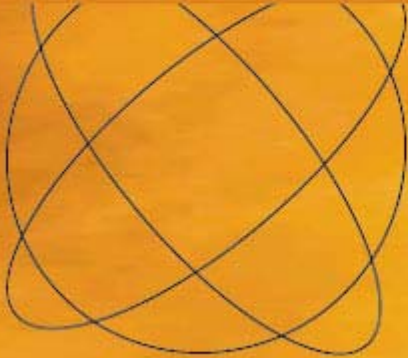


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NETVOYAGER PLC

Equal Opportunities Policy

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Document Revision: 1.3

Section 1

POLICY STATEMENT

Netvoyager plc is committed to providing equal opportunities, which is demonstrated through our employment policies, procedures and practices. We believe that discrimination is unjust and unfair to individuals, groups of people and communities.

We will ensure that no one is treated any less favourably on the grounds of their race, colour, ethnic or national origin, gender, marital status or domestic responsibilities, disability, age, sexual orientation, trade union activity, religious or political beliefs, poverty or social status.

We accept our responsibility to ensure that no employee or applicant is discriminated against as defined by the provisions of the:

- Race Relation Act 1976, Amended Race Relations Act 2000
- Sex Discrimination Act 1975
- Disability Discrimination Act 1995
- Equal Pay Act 1994

The Company seeks to promote equal opportunity in recruitment, employment, promotion, training and career development.

The responsibility for enforcement of this policy rests with the managing director, who will monitor the effectiveness of the policy and associated initiatives.

The implementation of initiatives in support of the policy are the responsibilities of the Directors, Managers. All employees have an obligation to avoid discrimination and promote equal opportunities.

The objectives of our Equal Opportunities Employment Policy are;

- a) To ensure the company's services and activities are of high quality and responsive to our client's needs, ensuring that our employees adequately respond to the needs of our client.
- b) To ensure that the company makes best use of its employees and potential employee's skills, talents and abilities in delivering the company's services.
- c) To ensure that the company fulfil its legal obligations under the equal opportunities legislation and complies with provisions contained in various Codes of Practice.
- d) The following guidelines provide information, advise and guidance to managers, supervisors and employees regarding their responsibilities in achieving the objectives of our Equal Opportunities Policy.

Direct discrimination

Occurs when a person is treated less favourably than others in similar circumstances because of their race, colour, national or ethnic origin, gender, marital status, disability, sexuality, age or religious belief. It is also discrimination to segregate, harass or victimise people on these grounds.

Indirect discrimination

Means applying conditions or setting requirements or asking for certain qualifications that will adversely affect one particular group more than another and cannot be justified in terms of what is actually required to do the job.

Section 2

2. GUIDELINES

2.1. *Recruitment and Selection*

- a) The governing factor for appointments will be based on merit, competence and the ability to do the job.
- b) All jobs will be advertised externally and internally.
- c) All job advertisements will carry wording designed to encourage applicants from all sections of the community.
- d) Recruitment literature will describe jobs without gender, race or disability bias.
- e) Consideration will be given to using a range of advertising media to encourage and attract applicants from all sections of the community.
- f) All applicants will be assessed in the same way using the same evaluation and selection criteria.
- g) Selection criteria will not be set to unlawfully discriminate (directly or indirectly) on the grounds of gender, marital status or race or disability, and should solely be related to the requirements of the job.
- h) Age limits, age requirements or length of service restrictions will not be set as criteria for the job unless they can be justified as they are likely to have a disproportionately adverse effect on women and people from minority ethnic communities or if there is a genuine occupational qualification compliant with section 5.(2)(d) of the Amended Race Relations Act 2000.
- i) Disabled job applicants who meet the essential criteria of the job description will be guaranteed an interview.
- j) Where selection tests are used, tests will be specifically related to the job and in the case of ability tests they should be fully validated so as to avoid any bias on the grounds of gender, marital status, race or disability.

At job interviews generalised assumptions and prejudices about gender, race and disability will not enter into selection decisions. Questions concerning domestic commitments and similar topics will not be asked of women, and no questions will be asked of a woman that is not also asked of a man.

