



‘Inclusive by Nature’ Equality, Diversity and Inclusion Strategy

This strategy relates to: the Seetec Group, including all business streams and corporate functions



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1. Introduction (Message from Group CEO)

I am delighted to introduce **Inclusive by Nature**, Seetec's Equality, Diversity and Inclusion Strategy. This strategy makes a commitment to putting Equality, Diversity and Inclusion at the heart of who we are as an organisation. If we do it right, then it should be natural, second nature and intuitive, it should just feel right.

I am passionate about promoting equality, diversity and inclusion in all its forms, its importance and benefits and doing so beyond the legal minimum; the core basics of fairness and respect for difference, equality of opportunity and treatment across gender, age, disability (both mental and physical) and different abilities, ethnic minority groups, LGBTQ+ rights, neurodiversity, supporting part-time workers, those with caring responsibilities and more.

Recent global movements such as "Black Lives Matter", the "Proud, Strong and Visible" campaign for people with disabilities, the "Me too" campaign for gender equality and the debate about transgender rights and the Gender Recognition Act, have placed the spotlight on equality, diversity and inclusion issues. With extensive press coverage and backed up by diversity statistics and case law, these movements suggest there is still some way to go to achieve equality and inclusion in society.

We all have a key role in fostering an inclusive culture and ensuring all people, irrespective of their backgrounds are treated fairly, with dignity and respect. Recent national and global movements impact some of us more than others depending on our backgrounds and experiences. Everyone stands to benefit when we embrace and value the range of thoughts, ideas and ways of working that people from different backgrounds, experiences and identities bring to Seetec.

Seetec recognises the value of a diverse workforce and an equal and inclusive environment in helping us achieve our business aims and deliver an excellent service to our customers. As employee owners and with people at the heart of every one of our services, we are driven by our overarching aim of 'creating opportunities and improving lives'. To do this effectively, we need to ensure we understand and appreciate the diversity of the sectors we operate in and internally we have a workforce which is inclusive and diverse, and where colleagues fully represent and understand the communities that we serve.

"We all have a key role in fostering an inclusive culture and ensuring all people, irrespective of their backgrounds are treated fairly, with dignity and respect."



We actively promote a culture that gives all employee owners the opportunity to succeed and grow based on their abilities, encourage people to value each other and realise the contribution every individual makes to the business. We strive to create an environment where colleagues can perform at their best and where they feel included, supported, and treated fairly. We do not tolerate bullying, harassment, discrimination, or other negative behaviours. We welcome respectful, constructive, and professional challenge at all levels, without boundaries across roles and pay grades.

Diversity and Inclusion goes further than ensuring equality. Equality is about fair treatment, making sure everyone is treated fairly and given the same life opportunities. It is not about treating everyone in the same way, to achieve the same outcomes. We are all aware through the work that we do, that different people have different needs.

Diversity is about recognising the value of difference and Inclusion is about ensuring we get the best from everyone.

I am very proud of the positive work that has already been done in promoting mental health support and awareness, creating an environment where employees feel able to talk about mental health issues and are genuinely supporting their colleagues and it has inspired the desire for change in other areas.

This strategy strives towards better representing the people and communities we serve and creating a more inclusive working environment. We want an expected and natural consideration of diversity and inclusion in everything we do at all levels of the business. We need individually and as an organisation to lead by example. For this, we need a collective commitment to embrace and own this strategy and actions that support it.

I am pleased that our Employee Representatives and Employee Champions are passionate about diversity and inclusion being a key area of focus that they want to be involved in and will also drive and support the organisation in successfully implementing this strategy.



John Baumbach,
Group Chief Executive Officer

2. Inclusive by Nature

What does **Inclusive by Nature** mean for everyone at Seetec?

It should be natural. Second nature. If we do it right, then it should be intuitive and business as usual. It will be evident in how we work and just feel right.

- A culture in which integrity, respect and empathy for colleagues, and people and organisations we work with, is the norm.
- An environment where we can all feel safe, comfortable to be ourselves, unafraid and where psychological safety is encouraged.
- Working with talented people from a wide range of backgrounds.
- An environment where we can all perform to the best of our abilities and build positive relationships.
- Working in a supportive and flexible environment led by inclusive and effective leaders
- A culture where we can raise ideas and challenge one another in a respectful way irrespective of role and job level boundaries.
- A place where we understand, respect and support each other's differences.





