



Whistleblowing Policy

Policy No: SP0007

Effective Date	03 December 2018
Revision Number	5
This Revision Status	Final
Summary Purpose	Allow employees to report work-related misconduct or serious concerns, in good faith, freely and without fear of reprisal.
Summary Scope	All David MacBrayne Group employees
Policy Owner	Nicola Hurrell, Head of HSQE
DML Board Approved	01 September 2026





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1. Employing Companies Definition

The Employing Companies are committed to deal responsibly, openly and professionally with any concerns pertaining to our service and the environment in which we operate

Employing Companies

- David MacBrayne Limited
- CalMac Ferries Limited
- Caledonian MacBrayne Crewing (Guernsey) Limited
- David MacBrayne HR (UK) Limited and Argyll Ferries Limited
- Employees – all employees employed by the Employing Companies
- Human Resources – the Human Resources Department of David MacBrayne HR (UK) Limited

2. What This Policy Covers

All of us at one time or another have concerns about what is happening at work.

Usually, these concerns are easily resolved. However, when they are about unlawful conduct, financial malpractice, or dangers to the public or the environment, it can be difficult to know what to do.

Examples of behaviour or actions that might be interpreted as misconduct include:

- criminal offences;
- non-compliance with legal obligations;
- actions which endanger the health, safety or wellbeing of others;
- environmental damage;
- attempts to conceal wrongdoing;
- fraud, corruption or misuse of public funds, including stealing from the organisation, claiming money someone is not entitled to, falsifying records, accepting bribes, or using a position improperly for personal gain;
- abuse, bullying, harassment or victimisation of others;
- systemic failures to prevent harassment or discrimination;
- repeated incidents of customer, passenger or service-user harassment where appropriate action has not been taken;
- harassment, discrimination or victimisation by third parties including contractors, suppliers, agency workers, visitors and customers; and
- retaliation against individuals who report concerns.

It should be emphasised that this list is by no means exhaustive and that any other conduct causing concern should be reported.

You may be worried about raising such issues or may want to keep the concerns to yourself, perhaps feeling it is none of your business or that it is only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the organisation.



You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

The Company have introduced this policy to enable you to raise your concerns about such malpractice at an early stage and in the right way. We would rather that you raised the matter when it is just a concern rather than wait for proof.

If something does not seem right, or you are unsure whether a concern is serious enough to raise, we encourage you to speak up.

We would rather hear about concerns early so that they can be understood and addressed appropriately.

If, however, you are aggrieved about your personal position, please go to the [Grievance Policy](#) available on the Company Management System.

This Whistleblowing policy is primarily for concerns where the interests of others or of the organisation itself are at risk.

The supporting [Speaking Up and Raising Concerns Procedure](#) explains what will happen after a concern is raised and how concerns are assessed, investigated and resolved.

Why Speaking Up Matters

As a publicly funded organisation, we are accountable for the proper use of public money and for providing safe, reliable and trusted services to the communities we serve.

Everyone who works for or with the business has an important role in helping us identify concerns, prevent harm and improve how we operate.

Speaking up helps protect our employees, customers, communities, public resources and the reputation of the organisation.

We want people to feel confident raising concerns if something does not seem right.

This Policy should be read in conjunction with the [Speaking Up and Raising Concerns Procedure](#), which sets out the arrangements for reporting, assessing, investigating and resolving whistleblowing concerns, including the support available to individuals who raise concerns in good faith.

What is a Whistleblowing Concern?

A whistleblowing concern is the disclosure of information which an individual reasonably believes is in the public interest and tends to show that wrongdoing has occurred, is occurring, or is likely to occur. The individual does not need to have proof of wrongdoing but should have a reasonable belief that the information provided indicates a genuine concern that merits investigation.

Concerns that relate solely to an individual's personal employment circumstances will normally be addressed through the Grievance Policy or other relevant procedures unless they indicate a wider organisational issue, risk, legal breach, or systemic failing.