Interviewers will be aware of possible misunderstandings that may occur between people of different cultural backgrounds, and interviewers will focus on applicant's abilities not their disabilities.

All interview questions will relate to the requirements of the job.

Managers involved in recruitment and selection decisions will have received appropriate training.

2.2 ***Monitoring and Evaluation***

To ensure the company is achieving its policy objectives, we will monitor the effectiveness of our policy by keeping records of our recruitment selections process.

We will annually monitor and measure the effectiveness of the policy reviewing our practices where there are shortfalls and developing recommendations and implement them.

The records will contain information such as Gender, Race, Age, Disability, Criminal conviction, and Marital status. Each applicant and employee will be required to complete our Recruitment Monitoring Questionnaire.

Section 3

Terms and Conditions

- a) All vacant posts will be open for job-sharing unless considered unsuitable (with regards to maintaining work efficiency) and should be advertised in manner so as to encourage job sharing.
Any existing employee or any two existing employees will be able to apply to their manager for a job-share arrangement in respect of their job.
- b) When an employee becomes disabled as a result of an accident or illness, reasonable adjustments will be made to seek to ensure the employee continues in the job.
- c) Where an employee has cultural needs that may appear to conflict with existing work requirements, consideration will be given to varying the requirements especially where it may be that the requirement is unjustifiable. In any such cases, advice should be sought from the Human Resource Manager.
- d) Where an employee requests leave over and above annual leave entitlement to visit relations in other countries, the employee will be able to “accumulate” part of their leave entitlement from previous years as part of the extended leave scheme. In the event of this or in order to arrive at any other arrangement, advice should be sought from the Human Resource Manager.
- e) Where an employee experiences sexual harassment this will be viewed as a form of sex discrimination which shall not be condoned or tolerated by the Company.

Female employees are far more likely to suffer from such discrimination and it can be defined as unwanted conduct of a sexual nature, or conduct based on sex which is offensive to the recipient, which interferes with the recipient's work performance and creates a hostile working environment. The rebuttal of such unwanted conduct is often followed by threatened or actual employment retaliation. An employee experiencing conduct which is believed to be sexual harassment should follow the stages in the complaints procedures.

- f) Where an employee experiences racial harassment this will be viewed as a form of racial discrimination which will not be condoned or tolerated by the Company.

Black and other minority ethnic employees are far more likely to suffer from such discrimination (though not exclusively) and it can be defined as an unwanted conduct of racial nature, or conduct based on race, it is offensive to the recipient and interferes with the recipient's work performance creating a hostile working environment.

An employee experiencing conduct that is believed to be racial harassment should follow the stages outlined in the complaints procedure.

- g) Provisions relating to maternity leave and pay are detailed in the Company's 'Maternity pay and leave' policy. Maternity leave will not be treated as an obstacle to progression or career development.
- h) All other terms and conditions of employment will not be related to the gender, marital status, ethnic origin or disability of employees, and as far as practicable will not obstruct or limit the employment or promotion of any employee.

Section 4

Appraisal, training, career-development, promotion and transfer

- a) Where posts are internally advertised only (i.e. offering career-development and promotion opportunities to existing employees), the same principles as those governing external recruitment and outlined in paragraph 1(a) to (n) will apply.
- b) The Company's performance and development agreement scheme should relate specifically to the job/career of the individual and will avoid any bias or assumptions based on an employee's gender, marital status, disability or ethnic origin. The scheme will only involve assessing employees' aspirations and managers' views on employees' capabilities, performance and potential.
- c) In the case of trainees, merit increment, honoraria, etc the criteria on which employees' pay rises through increment will not be based on criteria related to gender marital status, disability or ethnic origin.
- d) All employees will be encouraged to take suitable opportunities for training and advancement. In particular, in areas of work where certain groups are under-represented (especially in senior management), managers will take a pro-active role in ensuring employees from such under-represented staff take up training opportunities that assist their future possible entry into these areas of work.
- e) Employees who have recruitment and selection responsibilities and/or who have supervisory responsibilities will undertake training in recruitment, selection, and in equal opportunities to ensure awareness and fairness in their assessment and selection process enabling them to encourage and promote equal opportunities for all.
- f) Employees who have direct contact with members of the public will undertake training on dealing with service users to ensure awareness of their customers needs and the public at large, ensuring satisfactory service delivery.
- g) In situations where employees are being re-deployed due to changes in the operational arrangements of the Company, the procedures for re-deployment (including ring-fencing and priority candidates) will be free from bias on the grounds of gender, marital status, disability and ethnic origin.
- h) Where employees are seeking re-deployment on the grounds of disability or ill-health (and would otherwise be retired on the grounds of ill-health) assistance will be sought where appropriate from the Department for Work and Pensions.

