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OPERATING POLICIES

Gateway Psychology Operating Policies are statements on the way Gateway Psychology will operate within the Business System. They signal the values and philosophy of our Company and provide a framework of general principles for all employees, Associates and colleagues to follow.

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SIGNATORIES (signed and controlled electronically)

Dr Meryl Ann Forse

Dr M.A. Forse – Managing and Clinical Director

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1. SCOPE OF POLICY

This Equality, Diversity and Equal Opportunities Policy applies to all employees, workers, Contracted Associates, agency workers, contractors and other individuals undertaking work on behalf of Gateway Psychology Limited (“the Company”).

The principles of this policy also apply to the way in which Gateway Psychology provides services to clients, children, young people, families, carers, commissioners and other people who access or engage with our services.

All staff and Associates are expected to understand and comply with this policy and to promote equality, dignity, inclusion and respect in their work.

2. WHY WE NEED A POLICY

Gateway Psychology is committed to eliminating unlawful discrimination and promoting equality, diversity and inclusion within our workforce and the services we provide.

We are committed to providing an inclusive working and service environment in which people are treated fairly, with dignity and respect, and to meeting our responsibilities under relevant equality, employment and human rights legislation.

The Company will not unlawfully discriminate against any person because of a protected characteristic. We also recognise that people's experiences and opportunities may be affected by other aspects of their background, identity or circumstances which are not protected characteristics under the Equality Act 2010, and seek to promote fairness and inclusion more broadly as part of our organisational values.

Gateway Psychology aims to:

- fully engage with and utilise the talents of all members of staff and benefit from diversity within the workforce;
- attract, retain and develop staff and Associates with the appropriate skills, experience and values;
- provide fair and equitable employment opportunities;
- provide accessible, respectful and responsive services;
- make reasonable adjustments for disabled people where required;
- prevent and respond appropriately to discrimination, bullying, harassment, sexual harassment and victimisation; and
- maintain a reputation as a fair, responsible and inclusive employer and service provider.

Equality does not necessarily mean treating everybody identically. Different approaches, reasonable adjustments or additional support may be necessary to ensure equitable access, participation and opportunity.

3. KEY MANAGEMENT RESPONSIBILITIES

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- 3.1. Understand this policy and relevant legal responsibilities relating to equality, diversity and equal opportunities.
- 3.2. Ensure that employees, Associates and contractors understand this policy through appropriate communication, induction, training and familiarisation and are expected to behave in accordance with it.
- 3.3. Promote an organisational culture in which equality, diversity, dignity and inclusion are supported and discriminatory or inappropriate behaviour is challenged.
- 3.4. Ensure that employment and service-delivery practices within their areas of responsibility are fair and non-discriminatory and that reasonable adjustments are considered where required.
- 3.5. Respond appropriately to concerns regarding discrimination, bullying, harassment, sexual harassment or victimisation and ensure that concerns are directed through the appropriate Company procedure.
- 3.6. Contribute to the monitoring, review and continual improvement of relevant policies, procedures and working practices.
- 3.7. Ensure that identified concerns, risks or potential non-conformances are addressed appropriately and escalated to Senior Management where necessary.

4. DETAILS OF THE POLICY

4.1. Key Legislation

Key legislation and statutory requirements relevant to this policy include:

- Equality Act 2010;
- Human Rights Act 1998;
- Employment Rights Act 1996, as amended;
- Worker Protection (Amendment of Equality Act 2010) Act 2023;
- Employment Relations (Flexible Working) Act 2023 and associated Regulations;
- Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000;
- Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002;
- Trade Union and Labour Relations (Consolidation) Act 1992; and
- relevant provisions of the Employment Rights Act 2025 as they come into force.

Gateway Psychology will also have regard to relevant statutory Codes of Practice and guidance issued by bodies including the Equality and Human Rights Commission (EHRC) and ACAS.

This list is not exhaustive and this policy will be reviewed in response to significant changes in legislation or statutory guidance.

The Equality Act 2010 provides protection against unlawful discrimination, harassment and victimisation in areas including employment and the provision of services. It also places duties on employers and service providers to make reasonable adjustments for disabled people in circumstances specified by the Act.

The Worker Protection (Amendment of Equality Act 2010) Act 2023 introduced a preventative duty requiring employers to take reasonable steps to prevent sexual harassment of employees in the course of their employment.

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Part-time and fixed-term workers are protected from less favourable treatment in circumstances specified by the relevant Regulations.

The Human Rights Act 1998 incorporates rights under the European Convention on Human Rights into UK law and is relevant to Gateway Psychology's commitment to dignity, respect and non-discrimination.

