Diversity and Inclusion objectives: Leading The Way

2013-2016
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Foreword

Our vision is to be valued as a digital, customer focused, centre of excellence. Over the last year, we have worked hard to know more about our people and our customers. The systems that we have put in place enable us, more than ever before, to understand the diversity and inclusion issues which really matter.

Our objectives for the next three years build on this foundation. While the objectives are ambitious, we are confident that they are attainable. This document sets out our strategic plan for delivery on diversity and inclusion recognising the central role which this agenda plays to improving SLC as an organisation and reflecting our customer base better. We want to embrace diversity because we want to nurture and include all talents, ideas and innovations. We have been targeted in our approach, focusing our efforts where they are needed most. We have five objective areas:

1. Disabled Students Allowance,
2. Digital Accessibility,
3. Our People,
4. Management Information, and
5. Impact Assessment.

Each of the objectives in this document is directly linked to our business priorities and objectives. We look forward to the work ahead to mainstream diversity and inclusion into our activities, moving beyond compliance to best practice because it is good for our business.

Mick Laverty, CEO

Ed Smith, Chairman
Securing a level playing field for all of our customers through targeted support is at the heart of what we want to achieve. We work hard to deliver targeted support to students to enable them to achieve their academic potential. However, many of our processes for delivering this support where it is needed most are labour intensive both for customers and for SLC. Customers will often find themselves applying for targeted support alongside one or more other products. We want to work to make this easier for everyone. Realising efficiency through the delivery of a streamlined process for our customers is central to our vision.

“Securing a level playing field for all of our customers through targeted support is at the heart of what we want to achieve.”

Derek Ross
Director of Operations and Customer Services
DSA in 2016 is more streamlined reducing the administrative burden on students and SLC

(Objectives 1, 2, 3 and 6)

7 in 10 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.

In 2016 students move through the DSA process much more quickly

(Objectives 2 and 3)

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.

1 Throughout this document you will see our equality objectives linked directly to our business objectives. You can see a full list of our business objectives in the appendix to this document.
In 2016 students, SLC and stakeholders have more clarity and consistency on evidence requirements and thresholds

(Objects 3 and 6)

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 achieve 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.

DSA in 2016 remains sustainable by reducing error and fraud

(Objects 1, 3 and 6)

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.
Our objective is to create intuitive, inclusive and accessible services which improve user experience for all. We want to ensure that no student or colleague is excluded because of their disability. With the vast majority of customers applying for our services online, it makes sense that our web presence should be accessible. Making this reality is a complex task as we work with a range of emerging and legacy systems. However, our passion to mainstream accessibility for customers and colleagues into every aspect of our operation is what drives us forward.

“Our objective is to create intuitive, inclusive and accessible services which improve user experience for all.”

Jenifer Stirton
Director of Marketing and Communications

Gordon Simpson
Chief Information Officer and Director of Transformation
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.

(Objectives 1and 6)

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 compliance standard for WCAG.

(Objectives 1and 6)

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.
Our customers are at the heart of everything that we do but our culture is what will shape an enduring and positive relationship with those customers and with our stakeholders.

What kind of culture do we want to be known for? We have already come a long way toward answering this question through the development and rolling out of the Leading The Way framework. Diversity, inclusion and respect are implicit throughout the framework and are a thread through all. Included in this is the requirement for managers to act as role models by championing equalities within the framework.

We are committed to ensuring the SLC workforce reflects the customers we serve.

I am committed to driving forward diversity and inclusion at SLC and look forward to realising the benefits for our people and our business.

Taroub Zahran
Director of People and Transformation

“We are committed to ensuring the SLC workforce reflects the customers we serve.”
SLC in 2016 is more flexible and agile

(Objectives 1, 5 and 6)

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. Applying these principles to all.
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.

(Objective 5)

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.
Developing an evidence based approach to delivering on diversity and inclusion is fundamental to the success and sustainability of SLC operations. Our objective is to mainstream diversity and inclusion indicators into our business reporting systems, ensuring that managers can take account of them every step of the way. We want to be able to measure and quantify the tangible benefits which good practice in this area bring. By integrating our diversity and inclusion indicators into the core of how we measure success, we will be taking one step closer to our mainstreaming objective. In my role as Chair of our Finance and Governance group, I am committed to ensuring that the Equality Forum, which reports to the group, delivers on its mainstreaming objectives.

Les Campbell

Director of Finance and Administration

“Our objective is to mainstream diversity and inclusion indicators into our business reporting systems ensuring that managers can take account of them every step of the way.”
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.