Section 5

Dismissal and Redundancy.

- a) In cases where employees are being dismissed, this decision will not be made on grounds of their gender, marital status, disability or ethnic origin and decisions will be made solely in accordance with the Company's disciplinary procedure,
- b) Intentional, direct and overt acts of race and sex discrimination, and racial and sexual harassment will be regarded as gross misconduct and therefore a dismissible offence.
- c) In cases where employees are selected for redundancy, decisions will not take account of their gender, marital status, disability and ethnic origin and no criteria (such as 'part-timer first' or 'last in first out') will be applied if it cannot be justified and it has a disproportionately adverse effect on women and/or minority ethnic groups. In particular, registered disabled people will not be made redundant without reasonable cause.
- d) Where an employee has been found guilty of theft, our bringing the company into disrepute the employee may be dismissed.

Section 6

Equal opportunities for all regardless of age, sexual orientation, trade union activity, and religious and political beliefs.

- a) This policy also seeks to ensure that the Company does not discriminate on the grounds of age, sexual orientation, trade union activity, religious and political beliefs, poverty and social exclusion. These areas are not covered by 'anti-discrimination' legislation or Codes of Practice in way legislation covers race, colour, ethnic or national origin, gender, marital status or domestic responsibilities, and disability.
- b) Nevertheless, the objectives of our Equal Opportunities Policy apply equally to these areas as it does for those that have supporting legislation.

Section 7

General provisions.

- a) While the overall responsibility for the Policy lies with the Managing Director and every employee has a personal and legal obligation to avoid discrimination, and to promote equal opportunities for all. The Company will ensure that employees are aware of these obligations.
- b) The Company will regularly examine staffing information through workforce surveys, applications questionnaire, and on any other aspects of personnel activity in order to ascertain the make-up and experiences of the Company's employees by gender, marital status, disability and ethnic origin, and in order to monitor progress in implementing the Equal Opportunities Employment Policy.
- c) All personnel policies and procedures, particularly those relating directly to equal opportunities will be regularly reviewed to ensure they are operating in a non-discriminatory manner and are adequately assisting the implementation of the Equal Opportunities Employment Policy.
- d) Complaints of discrimination by employees should be raised at an appropriate level of the Grievance Procedure, and complaints by job applicants should be made to the Managing Director. Any complaints will be treated seriously and sensitively.

Section 8

Equal Opportunities in Service Delivery

8.1 *Customer First Policy*

Netvoyager plc takes active steps to provide equal opportunities, in service, delivery and the employment of staff. We are committed to building on our existing achievements through improving our services and employment practices.

Netvoyager plc is committed to equal opportunities, both in the delivery of services and the employment of staff.

Equal opportunities means that our customers will not be treated less favourably because of their race, colour, national or ethnic origin, gender, marital status, disability, sexuality, age or religious belief.

Our commitment to equal opportunities means we will encourage the development of understanding and appreciation of diversity and lifestyles.

- We will take positive steps to ensure equal opportunities in complying with the provisions of the:
 - Race Relations Act 1976 , Amended Race Relations Act 2000
 - Sex Discrimination Act 1975
 - Disabled Persons Act 1985
 - Disability Discrimination Act 1995

The company expects its workforce to have a positive attitude to equality issues, treating each other equally and fairly regardless of their race, colour, national or ethnic origin, gender, marital status, disability, sexuality, age or religious belief. All employees are responsible for complying with our policies in the following ways:

8.2 *Accessibility of Services*

Netvoyager plc will work with local people to provide a safe environment.

