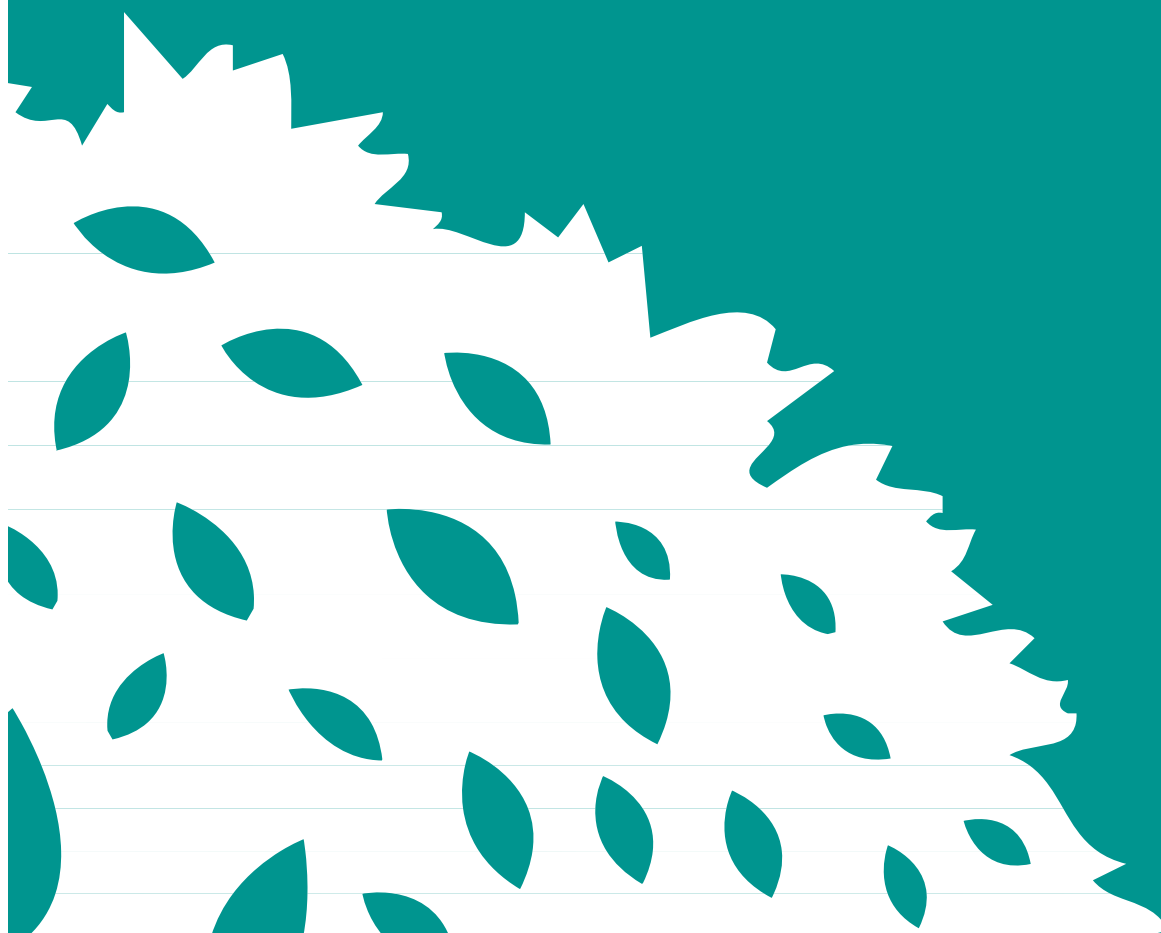




Student
Loans Company

SINGLE EQUALITY SCHEME

2009-2012



Foreword by Ralph Seymour-Jackson Chief Executive

Our decision to produce a Single Equality Scheme

We at the Student Loans Company (SLC) are committed to ensuring that everyone has full access to our services easily; assisting them to enter higher education and fulfil their contribution to society. We aim to eliminate discrimination in our employment opportunities and to remove barriers which may exist to allow us to ensure that we recognise the potential contribution to our workforce irrespective of race, disability or gender.

In line with our duties under the Disability Discrimination Act 1995, SLC published its first Disability Scheme in 2006. It became clear soon after that SLC would be required to publish both a Race Equality Scheme and a Gender Equality Scheme in order to ensure that as a Non Departmental Public Body (NDPB), we were fulfilling our wider duties under the various Equality Acts. We decided to take advantage of this opportunity to develop a Single Equality Scheme, setting out how we are promoting and taking action on the specific equality duties placed on us in terms of race, disability and gender, while also explaining how we intend to apply the principles of our equality duties to other strands of diversity.

The intention is that SLC's Single Equality scheme will provide a framework for fairness, through identification and implementation of a vision of equality, which will bring together the three existing duties and, in the same spirit of equality, extend the scheme to gender reassignment, age, sexual orientation and religion or belief.

There are many similarities in the requirements under each of the equality duties. For example, shared duties to assess and consult on the impact of proposed policies; monitoring existing policies; and monitoring key employment processes.

There also are a number of specific equality requirements, for example, a requirement under the Race Equality Duty to promote good race relations; a requirement under the Disability Equality Duty to treat disabled people preferentially if necessary in order to deliver equality; a requirement to promote positive attitudes towards disabled people; and a requirement under the Gender Equality Duty to address the causes of any gender pay gap.

