

11 Alcohol & Drug Abuse Policy

Policy Statement

The Company's success depends upon employee's contribution to the business. Employee health and well-being is of the utmost importance and the Company is committed to providing a safe and healthy working environment where all employees are supported to develop and utilise their skills and abilities to their full potential.

We aim to protect and maintain the health, safety and welfare of all employees who may be affected by their own or their colleagues' misuse of alcohol and drugs by reducing levels of drug abuse and related harm.

The Company recognises that employees may suffer from alcohol or drug related problems. This policy sets out the principles, within which the Company will usually manage alcohol or drug related problems at work, in accordance with the relevant legislation.

This policy and any associated documentation will be reviewed on a regular basis and the Company reserves the right to make changes as required.

Objectives

The aim of this policy is to protect the health and safety of employees, customers and members of the public.

Whilst this policy sets out the Company's preferred approach to dealing with alcohol and drug related problems, it is recognised and accepted that every problem is an individual case and will occur within a specific context, and as such will be dealt with on its own merits.

The objectives of this policy are to:

1. Promote a safe working environment and reduce the harm which can be caused by the inappropriate use of alcohol, drugs, solvents and other harmful drugs;
2. Provide guidelines on acceptable and unacceptable use, and procedures relating to alcohol and drug use;
3. Provide a procedure for offering support to employees for whom alcohol and other drug abuse have become a problem, either to themselves or other people.

Scope

This policy applies to all employees, including temporary, fixed term and casual workers. It also applies to contractors, agency workers, and third parties.

Principles

The Company promotes a culture in which alcohol and drug abuse is not tolerated, due to adverse effects on health & safety, productivity, attendance, Company reputation, morale and employee relations.

Employees must be 'fit for work'; those employees whose inappropriate use of alcohol or drugs (either during work, during rest breaks, or, during the hours before work) is adversely affecting their work performance will be managed and where appropriate, encouraged to seek

professional help.

The Company will seek to support employees with addiction problems, whilst ensuring that the health and safety of the employee, their colleagues and others' in the workplace is safeguarded.

The Company wishes to encourage a culture in which employees take responsibility for their own behaviour in relation to any alcohol or drug use and manage it responsibly in relation to the health and safety of all employees and their own work performance.

The policy will be applied fairly and consistently whilst allowing differing responses for individual circumstances.

Process

Limits

The Company has clear and unambiguous limits on alcohol levels in line with legislation, which will apply whilst employees are at work. These limits are:

- the presence of drugs, other than prescription, pharmaceutical or medicinal medication which does not affect work performance or concentration; or,
- more than 29 milligrams of alcohol in 100 millilitres of blood; or,
- more than 13 micrograms of alcohol in 100 millilitres of breath; or,
- more than 39 milligrams of alcohol in 100 millilitres of urine.

As a minimum standard, whilst on Company premises, during working time (including rest breaks), it is unacceptable to:

- Be in possession of any illegal drugs;
- Attempt to supply or purchase any illegal drugs;
- Be involved in the production of any illegal drugs;
- Be under the influence of any illegal drugs;
- Consume alcohol on Company premises;
- Smell of alcohol whilst on duty;
- Attempt to report for work or be unfit for work due to alcohol or drug consumption. Alcohol consumption in the hours leading up to work is tolerated provided the employee is 'fit for work' at the start of shift (subject to specified limits).

Limits on alcohol consumption should not be taken to imply that consumption to this level is encouraged. However, the Company acknowledges that certain levels are reasonable, provided behaviour or ability is not impaired or safety compromised.

Employees are encouraged to:

- Take responsibility for monitoring the effect of alcohol on themselves;
- Know their own tolerance levels / limits;
- Understand that on average, the human body rids itself of one unit of alcohol per hour and therefore employees should adapt drinking patterns according to shift start times.

Breaches of the limits set out in this policy may be deemed as Gross Misconduct and subject to disciplinary action in accordance with the Disciplinary policy. Action may be taken up to and including summary dismissal from the Company.