Why are we committed to being **Inclusive by Nature**?

Beyond the legal minimum requirements and the core basics of fairness and respect for difference, it ensures that we are:

Representing the Communities in which we serve to the best of our ability, understanding and reflecting our diverse customer base. Our service users often come from vulnerable and disadvantaged backgrounds. It is important to understanding the hopes and aspirations of local communities so that our services better reflect their priorities. We want to collaborate with disadvantaged communities to give them a voice and more opportunities to succeed.

Promoting differences in thoughts and viewpoint, leading to ideas and new ways of doing things, everyone bringing their own unique views and perspective, leading to a culture of innovation as research has proved that innovation depends less on IQ and more on a diverse and inclusive workforce. Through creating a listening and engaging culture, people can have the confidence to share ideas and together we can identify new ways of doing things.

Attracting and retaining talented people, the more inclusive our organisation is the more likely it is that we will attract highly talented candidates from a more diverse talent pool and that our colleagues will fulfil their potential. When we can be ourselves, without fear of judgement, we perform better, enjoy ourselves, experience better job satisfaction and want to stay with Seetec for longer.

In addition, an inclusive culture leads to higher employee engagement, increases productivity, reduces turnover and sickness rates and delivers better outcomes for our customers and communities.

3. Our Values

In every aspect of this strategy we will seek to embed our Seetec values of:

- Respect
- Adding Value
- Aspirational
- Transformational



4. Our Commitment

Seetec is committed to being an equal, diverse and inclusive employer. We do not tolerate discrimination in any form, whether it is direct or indirect, by association, linked to a perceived characteristic, harassment or victimisation. Discrimination has no place in our business, and we continue to take steps to educate and encourage our employee owners to celebrate the diversity and inclusivity agenda. We will achieve this by:

1. Focusing on inclusion to build our culture and reputation as an organisation that attracts, develops, retains, and fully engages and celebrates diverse talent across our businesses.
2. Continuing to increase the representation of under-represented groups at all levels across the organisation.
3. Proactively taking steps to ensure inclusion is at the heart of our attempts to support resilience and improve the life chances of every single person who uses our services.



We are starting from a promising position. We already have a strong set of values which people across Seetec share. They represent the expectations we have for ourselves and each other, they guide our decision-making and the way we behave, respect for our colleagues and customers is already part of our culture. Over the last year we have reaffirmed this through the launch of our Dignity at Work Policy, continued to roll out Unconscious Bias training, Mental Health First Aid and Mental Health Awareness training, embedded diversity and inclusion as a core element of our Management Development Academy, signed up to the Time to Change Pledge and Mindful Employer and attained Disability Confident Leader status. We have also focused on raising awareness of menopause and are currently seeking to the same with endometriosis, and to register as an endometriosis aware employer. However, we know that there is more work to be done and we intend to listen and engage with our colleagues to understand their experiences of working in the organisation and how we can change current, or adopt, new practices and policies to make Seetec an even better place to work.

In terms of representation, there are already elements that we can be proud of particularly our gender representation, overall 72.46% of our workforce are women, they represent 61% of our management teams and 54.80% of our senior management and Directors, including Group Executive Board members. Our recent Employee Council Director election saw a 50/50 male and female representation in candidates and resulted in a female appointment. However, we want to improve our diversity reporting data and improve our representation across all diversity strands.

Our representation of colleagues who have disclosed a disability is 7.92%, and has steadily increased over the last 5 years, (1.4% in 2015) however remains under-representative (13.4% of the UK's working population were disabled as at June 2019). Our data also shows that 1.7% of employees identified as LGBT+ but only 77% of colleagues have disclosed their sexual orientation and 3.72% of colleagues are from black, Asian and other ethnic minority groups but only 25% of colleagues have disclosed their ethnicity (12.6% of the UK's working population were from ethnic minorities in June 2019). To begin this process, we have recently launched our 'check your data' initiative to encourage colleagues to update their personal records and we aim to have a 95% disclosure rate across all protected characteristics. At a group level the median gender pay gap for 2020 is 9.5% which is well below the average median of 17.3%, however we also acknowledge that further focus is required on improving this gap.

