reference Manual' for England and the requirement to adopt the activity descriptors and cost bands will involve considerable change for all DSA stakeholders therefore the implementation of the manual will

be split in to two phases. Phasing of implementation in this way will allow Non-Medical Help partners time to adjust to new definitions prior to the introduction of the cost ranges. On 24 January 2014 'Non-Medical Help Services Reference Manual' for England was published on the SLC website and DSA stakeholders were asked to use the new activity descriptors.

By introducing a more standardised and regulated approach to Non-Medical Helper services it is anticipated that this should improve the service and quality of Non-Medical Help services for students. It is anticipated that this will have a positive impact on students and result in a more effective and efficient service for customers.

Aligning the definition of 'Disability' with the 2010 Equality Act

From Academic Year 2014/15, BIS have updated DSA policy guidance to provide that a student must meet the definition of Disability under the 2010 Equality Act in order to be eligible for DSA. The Student Support Regulations do not currently define disability for the purposes of receiving student support, including disabled students allowance. Aligning the definition of disability will provide clarity and consistency particularly where institutions are considering adjustments in parallel to DSA. This change will not have a negative impact on disabled students. However, where an existing student is found to not meet the definition of disability under the Act, but has nevertheless already been awarded DSA for a course, they will continue to receive the support put in place through their study needs assessment.

Suppliers submitting invoices electronically

On average the DSA team deal with 300,000 invoices per year. With all data entered manually it is not only a time consuming process but a complicated system with many components. Initially the invoices come through the post, which are then scanned, matched with reference numbers and student reference numbers. Some of the variables that have to be checked are eligibility criteria and account balances which are cross-referenced before payment can be made.

In September 2013 this process went through an 8 week pilot in which suppliers had the option to submit invoices electronically, with all the data the processor needs presented in a logical and easy to access format. This resulted in a faster and easier process. We now currently have 5 suppliers who are using the live system as a permanent arrangement and we expect that by the end of the Academic Year 13/14, over 50% of all invoices we receive will be handled digitally through the e-invoicing solution. As the invoices are now processed faster, this benefits stakeholders and customers, as ultimately it will improve the services that we offer our DSA customer.

Accessibility Update

In 2016 SLC has a well established and functioning network of trained employees who ensure that accessibility is mainstreamed into the procurement, development, delivery and maintenance of digital products.

Accessibility is a moving target. The speed of technological innovation means that there are new ways which we can increase the accessibility and usability of our systems. We need to take a holistic approach to delivering accessibility for our customers and our colleagues. This approach begins with procurement and ends with the active maintenance of accessibility standards.

How can we make this happen?

- I. Ensure accessibility is built in as a requirement for the procurement stage of any new digital products
- II. Ensure that developments of customer facing and business to business digital products are taken forward using the BS8878 standard.
- III. Source appropriate digital accessibility training for colleagues.
- IV. Source in-depth follow on digital accessibility training for priority business areas.
- V. Develop a range of support mechanisms, intranet site, communications to ensure the sustainability of digital inclusion work.

In 2016 we aim to have all digital services meet AA level compliance standard of the Web Consortium Accessibility Guidelines.

While much progress has been made on our corporate website, ongoing User Access Testing (UAT) still identifies issues with repayment sites, iRecruitment and customer portal. Improving the accessibility of digital products for customers with disabilities and usability more widely will improve the customer experience for all.

How can we make this happen?

- I. Provide an ongoing independent accessibility testing function for all digital products ensuring that accessibility issues identified are appropriately prioritised and fixes are resourced and taken forward.
- II. Securing the dedicated resource and person power to coordinate out digital accessibility mainstreaming activities.

Summary of progress from 2013 to 2014

The Equality Act 2010 was introduced with the intention of comprehensively tackling the discrimination which many disabled people face. The Act is 'anticipatory', which means that SLC as a service provider should not wait until a disabled person has complained about not being able to use our services but, we must proactively consider the needs of a range of disabled people with a range of impairments including sight loss, hearing loss, mobility and cognitive impairments and any reasonable adjustments that can be made to our services. Under the Equality Act 2010, businesses have a legal obligation to customers and staff to make sure that all IT channels and applications are accessible to disabled people.