Examples of Concerns Appropriate for Whistleblowing

Examples of concerns that may be reported under this Policy include:

- health and safety breaches;
- environmental incidents;
- fraud, corruption or financial malpractice;
- misuse of public funds, including stealing from the organisation or claiming money not entitled to



- falsifying records,
- accepting bribes or using a position improperly for personal gain.
- criminal offences;
- breaches of legal or regulatory obligations;
- systemic bullying, harassment or discrimination;
- failure to take reasonable steps to prevent harassment, sexual harassment or discrimination;
- failure to investigate allegations of harassment, discrimination or victimisation appropriately.
- repeated customer or passenger harassment of employees where management action has been inadequate;
- harassment or discrimination by contractors, suppliers, visitors or other third parties;
- retaliation against individuals who have raised complaints;
- attempts to conceal any of the above.

If in doubt – raise it!

3. Scope

3.1 Employees

This Policy applies to all employees, including permanent, temporary, fixed-term, part-time, and seasonal staff, as well as contractors and agency workers engaged by the Employing Companies.

The Whistleblowing Policy is intended for raising concerns where there is a risk to others, the organisation, or the wider public. This includes serious wrongdoing, breaches of legal obligations, unlawful acts, and failures to meet statutory duties, including matters related to sexual harassment and other unlawful conduct under the Worker Protection (Amendment of Equality Act 2010) Act 2023.

The Policy is aligned with the protections provided under the Public Interest Disclosure Act 1998 (PIDA) and provides protection for employees making qualifying disclosures in the public interest, safeguarding them from victimisation, retaliation, or adverse treatment by their Employing Company.

Concerns relating to sexual harassment may be raised under this policy where they reflect systemic issues, serious misconduct, or a failure to meet legal duties to prevent harassment.

Concerns relating to bullying, harassment, discrimination, customer harassment or third-party harassment may also be raised under this policy where the concern relates to:

- a pattern of behaviour affecting multiple individuals;
- a failure to investigate complaints appropriately;
- a failure to implement reasonable preventative measures;
- retaliation against individuals raising concerns; or
- organisational practices that may place employees at risk or result in breaches of legal obligations.

Individual complaints that relate solely to a person's own employment circumstances will normally be managed under the Grievance Policy, Harassment and Bullying Policy, or other relevant procedures. However, concerns that indicate wider organisational failings, systemic issues, significant risks to employees, or breaches of legal obligations may be raised under this Whistleblowing Policy.



The Policy will be reviewed annually, and confidential information may be retained to support ongoing improvement of procedures.

3.2 Our assurances to you

3.2.1 Our Commitment to you

The Employing Companies are committed to this Policy.

If you raise a genuine concern under this Policy, you will not be at risk of losing your job or suffering any form of retribution as a result.

The Employing Companies will take appropriate steps to protect individuals who raise concerns in good faith.

Depending on the circumstances, this may include:

- monitoring for signs of victimisation or detriment;
- temporary changes to reporting arrangements;
- temporary adjustments to duties where appropriate;
- access to employee wellbeing resources;
- referral to occupational health or employee assistance services; and
- access to trade union representation or workplace support arrangements.

Provided you are acting in good faith, it does not matter if you are mistaken. Of course, we do not extend this assurance to someone who maliciously raises a matter they know is untrue.

3.2.2 Your confidence

We will not tolerate the harassment or victimisation of anyone raising a genuine concern and in any such instances the offender will be subject to the Employing Companies disciplinary procedures which may lead to dismissal. However, we recognise that you may nonetheless want to raise a concern in confidence under this Policy. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity, we will discuss with you whether and how we can proceed.

Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter or to protect your position or to give you feedback. Anonymous concerns will be considered and, where sufficient information is available, investigated wherever reasonably practicable. However, anonymous reporting may limit our ability to investigate fully, provide feedback, or implement protective measures for the individual raising the concern.

Employees are encouraged to identify themselves wherever possible, as this will assist the investigation and enable appropriate support to be provided.

