



Harassment and Bullying Policy and Procedure

Policy No: HR0010

Effective Date	15 August 2016
Revision Number	5
This Revision Status	Final
Summary Purpose	Explains the policy and procedure to be followed in respect of harassment and bullying.
Summary Scope	All David MacBrayne Group employees, Agency Workers and Contractors
Policy Owner	Patricia Harwood, HR Business Partner
DML Board Approved	01 September 2026





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1. Purpose

The Company (meaning David MacBrayne Limited, CalMac Ferries Limited, Caledonian MacBrayne Crewing (Guernsey) Limited and David MacBrayne HR (UK) Limited) is committed to providing a fair and harmonious working environment in which everyone is treated with respect and dignity and in which no individual feels bullied, threatened or intimidated. The aim of this policy is to prevent harassment and bullying in the workplace which includes harassment and bullying by other workers or by third parties you encounter while doing your job.

In accordance with the Equality Act 2010, the Company will not permit harassment of employees by third parties and will take all reasonable steps to prevent such harassment. Third parties may include passengers and customers, contractors, suppliers, visitors, members of the public and users of online or social media channels encountered in connection with work. The Company will identify foreseeable risks and maintain proportionate preventative and response controls through its relevant employment, operational, contractual and customer conduct arrangements.

This policy has been developed to protect all employees, consultants, contractors, customers or visitors from harassment or bullying at work in any form. It is unacceptable behaviour and will not be permitted or condoned and will be viewed as a gross misconduct offence which may result in dismissal without notice. Whilst any form of sexual harassment is also treated in the same way, there is a separate policy for dealing specifically with any form of sexual harassment which can be accessed here – [Sexual Harassment Policy](#)

2. Scope

This policy applies to all employees, agency workers, consultants and contractors working for or on behalf of the Company.

It protects those within scope from bullying and harassment arising in connection with work, whether the conduct is by another member of the workforce or by a third party.

Third parties may include passengers, customers, suppliers, contractors, visitors, members of the public and users of online or social media channels. Where inappropriate conduct involves a third party, the matter will be managed through the relevant contractual, operational or customer conduct arrangements, including the Company's Conditions of Carriage where applicable..

3. Policy

It is the policy of CalMac Ferries Limited that any breach of the Policy will be taken very seriously and may lead to investigation and disciplinary action under the Company's Disciplinary Procedure, up to and including summary dismissal for gross misconduct.

CalMac Ferries Limited will comply with Equality Act 2010 and CalMac Ferries Limited will provide an environment where this behaviour will not be tolerated.

3.1 Implementation

The Company will ensure compliance with the applicable legislation by;

- Taking steps to ensure that all employees understand their rights and responsibilities in relation to bullying and harassment, including through regular training and access to relevant resources.



- Sharing clear and visible information about the company's harassment and bullying policy and zero tolerance to inappropriate behaviours in common areas, such as noticeboards, Gangway pages, Manager's Toolkit and induction materials.

3.2 What is Harassment and Bullying?

Harassment and bullying detract from a productive working environment and can impact on the health, confidence, morale and performance of those affected by it, including anyone who witnesses or has knowledge of the unwanted or unacceptable behaviour.

3.3 Definition of Harassment

Harassment under the Equality Act 2010 is unwanted conduct related to age, disability, gender reassignment, race, religion or belief, sex or sexual orientation which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

When considering whether conduct has had this effect, account will be taken of the perception of the person affected, the other circumstances of the case and whether it is reasonable for the conduct to have that effect. The conduct does not need to have been intended to cause offence or distress in order to amount to harassment.

The Company also prohibits bullying or other unacceptable conduct connected with any personal characteristic or status, including marriage or civil partnership and pregnancy or maternity, whether or not the conduct falls within the statutory definition of harassment.

A single incident of unwanted or offensive behaviour can amount to harassment. Some examples are given below, but many forms of behaviour can constitute harassment. These examples are:

- physical conduct, ranging from touching, pushing or grabbing to punching or serious assault
- verbal or written harassment (letter, email or text message) through jokes, offensive language, defamatory/derogatory remarks, gossip, or threats
- unwelcome sexual behaviour, including unwanted suggestions, propositions or advances
- the sending or displaying of material that is pornographic or obscene, including e-mails, text messages, video clips, photographs, posters, emblems or any other offensive material
- inappropriate posts or comments on or via social media commonly known as "cyber bullying"
- isolation, non-co-operation at work or exclusion from social activities
- coercion, including pressure for sexual favours
- inappropriate personal contact, including intrusion by pestering or spying

It should be noted that it is the impact of the behaviour that is relevant and not solely the motive or intent behind it.

3.4 Definition of Bullying

Bullying is persistent, offensive, abusive, intimidating or insulting behaviour, which, through the abuse of power, makes the recipient feel upset, threatened, humiliated or vulnerable.



Bullying can be a form of harassment and can undermine an individual's self-confidence and self-esteem and cause them to suffer stress.

Bullying can take the form of physical, verbal and non-verbal conduct. As with harassment, there are many examples of bullying, which can include:

- shouting at or humiliating others
- high-handed or oppressive levels of supervision
- unjustified, offensive and/or insulting remarks e.g. performance, appearance etc
- excluding employees from meetings, events or communications without good cause
- physical or emotional threats
- Bullying can occur in the workplace and outside of the workplace at events connected to the workplace, such as social functions or business trips.