Whilst we recognise the benefits of producing a Single Equality Scheme, SLC is mindful of the need to ensure that the specific requirements of each duty are addressed in an explicit and discernible way. Accordingly, we have included in our Single Equality Scheme an Executive Summary of how we intend to comply with each of the required general and specific duties.

Tracking progress and demonstrating success

Our Single Equality Scheme reinforces SLC's commitment to equality and diversity in the workplace. The new scheme places a stronger focus on fairness, respect for others and avoiding discrimination and is intended to accommodate any future modernisation of equalities legislation under the intended Single Equality Act. Like SLC's values, our Single Equality Scheme makes clear the standards of behaviour which are expected of all staff, and the positive role modelling which is expected of managers. The Finance and Governance Board which was established to ensure the Company complies with corporate governance and legislative issues and to whom the Equality forum report, have also recently approved a suite of work life balance policies.

Executive Summary

SLC recognise that the overarching goal of the duties is to promote equality of opportunity and to eliminate unlawful discrimination and harassment for all racial groups; disabled people; and for men and women (including those who are transgender), both within the business of our organisation and through our workforce. We recognise also that each duty contains different elements reflecting the equality priorities for different groups.

Each duty has general and specific duties. This Single Equality Scheme seeks to preserve the requirements of each individual element of the duties. We provide herewith a summary of our understanding of the scope of each of the individual duties.

How we will ensure that we fully comply with the Disability Equality Duty

We have done this in respect of the Disability Equality Duty by:

1. including a distinct section on gathering and analysing the evidence of disability equality and inequality in employment;
2. addressing identified gaps in disability equality by producing a separate Disability Equality Action Plan which identifies how and when these gaps are to be closed;
3. formally involving disabled people in the development of the Single Equality Scheme in order to set a timetable for establishing the priorities and actions in the Disability Equality Action Plan; and
4. developing our approach to equality and diversity impact assessments which considers the impact on disability, gender and race equality separately.

How we will ensure that we fully comply with the Race Equality Duty

We have done this in respect of the Race Equality duty by ensuring the scheme is compliant with the Commission for Racial Equality's Statutory Code of Practice (now the Equality and Human Rights Commission) on the Duty to Promote Race Equality 2002 and with the Commission's template for assessing Race Equality Schemes.

How we will ensure that we fully comply with the Gender Equality Duty

We shall ensure we undertake effective monitoring to gather information on where one gender is under-represented in particular work so that SLC can undertake positive action to encourage members of the under-represented gender to apply for such work, or to provide training to equip the under-represented gender for such work. We shall also ensure that we have due regard to the need to eliminate unlawful discrimination and harassment against transgender people in the fields of employment and vocational training

Our other duties

In addition to the race, disability and gender equality strands, this scheme has tried to apply the same principles of the equality duties in relation to age, sexual orientation, and religion or belief. We have also tried to consider gender identity not solely transgender as an additional strand. There are also areas, such as caring, which straddle a number of strands, for example disability, gender and age.

1. About SLC

SLC is wholly owned by the the Department for Business, Innovation & Skills (BIS) and the Scottish Government and was designated a Non Departmental Public Body (NDPB) in 1996. SLC is a non-profit making organisation that provides loans and grants annually to almost one million students in colleges and universities across the four education systems of England, Northern Ireland, Scotland and Wales.

SLC manage the administration of the collection of loan repayments from just over two million customers no longer in Higher Education. We provide a number of other financial services to the higher and further education sectors, working in close partnership with over 600 universities and colleges. In fulfilling this role, we occupy a central position in the provision of student finance in the UK.

We employ more than 1800 people in four locations throughout the UK. The majority of staff are based in our headquarters in Glasgow, which includes our Customer Contact Centre, where advisors handle up to four million calls every year. SLC's large scale printing and mailing functions are based at our Hillington complex, just outside Glasgow. In Darlington we process applications from students from the EU wishing to study in the UK and assess entitlement to funding for studies from 10 local authority areas. We are also responsible for processing all applications for funding for new English students from Academic Year 09/10. At Colwyn Bay, we have a Welsh bilingual customer contact centre servicing customers in Wales.

1.1 Objectives

The key objectives for the Scheme are:

- fulfilment of the general and specific duties as set out under Disability Discrimination Act 1995 and the Disability Discrimination Act 2005; The Race Relations Act 1976 and the Race Relations Amendment Act 2000; the Gender Recognition Act 2004; The Equality Act 2006 and the Special Educational Needs and Disability Act 2001.
- consultation and involvement on changes to policies and procedures;
- development of a process for gathering evidence to support effectiveness of the Scheme's implementation;
- monitoring the effectiveness of policies and service delivery;
- creation of an Action Plan in order to ensure the fulfilment of the duty of care;
- consideration of the impact of individual functions of the organisation vis-à-vis relevance to equality duties so priorities can be set in terms of high, medium or low relevance
- training staff to understand diversity issues, our values and the laws relating to discrimination
- assessing the impact of proposed policies and procedures on affected people;
- publication and review of the Scheme;
- reporting on the effectiveness of the Scheme
- providing a summary of progress.