Relevant immigration and right-to-work requirements are addressed within Gateway Psychology's Recruitment of Staff Policy.

4.2 Protected Characteristics

The Equality Act 2010 identifies nine protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Gateway Psychology will not tolerate unlawful discrimination, harassment or victimisation in relation to employment or the provision of its services.

Protection may also apply where a person is treated less favourably because they are perceived to have a protected characteristic or because of their association with another person who has a protected characteristic.

Unlawful discrimination may include:

- **Direct discrimination** – treating someone less favourably because of a protected characteristic.
- **Indirect discrimination** – applying a provision, criterion or practice which places people sharing a protected characteristic at a particular disadvantage and which cannot be objectively justified.
- **Discrimination arising from disability** – treating a disabled person unfavourably because of something arising in consequence of their disability where the treatment cannot be objectively justified.
- **Failure to make reasonable adjustments** – failing to take reasonable steps to remove or reduce a substantial disadvantage experienced by a disabled person where the legal duty applies.
- **Harassment** – unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- **Sexual harassment** – unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

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- **Victimisation** – subjecting a person to a detriment because they have carried out, or are believed to have carried out, a protected act, such as making or supporting a complaint of discrimination.

4.3 Our Clients

Our clients will be treated fairly, with dignity and respect and in accordance with applicable equality legislation.

Gateway Psychology recognises that providing an equitable service does not necessarily mean providing an identical service to every person. Individual needs and circumstances will be considered when planning and delivering services.

Where relevant, consideration will be given to factors including:

- age and developmental stage;
- disability and neurodivergence;
- communication and language needs;
- sensory needs;
- culture, ethnicity and heritage;
- religion or belief;
- sex, gender and sexual orientation where relevant;
- family structure and relationships;
- literacy and understanding;
- accessibility requirements; and
- the impact of trauma and previous experiences upon engagement with services.

These factors will be considered without stereotyping or making assumptions about an individual's identity, experiences, needs or preferences.

Reasonable adjustments will be made for disabled clients and service users where required. These may include adjustments to the physical environment, appointment arrangements, communication methods, information provided or the way in which a service is delivered.

Where appropriate and reasonably practicable, Gateway Psychology will facilitate accessible information, communication support or interpreting arrangements.

Children, young people and families will be supported to understand information provided to them and to participate meaningfully in decisions affecting their care, taking account of age, developmental level, communication needs and capacity.

Clinical decisions may legitimately take account of an individual's clinical presentation, developmental needs, risks and the scope and competence of the service. Such decisions must be based upon relevant clinical considerations and must not constitute unlawful discrimination.

4.4 Recruitment and selection

The Company will seek to attract applicants from all sections of society and ensure that equality principles are applied throughout recruitment and selection.

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This will include:

- ensuring job descriptions, person specifications, advertisements and related documentation are relevant to the role and do not contain unjustifiably discriminatory requirements;
- communicating relevant requirements to recruitment and employment agencies used by the Company;
- shortlisting applicants against objective and relevant criteria;
- asking relevant, fair and appropriately consistent questions at interview;
- considering reasonable adjustments required by disabled applicants to participate in recruitment and selection;
- keeping appropriate records of recruitment and selection decisions; and
- periodically reviewing recruitment and selection practices to identify and address potential discriminatory barriers.

Questions regarding personal circumstances or protected characteristics will not be asked unless there is a legitimate and lawful reason for doing so.

Questions about health or disability before an offer of employment will only be asked in circumstances permitted by the Equality Act 2010, including where necessary to:

- establish whether an applicant requires reasonable adjustments to participate in the recruitment process;
- establish whether an applicant is able to undertake a function intrinsic to the role, with reasonable adjustments where appropriate;
- undertake lawful equality monitoring; or
- support lawful positive action where applicable.

Equality monitoring information will be kept appropriately separate from information used to make recruitment and selection decisions.

Following a conditional offer, appropriate health information may be requested where relevant to establish fitness to undertake the role and identify reasonable adjustments which may be required. Health and disability information will be handled sensitively and in accordance with the Company's Confidentiality and Data Protection Policy.

Right-to-work and other pre-employment checks will be undertaken consistently and in accordance with the Recruitment of Staff Policy.

4.5 Performance and Development Reviews

Decisions regarding performance, development, promotion, transfer and career opportunities will be made fairly and without unlawful discrimination.

All relevant members of staff are expected to participate in the Company's Performance and Development Review process. Reviews should provide an opportunity for constructive discussion regarding performance, development needs, objectives and appropriate support.