Whilst we have made good progress in some areas, our **Inclusive by Nature** Strategy continues to build on what we have done so far with the aim of becoming a more inclusive employer. Some of the actions required to achieve our aim are embedded as business as usual. However, we will also take some specific actions to complement business as usual and achieve further changes.

5. Our Approach

Our plan will focus activity, and measure success, against the six pillars of the Inclusive Employers Standard. The pillars shape inclusive best practice around six themes Engage; Equip; Empower; Embed; Evaluate; and Evolve inclusion. The activity will range from practice and policy to colleague engagement, from learning and development to culture and leadership: providing a strong foundation for embedding **Inclusion by Nature**.



ENGAGE:

We will engage colleagues at all levels to ensure they have a good understanding of our vision for an **Inclusive by Nature** culture.



EQUIP:

We will equip managers and colleagues with the knowledge, skills and tools to design and deliver more effective inclusive policies, processes and working practices.



EMPOWER:

We will empower colleagues through open discussions to constructively challenge current ways of working and contribute to development of more inclusive working practices.



EMBED:

We will embed inclusion and diversity to build a positive reputation internally and externally, through our recruitment processes and training programmes in addition to ensuring our interactions with each other are consistent with an **Inclusive by Nature** culture.



EVALUATE:

We will measure progress against quantitative and qualitative metrics, ensuring that we are listening to the actual experiences of our colleagues from under-represented groups. In addition, we will commission independent assessment and evaluation of the effectiveness of our strategy and interventions.



EVOLVE:

We will continuously learn and draw on best practice to develop creative inclusive interventions.

6. Our Priorities and Actions

Objective 1 - Focusing on inclusion to build our culture and reputation as an organisation that attracts, develops, retains and fully engages diverse talent across our businesses.

Priority	We will achieve this by...	Action	Measure
Communicating the vision and leading change	<ul style="list-style-type: none"> Communicating our vision for an Inclusive by Nature culture and the role colleagues play Holding our leaders and managers, from the Executive Board down, to account for inclusion Building line managers' awareness and confidence in inclusion Providing line managers with development opportunities to grow our capability in inclusive leadership Leadership and Managers listening and acting on colleague feedback. 	<ul style="list-style-type: none"> Launch and communicate our Inclusive by Nature, Equality, Diversity, and Inclusion Strategy Embed Diversity and Inclusion as a key component of the MDA Programme Deliver ED&I Awareness training to all colleagues Engage Employee Reps and Champions to support launch and implementation via Champion meetings. 	<ul style="list-style-type: none"> Increase the percentage of people who feel that Seetec Respects its colleagues - EE surveys Add specific Diversity and inclusion questions to the EE annual survey Develop pulse surveys to capture degree of awareness and understanding.
Fostering positive behaviours and working environment	<ul style="list-style-type: none"> Promoting positive behaviours and tackling bullying, harassment, and discrimination Empowering everyone to relentlessly challenge inappropriate behaviours Empowering managers to offer additional support to meet individual needs including flexible ways of working Ensuring our physical environments are inclusive and accessible to all Raising awareness of faith and belief diversity Providing support for individuals in relation to equality, diversity and inclusion issues Promoting equality, diversity and inclusion in our employment practices and training. 	<ul style="list-style-type: none"> Review and communicate People policies Managers to attend People Management Modules of the MDA Inhibit discrimination through awareness campaigns Continue to roll out unconscious bias training, Mental Health First Aid and MH awareness training Embed Flexible/Mobile working policy where roles allow Provide support for religious observance and worship during work Create ED&I action plan per business pillar with oversight at GEB/Employee Council Create Equality Diversity and Inclusion channel on the intranet/MS Teams. 	<ul style="list-style-type: none"> Reduction in grievances and complaints EE survey - reduction in % of colleagues experiencing bullying, harassment and discrimination Pulse surveys throughout the year 100% of managers to have completed unconscious bias training and Mental Health Awareness Training.