General Web Accessibility Guidance

In December 2010 BSI launched the first British Standard to address web accessibility and the challenge of digital inclusion.

The standard has been designed to introduce non-technical professionals to improved accessibility, usability and user experience for disabled and older people. It is especially beneficial to anyone new to this subject as it gives guidance on process, rather than on technical and design issues. BS 8878 Web Accessibility – Code of Practice is consistent with the Equality Act 2010 and is referenced in the UK government's e-Accessibility Action Plan as the basis of updated advice on developing accessible online services. It includes recommendations for:

- Involving disabled people in the development process and using automated tools to assist with accessibility testing
- The management of the guidance and process for upholding existing accessibility guidelines and specifications.

Web Essentials course

The Equality and Human Rights Commission (EHRC), AbilityNet and BCS, the Chartered Institute for IT have developed a course on web accessibility. It aims to equip individuals and businesses with the tools to make their website accessible and open it up to the widest possible audience.

We have managed to obtain a licence for 200 courses to allow designers, developers and web site producers to understand accessibility best practice with a fundamental understanding of digital inclusion. The course provides tools to help us understand accessibility at all stages of web site development and provides recognised training standards for identifying usability problems and how to easily solve them.

To date, approximately 40 members of the Marketing and Communications team staff have undertaken the course including Designers, Editors, Live Service Administrators and Analysts.

Digital Delivery and Accessibility

The Government Digital Service (GDS) is leading the digital transformation of government. GDS works in three core areas:

- transforming 25 high volume key exemplars from across government into digital services
- building and maintaining the consolidated GOV.UK website – which brings government services together in one place
- changing the way government procures IT services

In keeping with the Government Digital Services (GDS) & Cabinet Office policy¹, in all Digital Delivery / GDS exemplar deliveries to date, we have worked to achieve a AA rating of the World Wide Web Consortium Web Accessibility Initiative Web Content Accessibility Guidelines 2.0 standard² (W3C WAI WCAG). As of January 2014, these deliveries will have incrementally redeveloped our various student facing applications, known as the customer portal, to improve accessibility for Student Finance England customers and by April 2014 for Student Finance Wales and Student Finance Northern Ireland customers.

In addition, we aligned areas of our service to the W3C WAI Accessible Rich Internet Applications (ARIA) 3 recommended techniques. Accessible Rich Internet Applications (ARIA) defines ways to make Web content and Web applications (especially those developed with Ajax and JavaScript) more accessible to people with disabilities. For example, ARIA enables accessible navigation landmarks, form hints and error messages, live content updates, and more.

¹ <https://www.gov.uk/service-manual/user-centered-design/accessibility.html>

² <http://www.w3.org/TR/WCAG/>

³ <http://www.w3.org/TR/wai-aria/>

To achieve this we invited specialist independent consultants to examine our HTML code at key points of system development. This allowed for the development of our staff to gain new skills that could be utilised for future delivery. We chose in our last delivery to iterate on a common code in order to preserve improvements made in earlier phases and projects.

Some examples of how we ensure that our services are accessible are:

- ensuring all software functionality is keyboard accessible
- using the correct colour contrast ratios for text and icons
- ensuring that 'time-outs' can be adjusted by the user to enable users enough to read and use the content.

We invited 18 users, with various disabilities and users of assistive technologies (such as Jaws screen reader & most recently Zoom Text screen magnifier) to use our services and provide feedback on usability and accessibility. This usability testing consisted of:

- 3 blind people who use the Jaws or NVDA screen readers;
- 2 partially sighted people who use ZoomText, Windows magnifier, or Magic screen magnification
- 2 Deaf people who use BSL as their preferred language
- 1 person with a mobility disability who uses Dragon Naturally Speaking speech recognition
- 1 person with a motor disability who uses only a keyboard
- 1 person who has poor mouse/motor control
- 2 people with cognitive conditions such as severe Dyslexia or Asperger's syndrome.

