

## Drug and Alcohol Policy

### Introduction

The use of drugs, alcohol, solvents and other intoxicants in the workplace is a serious issue. The use of substances can lead to significant health problems and wider social issues, but more importantly, anyone under the influence at work may be a significant hazard to themselves or others.

It is not only illegal drugs that cause issues, so called 'legal highs' even prescription drugs can affect an individual's ability to do their work, especially where there is a high level of concentration and awareness i.e. operating tools and machinery.

Drugs differ from alcohol in that their use is generally not socially acceptable and is often illegal. The use of some drugs can also more rapidly affect physical and mental health than alcohol abuse, so the earlier the problem can be dealt with the greater chance of resolving issues.

We recognise that most people maintain a healthy approach within their social life and make good choices. We also respect our employees right to privacy. However, when issues associated with alcohol and substance abuse start to emerge in the workplace it is important that we take any safeguarding action that is necessary, to maintain the safety of our workforce.

### Policy objective

The purpose of this policy is to ensure all our staff, contractors and visitors to Campion sites are kept safe, understand the dangers of alcohol and drug misuse in the workplace and what to do if there is a problem. We will take all reasonable steps to ensure we deal with issues that arise quickly and fairly to prevent problems escalating unnecessarily.

### Information/Data protection

Campion will naturally assess employees for signs of misuse of drugs and alcohol in the course of normal working behaviours, in addition to have testing procedures in place for all Working Personnel (Appendix 1). Campion may hold information related to drugs and alcohol misuse at work as part of the exceptional reporting of issues and incidents at work, or in the course of legitimate investigations.

### Policy owner

Dougie Herd and Susan Jackson

The drugs and alcohol policy is delegated to the Health & Safety Manager and supported by HR Services.

### Who does the policy apply to?

All employees, workers, subcontractors, visitors.

### General responsibilities

Under the Health & Safety at Work etc Act 1974 every employee whilst at work has a general duty, so far as is reasonably practicable to take care for their own health and safety and of others who may be affected by the work they do.

It is an offence under the Misuse of Drugs Act 1971 for any person knowingly to permit the production, supply or use of controlled substances on their premises except in specified circumstances (e.g., when they have been prescribed by a doctor).

The Road Traffic Act 1988 states that drivers of road vehicles must not be under the influence of drugs or alcohol while driving, attempting to drive or when they are in charge of a vehicle.

### Manager expectation:

All Campion manager/supervisors will ensure that where it has become known that an individual (whether a Campion employee or not) is in unauthorised possession of, or is under the influence of drugs or alcohol, or suspected of being under the influence of drugs and alcohol, whilst on duty or on any Campion site, they will be removed from site immediately (as a safeguarding action) pending further investigation. A manager's word will be final in these circumstances.

The matter should then be reported to Health & Safety Manager/ HR Manager who will then inform the designated director as soon as possible.

### Employees are expected:

- to refrain from work if they are not fit for duty as a result of drugs or alcohol.
- to inform the organisation if they are prescribed drugs that may affect their ability to perform their duties, particularly if they operate tools or machinery.
- Report immediately any concerns they may have regarding someone else's ability to do their job safely as a result of drugs and alcohol.

### Explicit rules

At no time are you permitted to drink alcohol or take drugs:

1. During working hours
2. During rest breaks or before coming on duty.
3. In excess outside normal working hours, when the affects may still be present in your system when you are due back at your workplace (further guidance can be found on NHS or HSE websites).
4. Have unauthorised drink or drugs in your possession within a Campion Homes workplace.

### Exceptions

There may be occasions where authorised social events are organised by Campion Homes, where alcohol is present. Your standard of conduct is expected to be maintained and any breaches of conduct would be managed in line with the Staff Manual.

Standard of conduct are expected to be exemplary when you are representing Campion Homes or hosting any social events that are in the capacity of Campion Homes.

### Your support at work

There are many reasons people get into trouble with drugs and alcohol. Campion Homes recognises that employees with drink or drug problems have the same rights to dignity and respect as their colleagues. Information will be treated confidentially, and support offered. You can talk to your line manager, H&S representative, or HR Services for further guidance. For further information see Appendix 2.

### Breaches of the drugs and alcohol policy

All breaches, or suspected breaches of the drugs and alcohol policy will be dealt with under the Disciplinary Policy/Staff Manual, H&S Policy, and absence management arrangements. Serious breaches may result in termination of your employment, or in, extreme cases prosecution.