We will gather and use the information about our services by:

- monitoring service delivery and employment functions;
- monitoring public complaints and staff grievances;
- undertaking impact assessments of our policies and functions;
- undertaking staff surveys;
- consulting with staff, service users and stakeholders;
- having structured processes to regularly review the information gathered; and
- ensuring that where performance is not meeting our objectives, or is causing disadvantage, actions are instigated and implemented to address the shortfall/concerns

The company values and behaviours underpin our service delivery and we are committed to:

- **Deliver** - Delivering for our customers' futures enabling customers to fulfil their ambitions and potential
- **Inspire** - Living the values and realising the vision
- **Teamwork** - Working together and achieving shared goals
- **Care** - Ensuring colleagues, customers and partners have confidence in each other
- **Celebrate** - Recognising and encouraging individuals contribution

Our priorities for 2009-2011

- Make sure that our buildings and working practices are accessible to all.
- Make sure that our websites are accessible.
- Consult and involve representative networks covering all equality areas to help inform our future activities.
- Monitor the effectiveness of our services to ensure that they reach all groups and that people are satisfied with our service.
- Establish monitoring and analysis systems for our staff across all equality areas.
- Conduct regular equal pay audits.
- Train staff on equality impact assessments, the general equality duties and the implications of these for their work.
- Make sure that contractors providing goods, facilities and services to us meet our procurement criteria for all equality areas.
- Ensure the Equality Forum meet regularly to ensure regular up-keep of the aims and objectives and most effective use of our monitoring.
- Set up an involvement strategy that includes all groups of people in order to develop our next Equality Scheme.

2. Equality and Diversity Statement

SLC values equality and diversity in all respects, and is determined to ensure:

- that we treat all individuals fairly, with dignity and respect;
- that the opportunities we provide are open to all; and
- that we provide a safe, supportive and welcoming environment; for employees, customers and visitors.

It is the aim of SLC to ensure that no employee, job applicant or customer receives less favourable treatment on grounds of gender, marital status, disability, race, colour, nationality, ethnic origin, religion or belief, sexual orientation, family circumstances or age, or are placed at a disadvantage by imposed conditions or requirements which cannot be shown to be justified.

We recognise that there is still substantial work to be undertaken to secure a truly inclusive community, and we are committed to a wide-ranging plan of action to tackle discrimination and to promote diversity.

The rationale for SLC's commitment to equality and diversity includes:

- An understanding of the importance of opening SLC up to all sections of the community.
- Identifying, using and developing the skills and talents offered by employees, customers, potential employees and potential customers of SLC, to their and SLC's benefit.
- Awareness that, in addition to being illegal and immoral, discrimination is also wasteful.
- Recognising the negative impact on individuals of the effects of discrimination in terms of attainment, career progression, self-fulfilment and self-esteem.

2.1 Race Equality Duty

The Race Relations Amendment Act 2000 amended Section 71(1) of the 1976 Race Relations Act to place on specified public bodies a general statutory duty to, in carrying out their functions to have due regard to the need:

- a. to eliminate unlawful racial discrimination;
- b. to promote equality of opportunity; and
- c. to promote good relations between people of different racial groups.

The aim of the general duty is to make the promotion of racial equality central to our work. The general duty also expects public authorities to take the lead in promoting equality of opportunity and good race relations, and preventing unlawful discrimination.

Specific duties

The general duty is supported by specific duties which came into effect in December 2001. Under these duties, SLC are required to publish a Race Equality Scheme.

- a. functions and policies, or proposed policies, which have been assessed as relevant to the performance of the duty and
- b. arrangements for:
 - i. assessing and consulting on the likely impact of proposed policies on the promotion of race equality;
 - ii. monitoring policies for any adverse impact on the promotion of race equality;
 - iii. publishing the results of such assessments and consultations, and such monitoring;
 - iv. ensuring public access to information and services provided;
 - v. training employees in connection with the duties.

The Scheme's assessment of action should be reviewed at least every three years.

Employment Duties

This duty requires the monitoring of employment procedures and practice. Arrangements must be in place for monitoring, by reference to racial groups, the numbers of:

- employees in post;
- applicants for employment, training and promotion;
- employees who receive training;
- employees who benefit or suffer detriment from our performance assessment procedures;
- employees involved in grievance procedures;
- employees who are the subject of disciplinary procedures; and
- employees who cease employment.

The purpose of monitoring is to both collect and analyse the data to identify issues which may be affecting racial groups differently. For example, the results may show under-representation of different racial groups at different levels of each department; or that policies may be affecting different groups at different stages (for example recruitment); or whether groups of employees are taking out more grievances and on what issues.

We have also developed a tool for assessing the relevance of our policies and functions to meet the specific requirements of the race equality duty.

2.2 Disability Equality Duty

The Disability Equality Duty is the general duty that when carrying out our functions, we have 'due regard' to the need to:

- a) promote equality of opportunity between disabled people and other people;
- b) eliminate discrimination that is unlawful under the Act;
- c) eliminate harassment of disabled persons that is related to their disabilities;

- d) promote positive attitudes towards disabled people;
- e) encourage participation by disabled people in public life;

Specific Duties

There are specific duties which we must meet in order to meet this General Duty. The specific duties mean we need to:

- produce a disability equality scheme setting out how we propose to meet the general duty;
- carry out impact assessments of relevant policies and functions;
- collect and study evidence and identify actions and address gaps in achieving disability equality, in relation to the recruitment, retention and development of disabled employees, and the extent to which our services and functions meet the needs of disabled people.
- prioritise actions;
- involve disabled people in the review of policies and impact assessments;
- set an example to others;
- train our employees on disability equality issues through our Single Equality Scheme; and
- work with others to deliver disability equality.

SLC are keen to involve disabled people in an ongoing and meaningful way to identify priorities for action. Involving disabled people is not a one-off, 'tick box' exercise. We want to benefit fully from disabled people's views, experiences and ideas, and from organisations that represent disabled people, in order to plan action now and in the future.