All whistleblowing concerns will be assessed and investigated in a manner that is:

- independent;
- objective;
- proportionate to the risk identified;
- confidential so far as reasonably practicable;
- undertaken by appropriately trained individuals; and
- free from conflicts of interest.



4. Raising Concerns

Employees may raise concerns through a range of channels including line management, senior management, Human Resources, the Speak Up arrangements and other escalation routes detailed within the Speaking Up and Raising Concerns Procedure.

The organisation encourages concerns to be raised at the earliest opportunity so they can be appropriately assessed and addressed.

For full details of reporting routes, investigation arrangements, timescales and support available to whistleblowers, refer to the Speaking Up and Raising Concerns Procedure.

5. Independent Advice

If you are unsure whether to use this policy or you want independent advice at any stage, you may contact either

- Your Union
- The independent charity **Public Concern at Work** on 020 3117 2520 or go to their website <https://protect-advice.org.uk/>.

Their lawyers can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work.

6. External Contacts

While we trust this Policy gives you the reassurance you need to raise such matters internally, we recognise that there may be circumstances where you can properly report matters to outside bodies, such as regulators or the police.

Protect (formerly Public Concern at Work) (or your Union) will be able to advise you on such an option and on the circumstances in which you may be able to contact an outside body safely.

7. If You Are Dissatisfied

If you are unhappy with our response, remember you can go to the other levels and bodies detailed in this Policy. While we cannot guarantee that we will respond to all matters in the way that you might wish, we will try to handle the matter fairly and properly. By using this Policy, you will help us to achieve this.

8. Document Review

The Policy Owner is responsible for reviewing this document in consultation with other members of the Executive. Notwithstanding above, all personnel have a responsibility to use this document critically and to forward any suggestions for its improvement through management line or use the Feedback function in the SharePoint Company Management System.

Governance & Oversight

The Audit and Risk Committee will receive periodic anonymised information relating to whistleblowing disclosures, emerging themes, investigation outcomes and organisational learning to support effective governance and oversight.

Organisational Learning

Information arising from whistleblowing concerns may be analysed on an anonymised basis to identify recurring issues, cultural concerns, harassment risks, health and safety trends, compliance weaknesses and opportunities for organisational improvement.

Lessons learned may be used to improve policies, procedures, training and risk controls.



9. Document Change Information

The table below notes the changes made since the document was previously published.

Date of Change	What Changed	Who Changed (Title)	Who Whanged (Name)
19 September 2021	Contact information updated, Policy changes approved at DML Board 15 June 2022	Company Management Specialist	Janice Lowles
06 July 2023	Policy content reviewed with no material changes. Template updated. Director name changed	Company Management Specialist	Gabriela Soriano
11 January 2024	Policy content transferred to branded template; Policy number updated from HSQE 0004 to SC 0002; paragraph numbering adjusted; no content changes.	Company Management Specialist	Janice Lowles
19 August 2024	Policy content reviewed. Managing Director changed to Chief Executive Officer. Policy Owner changed from Graeme Baillie, Head of Governance, Risk and Assurance to Nicola Hurrell, Head of Quality and Risk.	Quality and Risk Administrator	Ann Marie McLoughlin
25 June 2025	Content reviewed; policy number updated from SC0002 to SP0007; policy owner title updated.	Head of HSQE	Nicola Hurrell
29 April 2026	Section 3.1: Content revised & updated to reflect new legislation. Section 4.2: Content revised All: Reviewed hyperlinks for functionality & updated Company document formatting.	Process and Documentation Manager	Lainey McGowan
01 September 2026	Policy comprehensively reviewed and updated to align with the new Speaking Up and Raising Concerns Procedure. Content expanded to clarify the scope and definition of whistleblowing concerns, including harassment, discrimination, third-party concerns and misuse of public funds; strengthen protections, confidentiality and anonymous reporting arrangements; clarify reporting and escalation routes; and introduce additional requirements for investigation principles, governance oversight and organisational learning.	Head of HSQE	Nicola Hurrell