We then used the feedback from this testing to enhance our system. Some examples are:

- The original 'timeout' alert caused issues for some users that zoomed within the browser – as they were focused on a particular part of the page we implemented a solution that covered the entire screen to help indicate to the user that something had changed.

- During testing, screen reader and partially sighted users took time to learn the question and answer behaviour - we added additional descriptive text (hidden from sighted users) to aid this for users of screen reader and partially sighted users.

Accessibility Audits and spot checks

As well as conducting regular accessibility audits on our public websites which includes the SLC Corporate website, Student Finance England, Student Finance Wales and Student Finance Northern Ireland, we also undertake spot checks on a monthly basis. Significant changes are followed by expert evaluations and improvements are prioritised. For the secure portal, the Digital Delivery teams conduct accessibility testing with real users at each stage of development. All design and build is compliant with GDS accessibility standards.

Intranet

To provide staff with further information and clarity regarding accessibility, we have further developed information on accessibility on our Intranet pages. This includes information on making websites accessible, making PDF and print material accessible, links to web content accessibility guidelines and accessibility case studies.

Benchmarking and best practice

Our Online Services Manager and Senior UI Designer appeared as keynote speakers at an Accessibility Conference organised by Text Help, the company who supply the Browsealoud tool for our public sites. This allowed them to informally discuss and compare the performance of SLC with other organisations, in respect of ensuring that the websites maintained by SLC meet current accessibility guidelines and follow best practice. As a result of this presentation the management of NHS Inform invited the Online Services Manager and Senior UI Designer to visit them at their headquarters to share knowledge as NHS Inform embark on a wholesale review of their online guidance and services.

Equality, Diversity and Inclusion Compliance Module

In addition, in order to increase general awareness amongst staff of the importance of accessibility and providing an inclusive service, the Equality, Diversity and Inclusion compliance training has been revised to include a section on general accessibility and web accessibility and how we can make our services more inclusive. The revised training module will be rolled out from July 2014. We expect all staff to complete the Equality, Diversity and Inclusion Compliance module on an annual basis each year.

Reasonable adjustments

We recognise our obligations under the Equality Act 2010 in terms of making reasonable adjustments for both our staff and customers. A reasonable adjustment involves making a change to the way that we usually do things to ensure that we are fair to disabled people. This may involve:

- Departing from our usual practice in the way we do things, if we find that the current position places disabled people at a substantial disadvantage; or
- Providing specialist equipment or additional support, such as providing our guidance materials in large print or Braille.

We continue to make reasonable adjustments for customers on a case by case basis in terms of accessing our services and we do not make assumptions. We aim to discuss the requirements with the customer concerned and seek to reach agreement on what may be reasonable in the circumstances.

SLC Youtube channel

In 2013, SLC launched a new Youtube channel. There are subtitles on the films and a link of the short films can be found at: <http://www.youtube.com/watch?v=w-okj3w89K4&list=UUQvTND9RLIsIpEYirK-XMTA>. The one minute films are on the following topics:

- Disabled Students Allowance
- Applying for Disabled Students Allowance
- Loans for Part Time Study
- Payment
- Repayment
- Interest
- Needs Assessments
- Phishing

Our People Update

SLC in 2016 is more flexible and agile

In the changing business environment, SLC will need to be flexible. Fully embracing new ways of working can deliver direct benefits by providing flexibility for the business and our people. If we can embrace this and find new ways to manage our people we can:

- I. Attract, retain and capitalise on the expertise of colleagues who need or just want to work in new ways.
- II. Be increasingly agile in managing peaks and troughs in work throughout the day, week, academic & application year.
- III. As a by-product of flexible working we can also realise savings on accommodation and estate costs.

How can we make this happen?

- I. Going beyond policy change to active management and recruitment of employees to work more flexibly.
- II. Developing the trust, competence and confidence of our managers to manage the new world of work.
- III. Clearly showing the savings in cost and improvements in motivation which can be achieved through delivery of a more flexible and agile workforce.

SLC in 2016 is 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.

In a competitive environment, embracing diversity can give SLC the competitive advantage it needs to thrive. To do this SLC will need to access the widest talent pool, drive down recruitment cost, and reduce absenteeism while at the same time creating a motivating work environment where creativity can flourish. Diversity and Inclusion can help us deliver this.

