

# Diversity and Inclusion Policy



Virgin Media encourages an inclusive working culture which values difference, enables people to be themselves, participate fully and meet their full potential. This helps us to attract, engage and retain a highly engaged workforce which is just as diverse as our customers and communities and in turn contributes to our business success.

This policy sets out the principles that Virgin Media apply for diversity and inclusion.

## Why do we have this Policy?

We are committed to ensuring that people of all ages, abilities or disabilities, sexes, racial/ethnic backgrounds, religions and cultures, sexual orientations, gender identities, marital and parental status' have equal access to and feel included in our business.

We want to ensure that no-one sees diversity as a barrier to success, or experiences less favourable treatment or unacceptable behaviour as a direct or indirect result of their diversity.

It is also important that everyone working for Virgin Media is clear about our expected standards of behaviour and does not harass, victimise or otherwise discriminate against anyone on the grounds of diversity. Not only would this run contrary to our values, it would constitute unlawful treatment under the Equality Act (2010).

## Who does it affect?

This policy applies to everyone working for Virgin Media.

## And finally...

This policy is non-contractual which means it is not part of your formal terms and conditions of employment with us. From time to time we might review and amend it and inform you of any changes.

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Sponsor (Responsible)	Chief People Officer
Owner (Accountable)	Head of Employee Relations and People Policy
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## 1. Principles

- We encourage a working culture based on mutual respect for all individuals, which appreciates and values the experiences, perspectives and skills brought by each of us to benefit Virgin Media.
- We are committed to being inclusive and broadly representing the diversity of our communities, suppliers, partners, clients and customers.
- We believe that everyone has the right to be treated fairly and has the right to equality.
- We seek to work with our people, clients and partners to reasonably prevent and appropriately respond to any form of harassment or victimisation, to eliminate unlawful discrimination and to promote good working relations.
- We are committed to a culture and working practices which recognise and value diversity and inclusion and are free from discrimination. Working practices include recruitment and selection, induction and learning, development and promotion, performance management, disciplinary and grievance procedures, working patterns, ending employment.
- Through this policy we commit to ensuring equality for our existing and potential workforce while striving to ensure the diversity of our people is reflective of the diversity of our customers and communities.

## 2. Our approach

### 2.1 Inclusive behaviour

We all want to work in an environment that is free from harassment and where everyone is respected;

#### Individuals

- We all have a personal responsibility not to behave in any way which is offensive or discriminatory towards others, and to speak up if we become aware of incidents of harassment or discrimination.
- This includes face to face/verbal and online/written behaviour.
- If an individual acts in a way that isn't in line with this policy it could lead to disciplinary action. In serious cases, discriminatory behaviour can be treated as gross misconduct and result in employment being terminated. Individuals can also be held personally liable for acts of harassment or unlawful discrimination.

#### Managers

- Managers of teams in particular have a critical role in creating inclusive team environments and have a duty to be aware of the types of behaviour which are not acceptable. Managers will be expected to reinforce our diversity and inclusion commitments through day to day activities within teams and to take action to stop any behaviour that might amount to harassment, victimisation or discrimination.

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## 2.2 Raising and managing complaints

In all cases where allegations of discrimination, harassment or victimisation are raised we will ensure the situation is handled with sensitivity and that an appropriate informal or formal investigation is conducted providing support to all concerned

### Individuals

If as an individual you think you have been harassed or discriminated against, in the first instance talk to your line manager. If your complaint involves your line manager, talk to their line manager if possible, or you can contact a member of Employee Services. You may wish to try to resolve things informally by talking to the person concerned as it might be they haven't realised there's an issue. The harassment policy sets out the procedure in more detail.

### Managers

As a manager if necessary you will need to carry out investigations into any complaints of discrimination against a member of your team in an objective and thorough manner and support individuals who state they have been harassed or discriminated against in a confidential manner. It is important to know that if you fail to take reasonable steps to stop behaviour or action recognised as unlawful discrimination, you may also be held legally responsible along with the company. For further advice or support please refer to the [Case Management Portal](#) in the Managers Corner on Touchpoint or contact Employee Services.

## 2.3 Learning and awareness

We provide online learning about diversity and inclusion for individuals and line managers on Ignite. We will continue to update and develop additional learning and awareness solutions going forward and clearly and regularly communicate to all our people our expectations of inclusive behaviour.

## 2.4 Attraction and recruitment

We welcome employment applications from a diverse range of candidates and are committed to ensuring our recruitment processes are inclusive and accessible to all.