## Policy Dependencies

- Campion Disciplinary Policy
- Health & Safety Policy

## APPENDIX 1 - Drugs and Alcohol Arrangements for Testing.

### Screening

The purpose of screening is to ensure adherence to these arrangements and that all Workers present on Campion Homes Ltd Premises are fit for work without impairment through alcohol, illegal drugs, prescription drugs or other substances. There are four types of screening methods used:

1. **Safety Critical Screening:** Where and when screening takes place on a Campion site all working personnel engaged in a safety critical role i.e., 360 excavator or telehandler, will be required to undergo mandatory screening.
2. **Random Screening:** screening which is carried out on a periodic basis for a random selection of personnel on any given Campion site.
3. **For Cause Screening:**
  - a. Where there are reasonable grounds for believing that a worker is intoxicated or under the influence of drugs (and as a result, unfit for work). This could be based on their conduct, behaviour or appearance, or as a result of a reported safety breach. This is known as 'Behavioural for Cause' screening.
  - b. When a worker has had direct personal involvement in a reportable major injury or accident, a dangerous occurrence, an incident which results in personal injury or an incident which results in significant damage to property or equipment, they may be required to undergo alcohol and drug screening. This is known as 'Post Incident for Cause' screening. Procedures for 'For Cause' screening are detailed below
4. **Rehabilitation:** where a Campion Homes Ltd worker is participating in follow-up monitoring or a rehabilitation programme, follow-up screening will be carried out unannounced during a defined period to verify continued abstinence from abuse of alcohol and/or drugs. The procedure for pre-placement screening will be adopted for rehabilitation screening.

### Screening Procedures - General

All screening will be conducted by an independent, competent and trained Collection Officer who will ensure that a standard screening procedure is undertaken including the Chain of Custody (EN ISO/IEC 17025 and EN ISO 15189).

Before submitting to screening, a worker will require to give consent.

Appropriate investigation and action will be taken in the instance of a worker refusing to be screened or attempting to falsify results. In the case of Campion Homes Ltd workers this may trigger disciplinary action up to and including dismissal.

Non-negative Results will be declared when the alcohol level within the sample is at or above the UK drink drive limit (see Appendix A) and/or when a drug or its metabolite has been found without a medical explanation, beyond a limit which is pre-determined in accordance with international drug testing guidelines.

All results from instant screening methods obtained during 'Random' and 'For Cause' screening

sessions will be communicated to the worker via the Collection Officer. Results from full laboratory analysis under Chain of Custody (EN ISO/IEC 17025 and EN ISO 15189) conditions will be communicated to the worker by the Company's appointed Occupational Health provider.

Negative Results from instant result screening will not be recorded and kept. Campion will be notified that you have a 'Fit for Work' status.

Non-negative Results will be recorded and kept by the Collection Officer. Campion will be notified of the non-negative result and will be advised of whether you are 'Fit for Work' or 'Unfit for Work'.

Specific details of Campion Homes Ltd workers' test results will be held in the strictest confidence by in the workers' medical file.

Under the standard screening procedure, a worker has the right to have a re-test carried out by another accredited laboratory. The retest will be organised by the workers nominated accredited testing authority with all costs borne by the worker.

### Procedure for Random Screening

This is the procedure for random drugs and alcohol screening of all workers on Campion Homes Ltd premises. Random screening is carried out by an independent, competent and trained Collection Officer from a third-party company. The randomness, timing and frequency of the random testing will be co-ordinated with Campion (using a discrete rotational list).

The number of random screening tests conducted in a sampling period, i.e., a year, will be agreed with the independent company prior to the commencement of the sampling period by the Director/Manager responsible based on the information from the previous year, e.g., number of positive results, sickness absence data, incident investigation data etc.

The minimum number of random screening tests conducted in a sampling period will be 2% of workers with access to the site.

The occurrence of a screening session will be agreed one week prior to the commencement of the session with the Director responsible. The number of workers to be screened during the planned session will be calculated using the approximate number of workers on site over the last 3 years for that date and time. The maximum number of workers to be screened in a session is 10. The minimum number of Workers to be screened in a session is 2.

The Collection Officer will select the workers for testing at random from the sign in book. There will be no further, individual selection process apart from mandatory testing of safety critical workers.

The screening will be unannounced, and the site shall be chosen by the Collection officers from a list provided by Campion Homes.

### The Testing Process

- The Collection Officer is responsible for administering the random drugs and/or alcohol screening session.
- Workers will be selected at random and in accordance with the agreed criteria at the start of the screening session.
- Upon being selected for screening the employee will be notified by the nominated manager and asked to attend the area and verify their identity with photographic ID. The donor will be notified of their right to nominate a fellow employee to witness the test. If photographic ID is not available, the appropriate Manager will verify the employee identity.
- The employee will be met and escorted by the Collection Officer to the collection room.

