



EMPLOYMENT PRACTICES

Drug and Alcohol-Free Workplace Policy



GES EMPLOYMENT PRACTICES

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KEY POINTS

- GES does not allow the attendance at work of any individual who is impaired due to being under the influence of any intoxicating substance.
- By reporting to work, staff are confirming that they are fit for work.
- GES does not allow the bringing into the workplace of alcohol, illegal or non-prescribed drugs and/or other intoxicating substances.
- Staff must notify the HR Department as soon as possible if they are prescribed medication that may impact their ability to carry out their role safely or effectively.
- GES reserves the right to request the required form of biological specimen(s) from staff for the purpose of testing for intoxicating substances.
- GES adopts a constructive and supportive approach when dealing with employees who may be experiencing drug or alcohol dependence or addiction.

Policy Aim

The Company is committed to providing a safe and productive work environment, to promoting the health, safety and well-being of its staff and complying with applicable legislation. This policy is designed to ensure that GES staff are aware of the health risks associated with alcohol/drug misuse, outline the help and support available, and set out the consequences for those who are found to be in breach of this policy.

The inappropriate use of alcohol or drugs can damage the health and wellbeing of staff and have far reaching effects on their personal and working lives. At work, alcohol or drug misuse can result in reduced levels of attendance, sub-standard work performance, increased health and safety risks, disciplinary problems and reduced efficiency. Furthermore, the effects of alcohol or drug misuse may be detrimental to the reputation and image of the Company and its ability to deliver high quality products and services.

The Company treats drug and alcohol dependency as a health problem that requires special treatment and help, although we reserve the right to take action to deal with the problem if this is appropriate.

This policy covers the use and misuse of intoxicating substances, which includes alcohol, solvents, legal and illegal drugs, prescription and over-the-counter medicines, including Novel Psychoactive Substances (formerly known as "legal highs") and other substances that could adversely affect work performance and/or health and safety.

This policy forbids the consumption of alcohol during the normal working day, which also includes during lunchtime and all other breaks during the working day.

Policy scope

The policy applies to all employees and officers, including those on fixed term contracts, loan or secondment. The organisation also expects service partners, agency workers, contractors and others working on its behalf whether paid or unpaid (for example, those on work experience) to comply with this policy. Failure to do so is likely to result in the employment or contract/arrangement being terminated. The term "staff" in this policy applies to all individuals carrying out work for the Company. "The Company" means GES and any other companies in the group.

Staff are required to be aware of and comply with this policy to ensure that their performance or ability to carry out their activities at work, when undertaking work duties or acting in the course of employment safely and competently is not impaired in any way. All staff members should observe the requirements of this policy. Failure to do so may result in action being taken, up to and including dismissal or termination of arrangement/contract.

Objectives

The policy aims to:

- Raise awareness of the risks and the potential harm to health associated with the misuse of intoxicating substances.
- Set out the support available to staff who may be misusing drugs or alcohol and encourage them to seek help.
- Set out the rules regarding the use of intoxicating substances both inside and outside of the workplace so that staff are aware of the likely consequences for their employment/contract/arrangement of misusing them.
- Provide a framework to enable instances of substance misuse to be handled in an appropriate, fair and consistent manner.
- Achieve a balance between supporting staff who come forward with a problem, and the legal requirement to preserve:
 - The health, safety and welfare of staff and others with whom they come into contact;
- As well as
 - The Company's reputation, and
 - The delivery of high quality, effective services.

The requirements of the policy

Staff must report for work, and remain throughout the working day, in a fit and safe condition to undertake their duties without any limitations due to the use or aftereffects of alcohol and/or drugs. The workplace includes all of the Company's sites, its car parks, any client sites or venues and any storage facilities.

Alcohol

- Consumption of alcohol during the normal working day, including during lunchtime and other breaks, whether inside or outside the office, is not allowed.
- Staff may not consume alcohol on Company premises or at customer sites, except at work related functions or activities, although this must be authorised by your manager and then only moderate and sensible levels of alcohol should be consumed.
- Where work related functions or work-related activities take place at the end of the working day, after which staff are not returning to work (for example a team visit to the pub), no authorisation need be sought from management for the consumption of alcohol. Where the individual is representing the Company, however, (for example attending an evening reception, seminar etc), they should bear in mind their responsibility to maintain a professional image and should behave accordingly.
- Staff must not consume alcohol before coming to work, including when on call or standby for work. In cases identified where alcohol has been consumed prior to start of the working day, the individual may be subject to testing to determine the alcohol concentrations present. Should the alcohol levels identified be at or above 35 micrograms per 100ml of breath alcohol concentration, then it will be considered a breach in policy.
- Staff must undergo testing for alcohol when requested to do so. Individuals who refuse to submit to an alcohol and/or drug test at any time may be subject to action, up to and including dismissal/termination of contract or arrangement.
- Staff over or suspected to be over the alcohol level will not be allowed to drive home and if they do, the Police will be informed.