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Performance management processes will be conducted fairly and consistently, taking account of relevant individual circumstances and reasonable adjustments where required.

Managers should ensure that disability, family-related leave, working arrangements or other relevant circumstances do not result in unjustified disadvantage when assessing performance or development opportunities.

4.6 Working Hours, Flexible Working, Pay and Benefits

Members of staff will be treated fairly in relation to working hours and working arrangements and will not be subjected to unlawful discrimination because of their working pattern or protected characteristics.

Employees have a statutory right to request flexible working from the first day of employment. Requests will be considered fairly and reasonably in accordance with current legislation, ACAS guidance and relevant Company procedures.

A request to alter working arrangements because of a disability may constitute a request for a reasonable adjustment and may therefore give rise to separate legal obligations. Such requests will not be considered solely under flexible working arrangements.

Pay and benefit decisions will be based on legitimate factors such as the requirements and responsibilities of the role, relevant skills and qualifications, performance and appropriate market considerations. Decisions will not be based upon protected characteristics.

Part-time and fixed-term staff will not be subjected to unlawful less favourable treatment because of their employment status.

4.7 Training, Development and Promotion

The Company recognises the importance of training and development in supporting staff performance, professional development and progression.

Gateway Psychology will seek to ensure fair access to appropriate training and development opportunities, subject to organisational requirements and individual development needs.

Managers are responsible for ensuring that decisions concerning training, development, promotion and transfer are based upon relevant skills, experience, qualifications, performance, development needs and the requirements of the role.

Reasonable adjustments will be considered where necessary to enable disabled staff to access and participate in training and development opportunities.

4.8 Facilities, Dress Code and Personal Appearance

Working spaces and facilities will, as far as reasonably practicable, be suitable for the work required and accessible to those using them.

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Reasonable adjustments to facilities, equipment or working arrangements will be considered for disabled staff, applicants and service users where required.

The Company does not operate a specific uniform. Staff are expected to dress in a manner appropriate to their role and the professional context in which they work.

Any expectations regarding dress or personal appearance will be applied fairly and sensitively, with appropriate consideration given to disability, religion or belief, sex and other relevant protected characteristics.

4.9 Bullying and Harassment

Gateway Psychology does not tolerate bullying, unlawful harassment, sexual harassment or victimisation.

Bullying may include offensive, intimidating, malicious or insulting behaviour or an abuse or misuse of power which undermines, humiliates or causes harm to another person.

Bullying may be verbal, non-verbal, physical or written and may take place in person or through telephone calls, email, messaging services, social media or other digital communications.

Bullying should not be confused with legitimate and reasonable management action, including constructive feedback, appropriate supervision, performance management or warranted criticism of performance or behaviour.

Examples of bullying may include:

- verbal or physical threats or intimidation;
- personal insults or persistent inappropriate criticism;
- shouting, abusive behaviour or malicious gossip;
- public humiliation, ridicule or inappropriate reprimands;
- deliberately setting unreasonable or unattainable expectations;
- deliberately excluding or isolating someone;
- making malicious or knowingly false allegations;
- inappropriate physical behaviour;
- unnecessary or intrusive monitoring;
- unjustifiably removing responsibilities;
- deliberately withholding information required for someone to undertake their role; or
- persistently undermining or failing to recognise an individual's work.

Harassment is unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Harassment may consist of a single serious incident or repeated behaviour and may include verbal, non-verbal, written, physical or online conduct.

Examples may include:

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- unwanted physical contact;
- offensive comments, jokes, jibes or name-calling;
- mocking or mimicking a person's disability, accent, religion, identity or other characteristic;
- crude or offensive gestures or language;
- displaying or sharing offensive material;
- unwanted comments or communications through verbal, written, electronic or online means;
- deliberate exclusion or hostile behaviour; or
- inappropriate or intrusive attention.

A person may experience harassment even where the behaviour is not directed specifically at them.

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples may include sexual comments or jokes, unwanted sexual attention, intrusive questions, unwanted touching, sexual gestures, displaying or sharing sexual material, sexually suggestive messages or repeated unwanted requests for dates or sexual contact.

Gateway Psychology will take reasonable steps to prevent sexual harassment of employees in the course of their employment. This includes considering relevant risks, maintaining appropriate policies and reporting arrangements, providing information or training where appropriate and responding to concerns.

Inappropriate behaviour may also arise from people who are not employed by Gateway Psychology, including clients, family members, visitors, commissioners, contractors, suppliers and other professionals. Staff and Associates are not expected to tolerate discriminatory, abusive or harassing behaviour as an inherent part of their role.