Legal / Prescription Pharmaceuticals

Where employees are prescribed medicines or are taking non-prescription over-the-counter medicines they must take steps to understand the effect these drugs may have upon their performance. Care should be taken to read any packaging, instruction and contraindications. Where an employee is unsure as to whether their ability may be affected, advice should be sought from a qualified person (Doctor, Pharmacist or Occupational Health).

It is the employee's responsibility to advise their manager if they are taking any medication that:

- May cause drowsiness or effect the employee's alertness;
- Should not to be consumed if driving a motor vehicle or operating machinery;
- They believe may affect their work performance in any way.

Employees that fail to advise management may be subject to disciplinary action in accordance with the Disciplinary policy. Action may be taken up to and including summary dismissal from the Company.

Working Off-Site

Employees working at Client's sites should comply with their Alcohol and Drug Abuse policy.

The limits described in this policy also apply in circumstances where individuals are away from their normal place of work, e.g. training courses. Employees are responsible for ensuring that their behaviour resulting through the use of alcohol is appropriate as Company representatives. Home based employees must be fit for work during working hours.

Social Events

Employees attending work related social events, including those outside of normal working hours are trusted to act responsibly and within the law.

The reasonable consumption of alcohol at official on-site staff functions is permitted, however employees must act responsibly and within the law.

At all work related social events, employees must avoid any actions that could result in a complaint, an act of Gross Misconduct or Misconduct, or could harm the Company's reputation. Employees must also ensure they remain 'fit for work' the following day.

Testing

Testing may be carried out to establish levels of alcohol or drugs in accordance with the strict industry guidelines.

The count back method may be applied. For example, should an employee test below the alcohol limit but the Company can establish the employee would have been over the limit at any point during their shift, then the Disciplinary policy may be applied.

Testing will always be conducted by suitably qualified / trained personnel.

Employees will not be permitted to return to work until the test proves negative or within specified limits.

Testing circumstances:

- **Pre-employment:** prior to the employee commencing employment;

- **Post incident:** immediately after an accident, incident or 'near miss';
- **With cause:** where an employee's behaviour, conduct, demeanour or appearance gives reasonable cause for suspicion;
- **Routine:** as part of routine medical examinations;
- **Support programme:** following treatment for a dependency issue;
- **Random:** individuals selected at random;
- **Voluntary:** where an employee volunteers to be tested.

Testing methods:

- **Urine:** the most common type of test. Usually the sample is sent to a laboratory for a full alcohol and drug analysis;
- **Oral Secretion:** a swab is placed in the donor's mouth, absorbing oral fluid. Alcohol testing usually provides instant results whilst drug testing is usually sent to a laboratory for a full analysis;
- **Breath:** provides immediate results for alcohol levels. A positive result is usually followed by a second test to confirm initial findings;
- **Blood:** commonly used for drug testing and is sent to a laboratory for a full analysis;
- **Hair:** provides much long detection windows (up to 90 days) hence it is generally used to confirm abstinence for individuals undergoing treatment.

Employees will be informed what tests are being carried out and for what purpose. Employees should provide photographic proof of identification before the test begins.

Employees have the right to refuse a test. However, employees refusing to co-operate with the testing procedure may be subject to disciplinary action in accordance with the Disciplinary policy. Action may be taken up to and including summary dismissal from the Company.

Positive results, above the limits set out in this policy, may be subject to disciplinary action in accordance with the local Disciplinary policy. Action may be taken up to and including summary dismissal from the Company.

Searches

Employees may be subjected to personal searches. Employees refusing to co-operate with the search procedure may be subject to disciplinary action.

Education And Training

Excessive alcohol and drug abuse can be harmful to the body and mind. Simultaneous use of alcohol and drugs can be particularly dangerous.

There are many underlying causes of alcohol and drug abuse. E.g.

- Stress (personal or work related);
- Long working hours;
- Depression;
- Low self-esteem;
- Health problems / medical conditions (including psychiatric);
- Life events (e.g. bereavement, divorce, personal relationship problems etc);
- Lifestyle choice.