- The employee is requested to read the Donor Information Sheet, which will be provided by the Collection Officer.
- A consent form will be completed with all relevant details and both the Collection Officer and employee will sign and date it. Refusal to consent to screening will end the screening process and will trigger an investigation by the company and may result in disciplinary action up to and including penalties appropriate for gross misconduct.
- For an alcohol test, the Collection Officer will breathalyse the employee to check for presence of alcohol using an approved and calibrated instrument.
- Drug testing will be carried out by using fingerprint testing and results available within 10 minutes
- The results are recorded on the consent form and communicated to the Worker by the Collection Officer.

If both breath alcohol and/or drug results are negative the screening procedure will end, and the worker will be permitted to return to work.

In the event of a Non-negative Result for breath alcohol and/or drugs the sample will be sent for full laboratory analysis under strict Chain of Custody (EN ISO/IEC 17025 and EN ISO 15189) conditions.

### Procedure for Non-negative Results

- Donor has read and initialled Consent Form CRN-0014.
- Result printout has been affixed, or results have been handwritten, directly on the form.
- Donor's hands have been washed for 2 minutes and dried.
- Donor has been monitored for 15 minutes and has **not touched anything**.
- Sample collected from all **10 fingers** onto a Collection Cartridge.
- Tamper-proof clear plastic cover closed.
- On rear of Collection Cartridge, '**FIRST**' circled and **barcode** from kit has been affixed.
- Sample collected from all **10 fingers** onto a second collection cartridge.
- Tamper-proof clear plastic cover closed.
- On rear of Collection Cartridge, '**SECOND**' circled and **barcode** from kit has been affixed.
- Both cartridges have been placed into the **tamper-evident security bag** and sealed.
- Barcode added to the security bag.
- Tamper-evident security bag has been placed in the bubble bag provided and sealed.
- **Barcode** affixed to each layer of the Consent Form.
- All sections of the Consent Form have been completed.
- Consent Form copy sheets have been separated.
- White copy offered to the Donor.
- Yellow copy retained for your records.
- **Pink copy** of consent form, bubble bag and remaining barcodes have been placed into the postage paid envelope and sealed.
- Both specimen samples are sent to an accredited independent laboratory. The samples are held under strict Chain of Custody (EN ISO/IEC 17025 and EN ISO 15189) rules by the independent laboratory.
- Following a Non-negative result, the affected person will be suspended on full pay and without prejudice pending the results from the full laboratory analysis. The Worker will be asked to leave the Campion Homes Ltd Premises and provided with assistance in getting home safely.
- In the unlikely event of a person attempting to drive, after Campion have challenged their

fitness to do so (and having reasonable grounds), Campion would be obliged to inform the police of drink driving in progress.

- Full laboratory analysis results are ordinarily returned to the Director responsible within 5 working days. The HR manager will notify the employee or contractor of the result. In the event of a Negative result no further action will be taken.

In the case of a Campion Homes Ltd employee testing non-negative, an investigation will be carried out by the Company. The employee may be required to remain absent from site until the investigation has been completed, reporting to site only when requested. The Company will endeavour to undertake the investigation in a timely fashion to limit uncertainty and worry to the employee.

### Procedure 'For Cause'

Campion reserves the right to have tests for drugs or alcohol carried out on any employee or contractor if there is good reason to believe that they are intoxicated or otherwise affected by a substance at work "With Cause"; or they have a history of being intoxicated at work.

Campion reserves the right to seek a breath sample from any employee or contractor suspected of being under the influence of alcohol at work. This will be undertaken on site by the site manager, they will have the right to have a representative present. If the employee, or contractor, is found to be over the legal limit stipulated for driving (at the time of the test) then this will be referred to Campion's head office, or their employer, for further consideration.

Substance testing is not intended to discriminate against, or harass, any individual or group of individuals.

The following indicators, which are not exhaustive, may suggest an individual is not in a fit and healthy state to attend work and may give rise to management action "with Cause":

- The smell of alcohol from an individual
- Dishevelled appearance (often accompanied by other indicators)
- Falling asleep
- Behaviours that are inappropriate and out of character
- Physical Condition i.e., glazed eyes, slurring of words
- Lack of concentration
- Dilated pupils

Where a manager feels an individual is not in a fit and healthy condition to work due to drugs or alcohol, the manager should pursue one or more of the following actions:

- seek further guidance, advice or a second opinion from an appropriate source.
- breathalyse the individual.
- refer their individual to his line manager.

### Substance Testing

Where an individual is suspected of being under the influence of a substance, they may be required to provide a breath sample or be immediately referred to an independent, competent and trained Collection Officer to undergo a drugs test.