8.3 *Planning and Improving Services*

We will ensure that the workforce and service delivered is reflective of the community it services.

The success of our service is demonstrated by our customer base and we aspire to continually review and improve services ensuring they meet the needs of customers. We are a customer led organisation, committed to consulting widely with users and staff to ensure that our service meets their requirement.

We will ask our clients for feedback on projects undertaken.

We will act on the outcome of our feedback by improving services wherever possible.

We will endeavour to enhance our reputation as a provider of high quality services.

8.4 *Monitoring and Improving Performance*

Monitoring

We will endeavour to improve service by monitoring continually the quality of our service delivery and the effectiveness of our equal opportunities policy.

Netvoyager plc **will:**

Monitor services regularly and bring forward action plans for improvement.

Solicit feedback from our customers about our standard and quality of service delivery.

Recognise and use the experience of staff in improving services.

Monitor the effectiveness of our equalities policy to ensure that there is clear representation and transparency in our recruitment and promotion processes.

Provide regular public reports about the quality of the services, the views of those who use them.

Netvoyager plc prides its self in the quality of service and workmanship and wants to keep our customers. We want our customers to be honest with us and we will be honest when things go wrong and work quickly to put them right.

Netvoyager will:

Provide clear information to the public and its customers on how to complain;

Listen to complaints and comments and act upon them in an agreed time scale;

Tell you what action we have taken on your complaint;

Treat all complaints fairly in accordance with its equalities policy and frame work and monitor all complaints to ensure that this is being achieved;

Use complaints to improve the quality of services.

Our Staff

We will endeavour to have a workforce that reflects the communities serviced. This is achieved through our Equal Opportunities in Employment policy which is practised in recruitment and selection for jobs. We encourage job applications from the widest possible pool providing opportunities for discriminated against groups. We equally offer training and promotion to our staff.

We will provide staff with training on equal opportunities in service delivery within the framework of Company's Code of Conduct;

Ensure that staff treat everyone fairly and equally and to a high standard of behaviour;

Do not use discriminatory practices in delivering services;

Take disciplinary action against staff in breach of the policy;

Develop the potential of staff from discriminated against groups, (through training, mentoring and monitoring);

Enhance our reputation as an equal opportunities employer;

Provide a safe and harassment free environment for staff;

Make sure staff are comfortable with and clear about their rights and responsibilities.

Our Customers

Netvoyager plc values its customers and has a duty of care to ensure that all customers are treated fairly and without prejudice. Our customer care policy is consolidated with the principles of our equalities policy and all members of staff are bound by this.

Netvoyager plc has an expectation that its customers will not harass or discriminate against its staff and will treat our staff fairly and equally. As we will act upon a member of our staff discriminating or harassing our customers we will take action upon a customer harassing or discriminating against our staff.

Section 9

9.1 *Code of Conduct*

It is of extreme importance to remember that when you carry out your duties you are representing Netvoyager plc and it is important that you understand and comply with the company's Equal Opportunity Policy.

The aim of the Equal Opportunity Policy is to ensure that customers and members of the public are treated equally and fairly and no one is discriminated against, harassed or victimised because of their race, sex, disability, sexuality, marital status or religion.

Employees are urged to be considerate of others and avoid harassing, offending or discriminating against our clients or members of the public as this is offensive. Should any employee be found guilty of this they will face disciplinary action and could be dismissed for gross conduct.

Your intention may not be to offend but people differ and have different needs, expectations and cultures therefore courtesy, respect and consideration must be communicated in action and words at all times.

To ensure that you understand what the company expects you to bear in mind at all times the following:

9.2 *Sexual Harassment*

Is unwanted and unwelcome. This means comments, looks, actions, suggestions or physical contact that people object to or find offensive.

You should never harass members of the public or clients for example by shouting or whistling etc. sexual harassment is mainly but not only experienced by women.

There should be no unwanted physical contact that people object to which can be offensive. Physical contact can also include pats, pinches, unnecessary touching or brushing against someone's body. Also do not make suggestive remarks, use affectionate pet names, tell sexually explicit jokes or make comments on appearance.