Our action plan illustrates the first steps that we will take to improve our consultation process and develop it into fuller involvement. In future, we may also look at other specific activities (such as 'mystery shopper' exercises where people test us anonymously) to gather the views of disabled people about our services, particularly our helplines and website.

Our priorities for 2009/2010 to promote disability equality include:

- Giving people accessible information, including an accessible website.
- Making sure our buildings are accessible.
- Ensuring we consider fully any reasonable adjustments required
- Involving disabled people, support workers, organisations and representatives as we develop our work.
- Achieve Job Centre Double Tick status

SLC will produce an annual report on adherence to the Disability Equality Duty with key action points on how to address gaps.

2.3 Gender Equality Duty

The Equality Act 2006 amended the Sex Discrimination Act 1975 to place a statutory duty on all public authorities, when carrying out their functions, to have 'due regard' to the need to:

- eliminate unlawful discrimination and harassment;
- promote equality of opportunity between men, women and transgender people

The Gender Equality Duty covers employment, vocational training, and delivery of goods, facilities and services. As a result, public authorities such as SLC are required to have due regard to the need to eliminate discrimination and harassment of transgender people in employment and related fields and vocational training (including further and higher education), and provision of goods, facilities and services.

To assist the general duty, there are also the following specific duties:

- To prepare and publish a gender equality scheme, showing how we will meet the general and specific duties and setting out our gender equality objectives.

- In formulating our overall objectives, to consider the need to include objectives to address the causes of any gender pay gap.
- To gather and use information on how our policies and practices affect gender equality in the workforce and in the delivery of services.
- To consult stakeholders (i.e. employees, service users and others, including trade unions) and take account of relevant information, in order to determine our gender objectives.
- To assess the impact of our current and proposed policies and practices on men and women and transgender equality.
- To implement the actions set out in our scheme within three years, unless it is unreasonable or impracticable to do so.
- To report against the scheme every year and review the scheme at least every 3 years.

Our gender objectives for the year include:

- Establishing the extent, if any, of our gender pay gap and taking action to reduce it where possible.
- Taking action to prevent transgender discrimination in access to our services by producing clear guidance and having in place clear employment policies and procedures.
- Updating our dignity at work/anti-harassment policies for our employees that specifically address issues for men and women, including transgender employees.
- Developing an involvement strategy that enables transgender people to get involved with our work.
- Ensuring that employees receive training on the positive equality duties including the gender equality duty and its considerations in the impact assessment process.
- Including gender equality as part of our procurement criteria.

3. Common elements of the Equality Duties

3.1 Eliminating harassment and unlawful discrimination

SLC will annually undertake an employee survey about any experiences of harassment or discrimination within the previous 12 months, breaking this down by disability, race, gender, sexual orientation, religion / belief and non-belief, and “any other grounds”. If identified, action is taken forward within the relevant business area as well as through training and other actions taken as appropriate.

3.2 Discrimination and Harassment

SLC will not tolerate any form of discrimination or harassment against individuals on the basis of gender, race, colour, ethnic or national origin, religion or equivalent belief system, disability, sexual orientation, social class, age (subject to the usual conventions on retirement), marital status or family responsibilities, or as a result of any conditions or requirements that do not accord with the principles of fairness and natural justice.

In defining discrimination and harassment, SLC recognise and adhere to the following statutory distinctions:-

3.2.1 Direct Discrimination

This is the most overt type of discrimination. Unlawful direct discrimination occurs where a person is treated less favourably than others are, or would be treated. This could be on the grounds of that person's age, a disability, their gender, or on the grounds that that person intends to undergo, is undergoing or has undergone gender reassignment, their race, religion or belief or sexual orientation.

3.2.2 Indirect Discrimination

This type of discrimination is usually more subtle and consequently may be harder to identify. Generally, unlawful indirect discrimination occurs when a specific rule or requirement applies equally to everyone, but the effect of that rule disadvantages a considerably larger proportion of a minority group and the rule cannot be justified.

3.2.3 Victimisation

This is conduct intended to victimise anyone who has asserted their own rights under anti discrimination legislation or has supported someone who has.

3.2.4 Harassment

This is unwanted conduct which takes place with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment.

4. The current position

4.1 Employment

4.1.1 Policies and Procedures

SLC has a comprehensive suite of policies in place to cover discrimination in employment practices. SLC operate a continuous review in order to ensure legal compliance and continual improvement. All policies and procedures, once reviewed are then checked by both our internal legal advisors, and those of the Public and Commercial Services (PCS) union, to ensure that they comply with current legislation.

The current policies in place are:

Work Life Balance

Bullying & Harassment

Equal Opportunities

Flexible Working

Equal Pay

Recruitment

Relocation

Homeworking

Stress at Work

4.1.2 Learning & Development

SLC's induction process currently covers the main policies and procedures with regard to Equal Opportunities Training.

The training session comprises of several components including:

- What is Equal Opportunities
- Making assumptions - Our Map of the World, Our Behaviour
- Discrimination, Victimisation and Harassment
- Equality - Gender, Race, Age & Disability
- Breach of Policy
- Your Responsibilities and Management Responsibility to Equal Opportunities and Equality.

The training is used to ensure full awareness that no employee or job applicant receives less favourable treatment on grounds of gender, marital status, disability, race, colour, nationality, ethnic origin, religion or belief (or lack of belief), sexual orientation, transgender status or age, or are placed at a disadvantage by imposed conditions or requirements which cannot be shown to be justified.

