




Drugs & Alcohol Policy

Version: 3

Issue date: February 2025

RCPO00011	Drugs & Alcohol Policy
<p>ISSUE DATE December 2020</p> <p>REVIEW DATE February 2025</p> <p>NEXT REVIEW DATE February 2026</p> <p>VERSION 03</p>	<p>AUTHORISED BY</p>  <p>Mark Taylor CEO</p>

Version Change Summary		
New Version ID	Date of Change	Summary of Changes
1	3/12/2020	Creation
2	03/03/2023	Reviewed and updated
3	13/02/2025	Reviewed amendment made to CEO name and signature added

1. PURPOSE

To establish a clear procedure in respect of any employee whose safety or performance of his/her duties is or may be impaired as a result of consuming alcohol or drugs. This is to ensure all persons employed directly by Rock Compliance Limited (referred to as “the Company”) meet the requirements of the Health and Safety at Work Act 1974, the Misuse of Drugs Act 1971 and all other relevant Acts and Regulations. The Company will discharge its duty under these statutes by providing appropriate arrangements, rules, procedures and guidance on alcohol and drug abuse in the workplace.

2. SCOPE

All permanent and temporary employees of the Company and subcontractors who are working on behalf of the Company who are working on contracts that are under the control of the Company. For the avoidance of doubt – this policy and procedure does not form part of an employee’s contract of employment and the Company may amend or withdraw the policy and procedure from time to time.

3. POLICY STATEMENT

The Company has a responsibility towards employees, contractors, subcontractors, and the general public to provide a safe and healthy working environment and recognises that this may be jeopardised by those who abuse alcohol or drugs. The Company will, therefore, take appropriate action to combat alcohol and drug abuse to protect the health, safety and welfare of all employees, and any others that may be affected by their acts or omissions, company property and the efficiency and success of our business. The Company is aware that in some instances, alcohol and/or drug dependency is defined as an illness. We actively encourage those employees who are experiencing difficulties with alcohol or drugs to seek help. Where appropriate, we will offer assistance in seeking relevant and evidence-based treatment. In these cases, normal sickness absence procedures will apply. Confidentiality is assured in these cases. This Policy will be reviewed periodically to ensure it reflects current legislative requirements and best practice. Any changes will be brought to the attention of all employees.

4. DEFINITIONS

Alcohol - Includes, but is not limited to distilled spirits, liquor, beer, wine, malt liquor, or any other intoxicants used for beverage purposes.

Drugs - Any psychoactive substance (those drugs that affect mood, thought process or perception), available both legally and illegally. A non-exhaustive list would include all those drugs covered by the Misuse of Drugs Act (1971) and The Medicines Act (1968). It also includes solvents or any other substances that have the potential to impair. **Illegal Drugs** - All those drugs covered by the Misuse of Drugs Act (1971).

Dependency - Where the user has adapted physically and/or psychologically to the presence of alcohol or drugs and would suffer if they were withdrawn abruptly.

Company Premises - To include all premises the Company has responsibility for and includes all Company vehicles. This policy also applies to all occasions where employees are on Company business, including working on client premises, unless suspended with the agreement of a Senior Manager. **Impaired (Alcohol)** - In terms of this policy any person who has Breath Alcohol Concentration that exceeds 22 mcg/100 ml (to be confirmed by an appropriate test) is deemed to be impaired due to alcohol and therefore in breach of this policy. In certain circumstances a lower cut-off level for alcohol may be applied, for example, for employees working on contracts where the client/customer requirements or policy specifies a lower level. In these circumstances, employees will be advised of the levels that apply to their particular role or that contract. **Impaired (Drugs)** - In terms of this policy, any person found to have consumed illegal drugs or used drugs in an unsanctioned or unreported way (to be confirmed by an appropriate test) is deemed to be impaired due to drugs and therefore in breach of this policy.

Abuse - This applies to using alcohol or drugs in an unsanctioned way. For example, any illegal drug use, or using drugs for non-medical purposes without proper direction to do so from an appropriately qualified person such as a medical doctor or pharmacist. It also applies to using alcohol or drugs in a way that are harmful / hazardous to the individual or to others and which are likely to distort perception and response when at work.

5. GUIDELINES AND RULES

The intention of the policy is that the working environment should be free from the influence of alcohol and drugs. This policy will help to ensure that the health and safety of our employees, and others with whom they come into contact, to maintain the efficient and

effective operation of the business, and to ensure our customers receive the quality service they require. For those reasons, the following rules will be strictly enforced. No employee or contractor shall: Report or try to report to work whilst impaired due to alcohol or drugs (whether illegal or not). Employees who are “on-call” are treated as “at work” and therefore expected to be able to comply with this policy whilst on call. Be in possession of illegal drugs on Company premises. Attempt to sell, distribute or supply drugs which contravene the Misuse of Drugs Act 1971 and the Medicines Act 1968, whilst on Company premises or whilst representing the Company.

