



Anti-Bullying and Harassment Policy

1. Policy Statement

GEODEC Limited is committed to providing a working environment that is safe, respectful, inclusive, and free from bullying, harassment, intimidation, or victimisation. All individuals have the right to be treated with dignity and respect at work.

Bullying and harassment of any kind will not be tolerated. The Company will take all reasonable steps to prevent such behaviour and will take appropriate disciplinary action where breaches of this policy occur.

This policy is compliant with the Equality Act 2010, the Protection from Harassment Act 1997, the Employment Rights Act 1996, and relevant ACAS Codes of Practice.

2. Scope of the Policy

This policy applies to all persons working for or on behalf of GEODEC Limited, including:

- Employees (permanent, temporary, full-time, part-time)
- Directors and officers
- Subcontractors and self-employed workers
- Agency workers and consultants
- Apprentices, trainees, and work placements
- Any individual representing the Company

The policy applies to conduct:

- In the workplace
- On client sites
- During work-related travel
- At work-related social events
- In online, digital, or remote working environments (including email, messaging platforms, and social media where work-related)

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VAT Number: 507501225
Registered in England and Wales



3. Definitions

3.1 Bullying

Bullying is offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates, or causes distress to another person.

Examples include (but are not limited to):

- Persistent criticism or unreasonable demands
- Shouting, verbal abuse, or aggressive behaviour
- Spreading malicious rumours or gossip
- Excluding or isolating an individual deliberately
- Undermining work performance through unfair treatment
- Abuse of authority or position

3.2 Harassment

Harassment is unwanted conduct related to a protected characteristic under the Equality Act 2010 that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Protected characteristics include:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

Harassment may be a single incident or a pattern of behaviour.

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4. Responsibilities

4.1 The Company

GEODEC Limited will:

- Promote a culture of dignity and respect
- Take all complaints seriously and investigate them promptly
- Ensure confidentiality is maintained as far as reasonably possible
- Protect individuals from victimisation for raising concerns
- Apply disciplinary measures where appropriate

4.2 Managers and Supervisors

Managers and supervisors are responsible for:

- Leading by example
- Preventing bullying and harassment within their areas of responsibility
- Addressing inappropriate behaviour promptly
- Supporting individuals who raise concerns

4.3 All Workers

All individuals working for or on behalf of the Company must:

- Treat others with respect
- Refrain from bullying or harassing behaviour
- Cooperate fully with any investigation

5. Reporting Bullying or Harassment

Any individual who believes they are being bullied or harassed is encouraged to raise the matter as early as possible.

Concerns may be reported to:

- A Line Manager or Supervisor
- A Director of GEODEC Limited
- The Health & Safety or Compliance Lead

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Reports may be made verbally or in writing. Individuals may be accompanied by a colleague or representative at any formal meeting.

6. Informal Resolution

Where appropriate and with the agreement of the individual concerned, issues may be addressed informally. This may include:

- A facilitated discussion
- Mediation
- Clear guidance to the individual whose behaviour is causing concern

Informal resolution will not be appropriate for serious allegations.

7. Formal Procedure

Where informal resolution is not appropriate or has been unsuccessful, the matter will be dealt with under the Company's formal disciplinary or grievance procedures.

The formal process will include:

- A fair and impartial investigation
- The opportunity for all parties to be heard
- Consideration of evidence
- A written outcome

Disciplinary action may include:

- Formal warnings
- Mandatory training
- Suspension
- Termination of employment or contract

8. Victimisation

Victimisation of any individual who raises a complaint, supports another person's complaint, or participates in an investigation is strictly prohibited and will be treated as a serious disciplinary offence.

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9. Malicious or False Complaints

The Company recognises that complaints are made in good faith in the majority of cases. However, making a deliberately false or malicious allegation may result in disciplinary action.

10. Confidentiality and Data Protection

All complaints and investigations will be handled sensitively and confidentially, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Information will only be shared on a need-to-know basis and retained only for as long as necessary.

11. Support

Where appropriate, the Company will provide reasonable support to individuals affected by bullying or harassment, which may include temporary adjustments to working arrangements.

12. Policy Review

This policy will be reviewed annually or earlier if required due to changes in legislation, guidance, or Company operations.

13. Policy Status

This policy does not form part of any contract of employment and may be amended by GEODEC Limited at any time.

Signed By:

George Ryan Matthews

19th December 2025

office@geodec.co.uk

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