Sexual harassment can also include questions of a personal nature which are not connected to the carrying out of your work.

9.3 *Disability*

People with Disabilities are likely to experience harassment in a number of ways, name calling, jokes or comments based on appearance or perceived ability.

They may have a physical or learning disability or both. Sometimes disabilities are not obvious and someone with an unseen disability may not wish to declare or show their disability.

You should always be considerate and sensitive to the fact that people with physical disabilities will have different needs and the service may need to make special arrangements. For example, when working on-site ensure that there is access for wheel chair and adequate signage to alternative routes.

Do not be rude or patronising to others because of their disabilities always try to be helpful when carrying out your work.

9.4 *Racial Harassment*

This includes actions and practices that are racially motivated. These actions are unwanted and cause offence, distress and humiliation. You should never harass a client or member of the public on the basis of their colour, nationality, ethnicity, national origin or religion.

Racially motivated harassment consists of jokes or comments based on stereotypes of cultures or religion. You are reminded that we live and work in a multi-cultural society where many people do not speak English as a first language.

9.5 *Sexual Orientation*

It is unacceptable to victimise or harass clients, members of the public or colleagues on the grounds of sexuality. This includes embarrassing or offensive jokes, remarks or name-calling, unnecessary comments on dress appearance or lifestyle.

Harassment can take the form of intimidation or threatening to “expose” a lesbian or gay person to colleagues or other people in the local community.

Victimisation is defined as treating a person less favourably than others would be in the same circumstances because that person has made a complaint or allegation of discrimination or has acted as a witness or informant in these proceedings.

Harassment, Discrimination and Victimisation to members of the public, customers or colleagues is an offence and will not be tolerated. Disciplinary action will be taken against anyone found guilty of committing such an offence.

Section 10

BACKGROUND DOCUMENTS

The following legislation is relevant to the question of eliminating discrimination and promoting equal opportunities.

10.1 ***Gender and martial status.***

a) Sex Discrimination Act 1975.

Under the Act it is unlawful to discriminate (directly or indirectly) on the grounds of gender or martial status in employment, training and related matters and in the provision of goods, facilities and services.

b) Equal Pay Act 1970 (amended 1983)

The Act seeks to eliminate discrimination on the grounds of gender with regard to terms and conditions of employment and pay. The Act enables a woman to compare her job with the same or a different job being performed by a man and to argue that the jobs are of “equal value”, deserving equal pay, terms, and conditions.

c) Equal Opportunities Commission: Code of Practice.

The Code of Practice sets out a series of recommended ‘good employment practices’ aimed at eliminating gender and marriage discrimination and promoting equality of opportunity. The code is available from the Principal. Failure by the Company and its employees to observe the provisions of the Code can put the Company at risk in any proceedings taken against it. Therefore the Code’s recommendations are as far as possible incorporated into this document.

10.2 Race, colour, ethnic or national origin.

a) Race Relations Act 1976 (Amended Race Relation Act 2000)

The Act makes it unlawful to discriminate (directly or indirectly) on racial grounds (that is, race, colour, nationality or ethnic origins) in the field of employment, training and related matters, in education, provision of goods and services and in disposal and management of premises.

b) Commission for Racial Equality: Code of Practice.

The Code of Practice aims to give practical guidance on how to eliminate racial discrimination and to enhance equality of opportunity. The Code is available from the Principal.

Failure by the Company and its employees to observe the provisions of the Code could put the Company at risk in any proceedings, which might be taken against it. Therefore the Code's recommendations are as far as possible incorporated into this document.

2. Disability.

a) The Disability Discrimination Act 1995.

Employers with 20 or more workers have a duty to ensure that they do not discriminate against people who come under the definition in the Act of disabled people.

Employers also have the duty to ensure that they make reasonable adjustments in relation to the employment of disabled people. The Act placed similar responsibilities with regards to providing goods and services to people with disabilities.

b) Department of Education & Employment: Code of Practice.

The Code of Practice serves to help employers develop good practices in employing disabled people and is available from the Human Resource Manager. The provisions of the code are as far as possible incorporated into this document.