The test will require a urine sample and will be carried out within 2 hours at the employee's place of work. The individual must not return to work after the test until further notice is given.

There will be an immediate test result where the test results are negative the individual will be

informed, they are permitted to return to work.

Where an employee's test results are non-negative the employee will normally remain suspended on full pay until a full investigation takes place and any subsequent hearing, in line with the Disciplinary Policy.

Failure to co-operate with any of these arrangements will be deemed gross misconduct which may result in termination of employment, or a breach of contractual terms (for workers and sub-contractors).

## APPENDIX 2

### Where to get help?

Your GP is a good place to start. They can discuss your problems with you and get you into treatment. They may offer you treatment at the practice or refer you to your local Alcohol misuse program or drug service. If you're not comfortable talking to your GP, you can approach your local drug treatment service yourself.

Visit the Frank website to [find local drug treatment services](#). If you're having trouble finding the right sort of help, call the Frank drugs helpline on 0300 123 6600. They can talk you through all your options.

As well as the NHS, there are a number of charities and support groups across the UK that provide support and advice for people with an alcohol misuse problem.

For example, you may want to contact:

- Alcohol Concern – runs the national drink helpline, Drink line on 0300 123 1110
- Alcoholics Anonymous – helpline 0845 769 7555
- Al-Anon Family Groups – helpline 020 7403 0888

For a full list of charities and support groups, see the NHS page on alcohol support.

Local support for drugs and alcohol abuse:

[www.fifeadp.org.uk](http://www.fifeadp.org.uk),

**Email:** [alcohol.druginfo@fife.gov.uk](mailto:alcohol.druginfo@fife.gov.uk)

**Tel:** 03451 55 55 55 + Ext 446153

**Address:** Brunton House, High Street, Cowdenbeath, KY4 9QU



## Glossary

### Definition of terms

- **Abstention:** The voluntary act of self-denial.
- **Breathalyse:** To measure the amount of alcohol present in a person's exhaled breath.
- **Campion Premises:** Any site or office under the control of Campion
- **Chain of Custody** (EN ISO/IEC 17025 and EN ISO 15189): The chronological documentation or paper trail, showing the donation, custody, control, transfer, and analysis of a sample.
- **Collection Officer:** An independent, competent person trained in collecting samples for alcohol and drug analysis.
- **Collection Room:** An area with the required facilities and equipment needed to ensure the privacy of the donor and the integrity of the collection procedure.
- **Donor Information Sheet:** An information sheet detailing what to expect during a screening procedure.
- **Driving on Company Business:** Includes any driving for a work-related task that is outside of the daily commute from home to your normal workplace.
- **Drug Paraphernalia:** Any equipment, product, or material that is modified for making, using, or concealing illegal drugs.
- **Employee** – A person directly employed by Campion under a Contract of Employment.
- **Full Laboratory Testing:** Analysis of a cartridge using either Liquid or Gas Chromatography/Mass Spectrometry.
- **Major Injury or Accident:** As described in Schedule 1 of the Reporting of Injuries, Disease and Dangerous Occurrence Regulations.
- **Medical Review Officer:** A medical professional qualified to read and interpret drug test results in the context of information provided by the donor.
- **Metabolite:** A metabolite is the intermediate or product found in the body after a drug has been broken down by the liver.
- **Negative Result:** A result showing the absence of drugs (or their metabolites) in fingerprint and/or levels of alcohol in breath below the legal UK drink drive limit.
- **Non-negative Result:** A result that has not been medically reviewed and shows the presence of drugs (or their metabolites) in fingerprint and/or levels of alcohol in breath at or above the legal UK drink drive limit.
- **Photographic ID:** Valid Passport, Valid Driving Licence Photo card, or CSCS card.
- **Positive Result:** A result that has been medically reviewed and shows the presence of drugs (or their metabolites) indicative of substance misuse or abuse and/or alcohol at or above the legal drink drive limit.
- **Reasonably Practicable:** Reasonably practicable means what is, or was at the time, reasonably able to be done, taking into account and weighing up all relevant matters.
- **Reportable Dangerous Occurrence:** As described in Schedule 2 of the Reporting of Injuries, Disease and Dangerous Occurrence Regulations.
- **Self-Referral:** Workers are able to refer themselves to Occupational Health without having to first speak to their Manager.
- **Drink Drive Limit (Scotland):** 22 µg (micrograms) of Alcohol per 100 ml (millilitres) of Breath OR 67 mg (milligrams) of Alcohol per 100 ml of Urine OR 50 (milligrams) of Alcohol per 100 ml of Blood.
- **Workers:** Describes the collection of Campion employees, third party workers.