Any contravention of this, without exception, will be reported to the Police. Employees may consume alcohol at Company arranged functions where such consumption has been authorised by the appropriate Director. Such functions will, where possible be arranged for times when employee(s) do not have to return to work having recently consumed alcohol. However, if alcohol is consumed, they must not drive a vehicle or return to work on any of the Company’s premises/sites whilst over the Company limit. Employees must remember that they are acting as ambassadors of the Company and their behaviour is appropriate, lawful and does not offend, harass or irritate others present, nor does it in any way, bring the Company into disrepute or undermine our brands. Contravention of these rules is a very serious matter, and the Company will take disciplinary action in the event of an infringement under the Company’s disciplinary procedures, which may include dismissal.

6 Medication

It should be recognised that prescribed and over-the-counter medicines may cause impairment to an individual’s performance at work. It is therefore the employee’s responsibility to seek advice from their GP or pharmacist on any medicines they are taking. They should inform their line manager or any other manager they wish, of any possible side effects of their medication. Any medical information will be treated in strictest confidence.

7. SUPPORT

The Company will endeavour to ensure that advice and specialist help are made available to any employee who feels they have a problem relating to alcohol or drugs and seeks help from the Company. Any employee who seeks the assistance of the Company in obtaining help and support for an alcohol or drug dependency problem is assured of their confidentiality being respected. Early identification and treatment are essential to ensure that problems for both the employee and the Company are avoided. It is very important therefore that employees who feel that they may have a problem with alcohol or drugs should come forward and seek assistance at the earliest possible opportunity. Employees should contact their line manager, the occupational health department, or the human resource department who will arrange for the appropriate course of treatment or rehabilitation programme to be made available. During any period of absence from work for agreed treatment, the Company’s normal sick pay arrangements will apply and absence for treatment will be treated as normal sickness. If an agreed or recommended course of treatment is not followed by an employee or is ineffective and occurs concurrently with lapses in the employee’s performance, conduct or attendance then they will be dealt with in accordance with the Company’s normal disciplinary or sickness absence procedures as appropriate. This includes any matter arising prior to the disciplinary procedure being initiated. Testing may be carried out to ensure compliance with the treatment and recovery programme. This option will be agreed with the employee before the commencement of the treatment and recovery programme. The aim of treatment and rehabilitation is to ensure optimum recovery and return to work. Any employee with a dependency to alcohol or drugs who only declares they have a dependency when a serious misconduct issue has arisen or before a test takes place or where they are proven to be in

breach of this policy will be subject to the same disciplinary procedures as any other employee who breaches this policy.

8. DISCIPLINE

Where the rules of this policy are contravened, dismissal may result on the grounds of gross misconduct under the Company's disciplinary procedure. Employees should refer to the Company's disciplinary procedures for information.

9. SCREENING/TESTING

Screening and testing apply to all employees – this means a directly employed person of the company or any other person who carries out work for the company both on and off company premises, and includes but is not limited to agency staff, contractors, sub-contractors and visitors. The purpose of screening and testing is to ensure that due diligence is exercised and to deter and/or detect individuals working on Company premises whilst being impaired due to alcohol or drugs. Screening and testing will take place in the following circumstances: New Starter - As a part of the new starter process, all successful applicants may be required to undertake an alcohol and/or drug screen. Where an applicant either refuses to provide a sample or attempts to falsify or tamper with evidence or produces a positive result their offer of employment will be withdrawn by the Company. For-Cause Testing - Where it is suspected that an individual is in breach of this policy or where it is suspected that an individual is impaired due to the use of alcohol or drugs, testing may be used as part of an assessment process. Post-Accident/Incident Testing – As part of an accident/incident investigation, testing may be carried out on those individuals involved, where possible, to determine whether or not alcohol or drugs may have been a contributory factor. Help and Support – If an individual's performance is affected through a dependency to alcohol or drugs or where they are being supported by the Company for an alcohol or drug dependency, they may be required to undergo testing. Random Testing – Employees may be randomly selected and tested at each of the Company's premises throughout the course of the year. This process is regardless of the employee's status. This is to ensure fairness within the policy and give a clear message that the abuse of alcohol or drugs cannot be tolerated by the Company. The company will use breath testing for alcohol and urine testing for drugs but reserves the right to use other approved methods of testing if necessary. Should an employee refuse to consent or provide a sample for testing they will be suspended immediately, pending the outcome of the disciplinary hearing. The company reserves the right to treat a refusal the same as a positive result. A refusal by a contractor or agency worker to provide a sample will result in that individual being removed from the Company premises. Their employer will be notified of this decision.