The Equal Opportunities course is supported by an ongoing e-learning course designed to reinforce the learning from the initial training session.

4.1.3 Recruitment & Selection

General recruitment

All vacancies are advertised internally, and some externally, following our Recruitment Policy and Equal Opportunities Policy. We have a clearly documented recruitment and selection process which includes the agreement of Job Descriptions and Person Specifications for all vacancies and the development of clear and valid short listing and selection criteria (both essential and desirable) related to the specific requirements of the role being recruited to.

SLC has implemented a new recruitment system to encourage on-line applications through our web site. This will enable the auditing of our set processes and procedures, ensuring consistency of approach and application. There is no limit set for the amount of time allowed to complete an on-line application, as it is accepted that some people with disabilities may take longer to do this. As well as via on-line, applications are accepted through other means such as paper based CVs and covering letters.

The new recruitment system asks specific questions about disability and whether any specific requirements need to be taken into account for the interview stage; such as access, or assistance with any testing planned during the process. All applicants who arrive for interview are asked if they have any special requirements. Many members of

the HR team are trained and qualified to administer psychometric tests as part of the selection process. These tests form only part of any selection process. Any tests used as part of the selection process are chosen through an analysis of the knowledge, skills and experience required for the vacant role and an analysis of the various test banks available. SLC have incorporated specific modules in their training programme covering 'Fair Selection and Test Ethics'. This covers areas such as 'Equal Opportunities in Testing'; 'Guidelines for Testing People with Disabilities' and 'The Ethics of Test Use'.

The module 'Testing for People with Disabilities' incorporates guidance on testing people with hearing, visual, motor and other disabilities. This covers assistance such as having someone who can use sign language being made available; tests in braille; large print, the use of audio equipment; larger answer sheets; or simply giving the applicant more time to complete the tests, depending on the level of disability.

At job interviews clarification is sought from any disabled candidate as to what adjustments, if any, SLC would be required to make for them in the work place. Where such a candidate is successful at the interview, an online Workstation Risk Assessment is carried out on joining. Reasonable adjustments put in place following such assessments have included a 'My Reader' device being provided, text sizes being enlarged on PCs and electronic staplers being provided. SLC have also now been accredited with the positive about people with disabilities scheme.

Agencies

SLC has a Preferred Supplier List of agencies to assist with recruitment. As an NDPB, and because of the potential value of these contracts, a rigorous tendering and procurement process is undertaken. Part of the tender documentation asks for evidence of an Equal Opportunities Statement/Policy. Our equal opportunities statement and policy includes our commitment to the positive duties under each of the Acts.

Recruitment Advertising Agency

Apart from the new recruitment system and working with agencies, SLC uses other ways to attract applications for jobs. These include using the Job Centre, websites, newspaper and other methods such as radio and Jobs Fayres.

We rely on our advertising agencies to give us advice on the best methods and media to use when trying to fill particular vacancies. This advice is based on research and experience gained from working with a very wide range of organisations. Our current agency have a statement on 'Diversity in the Employment Community', covering issues such as legal requirements, advertising, best practice and success strategies. Their statement includes more information on a selection of titles and some of the issues pertinent to advertising to specific groups. For example we advertise in 'Disability Now' with a readership of approx 60,000 and www.youreable.com, which is a one stop shop for people with disabilities, providing access to information, goods and services.

Diversity Monitoring in employment

SLC recognises that it needs to gather more information in order to analyse trends which show where certain groups of people may be under-represented when compared to the local community as a whole. This includes data on recruitment, development and retention of employees with disabilities, including promotion and grievances.

SLC carry out diversity monitoring (gender, disability and ethnic origin) of data on a continuous basis to identify any possible unlawful discrimination in recruitment, performance appraisal, or promotion. If anything is identified in the data, further research is undertaken to qualify the findings. Age data is also available and data has been collected to allow monitoring by sexual orientation and religion / belief.

The online recruitment process and Oracle HR system provide SLC with a facility to analyse this information effectively. To date, actions have resulted in changes to our performance appraisal system as well as improved information within the recruitment process. Liaising with advertising agencies also allows us to develop joint strategies which will help to positively encourage more applications from people with disabilities.

Equal Pay

SLC conducts Equal Pay Audits regularly in order to ensure there is continuous analysis of the impact of pay and grading. Where any anomalies are identified, these are investigated, and where necessary adjustments are considered.

All employees at SLC are subject to the same terms and conditions of employment and a common pay and grading system. The scheme used for job evaluation is an analytical evaluation scheme, where the job is broken down into components (known as factors) and scores for each component of the job are awarded with a final total giving an overall rank order.

Occupational Health

SLC has an Occupational Health provider, and any employee who is thought to be suffering from any potential disability, such as depression, is referred to the Occupational Health provider for a consultation. The purpose of this is to investigate what support SLC can provide for the individual and what reasonable adjustments can be made to assist them in continuing in the workplace, or to assist in a phased return to work. Examples of reasonable adjustments which have been put in place have included phased part-time returns, change to job responsibilities, reduced targets/objectives, and workstation adjustments.

Employee Counselling Service

SLC has a support network for employees through the Employee Counselling Service. This is available through our Occupational Health providers, and is available to all employees and their families, offering confidential counselling service and lifestyle advice lines. This is promoted through induction, management briefings and through management referrals.

