



.....Group of Companies

 **Digital Modus**
Professional Services

 **Digital Modus**
Software Solutions

 **Digital Modus**
Recruiting

Equality & Diversity Policy

DM/106/07

ISO 9001:2026



Crown
Commercial
Service
Supplier

PUBLIC

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Document Information

[DM Group Shared Governance and Policy Statement](#)

Document Control

Version	Date	Author	Comments
DM/106/01	1st February 2022	Nick Howes	Initial Draft
DM/106/02	7th February 2022	Nick Howes	Changes following HR Consulting review
DM/106/03	27th July 2023	Kerry Brannigan	Annual Review, Policies numbered & Google Approval Requested from Directors
DM/106/04	14th September 2023	Magda Marshall	Policy has been amalgamated with the existing Equal Opportunities Policy in the handbook.
DM/106/05	30th June 2024	Magda Marshall	Annual Review: no changes made
DM/106/06	30th June 2025	Magda Marshall	Added information about the Disability Confident Committed (Level 1) accreditation to the introduction Rebranded document
DM/106/07	8th June 2026	Kerry Brannigan	Added Shared Governance and Policy Framework Statement. Added new Logo

Distribution List

Name	Role
Staff	All Staff employed by Digital Modus must-read.
Contractors	All people involved on behalf of a subcontractor contracting with Digital Modus must-read.
Suppliers	Shared with Suppliers as part of Digital Modus supplier onboarding.
Customers	Shared with all Customers on request.

Introduction

Digital Modus is committed to promoting equality and diversity in all aspects of its work. We aim to create an inclusive and diverse environment where all individuals are treated with dignity and respect, regardless of their age, disability, gender, race, religion or belief, sexual orientation or any other characteristic protected by law. We encourage our employees to actively support and uphold this policy.

We are pleased to confirm that Digital Modus is recognised as a Disability Confident Committed (Level 1) employer. This accreditation reflects our commitment to adopting inclusive, accessible, and fair recruitment and employment practices. As part of the scheme, we have pledged to ensure that our recruitment processes are inclusive and accessible, to offer an interview to disabled applicants who meet the minimum criteria for a role, to anticipate and provide reasonable adjustments as required, and to promote a culture of inclusivity and respect.

1. Purpose

The purpose of this policy is to serve as a guiding document that outlines our commitment to fairness, inclusivity and equal opportunities. It helps prevent discrimination, promotes a positive environment, and can lead to improved workplace dynamics.

2. Scope

This policy applies to all employees, contractors, clients, customers, and any other individuals associated with Digital Modus.

3. Responsibilities

Senior Leadership: Senior leaders are responsible for setting the tone, promoting diversity, and ensuring compliance with this policy.

Line Managers: Line managers are responsible for implementing this policy within their teams, addressing concerns promptly, and providing support to employees.

All employees: All employees are responsible for treating each other with respect and promoting equality and diversity within the workplace.

4. Principles

Digital Modus is dedicated to:

- a) Treating all individuals fairly and with respect, valuing diversity and promoting equality.
- b) Complying with all relevant equality legislation, including but not limited to the Equality Act 2010.
- c) Taking all reasonable steps to prevent discrimination, harassment, and victimisation.
- d) Providing equal opportunities in recruitment, training, career development, and promotion.
- e) Creating an inclusive work environment that encourages diversity and the contributions of all employees.
- f) Ensuring that our policies and practices are free from discrimination and bias.

5. Discrimination

Unlawful discrimination or harassment of other people, including current and former employees, job applicants, clients, customers, suppliers and visitors will not be tolerated. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work events including social events.

6. Bullying & Harassment

Digital Modus is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

6.1. What is harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

6.2. Examples of harassment.

Harassment may include, for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- offensive emails, text messages or social media content;
- mocking, mimicking or belittling a person's disability.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

6.3. What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct.

6.4. Examples of bullying.

Bullying may include, by way of example:

- physical or psychological threats;
- overbearing and intimidating levels of supervision;

- inappropriate derogatory remarks about someone's performance;

6.5. Constructive feedback

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

6.6. Raising an issue

If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure.

We will investigate complaints in a timely and confidential manner.

Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

6.7. Protection and support for those involved.

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

6.8. Record keeping

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

7. Working practices

We will consider any possible indirectly discriminatory effect of our standard working practices, including the number of hours to be worked, the times at which these are to be worked, and the place at which the work is to be carried out. When considering requests for variations to these working practices we will only refuse these if we have good reasons for doing so.

8. Part-time and fixed-term work

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

9. Disabilities

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

10. Recruitment & Selection

We are committed to recruiting and selecting candidates based on their skills, qualifications, and experience, free from bias or discrimination. For more information, please refer to our [Recruitment and Selection Policy](#).

11. Training and Development

We provide training and development opportunities to all employees, ensuring that they have equal access to career advancement.

12. Monitoring questionnaire

As part of your onboarding at Digital Modus and at regular intervals thereafter you will be asked to complete an equality, diversity and inclusion monitoring questionnaire. The data we collect from these will be used to help us make decisions that help fulfil our equality, diversity and inclusion aims.