Drugs and other intoxicating substances

- Staff must not bring illegal drugs onto the Company's premises (including all of the Company's sites, its car parks, any client sites or venues and any storage facilities) take drugs and/or other intoxicating substances at any time, with the exception of drugs prescribed for the individual or over-the-counter medicines used for their intended purpose (in accordance with the instructions given by the prescriber, pharmacist or manufacturer).
- Staff must notify the HR Department as soon as possible if they are prescribed medication that may cause serious side effects, and which is likely to impair their ability to undertake their duties safely and effectively.
- Staff who experience serious side effects as a result of taking prescribed or over-the-counter medicines that impair their ability to perform their duties safely and satisfactorily must notify the HR Department as soon as possible. This is particularly important if they occupy a post where it is not only their own safety but the safety of others that could be jeopardised. (Note that this is only applicable if the staff member is attending work - there is no requirement to notify managers about medication prescribed or taken during periods of sickness absence unless it will continue to be taken after the individual's return to work.).

- Staff have a responsibility to check with their doctor, practice nurse or pharmacist about the side effects of prescribed or over the counter medication which could potentially adversely affect their ability to do their job safely.
- Staff must undergo testing for drugs and/or other intoxicating substances when requested to do so.

Controlled drugs

Staff are not permitted to possess, store, trade or sell controlled drugs on Company premises or bring the Company into disrepute by engaging in such activities outside of work. The only exception to the above in relation to possession is where an individual has a prescription for a controlled drug, however trading or sale of such prescription drugs is not permitted.

Responsibilities of Staff

Staff are required to:

- Familiarise themselves with this policy and comply with its provisions.
- Present a professional, courteous, and efficient image to those with whom they come into contact at all times. They therefore have a personal responsibility to adopt a responsible attitude towards drinking and taking prescribed and over-the counter drugs.
- Where appropriate, co-operate with any arrangements for help and support offered by the Company to address any alcohol or drug misuse problem they may have.

Note that there is no obligation on staff to accept such help and support if this is not appropriate for their circumstances.

Screening Programme: testing for Drugs and Alcohol

The Company reserves the right to request the required form of biological specimen(s) from staff for the purpose of testing for intoxicating substances. This can be requested to:

- Carry out unannounced testing of the workforce to detect drugs and/or alcohol if there are grounds to suspect that any staff member is unfit through drugs and/or alcohol.
- Undertake unannounced random sampling testing of the workforce.
- Testing will also be undertaken following an accident or incident of any kind in the workplace. This may include not just the individual directly involved in an accident / incident, but also any other staff member deemed relevant.
- Undertake follow up testing where an individual's previous history, testing results profile or circumstances deem it necessary.

Screening is not intended to discriminate against any individual or group of individuals.

On each occasion where an individual is being tested, the Company will seek consent from that individual. Failure to comply with any aspect of the screening procedure will be viewed seriously and will be dealt with under the Company's Disciplinary Procedure. Refusal to undergo testing may be treated as a positive test result. Alteration, or otherwise falsification, of test results may be treated as a positive test result.

Results of tests for drugs and/or alcohol are confidential and reported only to HR, Line Managers and those tested.

If an individual test positive for drugs and/or alcohol, arrangements will be made to remove the individual from the workplace (to ensure that they do not harm themselves or others). In the case of employees, the individual will be suspended with pay pending further investigation. Thereafter the Company's disciplinary procedure will be applied, which may result in a disciplinary sanction up to and including the employee's dismissal.

The Company reserves the right to carry out follow-up alcohol and drug screening for staff who have been receiving support or been absent from work because of an alcohol or drug-related problem. Where the presence of a controlled substance has been detected through testing, the Company also reserves the right to carry out follow-up alcohol and drug screening.

Specimen provision

Biological specimens requested for toxicological analysis for intoxicating substances are to be provided with the individual's consent. Where appropriate, a portion of the collected biological specimens will be retained on behalf of the individual for a defined period of time and be made available for independent third-party analysis, should it be required. Every effort will be made by the Company to maintain the integrity and composition of the retained biological specimens during this period.

Confidentiality

The Company will treat issues relating to dependence on, or misuse of, alcohol or drugs in confidence, within the limits of what is practicable and within the law. In order to provide effective support and help, it may be necessary, for example, for information to be shared with others (for example, the individual's Manager/Supervisor (where the initial approach has been from a Works Manager)), but this will be kept to a minimum.

Help and Support

Staff are strongly encouraged to seek help if they have concerns regarding their alcohol or drug consumption. In addition to the individual's GP, there are a number of agencies which offer help and support for those experiencing problems with drugs or alcohol. A list is available at Appendix B at the end of this policy.

If the individual has concerns about the way in which their consumption of drugs or alcohol is affecting their work, they may wish to approach their line manager or HR Department in the first instance.

Where an individual has disclosed that they have a drug or alcohol problem, the Company will always adopt a constructive and supportive approach to assist them to address it. This may

include allowing time off for attending rehabilitation, counselling or medical appointments related to the problem, subject to the normal rules on Sickness Absence.