- I. Accessing the widest talent pool by attracting a broader range of candidates and ensuring that all candidates enjoy the same development and progression opportunities.
- II. Develop a motivated culture where SLC employees are creative and find innovative ways to address new business challenges.
- III. Reducing costs associated with recruitment, absence and underperformance.

How can we make this happen?

- I. Based on sound evidence, explore areas where positive action can act as an enabler (e.g. through Leadership Talent, Aspiring Managers and other Learning and Development activities).

- II. Improve our recruitment practice by working to identify unconscious bias and using more intelligent metrics and systems to target our advertising.
- III. Retain our talent and motivate our workforce through intelligence driven action and improved performance development/management systems.

Summary of progress from 2013 to 2014

We invest in our people to deliver the best possible service for our customers. In FY 2013-2014, we have continued to develop an organisational culture where we expect excellence and where people work together to do what is best for customers in the most efficient ways possible. We have been setting a clear set of shared priorities for delivery, and communicating and translating them into improved ways of working, supported through rigorous implementation of the performance management process. Achieving consistency of how we do business with each other and with stakeholders, and strengthening our management of performance, is achieved through embedding our 'Leading the Way' commitments, which spell out the attitude, approach and positive ways of working that SLC is seeking as its cultural brand.

Leadership Talent Programme

With a fast-moving, innovating and transforming organisation comes the requirement for excellence in leadership and management. We are investing heavily in developing and nurturing effective leadership to take us through change and improving managerial skills to fully support our people as well as provide stable and excellent operational delivery. We are committed to the development of high performing managers through the Leadership Talent Programme which is in the second year. The programme develops managers across all levels of SLC- front line manager, middle managers or senior managers. We recognise that we need to develop talent by ensuring our people have the skills and experience to progress through the highest levels at SLC. Our Diversity and Inclusion Monitoring Report evidences that women make up less of the workforce at the higher levels of SLC. In response to this in 2012/2013 4 men and 6 women were selected to go through the Leadership Talent Programme and in 2013/2014, 3 men and 9 women were selected to benefit from the Leadership Talent Programme.

Developing staff in Transformation

A new recruitment approach has been brought into place to develop staff within the Transformation Programme. This is to reduce turnaround times and present costs efficiency. This approach also includes analysis of equality metrics by gathering data on the people metrics and where necessary, making any adjustments to our resourcing approach. We aim to ensure that employees are gaining the opportunity to grow and develop their skill sets whilst we go through this substantial period of change. Where we have recruited external specialist contractors to work on particular projects as part of transformation, we are developing the skills of our

existing staff by providing development and shadowing opportunities which increases the skill set of our employees and ensures development and progression opportunities.

Positive about disabled people scheme

SLC is accredited under the Job centre Plus 'positive about disabled people' Scheme. One of the commitments we have made under this logo is to operate a guaranteed interview scheme. We continue to ensure that our systems allow us to work with recruitment managers to ensure that the guaranteed interview scheme is effectively implemented and that all candidates who meet the minimum criteria for a position and declare a disability are invited to interview.

Reasonable adjustments for employees

SLC recognises its duty under the Equality Act to make reasonable adjustments for any employees that are deemed to be disabled. We have made a commitment to improving on the recruitment and retention of colleagues with disabilities through the provision of reasonable adjustments alongside a number of other activities. We have developed a system with our occupational health provider to allow us to monitor and track that reasonable adjustments have been carried out. For example, when a new employee is commencing employment with SLC, if the employee has indicated that they are disabled, the occupational health provider will discuss any reasonable adjustments or modifications that are required to any equipment or working process prior to the employee commencing employment. By compiling a system for this information, we can ensure that all reasonable adjustments are made prior to the employee commencing employment. Such a system also allows for reasonable adjustments to be recorded and monitored and ensures that any future adjustments that are required are carried out in a timely manner.

Contingent Labour ONE Framework

Delivering the public service efficiencies agenda requires tight resource management, new approaches to our working practices and careful workforce management as new systems, digital services and working practices demand changes to the shape and size of our workforce over the coming years. Honesty, engagement, investment in staff and careful forward planning are key to success. It's a time of change for the organisation but also a time for opportunity and we are supporting our people throughout the journey.