4. Your Rights and Responsibilities

4.1 Your Rights

You have the right to work in an environment free from harassment, bullying and victimisation. The Company recognises your right to complain about harassment or bullying should it occur. All complaints will be dealt with seriously, promptly and confidentially.

Every effort will be made to protect anyone who raises a complaint, provides evidence or information, or otherwise participates in the complaint process from further bullying, harassment, victimisation or retaliation. Any allegation of victimisation or retaliation will be taken seriously and addressed in accordance with the relevant Company policies and procedures.

4.2 Your Responsibilities

You have a responsibility to help ensure a working environment in which the dignity of everyone is respected. You must comply with this policy and you should ensure that your behaviour to colleagues and anyone connected to the Company, does not cause offence and could not in any way be considered to be harassment or bullying.

You should discourage harassment and bullying by making it clear that you find such behaviour unacceptable. You should also support colleagues who suffer such treatment and are considering making a complaint. You must alert a manager or supervisor immediately to any incident of harassment or bullying to enable the Company to deal with the matter promptly and effectively.

4.3 A Manager's Responsibilities

Managers are responsible for promoting a working environment in which bullying, harassment, sexual harassment and victimisation are not tolerated.

Managers must:

- model the standards of behaviour expected by the Company and challenge inappropriate behaviour which they witness or become aware of, whether or not a formal complaint has been made;



- take any concern relating to bullying, harassment, sexual harassment or victimisation seriously and ensure that it is promptly referred and managed in accordance with the relevant Company policy and procedure;
- support employees who raise or witness concerns and take appropriate steps to protect those involved from further harassment, victimisation or retaliation;
- identify and escalate foreseeable harassment risks within their area of responsibility, including risks arising from interaction with passengers, customers, contractors, suppliers or other third parties, and ensure that relevant preventative and operational controls are applied; and
- ensure employees are aware of the standards expected of them, the available reporting routes and any relevant training or guidance.

4.4 The Company's Responsibilities

The Company is committed to preventing bullying, harassment, sexual harassment and victimisation and to taking appropriate action where concerns arise.

The Company will:

- identify and assess foreseeable risks of harassment, including risks arising from working arrangements, workplace culture and interaction with passengers, customers, contractors, suppliers, visitors and other third parties;
- take proportionate preventative action in response to identified risks and maintain appropriate employment, operational, contractual and customer conduct controls;
- provide clear and accessible routes for employees to report bullying, harassment, sexual harassment or victimisation and ensure concerns are responded to promptly and sensitively;
- provide appropriate information, guidance and training to employees and managers on expected standards of behaviour, prevention, reporting and response;
- monitor available information and trends relating to harassment and bullying to identify recurring issues, emerging risks and opportunities for improvement;
- engage with employees and their representatives, where appropriate, when assessing risks and reviewing preventative arrangements; and
- periodically review the effectiveness of this policy and the wider controls used to prevent and respond to harassment and bullying, implementing improvements where required.

The Company's specific arrangements for preventing and responding to sexual harassment are set out in the [Sexual Harassment Policy \(HR0033\)](#).

5. Procedure for Raising a Complaint

Concerns relating to bullying, harassment, sexual harassment or victimisation may be raised with your Line Manager, another appropriate manager or your HR Business Partner.

You do not need to determine which Company policy or procedure applies before raising a concern. Any manager or HR representative who receives a report should ensure that it is promptly considered and directed to the appropriate process.



Complaints relating to bullying or harassment will normally be managed in accordance with this policy and the Company's Grievance Policy. Complaints relating specifically to sexual harassment will be managed in accordance with the Sexual Harassment Policy (HR0033).

Where appropriate, HR will advise the employee which procedure will apply and ensure that any immediate support or protective measures are considered without delay..

5.1 Non-compliance

Harassment or bullying by a third party will be addressed through the appropriate operational, contractual or customer conduct arrangements. Depending on the circumstances, action may include requiring the behaviour to cease, ending or transferring an interaction, refusal of service or carriage, removal from Company premises or vessels, customer sanctions, action under the Company's Violence and Aggression or social media arrangements, contractor or supplier escalation, or referral to the Police or another appropriate authority.

Any employee's failure to comply with this policy may result in disciplinary action being taken in line with the Company's Conduct and Standards and Disciplinary policies.

Incidents or concerns arising under this policy must be reported through the appropriate Company reporting route. Depending on the circumstances, this may include HR reporting arrangements, the Company's incident reporting system or other relevant operational processes. Incidents should only be recorded as an Accident or Near Miss where the applicable reporting definition is met.

6. Document Review

The Policy Owner is responsible for reviewing this document yearly, in consultation with other members of the Executive as required.

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.



7. 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 changed (name)
10/01/2024	Transferred to new policy template	Head of HR Services	Carol MacFarlane
28/05/2025	Included link to Sexual Harassment Policy	HR Business Partner	Patricia Harwood
18/08/2026	Policy reviewed and transferred to the latest policy template. Updated scope, harassment definitions, third-party harassment provisions, complainant protections, manager and Company responsibilities, complaint routes and reporting requirements to align with the revised Company harassment framework and forthcoming legislative requirements.	Head of HR Business Partnering	Caroline Barry