



Equality, Diversity & Inclusion Policy

Policy No: HR0007

Effective Date	15 August 2016
Revision Number	6
This Revision Status	Final
Summary Purpose	To promote the principles of equality and diversity in the Company.
Summary Scope	All David MacBrayne Group Employees. The policy also applies to agency workers and contractors whilst working for, or on behalf of, the Company
Policy Owner	Natasha Kerr, HR Business Partner
DML Board Approved	01 September 2026





Contents

1. Definitions	3
2. Scope	3
3. Responsibilities	4
3.1 All employees are responsible for:	4
3.2 Line managers are responsible for:	4
3.3 The HR team are responsible for:	4
4. Unlawful Discrimination	5
5. Career Development	5
6. Complaints	5
7. Inclusive Calmac	6
8. Document Review	6
9. Document Change Information	7



1. Definitions

The Company is committed to advancing Equality, Diversity & Inclusion and is fully dedicated to ensuring there are no acts of unlawful and unfair discrimination.

The Company aims to provide a working environment and culture which recognises and values differences between employees.

Equality: is ensuring that individuals or groups are not treated less favourably due to protected characteristics. It also means providing equal opportunities, which might involve making reasonable adjustments to accommodate different needs.

Diversity: is recognising the unique differences among people and aiming to create a workforce that reflects a wide range of backgrounds, knowledge, skills, and experiences. It's about valuing differences, not discriminating against them.

Inclusion: is making sure that everyone feels welcome, respected, and able to participate fully in all aspects. It involves creating an environment where people feel comfortable sharing their perspectives and differences.

Protected characteristics: The Equality Act 2010 legally protects individuals based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Unlawful discrimination: is legally defined as treating someone unfairly or less favourably than others because of certain personal characteristics, known as protected characteristics.

Direct discrimination: is when someone is treated less favourably than another person because of a protected characteristic.

Indirect discrimination: is when a policy or practice, though seemingly neutral, disadvantages individuals with a protected characteristic and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Reasonable adjustment: is as defined by the Equality Act 2010, changes that employers must make to remove or reduce disadvantages faced by disabled individuals. The Company is committed to making reasonable adjustments where required, in line with the Equality Act 2010.

2. Scope

The Company is committed to advancing Equality, Diversity & Inclusion and is fully dedicated to ensuring there are no acts of unlawful and unfair discrimination, whether directly or indirectly.

The Company will not tolerate discrimination on the grounds of the following 'Protected Characteristics':

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



3. Responsibilities

All employees have a responsibility for ensuring they familiarise themselves with the Company's Equality, Diversity & Inclusion Policy and that they act in accordance with the Policy at all times.

All employees within the David MacBrayne Group whether permanent, temporary, fixed term, part-time or seasonal are governed by this Policy. The policy also applies to agency workers and contractors and their staff whilst working for, or on behalf of, the Company.

3.1 All employees are responsible for:

- Understanding what constitutes discrimination.
- Acting in accordance with this policy and therefore treating colleagues with dignity at all times and not discriminating against others.
- Being proactive in their approach to ensuring discrimination within the workplace does not occur and responding to situations appropriately, to ensure the Equality, Diversity & Inclusion Policy is put into practice.
- Immediately reporting any behaviour that is identified by another individual as discriminatory.
- Requesting reasonable adjustments.

3.2 Line managers are responsible for:

- All managers must set an appropriate standard of behaviour, lead by example and ensure those they manage adhere to the policy with regard to equal opportunities.
- Implementing the policy and its associated procedures.
- Ensuring all employees are aware of their responsibilities and have received appropriate training and support.
- Not discriminating during the recruitment, training, development, promotion, rewarding and management of employees.
- Considering and implementing reasonable adjustments where required.
- Ensuring that appropriate action is taken against anyone who breaches the policy.
- Driving an inclusive culture in their teams (examples of how you could do this below):
 - Being aware of the Equality, Diversity & Inclusion strategy.
 - Becoming an Ally by joining an Inclusive CalMac Group.
 - Recognise and reward diversity & inclusive contributions.
 - Ensuring they are conscious of their language and aware of what could isolate or offend other colleagues.
 - Ensure they have taken part in Diversity training available.
 - Include Equality, Diversity and Inclusion agenda items in team meetings.

3.3 The HR team are responsible for:

- Supporting line managers in the implementation and management of the policy.
- Promoting awareness on Equality, Diversity & Inclusion.
- Reviewing the Policy.
- Proactively identifying areas for improvement.



4. Unlawful Discrimination

Unlawful discrimination of any kind in the working environment will not be tolerated and the Company will take all necessary action to prevent its occurrence.

The Company is committed to ensuring that no employee, contractor, agency worker, or job applicant experiences unlawful discrimination—whether direct or indirect—on the basis of any protected characteristic under the Equality Act 2010. This commitment applies to all aspects of employment, including:

- Recruitment and selection, including advertisements, job descriptions, interview and selection procedures.
- Training.
- Promotion and career-development opportunities.
- Terms and conditions of employment, and access to employment-related benefits and facilities.
- Grievance handling and the application of disciplinary procedures.

Harassment, sexual harassment and victimisation, as defined under the Equality Act 2010, will not be tolerated. The Company's arrangements for preventing, reporting and responding to these behaviours are set out in the Harassment and Bullying Policy and Procedure (HR0010) and Sexual Harassment Policy (HR0033).

5. Career Development

While positive measures may be taken to encourage under-represented groups to apply for employment opportunities or promotion, all jobs will be granted solely on merit.

All employees will have equal access to training and other career-development opportunities appropriate to their experience and abilities.

However, the Company will take appropriate positive action (as permitted by equal opportunities legislation) to provide specialist training and support for groups that are under-represented in the workforce and encourage them to take up training and career-development opportunities.

6. Complaints

If you believe that you have been discriminated against, you are encouraged to raise the matter as soon as possible with your manager or other senior employee in line with the Company's **Grievance Policy**. The grievance policy can be found on the Company Management System (CMS).

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If you make an allegation of discrimination, the Company is committed to ensuring that you are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under the Company's **Disciplinary Policy**. The disciplinary policy can be found on the Company Management System (CMS).



If you are accused of unlawful discrimination, the Company will investigate the matter fully. During the course of the investigation, you will be given the opportunity to respond to the allegation and provide an explanation of your actions.

Where there is evidence that a complaint was deliberately false and made in bad faith or with malicious intent, the matter may be considered under the Company's Disciplinary Policy and Procedure. A complaint which is not upheld will not, by itself, result in disciplinary action against the complainant.

If the investigation concludes that your actions amount to unlawful discrimination, you may be subject to disciplinary action, up to and including dismissal without notice for gross misconduct.

7. Inclusive Calmac

Every individual should feel respected, included and celebrated when they work for CalMac. The Inclusive CalMac steering group aims to champion, encourage and develop a sustainable culture of inclusion within CalMac.

In addition, the Women's Network was created to proactively understand what, if any, challenges and barriers exist for women to thrive, progress and sustain their careers with CalMac.

To access more information about both groups, please click [here](#).

These groups are part of a broader commitment to fostering an inclusive workplace for all employees.

8. 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.



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 changed (name)
18 August 2026	Policy reviewed following legislative gap analysis and transferred to the latest policy template. Updated harassment policy cross-references and complaint wording to align with the revised Company harassment framework	Head of HR Business Partnering	Caroline Barry