In order to streamline and reconcile the contractors within the business we are adopting the Crown Commercial Service guidance. The Crown Commercial Service provides centralised commercial and procurement services for the Government and public sector. The Contingent Labour framework forms part of the response to a review of how central government procures contingent labour undertaken during 2011, including a detailed review of all existing supply models for temporary workers currently in use within the public sector. It includes rules to govern supply chain behaviors. Moreover, it reflects the importance to government of the service

providers' supply chains embodying the principles of broadness, diversity and accessibility by demonstrating the duty to promote equality and diversity. It will allow Small and Medium Enterprises to compete on a level playing field. In addition, the new arrangements will also generate robust people management information that can be used by us to inform departmental workforce planning and ensure equality and diversity in the workforce.

Management Information

In 2016 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.

Previously our efforts have been driven by compliance alone. We need to move to a position where we can evidence the tangible business benefits, added value and sustainability which diversity and inclusion practice bring to our services and our people. Making sure that our managers can pay due regard to diversity and inclusion will require that we embed these indicators into decision making through relevant high level management information.

How can we make this happen?

- I. Consolidating the information available to us to ensure that we have the data collection mechanisms and systems in place to quantify our progress.
- II. Identify the host locations for this data and work to integrate it into pre-existent reports.
- III. Where necessary upskill our managers to interpret this information and take appropriate action.

Summary of progress from 2013 to 2014

Effective monitoring is an important tool for measuring performance and progress towards equality and diversity goals and in ensuring a truly inclusive workforce and service. Collecting and using equality information helps to identify equality priorities and to understand the impact of any proposals and decisions on people with protected characteristics. It helps to set useful objectives and measure progress against them and it can also help to base priorities and decision-making on sound evidence rather than assumptions or stereotypes. But monitoring is not an end in itself. Data that is collected needs to be analysed and used to inform appropriate action. We recognise that collecting and analysing data will help to identify ways to eliminate discrimination, advance equality, and foster good relations.

SLC is further developing its understanding of the potential of data to help underpin a proactive Equality Diversity and Inclusion strategy in understanding the composition of our workforce and service users which will in turn help to form and highlight differences between groups in terms of satisfaction, engagement and representation. This in turn can help us to identify, tackle and prevent issues that would otherwise undermine engagement with staff, service users and stakeholders.

Customer Insight

SLC undertakes customer insight activities that help keep the customers' point of view in the forefront, ensuring that the 'voice of the customer' is a key factor in service design, project prioritisation and business decision-making. Customer insight and engagement are providing us with a deeper understanding of customers' needs and expectations. We seek feedback from customers – students and learners, their sponsors and repayers – and listen to what they say. Our customer insight activities include surveys, research, focus groups, user testing and call reasons analysis. As part of this process we have introduced questions on protected characteristics to ensure that our complaints process is meeting the needs of all of our customers fully and we intend to analyse this information over the coming year.

Customer Complaints

Customer complaints provide invaluable insight into the errors we make. We seek to address each individual complaint as fairly and quickly as possible, and if customers are still unhappy with our response, there is an escalation route, ultimately resulting in adjudication by an Independent Assessor. As well as addressing individual complaints, we carry out an analysis of trends, identifying the most common reasons for complaint, and conduct detailed analysis to identify root causes. As a result of this analysis we trigger improvement actions, which operational managers take forward through procedural changes, coaching and training. If elimination of root causes requires system changes, these are pursued through inclusion in projects and programmes wherever possible.

Over the past year we have worked at trying to extrapolate anonymised information from our systems that we have on customer's protected characteristics, in order to undertake analysis on whether there is any correlation between protected characteristics and the types of complaints. We intend to monitor this information over the following year and use this to increase our capability for root cause analysis and improve the way that this is used to drive continuous improvement and therefore drive down the numbers of complaints we receive.