Concerns regarding third-party behaviour should be reported to an appropriate manager. Gateway Psychology will consider what reasonable and proportionate action is required, taking account of the circumstances, the safety and wellbeing of staff, clinical and safeguarding considerations and the Company's legal obligations.

Harassment will not be tolerated in connection with work-related activities, whether these take place on or off Company premises, during or outside normal working hours, or through electronic or online communications.

Discrimination, bullying, harassment, sexual harassment or victimisation may constitute misconduct or gross misconduct and may result in action under the Company's disciplinary procedures.

4.10 Procedures

The following measures will be taken to support equality, diversity and equal opportunities:

- Clients and service users with disabilities, sensory or communication needs, learning disabilities or difficulties, neurodevelopmental differences, or for whom English is not their first language will be supported through appropriate and reasonably practicable access, adjustments and communication arrangements.

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- Gateway Psychology will provide appropriate equality, diversity and inclusion information and training to support staff in understanding their responsibilities under this policy.
- Individuals involved in recruitment, selection, management and supervision will be expected to understand and apply the principles of this policy.
- Recruitment, selection, promotion, training and other relevant employment practices will be reviewed periodically to identify and address potential discriminatory barriers or inequalities.
- The Company will seek opportunities, where appropriate, to engage with relevant local communities, organisations, professional networks and other groups to support inclusive recruitment and service provision.
- Reasonable adjustments will be considered for disabled staff, applicants and service users where required. Adjustments will be considered on an individual basis and the Company will not assume that individuals with the same condition, diagnosis, impairment or neurodevelopmental profile require the same support.
- Reasonable adjustments may include changes to working arrangements, physical environments, equipment, communication methods, recruitment or assessment arrangements, supervision, training or the way in which services are delivered.
- Any member of staff who believes they have experienced or witnessed discrimination, bullying, harassment, sexual harassment or victimisation is encouraged to raise the matter with their line manager or another appropriate member of management. Where appropriate and where the individual feels comfortable doing so, concerns may sometimes be resolved informally. Informal resolution is not required and may not be appropriate where allegations are serious or where the individual does not feel able to address the matter directly. Staff may use the Company's Grievance Procedure where appropriate.
- Concerns will be taken seriously and considered as promptly, sensitively and fairly as reasonably practicable. Confidentiality will be maintained as far as possible, although information may need to be shared with relevant individuals in order to investigate or respond appropriately. No person should be subjected to detrimental treatment because they have raised a genuine concern, made or supported a complaint, provided information during an investigation or otherwise exercised rights under equality legislation.
- Failure by an employee to comply with this policy may result in action under the Company's disciplinary procedures. Serious discrimination or harassment may constitute gross misconduct. Concerns involving Associates, contractors or other individuals working on behalf of Gateway Psychology will be addressed through appropriate contractual or management arrangements.
- Where a client or service user believes they have experienced discrimination or unfair treatment in relation to Gateway Psychology's services, concerns may be raised through the Company's Complaints Policy and Procedure.
- Gateway Psychology may monitor relevant equality information where lawful, appropriate and proportionate in order to identify potential inequalities and inform improvements. Any equality monitoring information will be handled in accordance with data protection requirements and will not be used to make unlawfully discriminatory decisions about individuals.
- This policy and associated practices will be reviewed periodically and following significant changes to legislation, statutory guidance, organisational arrangements or identified risks.

5 CROSS REFERENCES WITH OTHER POLICIES AND PROCEDURES

- Employment of Staff Policy

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- Grievance Procedure
- Employee Handbook
- Confidentiality and Data Protection Policy
- Complaints Policy and Procedure
- Safeguarding Children Policy and Procedure
- Safeguarding Vulnerable Adults Policy and Procedure
- Health and Safety Policy
- Social Value Policy
- relevant employment and HR procedures.

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4. CHANGE HISTORY		
Details of Change	Date of Change	Issue Level
Draft issue	3/12/2013	0
Initial Issue	22/6/2014	1
Document review – no change made	25/06/2015	2
Document review – no change made	22/05/2016	3
Document review – no change made	19/04/2017	4
Document review – no change made	20/03/2018	5
Document review – minor changes made	17/7/2019	6
Document review – no change made	09/08/2021	7
Document review – no changes made	12/07/2022	8
Document review – small amendment to 4.9 – added ‘online or offline’	24/09/2023	9
Document review – minor updates to terminology and legislative references	16/07/2024	10
Document review – minor updates to equality, diversity and inclusion provisions	22/07/2025	11
Full policy review and update to reflect current equality and employment legislation and guidance	18/08/2026	12