SLC has an internal grievance procedure which employees can use in any cases of discrimination, harassment or bullying. If the employees does not want to contact a fellow member of staff in the first instance, they can contact the Employee Counselling Service in confidence and seek a third party referral.

Risk Assessments

Work station risk assessments and individual stress risk assessments are carried out by SLC to assist with supporting individuals in the workplace with regard to any disability. SLC have also recently purchased an interactive system to ensure staff can be trained on health and safety matters through an effective e-learning tool.

4.2 Products and Services

4.2.1 Forms, Guides & Leaflets

All application forms are available in a variety of formats, including braille, large print and audio. Students are advised to contact SLC's Customer Support Office (CSO), or our ordering line, if they require a form in an alternative format and SLC will then make the necessary arrangements for them to get the documentation in the format they require.

4.2.2 The Customer Support Office (CSO)

The CSO handles customer enquiries primarily by telephone. It is also now equipped to deal with contact by email and web-chat, thus providing the same service through a written, web-based medium. There are presently two manned 'type talk' machines in the CSO for communication with deaf customers. There is an additional service for deaf customers, where they type their queries to a helper, who then speaks to the CSO and vice versa. Minicom numbers are also available to assist the hearing impaired.

4.2.3 Internet

The SLC currently owns a public corporate website:

- <http://www.slc.co.uk>;

SLC also owns and runs six customer facing websites:

- <http://studentloanrepayment.co.uk>
- www.direct.gov.uk/studentfinance
- <http://www.studentfinancewales.co.uk>;
- <http://www.cyllidmyfyrwycymru.co.uk>;
- <http://www.studentfinanceneni.co.uk>
- <http://www.practitioners.studentfinanceengland.co.uk>

SLC seeks to ensure that these sites adhere to the W3C guidelines Priority 1 as a minimum. W3C guidelines are a mixture of technical standards for developers and common sense rules for making the best websites possible. Our aim is to meet Priority 3 compliance as standard. SLC employ a professional testing company to carry out regular accessibility audits in order to assess our web sites for evaluation against the Web Accessibility Initiative (WAI) Guidelines. These are accepted as the definitive set of international guidelines used for building accessible websites. To do this the company apply the following methods:

- Automated Assessment tools, such as AIS Web Accessibility Toolbar, Firefox Web Developer Toolbar, Wave, WebXACT and Cynthia Says. These tools are used to automatically test some of the required checkpoints.
- Manual Accessibility Evaluation where human judgement is required to recognise issues not identified by the Automated Assessment tool.

Further testing is required using different web browsers as well as testing with assistive technologies such as JAWS, IBM Homepage and Supernova. Additional testing is required on the accessibility of the websites without the use of a mouse. SLC will be paying close attention to areas such as forms design, data tables and page layout & navigation.

The testing company we use carry out usability testing with a selection of registered disabled participants, with the main focus being the accessibility of the sites. Usability concerns are also highlighted.

Participants are tested for a period of two hours each. The testers include users who are blind, partially sighted, dyslexic, physically disabled, and those with short-term memory or learning difficulties.

The testing company is required to identify the accessibility level the websites have achieved and to supply SLC with a Digital Accessibility Certificate and Trustmark certificate. The company's recommendations for system enhancements to aid accessibility and usability are included on our priorities for the Equality Scheme.

4.2.4 Collections

SLC has approved a corporate policy on how to deal with customers who are finding it difficult to meet their commitments to the SLC due to over-indebtedness, mental illness or incapacity or physical disability. This policy will, in the first instance, only apply to customers with Mortgage Style Loans, or those who have been overpaid a discretionary grant.

4.2.5 Disabled Students' Allowances (DSAs)

DSAs can help meet the extra costs of studying that students face as a result of their disability. DSAs are designed to help disabled students study on an equal basis with other students.

DSAs are paid in addition to the standard student finance package. The allowance available does not depend on household income and does not have to be repaid.

DSAs cover four types of assistance:

- Specialist equipment needed for studying, for example, computer software.
- A non-medical helper, such as a scribe or reader.
- Extra travel costs incurred as a result of a disability.
- Other costs, for example tapes or braille paper.

SLC has recognised the importance of the DSAs in the promotion of disability equality. The service is currently being redesigned to most effectively meet the needs of the customers. Quantitative research was undertaken with a sample of 1,800 customers, 225 were customers with disabilities, being either prospective, new, or returning students.

The key drivers for the new DSA service will be to:-

- ensure customers are provided with literature in an accessible format, simple and streamlined modular application forms will present a more coherent DSA service to customers;
- reduce the length of the DSA process to by ensuring that, as far as possible, the initial processes at the application stage occur simultaneously;
- ensure that customers have all their equipment and training before the start of their course to ensure that they are not lacking in vital support for a proportion of their studies;

- provide customers with one Student Support application process which includes DSA needs (effective from Academic Year 2010/2011);
- provide a mechanism which allows customers to track the progress of their application;
- provide customers with a re-assessment of their needs if their circumstances have changed or if they request a re-assessment;
- provide customers with a named contact and a direct dial telephone number to assist with their questions to try to ensure that they do not have to speak to someone different every time they contact SLC;
- provide customers with the ability to track the spend on their consumable allowance; and
- provide a 'one-stop shop' service to DSA customers.

4.3 Procurement

SLC recognises that as an organisation we enter into contracts with organisations for goods, works and services, and that these have the potential to impact on all groups of people. This means that we need to monitor the relevant equality considerations in the procurement process, to ensure that we are meeting the equality duties in relation to this function. All tender documentation is available on request, in braille and large font.

