

Equality, Diversity and Inclusion Annual Report 2017

APRIL 2017

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PART 1: EXECUTIVE SUMMARY

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

Some key highlights from 2016 have been:

- The inclusion of a session on 'unconscious bias' within the senior management development programme
- Disability Confident status confirmed. This replaced the \sqrt{V} Positive about Disabled People programme
- Support for Global Accessibility Awareness Day across business locations May 2016
- A series of video shorts (leadership; customer care and web testing) produced to support the
 equality e-learning programme, highlighting the ways in which EDI can be part of the day job
- Development work to extend the online application accessibility for our disabled student customers effective AY 17/18
- Capture our pay data as at the 'snapshot' date of 31st March 2017. Report produced in line with the gender pay gap reporting regulations
- Workforce equality profile data produced for Company as a whole and by location (Glasgow, Darlington and Llandudno Junction). Providing trend analysis with our 2015 data
- Process in place for tracking the number, type and annual spend on disability reasonable adjustments
- Company Health & Wellbeing Strategy supports a calendar of events throughout 2017; activity and events scheduled in Mental Health Awareness Week in May 2017; the Company commitment to 'Time to Change' by signing a pledge to support initiatives on mental health in the workplace
- Partnership with the National Centre for Diversity; employees surveyed in 2016; analysis included in this report

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

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

PART 2: INTRODUCTION

FOREWORD

The Student Loans Company (SLC) has an established commitment to equality, diversity and inclusion (EDI) and this report highlights the significance of our relationships and engagement with the lives of people, business, education providers, partners and stakeholders in the world we live in now and into the future.

This is my first report as Chief Executive of the Student Loans Company and it is important that the work on equality, diversity and inclusion is embedded into the SLC2020 Strategy particularly in relation to Organisational Health.

We want to put EDI at the heart of our business as a long-term commitment, driven by the needs of our customers and employees. We know there are challenges ahead and we are committed to incorporating EDI into our decision making; policy and performance review; learning and development in order to support a focus on achieving a workforce with the right skills for the business, our customers and our stakeholders.

As Chief Executive I am committed to making sure that SLC meets its equality obligations and encourage all of us to work together to achieve our goals.



Christian Brodie

Chairman



Steve Lamey

Chief Executive Officer

CONTEXT OF THE STUDENT LOANS COMPANY

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

Core functions of the SLC

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

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

OUR POLICY COMMITMENT TO EQUALITY, DIVERSITY AND INCLUSION

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

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

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

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

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

In practice this means that we:

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

PART 3: PROGRESS ON OUR EQUALITY OBJECTIVES 2016 - 2017

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

Effective leadership

- •7 sessions delivered on 'unconscious bias' incorporated as part of senior management development training during 2016
- •Engaged with the National Centre for Diversity (NCD) to carry out an employee survey to allow us to benchmark our equality performance
- •NCD Survey action plan developed

Active use of data to review policy and procedures

- Development of a policy governance process to measure the impact and effectiveness of our revised people policies piloted with a review of the Flexible Working Policy
- •Company equality and managment information data is used to inform the equality impact assessment of our revised people policies
- Improvements to our equality profile data capture and analysis

Promotion and communication of our EDI commitment

- Publish equality monitoring data; equality impact assessments and annual report in line with the public sector duty on equality
- Disability Confident Employer status confirmed; next self assessment is August 2017
- Development of a Well Being Strategy supported by a series of interventions and training on mental health in the workplace to support our managers to be better informed to support employees and encourage resilience
- Signed up to the 'Time for Change' pledge and action plan approved to support mental health in the workplace
- •Support across our 3 sites for Global Accessibility Awareness Day [GAAD] on May 2016

Understanding who our customers are

• Video shorts produced in 2016 with a focus on customer care and highlighting the ways in which EDI is 'part and parcel' of the day job. These are currently supporting our online EDI training module.