## 2.5 Diversity data and insights

In order to ensure we are delivering on our commitment to diversity and inclusion, it is important to understand the diverse make-up and the experiences, views and perspectives of different employee groups in our existing workforce and those applying to work for us. This means that

- Anonymised diversity data will be periodically reviewed at aggregate level to help us identify patterns and trends for different diverse groups (e.g. men/women, different ages, disability status). No identifiable individual personal data will be used or disclosed.
- From time to time we may request employees update their personal details via the employee self-service system in order to ensure we have up to date diversity data.

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- For personal diversity information we will always provide a ‘do not wish to disclose’ option.
- We will use aggregated diversity data where available from our employee surveys to identify engagement levels by diverse groups.
- We may also invite individuals with an interest in diversity to take part in qualitative research (e.g. focus groups) to identify opportunities for improvement.

### 3. Protected Characteristics

The Equality Act 2010 legally protects people from discrimination in the workplace. It replaces previous anti-discrimination laws with a single Act and sets out the different ways in which it’s unlawful to treat someone. It is against the law to discriminate against anyone because of these ‘protected characteristics’:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

See the glossary in section 5 for full definitions.

### 4. Information, Guides and Related Policies

[Employee Assistance Programme \(EAP\)](#)

[Speak out programme](#)

[Touchpoint - Employee Services](#)

[Touchpoint - Case Management Portal](#)

[Family Friendly Policies](#)

[Harassment Policy](#)

[Grievance Policy](#)

[Guide to managing reasonable adjustments](#)

[Religious Observance at Work Toolkit](#)

[Positive Action Factsheet](#)

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## 5. Glossary

### Protected Characteristics

**Age:** The Equality Act protects people of all ages. However different treatment because of age is not automatically unlawful direct or indirect discrimination if the company can justify it. For example; by putting in place a minimum age requirement for someone driving vans as part of their role, or someone working with adult content in contact centres.

**Disability:** a person is considered disabled if they have a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day-to-day activities. Normal activities could include things like commuting to and from work, using a computer screen, communicating with customers.

**Gender reassignment:** the act provides protection for transgender or transsexual people meaning a person who proposes to, starts, or has completed a process to change his or her gender. The person is not required to be under medical supervision, meaning for example a woman who decides to present and live as a man without undergoing any medical procedures is protected from discrimination. It is also discrimination to treat transsexual people less favourably for being absent from work because they propose to undergo, are undergoing or have undergone gender reassignment than they would be treated if they were absent due to illness or injury.

**Marriage and civil partnership:** people who are married or in a civil partnership are protected from any discrimination related to their partnership status.

**Pregnancy and maternity:** a woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and during any statutory maternity leave to which she is entitled. Companies cannot take into account an employee's period of absence due to pregnancy-related illness when making a decision about her employment.

**Race:** For the purposes of the act, race includes colour, nationality and ethnic or national origins.

**Religion or belief:** religion includes any religion or lack of religion meaning existing and potential employees are protected if they follow a certain religion or have no religion at all. The definition of a religion is 'having a clear structure and belief system'. Belief means any religious or philosophical belief which satisfies various criteria including that it is a weighty and substantial aspect of human life and behaviour. Denominations or sects within a religion can be considered a protected religion or belief.

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**Sex:** both men and women are protected from discrimination under the act.

**Sexual orientation:** lesbian, gay, bisexual and heterosexual people are protected from discrimination under the act.

## Types of discrimination

**Direct discrimination:** when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see perception discrimination below), or because they associate with someone who has a protected characteristic (see discrimination by association below).

**Discrimination by association:** direct discrimination against someone because they associate with another person who possesses a protected characteristic.

**Perception discrimination:** direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

**Indirect discrimination:** may occur when there is a condition, rule, policy or a practice that applies to everyone but particularly disadvantages people who share a protected characteristic.

Indirect discrimination can be justified if it is 'a proportionate means of achieving a legitimate aim'. Being proportionate means being fair and reasonable, including considering 'less discriminatory' alternatives to any decisions made.

**Harassment:** unwanted conduct, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. It can include behaviour that an individual finds offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves.

**Victimisation:** when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or knowingly supported an untrue complaint.

**Positive action:** the act allows Virgin Media to take positive action measures if employees or job applicants with a particular protected characteristic (e.g. gender, disability and so on) suffer a disadvantage connected to that characteristic, or if their workforce representation or participation in a particular activity is disproportionately low. We would need some evidence to show that people with that characteristic face particular disadvantages or are under-represented in the workplace and we cannot have a policy of automatically treating potential job applicants (or internal promotion candidates) with a protected characteristic more favourably.

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