Discussions with disability groups have identified the need to ensure that suppliers apply the same equality standards to their own staff as they are required to exhibit in their dealings with SLC's staff in fulfilling their contracted duties. This is being taken account of in our actions.

Unlawful discrimination, harassment or bullying is also not tolerated from, or towards, any supplier staff. Complaints procedures will also be used if these actions were to occur.

We recognise that public sector procurement is now covered under an EU Procurement Directive. Social issues need to be incorporated into the procurement process, where they are relevant to the subject of the contract, and assist in delivering value for money for the contracting entity. The OGC guidance note entitled 'Social issues in purchasing' (February 2006), available at http://www.ogc.gov.uk/sustainability_social_issues_in_purchasing.asp seeks to illustrate how a range of policy issues can be included at the different stages of the procurement process.

4.4 Status of the Scheme

This scheme is effective in respect of the relationship between SLC, its employees and its customers. All directors and employees of SLC must abide by this Scheme. Failure to comply is likely to result in disciplinary proceedings and conduct which is inconsistent with this Scheme may be considered to be gross misconduct, leading to summary dismissal.

All visitors to SLC, together with those contracted to work at or for SLC, will be expected to comply with this Scheme.

4.5 Corporate and Individual Responsibilities

Responsibility for ensuring that SLC meets its obligations in respect of legislation relating to equality and diversity ultimately rests with the Chief Executive. In practice, however, the management of these obligations is delegated to directors and managers and in particular to the Finance and Governance Board.

SLC is responsible as a corporate entity for putting into place mechanisms and procedures, and for encouraging a culture and environment, that accord with its statutory obligations and commitment to equality of opportunity.

The SLC Main Board is responsible for overseeing the effective and efficient discharge of SLC's statutory responsibilities.

The SLC Executive Board is responsible for ensuring that SLC complies with arrangements for Corporate Governance, financial management and control, risk management and all relevant legislation. The Finance and Governance Board has overall responsibility to ensure implementation of this Scheme, in line with SLC's existing priorities and business plans.

SLC is committed to:

- fostering an environment in which compliance with this Policy is regarded as integral to the work of SLC;
- ensuring, as part of the development of this environment, the production and implementation of Action Plans;
- giving serious consideration to complaints of harassment, victimisation or discrimination;
- seeking actively to promote equality of opportunity for others and striving to create an environment in which goals may be pursued without fear or intimidation;
- not discriminating unfairly in the way we provide or procure services on behalf of SLC;
- not discriminating unfairly in the recruitment, promotion and management of employees;
- not practicing unfair discrimination or harassment or encouraging employees to do so;
- developing equality and diversity strategies, policies and procedures; ensuring that these are effectively implemented and to ensure 'reasonable adjustment' in the work and customer environments; and for delivering change initiatives;
- the ongoing training of employees in Dignity at Work issues, including equality and diversity matters;
- not victimising any person who has complained of harassment or unfair discrimination or who has given information in connection with such a complaint.

5. Evidence Gathering, Monitoring, Measurement, Analysis and Reporting

SLC recognises the need to develop improved reporting mechanisms to capture relevant data and information for monitoring and measuring equality. This will enable the assessment of the impact of this Scheme on different groups of employees and job applicants. SLC will adopt a systematic approach to evidence gathering, monitoring, measurement, analysis and reporting on this Scheme. Responsibility for this will be assigned to the Equality Forum.

A number of techniques will be deployed in the monitoring of this Scheme. These include:

- data analysis;
- audits; and
- reviews by the Equality Forum.

SLC's new online recruitment process will ensure that data will be captured for all applicants who apply online and through agencies. SLC recognises the need to ensure that it collects and manually inputs the data for those who apply through other means e.g. by post.

SLC recognises the need to be able to assess the success, or not, of each recruitment campaign and assess and address any bias against any particular group.

5.1 Monitoring

SLC deem it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the organisation. Accordingly, a monitoring system is being introduced to measure the effectiveness of the Scheme and arrangements.

The system will involve the routine collection and analysis of information on employees by gender, marital status, ethnic origin, disability, competencies, grade and length of service in current grade.

There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training/development opportunities affect equal opportunities for all groups.

The information collected for monitoring purposes is treated as confidential and it is not used for any other purpose.

5.2 Related Policies and Arrangements

All employment policies and arrangements have a bearing on equality. SLC policies will be reviewed regularly and any discriminatory elements removed. Discrimination and victimisation are treated as disciplinary offences and they will be dealt with under the Disciplinary Procedure.

5.3 Breach of Policy

Failure by employees to adhere to the content of this Policy may result in disciplinary action. Discriminatory action or practices or acts of harassment or victimisation are likely to be regarded as gross misconduct, which could result in summary dismissal.