Where an individual does not wish to come forward to seek help, and their colleague(s) genuinely suspect that the individual may be misusing drugs or alcohol, they have a responsibility to raise their concerns with the individual's line manager. Staff should not, even with the best motives, 'cover up' for, or collude with, a colleague with an alcohol or drug related problem but instead should encourage the individual to seek help.

Breaches of the policy

The Company will adopt a constructive and supportive approach when dealing with individuals who may be experiencing drug or alcohol dependence or addiction.

However, if performance, attendance or behaviour is unacceptable, despite any support and assistance that has been offered, whether or not this has been taken up, dismissal or termination of contract/arrangement may ultimately result.

Notwithstanding the above, there will be circumstances where breaches of the policy, whether dependency-related or not, will be treated as a disciplinary matter and may result in summary termination of the employment/contract/arrangement. Examples of issues are:

- Deliberate disregard for personal safety and/or the safety of others which is associated with the use of intoxicating substances, whether or not this is as a result of dependence or addiction.
- A positive test result whether random, follow up or post-accident or through reasonable suspicion.
- For the purposes of this policy, a positive screening result means the screening for alcohol and drugs shows:
 - The presence of drugs, for which there is no medical need for either their use or the quantity of their use or more than 35 micrograms per 100ml of breath alcohol concentration.
- Unacceptable behaviour in the workplace associated with the use of intoxicating substances, whether or not this is as a result of dependence or addiction.
- Being found incapable of performing normal duties satisfactorily and safely as a result of consuming alcohol or taking drugs, whether or not this is as a result of dependence or addiction.
- Possession, consumption, dealing/trafficking, selling and/or storage of controlled drugs or alcohol either on work premises, or engaging in such activities outside of work.
- Being disqualified from driving as a result of alcohol or drug related offences (applies only to staff expressly required to drive a vehicle for work purposes).
- Making malicious or vexatious allegations that a colleague is misusing intoxicating substances.

This list is illustrative only and should not be regarded as exclusive or exhaustive.



Action taken will be in all cases be proportionate to the circumstances of the breach of the policy.

Where evidence warrants, the Company will inform the police of illegal drug use or any activity or behaviour related to drugs or alcohol over which there are concerns as to its legality.

The Company reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.

APPENDIX A

Definitions

Intoxicating substance - a substance that changes the way the user feels mentally or physically. It includes alcohol, illegal drugs, legal drugs, prescription medicines (for example, tranquillisers, anti-depressant, over-the-counter medicines), solvents, glue, lighter fuel.

Controlled drugs - these are drugs covered by the Misuse of Drugs Act 1971. They include both drugs with no current medical uses as well as medical drugs that are prone to misuse. All are considered likely to result in substantial harm to individuals and society.

Substance Misuse - Drinking alcohol, taking drugs or a controlled substance, either intermittent or continuous which interferes with an individual's health, work capabilities or conduct, or which affects the work performance and/or safety of themselves and others.

Dependency - a compulsion to keep taking an intoxicating substance either to avoid effects of withdrawal (physical dependence) or to meet a need for stimulation or tranquillising effects or pleasure (psychological dependence).

Addiction - a state of periodic or chronic intoxication produced by the repeated intake of an intoxicating substance. This means that a dependency has developed to such an extent that it has serious detrimental effects on the user and often their family as well, and the individual has great difficulty discontinuing their use. The substance has taken over their life.

APPENDIX B

Agencies and support mechanisms

Alcoholics Anonymous: 0845 769 75555 - the largest self-help group for people who acknowledge they cannot handle alcohol, and want a new way of life without it, the service is free.

Alcohol Concern has a website (www.howsyourdrink.org.uk). It is for people worried about their alcohol consumption. The website enables people to assess their alcohol consumption, along with recommended courses of action, such as contacting treatment centre's or online interventions.

Drinkline: 0800 917 8282 - a government funded free service. Can provide advice to the drinker or anybody concerned about the drinker. Has a database of local support and treatment services that can help the drinker. Website (www.Drinkaware.co.uk)

Individual's General Practitioner

FRANK: is a confidential, anonymous, discreet and well-informed friend ready to offer advice, information and support on drugs issues. FRANK is available by phone: (0800 77 66 00) on the web: (www.talktofrank.com) or by e-mail: (frank@talktofrank.com). You can talk to FRANK in 120 languages and you can text FRANK on (0800 917 8765).

Narcotics Anonymous: 0845 373 3366 - the largest self-help group for people who want to stop using drugs, services are free. Website (www.narcoticsanonymous)

Cocaine Anonymous : 0800 612 0225, open 10am to 10pm - a national self help group specifically for cocaine users. Website (www.cocaineanonymous)

Adfam National : 020 7553 7640 - the largest non-statutory organisation that works with and on behalf of families affected by drug and alcohol problems. Helpful for the family of the alcohol or drug user. Website (www.adfam.org.uk)

Samaritans : 08457 90 90 90 or email jo@samaritans.org