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

- Accessible and streamlined application processes for all our customers by extending online application accessibility to our disabled student customers
- Meeting relevant web and online accessible compliance standards
- Project development work in place to ensure compliance with Welsh Language requirements for AY 18/19

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

- The SLC inclusive design and communication strategy was launched over 2016 and is supported by a network of champions across the business.
- The Disabled Students Allowance function provides a direct service to disabled students applying for support to enable their access to education and further learning

We have empowered, engaged and well-supported employees

- Over 2016 there has been regular employee engagement using 'Talking Points' to share information and progress on the Company's new strategy
- •preparations are in place for compliance with gender pay gap reporting in 2018. The data will be run as at 31st March 2017 as per the regulations

A workforce which is representative of the communities we serve

- An annual workforce equality profile is produced, trends analysed and compared with populations across the key business bases of Glasgow, Darlington and LLandudno Junction. This information is available on the Company EDI webpage.
- •A system is in place to track the number, type and spend of disability reasonable adjustments approved annually.

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

- Health and Wellbeing strategy and action plan developed in 2016:
- Calender of events and information scheduled throughout 2017
- Events scheduled through Mental Health Awareness Week May 2017
- Workshops have been delivered for HR and managers in locations on 'Mental Health in the Workplace'.

PART 4: RESULTS FROM THE NATIONAL CENTRE FOR DIVERSITY SURVEY

THE BACKGROUND

Over November and December 2016 the Company engaged the National Centre for Diversity (NCD) to carry out an employee survey.

This external assessment provides an independent evaluation on the Company's commitment and progress on equality, diversity and inclusion (EDI) using the NCD equality compliance framework and will help to inform the future direction of travel on EDI.

The findings have been shared so far with Human Resources and Learning & Development teams across the Company to identify appropriate actions.

Below are the headlines:

The Headlines

9 out of 10 replies:

- Understand the meaning of equality, diversity, inclusion and protected characteristic
- Feel valued by colleagues
- Feel respected by colleagues

8 out of 10 replies:

- The people you work with are accepting of other people whatever their background
- EDI is taken seriously by colleagues and line managers

Respondents spoke highly of:

- · Colleagues and line managers
- The ability to work flexibily
- Having had EDI training
- Knowing where to go for help if experiencing discrimination/harassment/bullying

Respondents felt strongly about:

- · The Company not feeling fair
- · Not being treated fairly by senior managers
- Inappropriate behaviours at work
- Being treated differently due to equality characteristics (age, gender and disability)
- Having more information on mental health and unconscious bias at work

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There are some strong responses to the survey in terms of knowledge and awareness of EDI across the business which should be harnessed and expanded upon in terms of activity.

The poorest results and responses are in the area of culture with issues of fairness; exposure to inappropriate behaviour and perceptions of discrimination based on equality characteristics. This is an area of challenge for the business requiring action to improve our measurement against the NCD benchmark.

PART 5: EQUALITY MONITORING DATA

The following information sets out the equality profile of the Student Loans Company as at 31st December 2016.

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

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

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

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

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

HIGHLIGHTS FROM EQUALITY DATA MONITORING - AS AT 31ST DECEMBER 2016

Age			Commentary	
2,883 people are employed by Student Loans Average age = 37 years			The average age suggests a young workforce when compared with other public sectors where the average is 47 years.	
Gender: by Grade				Commentary
Apprentic G1 G2 G2B G3 G4 G5 G6	0.03% 9.03% 26.33% 3.04% 8.86% 4.22% 1.97% 0.59% 0.28% 0.07%	Male 0.03% 7.85% 19.31% 2.42% 8.51% 4.22% 1.97% 0.69% 0.42% 0.14% 45.57%	6 16.89% 6 45.64% 6 5.47% 6 17.37% 8.44% 6 3.94% 6 1.28% 6 0.69%	Up to G3 there are a higher percentage of women to men. G4 and G5 equalises however from G6 onwards the gender balance changes in favour of men.

Gender: Part-time and Full-time Split

Commentary



The percentage of women working for the Company is slightly higher than the UK average of 47%. (Business in the Community (BITC) research).

The part-time differential reflects national labour force survey data (ons.gov.uk)

Recent research from BITC indicates that 43.6% of women with dependent children are in employment.

Race/Ethnicity

77.52% 4.23%

Commentary

The England and Wales population profiles by ethnicity at 2011:

White 87.2%
Black/African/Caribbean/Black
British 3%

Asian/Asian British: Indian

2.3%

Asian/Asian British: Pakistani

1.9%

Mixed Race2% Other 3.7%

77.52% of staff say their ethnicity is White.

18.24% of staff No Reply

The remaining 4.23 % of people comprise:

Other Ethnic Group
Black/African/Caribbean/Black British
Mixed/Multiple Ethnic Groups
Prefer not to say
Asian/Asian British

0.03%
0.45%
0.62%
0.69%

Across Scotland the minority ethnic population is 4%.