		<ul style="list-style-type: none"> • Create Equality Diversity and inclusion pages on MySeetec • Encourage use of pronouns on email signatures • Improve maternity, paternity and adoption leave benefits. 	
Listening and Engaging with our employees from under-represented groups	<ul style="list-style-type: none"> • Engaging everyone in Inclusive by Nature • Providing opportunities for colleagues to provide feedback in a safe environment • Engaging with new colleagues during induction • Recognising the support required including support for generational difference and making reasonable adjustments as necessary. 	<ul style="list-style-type: none"> • Develop regular awareness campaigns • Create and launch a survey to understand where we are now • Develop a Diversity and Inclusion Calendar and make available to all colleagues. Communicate and promote celebrations to embrace differences and organise events involving people from across the organisation in developing, resourcing and delivering • Employee Council to lead on regular equality, diversity and inclusion colleague discussion groups • Share Inclusive by Nature strategy, Health and Wellbeing Strategy and People Strategy in all new colleagues inductions • All video communications to carry subtitles. 	<ul style="list-style-type: none"> • Disparity in engagement scores between diversity groups.
Continually Improving our policies and working practices	<ul style="list-style-type: none"> • Drawing on best practice when reviewing and designing our policies and working practices • Achieving external accreditation as an Inclusive Employer. 	<ul style="list-style-type: none"> • Review policies to ensure that we respect, reflect and can respond appropriately to our diverse needs • Introduce new ways of working, where required • Commission external assessment against the Inclusive Employer standard with the aim to work with them to develop an action plan for achieving Inclusive Employer status. 	<ul style="list-style-type: none"> • Evidence of implementation or review • Achieving Inclusive Employer Accreditation.

Objective 2 - Continuing to increase the representation of under-represented groups at all levels across the organisation.

Priority	We will achieve this by...	Action	Measure
Focusing on diverse recruitment	<ul style="list-style-type: none"> Consistently evaluating D&I data to understand where there may be gaps in the representation of diversity and developing action plans to address underrepresentation Ensuring our recruitment and selection practices drive the attraction, selection and retention of diverse talent Creating diverse and gender balanced senior leadership and management teams so that the commitment to diversity is driven from the top and that decision making is balanced Target diverse populations Promoting our Disability Confident Leader status Being visible in our commitment to supporting Mental Health – Time to Change Pledge, Mindful Employer and our IIP Gold and Health and Wellbeing accreditation Being visible in our commitment to Ban the Box. 	<ul style="list-style-type: none"> Review current demographics and develop action plans Review how and where we attract our people from and identify methods to address the disproportionality experienced by underrepresented groups Continue to use anonymised application processes Ensure all recruiters complete unconscious bias training Ensure that we have diverse representation on our selection panels Continue to offer the assisted application scheme and reasonable adjustments for candidates with disabilities or additional needs Review our online Careers site to make it more accessible and searchable for all external candidates Introduce work experience placements for people with disabilities. 	<ul style="list-style-type: none"> Increase in the percentage of colleagues in underrepresented groups, particularly ethnic minority groups Increase in diversity profiles across job levels Balancing out of gender across job levels.

Enabling Career Progression	<ul style="list-style-type: none"> Continuously improving our career progression opportunities for all including those from underrepresented groups Ensuring all qualified internal candidates have an opportunity to compete for open positions and apply for developmental opportunities. 	<ul style="list-style-type: none"> Produce metrics on participation from underrepresented groups in training and on Accelerated Development Programme and develop plan to address if required Analyse gaps in attainment, pay and progression of colleagues with protected characteristics. 	<ul style="list-style-type: none"> Increase in representation on the Accelerated Development Programme Increase in representation at different levels in the organisation.
Improving our diversity reporting data	<ul style="list-style-type: none"> Improving declaration and prefer not to say rates across all diversity strands Improving understanding of our workforce diversity profile to identify areas of cultural issues which we can address Improving our methods of measuring inclusion. 	<ul style="list-style-type: none"> 'Check your data' campaign Develop Diversity MI suite. 	<ul style="list-style-type: none"> Increase disclosures to 95% across all diversity strands.
Addressing our gender pay gap	<ul style="list-style-type: none"> In line with our commitment pay the Real Living Wage to all employees Ensure that pay is based on the value of the role irrespective of the gender of the postholder Seek to minimise the gender pay gap. 	<ul style="list-style-type: none"> Examine data to understand drivers of the gender pay gap Develop a plan to address the pay gap. 	<ul style="list-style-type: none"> Reduction in Seetec Group gender pay gap.

Objective 3 - Proactively taking steps to ensure inclusion is at the heart of our attempts to support resilience and improve the life chances of every single person who uses our services.