(Objectives 5)

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 preexistent reports.

III. Where necessary up skill our managers to interpret this information and take appropriate action.
Equality Analysis

Equality analysis is a tool that we use to deliver fairer decisions. Our approach is focused, proportionate, practicable and evidence based. It is not about box ticking. Each process needs to be different so that it is proportionate to the likely impact of the decision which it is assessing. If done right the analysis will help us to mitigate risk for SLC and capitalize on the links between good practice in this area and our wider aims of customer focus, sustainability and efficiency.

We want to mainstream diversity and inclusion into everything that we do so that it is innate. For SLC this is about evolving beyond compliance to a position where diversity and inclusion practice is part and parcel of everything we do because it is good for business. Impact analysis is central to enabling us to deliver on this.

“Equality analysis helps us to hardwire diversity and inclusion into everything we do.”

David Wallace
Deputy Chief Executive, and
Director of Strategic Development

Chris Andrew
Company Secretary, and
Director of Assurance Services
In 2016 equality analysis is fully functioning sustainable process delivered as Business As Usual by the departments which have ownership for the work being assessed.

(Objective 5)

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

(Objective 5)

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.
Your contributions and feedback

This document is designed to improve, develop and mainstream diversity and inclusion into 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 of our customers and colleagues. All feedback will be used to inform the progress of the scheme. Written comments should be addressed to:

Fiach O’Broin-Molloy
Equality and Diversity 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 243 3307.
Measuring our progress

Every three months we will measure the progress we have made toward mainstreaming diversity and inclusion through these objectives. We will chart our progress against our maturity model. Our ultimate goal is an integrated diversity and inclusion function which is owned by everyone in the business and does not require a specialist function.

Our objectives are ambitious and wide ranging and so our response needs to be agile to the changing environment in which we operate. Our vision of maturity in each of our objective areas is one where diversity and inclusion are hardwired into our work. At each mainstreaming meeting a responsible manager will report on the work which had been undertaken to arrive at the final maturity point. We will use our existing Equality Forum structure to deliver this.

On an annual basis we will inform our stakeholders and customers on our progress and publish a mainstreaming report on our website.
Complaints

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

I. Customer complaints should be handled in the first instance by the Customer Resolution Department. All complaints will be acknowledged in 5 working days with a full response issued within 15 working days.

II. SLC employees should submit formal complaints through the normal respect at work procedure or speak with their line manager or HR staff in the first instance.

III. Any employee who is a member of a Union and wishes to make a complaint may consult their Union Representative for help and advice.

IV. The recruitment unit in Human Resources will initially deal with complaints from members of the public about selection and recruitment.

V. 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 in the first instance.

All cases will be investigated as quickly as possible and normally within 15 days of receipt of the complaint.
Our maturity model is an assessment of what the journey toward mainstreamed equality and diversity in the objective areas looks like. On the matrix overleaf the current position is shaded in blue. Internal delivery plans describe the journey toward a mainstreamed position. Progress will be reported annually in line with statutory obligations.
# Business objectives FY 2013-14

<table>
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<tr>
<th>KEY BUSINESS OBJECTIVE</th>
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<tbody>
<tr>
<td>1. Progressing our business Transformation Programme</td>
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<td>2. Sustaining critical business processes and systems for the duration of the Transformation Programme to ensure a safe service</td>
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<td>3. Executing our Delivery Programme to meet annual policy changes and new stakeholder priorities</td>
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<td>4. Providing a safe and efficient student finance service that meets the needs and expectations of our customers and stakeholders, and continuing to improve the customer experience</td>
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<td>5. Managing our people responsibly and continuing to embed our Leading the Way framework</td>
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<td>6. Managing Public Money responsibly</td>
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In recent times equality law has changed. The Equality Act 2010 introduced the new concept of protected characteristics. Our duties now cover a much wider range of people. The protected characteristics are:

There is now a proactive body of law which places positive obligations on public sector bodies to anticipate discrimination and promote equality. This same concept exists in the Equality Act 2010. SLC is subject to the general and the specific equality duties. As we are a nondepartmental public body we work with the Equality Duty (section 149 Equality Act 2010) and The Equality Act 2010 (Specific Duties) Regulations 2011. SLC must have due regard to the need to:

I. eliminate unlawful discrimination, harassment and victimisation,
II. advance equality of opportunity between different groups, and
III. foster good relations between different groups.

The Equality Act explains that the second aim (advancing equality of opportunity) involves, in particular, having due regard to the need to:

I. remove or minimise disadvantages suffered by people due to their protected characteristics,
II. take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people, and
III. encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.