Religion & Belief

Commentary

Christian (all denominations) 27.30% Other 1.96% Muslim 0.90% Sikh 0.17% Hindu 0.17% Buddhist 0.14% Jewish 0.07% No religion 31.18%	In the 2011 Census; Christianity was the largest religion = 59% of the population. The next largest was Muslim with 4.8% of the population. The picture across the Company of those expressing a religion is: Glasgow = 32% Darlington = 29% Llandudno Junction= 25% Commentary		
,			
3.23% of Student Loans employees have indicated they have a disability	19% of the UK working age population have a disability; this equates to almost 7 million people. According to the Labour Force Survey 2012 46% of working age disabled people are in employment; this compares with 76% of the working non-disabled population.		
Learning Disability Mental Illness O.55% Mobility Impairment Sensory Impairment O.42% Prefer not say Other O.38% O.55% O.21% O.41%	Analysis of the Company budget for disability related reasonable adjustments/equipment would confirm under reporting from employees as the percentage of employees provided with equipment adjustments is 5.44%.		
LGB	Commentary		
2.7% of Student Loans employees said they are gay, lesbian or bisexual	1.5% of the UK population are Lesbian, Gay or Bi-sexual (ONS 2016) this is the most recent data source however, the LGBT foundation has estimated the figure to be between 5% - 7%. Within the Company this represents a slight increase on last year's report where 2.51% of people identified as LGB		
Gender Reassignment	Commentary		
0.28% of Student Loans employees declared this information	There is an absence of public data for comparison. This is the first % report by SLC against this protected characteristic.		

PART 6: EQUALITY, DIVERSITY AND INCLUSION – ACTION PLAN

This high level action plan is based on the findings from the EDI Survey carried out in December 2016. The actions in support of this will take place over 2017/2018.

There are four elements:

EDUCATE:

This action will support the Company developments on values and behaviours. These actions will achieve better informed managers; improved manager confidence in using in-house tools to support positive workplace behaviours and culture.

CULTURAL CHANGE:

A safe challenge framework will be set up to help employees address inappropriate behaviours in the workplace. The framework will be aligned to the (SLC Way) objectives defining behaviours which are fair, respectful and take account of workplace diversity.

SUPPORT:

Establish an internal EDI Forum and explore the internal appetite for a virtual/actual equality network and /or group of equality allies to provide support to individual employees on equality related issues.

REVIEW:

Actions will be reviewed using a range of employee engagement tools with the aim of improving employee responses to issues of fairness and workplace culture; benchmarked using information from the National Centre for Diversity.

EDUCATE

CULTURAL CHANGE

SUPPORT

REVIEW

Develop relevant training/programmes to support the Company message on positive workplace culture and behaviours.

Develop specific manager education e.g. 'unconscious bias' and use the internal tools for delivery (DLA and expresso sesions)

Manager and new manager induction should have a focus on culture and behaviour.

Use the 'talking points' model to increase workplace discussions on equality, fairness, respect and diversity

Establish a calendar of equality events to promote conversations and activity

Identifying behaviours to help deliver the SLC Way

Establish a safe challenge framework to address inappropriate behaviours

Obtain information and contacts from NCD on best practice examples on behaviour change Establish an in-house equality forum to help drive forward the equality action plan

Explore the merits and interest within the business for setting up a virtual/actual equality network for employees

Set up an EDI mailbox and make better use of the EDI intranet page as a source of information and links. EDI survey findings to inform Annual Reporting and refreshed actions for 17/18.

Re-do the key questions from the EDI survey later in 2017 to measure improvements.

PART 6: MEASURING PROGRESS

This will be achieved by:

- Publishing an EDI annual report (inclusive of workforce and recruitment equality data) on the progress we make on the equality objectives and actions.
- Monitoring our employee equality data and compare annual trends to identify relevant business actions to improve workforce representativeness.
- Reporting our gender pay gap information and analysis before March 2018
- Building a year on year improved direction of travel which will help the business promote and highlight case studies of good practice.
- Benchmarking our performance against the National Centre for Diversity compliance standard.
- Engaging with our customers and work together to create 'a level playing field' particularly for our customers with specific support needs.
- Keeping EDI on the business radar by using our internal and external communication systems and processes.