Priority	We will achieve this by...	Action	Measure
Develop an equality outcome monitoring framework for business areas	<ul style="list-style-type: none"> Working with commissioners to ensure that diversity monitoring for service users are in place e.g. Life Chances Identifying outcomes measures against which progress can be evaluated Reporting on these outcomes and explain or reforming any unequal outcomes achieve by protected groups. 	<ul style="list-style-type: none"> Ensure effective diversity monitoring mechanisms are in place for each contract Identify relevant outcomes measures for each contract Design reporting tools and frequency in collaboration with Data Analytics Complete first outcomes evaluation and integrate findings into quality improvement plans Monitor and collate data against Life Chances for DWP returns. 	<ul style="list-style-type: none"> Over 90% of service user protected characteristics are recorded Identified outcomes disparities are explained or reduced.
Integrate equality and inclusion and the needs of marginalised groups as a core strand of operational delivery.	<ul style="list-style-type: none"> Engaging with local partnership, equality forums and learning networks to support organisational learning Ensuring that best practice evidence is reflected in our delivery strategies Ensuring that all learning and development linked to delivery supports reflection on inclusion and bias Treating equality and inclusion as a key measure of service quality. 	<ul style="list-style-type: none"> Integrate equality and inclusion into partnership strategies Include introduction of equality and inclusion in a new starter induction programme Ensure completion of mandatory Equality and inclusion and Unconscious Bias training by all team members Integrate the findings of the CRC equality confidence survey into practice development plans for Interventions Alliance Develop a quality assurance framework which incorporates diversity and inclusion as key measures of service quality. 	<ul style="list-style-type: none"> 90% of colleagues complete mandatory equalities training.

Engage service users and communities to understand needs and develop trust and confidence	<ul style="list-style-type: none"> Ensuring that all service user engagement initiatives are monitored to ensure inclusion of marginalised groups Use all opportunities to celebrate the diversity of our communities with our service users Promote the needs of our communities, and challenge discriminatory attitudes and behaviour, during engagement with service users Work with external stakeholders to build partnerships to tackle specific EDI issues. 	<ul style="list-style-type: none"> Develop a service user engagement strategy for Interventions Alliance which promotes inclusion in engagement activity Develop service user's activities to celebrate key dates in the diversity calendar Work with PIPP to support wider HMPPS participation in local Pride events. 	
Make curiosity about one another's needs part of our culture	<ul style="list-style-type: none"> Hosting a network of diversity champions Creating frequent opportunity to discuss quality and inclusions and explore conflicts and difficulties Recognise colleague efforts in supporting ED&I through reward and recognition. 	<ul style="list-style-type: none"> Agree an equality statement to display in our premises and use during training and meetings Identify diversity champions for each contract/ team to join the Diversity Champions Network Integrate reflective practice sessions into colleague 1:1/ supervision/team meetings. 	<ul style="list-style-type: none"> All colleagues have at least 3 reflective practice sessions each year.
Work with Delivery Partners to ensure ED&I is embedded throughout our supply chain	<ul style="list-style-type: none"> All Delivery Partners have an ED&I action plan (workforce and operational) Regular review of action plans to monitor progress Treating equality and inclusion as a key measure of service quality Apply robust due diligence criteria to potential supply chain partners e.g. Modern Slavery. 	<ul style="list-style-type: none"> Support Delivery Partners to create action plans where required Develop a quality assurance framework which incorporates diversity and inclusion as key measures of service quality. 	<ul style="list-style-type: none"> Evidence of action plans in place Performance against key measures.

7. Measuring Progress

Our action plan will include measurement against the following below criteria:

- A suite of diversity statistics to be produced and analysed by HR quarterly and shared with Group Executive Board and Employee Council
- Diversity Declaration rates
- Gender pay gap data -reported and analysed annually
- Learning and development data
- Annual people survey – bullying, harassment and discrimination scores and disparity in engagement scores between diversity groups
- Employee Relations data – bullying, harassment and discrimination grievances and complaints
- Benchmarking against national and sector specific data.

We will commission an independent assessment in 2022.



8. Responsibilities

Diversity and Inclusion is the responsibility of all colleagues to contribute to creating an inclusive culture and environment.

Executive Directors will both be ultimately accountable for, and hold other employeescolleagues to account for, the delivery of this Diversity and Inclusion Strategy.