Employee Equality monitoring information

SLC collects equality information on employees in order to be able to identify trends and any gaps. As equality monitoring will help us determine who has applied for a job and who has been selected, in terms of their protected characteristics. It then allows us to

compare who has applied for jobs against the profile of jobseekers in the local community and nationally and the profile of employees already in the organisation. Such analysis can highlight any groups who are not applying or not getting further on in the recruitment process, along with information on progression and development of our employees. Over the past year we have been considering what further meaningful information we can collect for example in terms of training who is applying, whether the training is being granted etc and considering methods of collecting this information using the current systems that we have in place, we intend to undertake further work around this over the coming year. This includes adding this information in a meaningful way to our management information reports.

Equality Analyses Update

In 2016 equality analysis is a fully functioning sustainable process delivered as Business As Usual by the departments which have ownership for the work being assessed.

To make sure that impact is considered right at the point when decisions are being made, we need to empower our business managers to carry out the process themselves. In 2016, we will have moved to a point where every manager is responsible for leading the way on diversity and inclusion and empowered to do so by appropriate training and support.

How can we make this happen?

- I. We will continue to develop guidance which is targeted to the needs of our business areas.
- II. We will use feedback from our colleagues and stakeholders to improve the efficiency of our process.
- III. We will continue to develop a practicable, proportionate and evidence based system which identifies mitigations and opportunities to progress diversity and inclusion while informing our ongoing development as a business.

In 2016 we have consolidated and assessed all of our legacy policies for their impact on diversity and inclusion

We have a large volume of legacy policies which have not undergone equality analysis. The result is that we are not able to evidence having paid due regard to our equality duties and may have missed opportunities to further the diversity and inclusion agenda through our work.

How can we make this happen?

- I. Starting straight away we will review all of our existing policies and prioritise them based on their likely impact on diversity and inclusion.
- II. We will carry out analysis on the highest rated policies within year one and continue through medium rated policies in year two and low rated policies in year three.

Summary of progress from 2013 to 2014

The general equality duty requires public authorities to have due regard to the aims of the general equality duty when making decisions and setting policies. To do this, it is necessary for decision-makers to understand the potential impact of their decisions on people with different protected characteristics and to identify potential mitigating steps to reduce or remove adverse impacts. This should help to ensure that the policy is fully effective for different groups of people.

Equality Impact Assessment

An Equality Impact Assessment is a systematic and evidence based approach for identifying and removing any barriers, arising from a policy, procedure, or practice that has the potential to cause discrimination against a protected characteristic, as specified by the Equality Act 2010. In short, Equality Impact Assessments verify that our policy, procedures and practices are “equality proof”, non-discriminatory and progress the general equality duty. Assessing impact on equality involves using good equality information and analysis, and doing this at the right time, as part and parcel of our decision-making. We have reviewed our legacy HR policies and prioritised them; we are working through them to assess their impact on Equality, Diversity and Inclusion. We continue to undertake Equality Impact Assessments on our new policies, procedures and practices.

Review of Equality Impact Assessment template

To increase awareness and understanding of when and how to undertake an Equality Impact Assessment we have, over the past year, critically reviewed the Equality Impact Assessment Template to make the process clearer and smoother. A detailed guidance document has been produced explaining the rationale behind the Equality Impact Assessment, the relationship with the Public Sector Equality Duty and what that means for SLC, the definition of ‘policy’, when and who should undertake an Equality Impact Assessment, the benefits of an Equality Impact Assessment, and what evidence should be used and mitigating against any negative impact. The guidance contains practical information on how to carry out an Equality Impact Assessment confidently and competently.

Equality Impact Assessment training

We have coupled this with a dedicated training module on Equality Impact Assessments which also includes a practical case study on drafting an Equality Impact Assessment. In addition, as a measure to increase the awareness and understanding of the Public Sector Equality Duty, we have revised our Equality compliance training which is undertaken by all employees to include a section on the Public Sector Equality Duty and Equality Impact Assessments. We anticipate that this will increase the capacity of our employees to pay due regard to the Public Sector Equality Duty and understand and mainstream equality at SLC and intend to roll this out further over the coming year. One to one intensive support continues to be available from the Equality, Diversity and Inclusion Officer.