There are some general signs of alcohol or drug abuse, which are variable depending on the type of drug. E.g.

Physical Signs

- Smelling of alcohol or something to disguise the smell of alcohol, such as strong mints or aftershave / perfume;
- General neglect of appearance including personal hygiene;
- Hand tremors, slurred speech or facial flushing, especially after rest days;
- Confusion;
- Sleepiness, vague / distant manner;
- Poor co-ordination and balance;

Personality Changes

- Sudden mood changes;
- Sudden changes in behaviour pattern;
- Moodiness, apathy, depression, irritability or aggression (including violence);
- Tendency to blame others for shortcomings at work and to over react to real or imagined criticism;
- Paranoia;

Absenteeism and Timekeeping

- Poor timekeeping;
- Poor attendance, particularly after / before rest days;
- Prolonged meal breaks;
- Unexplained absences;

Reduced Work Performance

- Increase in accidents;
- Increase in mistakes / errors;
- Periods of very high and very low energy or productivity;
- Reduced quality / quantity of work;
- Difficulty concentrating or following instructions;
- Missed deadlines / appointments;

Relationships

- Poor relationships with colleagues.

This list is not exhaustive.

The above signs may also be caused by other factors.

The Company wishes to demonstrate a continuing commitment to awareness training and other education regarding alcohol and drug abuse.

Dependency

All employees are encouraged to inform their manager of any alcohol or drug dependency problems before it starts to affect performance.

In addition, all employees are encouraged to seek professional help if they have any issues with alcohol or drug dependency.

The Company will seek to support employees with addiction problems, provided they:

- Admit their dependency;
- Cooperate with the Company;
- Have not committed an act of Misconduct or Gross Misconduct;
- Agree to a programme of support.

Deliberate disregard of the policy or declining support may result in a less tolerant / sympathetic approach.

Each programme of support will be individual, however, in general terms, addiction problems will be treated constructively and as far as is reasonable, sympathetically, in the same way as other health problems. Employees may be permitted time off for rehabilitation programmes, counselling and medical treatment. Testing may still take place.

However, if individuals fail to acknowledge their problem, are positively tested, discontinue treatment or fail to comply with this policy or a subsequent programme of support, the matter may be treated as a disciplinary issue in accordance with the Disciplinary policy. Action may be taken up to and including summary dismissal from the Company.

Whistle Blowing

Employees are not permitted to cover up a colleague's potential alcohol or drug problem. Employees found to be colluding or covering up a potential issue may be subject to action taken under the Disciplinary policy. Action may be taken up to and including summary dismissal from the Company.

Employees who are aware of a potential problem with a colleague should inform his / her manager immediately to avoid any risks to health and safety. Where an employee does not feel able to confide in internal management, the Whistle blowing procedure should be applied.

Dealing With Breach Of Policy

Breaches of any aspect of this policy or the limits set out in this policy, may be subject to action in accordance with the Disciplinary policy. Action may be taken up to and including summary dismissal from the Company.

Under normal circumstances, where an employee is suspected of Misconduct or Gross Misconduct, the employee may be tested (where applicable) and searched. In Gross Misconduct cases the employee may also be suspended on full pay pending further investigation and if supporting evidence is found during the investigation, summarily dismissed.

If an employee is suspected of possessing, supplying or producing illegal drugs at work the Company is required by law to notify the police.

Where any other illegal activity occurs (e.g. where an employee is under the influence of an illegal drug), the Company reserves the right to notify the police.

Confidentiality

Individual cases will remain confidential to the employee's manager, and third party support services. Other members of the management team will be informed only for the purpose of health and safety compliance, rehabilitation programmes and employee support.

If third parties are involved in testing procedures / processing of results, data will be stored and processed confidentially, ensuring data is protected at all time. In all circumstances, employee's sensitive data will be maintained in accordance with the Data Protection Regulations.