6. Future Plans

6.1 Development of the Equality Forum

An Equality Forum has been established to:

- update and maintain this Scheme;
- monitor and review this Scheme;
- evaluate and ensure the effectiveness of this Scheme;
- ensure involvement of people with disabilities in this Scheme and therefore ultimately in SLC's decision making process;
- promote equality of opportunity and eliminate discrimination for employees, potential employees and customers through all services across SLC;
- assist and advise in eliminating unlawful discrimination;
- assist in promoting positive attitudes towards people with disabilities;
- consider what steps are necessary to encourage participation by people with disabilities in public life;
- establish data-gathering, monitoring and measurement processes and systems;
- manage the on-going Action Plan;
- produce reports on the success of the Scheme;
- commission reviews of existing SLC policies and procedures to ensure compliance with the Scheme;
- ensure identified adverse impacts are addressed;
- identify methods for assessing the impact of policies and practice, or the likely impact of proposed policies and practices on equality for people with disabilities, using guidance from organisations such as the Equality and Human Rights Commission;
- screen existing SLC policies to determine whether a full impact assessment is to be carried out;
- ensure implementation of agreed policies / procedures;
- prepare questions to assist in considering the research and evidence relevant to effective impact assessment of this Scheme;
- identify examples of data and research sources to be considered when undertaking a full impact assessment;
- together with the EDFs, address adverse impact and /or missed opportunity to promote equality of opportunity and identify potential barriers; and
- develop a system for measuring outcomes against the objectives of this Scheme.

The Forum shall meet quarterly in the first instance and shall provide reports to the Finance and Governance Board. The Forum shall consider which reports are required from all business areas. These reports will be provided by the business areas to the Forum as directed. The Forum shall be chaired by the Legal and Compliance Manager or a delegate and shall have a representative from the following business areas:

- HR
- Learning and Development
- Facilities
- Business Services
- Communications
- Collections
- Customer Services
- Procurement
- Quality Assurance

Additional members shall be invited to attend as appropriate.

6.2 Policies and Procedures

Review of SLC's policies and procedures is ongoing. Part of this review process is to ensure that these policies and procedures are in line with the objectives of this Scheme.

6.3 Learning & Development

SLC recognises that education on new policies and training on their effective implementation is a crucial part of ensuring that SLC meets its obligations in relation to disability equality. SLC is developing training through a package through a contract supplier and is also investigating several software solutions to distribute and manage the introduction and understanding of all policies and procedures released.

SLC's approach to induction is currently being reviewed and in future will have a much greater focus on promoting equality in the workplace and on individuals' responsibilities in relation to the policies and in implementing the actions therein.

A training programme is being developed to cascade the implications of this Scheme to staff. This will explain clearly what each individual's responsibilities are in taking this forward, to ensure that we achieve this Scheme's objectives. This training will also be included as a module in our ongoing Management Development Programme.

As part of SLC's Customer First Programme, the Organisational Development work stream will look at how SLC operates and identify what needs to change to deliver our new service. This will include how we work together, company values and employee development.

Learning and development programmes will include training on the importance of monitoring the effectiveness of these programmes and will be regularly reviewed.

6.4 Recruitment & Selection

SLC will seek to ensure that all applicants, including those who apply other than through the website, are asked whether they require any assistance with attending an interview or with any testing required.

SLC recognises that it needs to positively promote vacancies to people with disabilities and that a means of doing this is by becoming an organisation which is 'Positive About People with disabilities'.

7. Your Contribution and Feedback

This Single Equality Scheme is designed to improve, develop and mainstream equality and diversity in our organisation. Throughout its lifetime it will be continually developed to achieve these goals.

SLC welcomes and values any observations, views and contributions made from all members of the community, particularly from persons with a disability. All feedback will be used to inform the progress of the scheme.

Written comments should be addressed to:

Shareen Auckbarallee
Legal and Compliance Manager
Student Loans Company
100 Bothwell Street
Glasgow G2 7JD

Feedback may also be provided via the SLC website www.slc.co.uk or by emailing equalities@slc.co.uk or by calling 0141 306 2068.

8. Complaints

Any individual who believes that they have been directly affected by SLC's failure to comply with this Scheme is entitled to complain and should do so in writing. Complaints will be handled as follows:

- Customer complaints should be handled in the first instance by the customer complaints department. All complaints should be acknowledged in 5 working days with a full response issued within 10 working days.
- Staff employed by SLC should submit complaints through the normal internal grievance procedure. This is available on our intranet pages.
- Any member of staff who is a member of a Union and wishes to make a complaint may consult their Union Representative for help and advice.
- The recruitment unit in Human Resources will initially deal with complaints from members of the public about selection and recruitment.
- Individuals or any other organisation or body, e.g. businesses from whom SLC buy goods or services, should contact the department they usually deal with.

All cases will be investigated as quickly as possible and normally within two months of receipt of the complaint.

Assessment of our policies and functions for relevance under the race equality duty

Introduction

The race equality duty includes the requirement for public authorities to assess their policies and functions for their relevance to the three parts of the duty (A eliminate unlawful discrimination, B promote equality of opportunity and C promote good relations). As part of their race equality scheme, public authorities are required to outline the relevance of each function or policy area and the criteria used to assess how relevant each is to the duty.

The following assessment for relevance has been developed to meet the specific requirements of the race equality duty, in order to ensure compliance. However, SLC is committed to extending these principles to the disability and gender equality duties, and to the other equality areas, as part of its full scheme for 2008-2011.

Criteria for assessment for relevance

The assessment for relevance has been carried out using the criteria set out in the Statutory Code of Practice on the Duty to Promote Racial Equality, with a number of additional criteria which reflect SLC's specific responsibilities.

The basic principle of any assessment for relevance is that SLC should rank their policies and functions according to whether they have a low, medium or high relevance to (race) equality.

The following three criteria are those identified in the statutory code:

1. There is already evidence that the function or policy is affecting some groups differently.
2. There is existing public concern that the function or policy may be causing discrimination.
3. There are concerns that the policy or function may be damaging good race relations.

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