10. SCREENING AND TESTING PROCEDURES

Alcohol – Intervention/Post Accident/Incident/Random - The test will be carried by an impartial collection agency specialising in alcohol and drug testing. The test will comprise of a breath sample collection using a calibrated digital alcoholmeter, similar to those employed by the police. The procedure for the administration of this test is as follows: The employee will be removed from their duties and asked to wait in a private area/room, where the nature of the test will be explained and the implications of a positive test result or a refusal to consent to the test. Upon the arrival of the approved collection agency representative, the employee will be asked to complete and sign a consent form to enable the test to take place. Failure or refusal to complete this will be viewed as a positive test result and the appropriate disciplinary proceeding will be implemented. If the test shows a breath alcohol level of zero, then the alcohol test will be deemed a negative result. If the test shows a breath alcohol level above zero, whether over or under the company limit of 22 mcg per 100 ml breath alcohol

concentration a further test will be performed at least 20 minutes later to validate the first test result. If the second test is positive, (over 22 mcg per 100 ml breath alcohol concentration) and therefore confirms the first, the employee will be suspended from work in accordance with the Company's disciplinary procedure and removed from Company premises pending the implementation of disciplinary proceedings. If the second test is not in the ascendency and the second test is below 22 mcg per 100 ml, then the result will be recorded, and the company will review the test result before determining the next stage of the investigation. For example, where the employee has been at work for more than one hour the company reserves the right to use the test result to determine whether the employee would have been above the company limit of 22 mcg per 100 ml when attending work. In certain circumstances a lower cut-off level for alcohol may be applied, for example, for employees working on contracts where the client/customer requirements or policy specifies a lower level. In these circumstances, employees will be advised of the levels that apply to their particular role or that contract. Employees will not be allowed to resume any work which the Company considers to be safety critical or otherwise likely to be affected by the consumption of alcohol but will either be deployed to other work or be suspended from work. Depending upon the circumstances action may be initiated under the disciplinary procedure.

Drugs – New Starter – The test will be performed by the Occupational Health Department and or an approved collection agency and will consist of a FDA (Food and Drug Administration) approved rapid urine test cup. Any evidence of illicit drug use will be deemed as a positive result and the Company will not continue the employment process with the applicant. **Drugs – Intervention/Post Accident/Incident** - The test will be performed by an impartial collection agency specialising in alcohol and drug testing. 7 The procedure for the administration of this test is as follows: The employee will be removed from their duties and asked to wait in a private area where the nature of the test will be explained and the implications of a positive test result. Upon the arrival of the approved collection agency representative, the employee will be asked to complete and sign a consent form to enable the test to take place. Failure or refusal to complete this will be viewed as a positive test result and the appropriate disciplinary proceeding will be implemented. The collection agency representative will collect the urine sample in accordance with strict chain of custody procedures. The drug test requires that the individuals provide a fresh sample of their own urine. The urine sample will be tested on site using an approved rapid urine test cup and where a non-negative reaction is obtained the sample will be split into two further samples (A and B) and both will be delivered to an approved laboratory following strict chain-of-custody procedures, where it will undergo confirmation analysis to ascertain the exact identity of the substance(s) found following the onsite test. The employee will be suspended from work in accordance with the Company disciplinary procedure pending the outcome of the laboratory result. If the laboratory confirmation analysis result is negative, the employee will be informed accordingly and, if appropriate to do so, will return to work. If the laboratory confirmation analysis result is positive, then the employee shall remain suspended from work in accordance with the Company disciplinary procedure pending the implementation of disciplinary proceedings. If the approved rapid urine test cup is negative the employee will be informed accordingly and, if appropriate to do so, will return to work. However, where impairment is still an issue, they will either be referred to Occupational Health if onsite or removed from site safely and arrangements made for them to see Occupational Health at the earliest opportunity.

Drugs – Random - The test will be carried out by an impartial collection agency specialising in alcohol and drug. The procedure for the administration of this test is as follows: The employee will be removed from their duties and asked to wait in a private area where the nature of the test will be explained by a management representative. The employee will be asked to complete and sign a consent form to enable the test to take place. Failure or refusal to complete this will be viewed as a positive test result and the appropriate disciplinary proceeding will be implemented. The impartial collection agency representative will collect the

urine sample in accordance with strict chain of custody procedures. The drug test requires that the individuals provide a fresh sample of their own urine. 8 The urine sample will be split into two samples (A and B), and both will be delivered to an approved laboratory following strict chain-of-custody procedures, where the sample will undergo initial analysis and if required confirmation analysis to ascertain the exact identity of the substance(s) found. The employee will return to work pending the outcome of the laboratory result. If the laboratory confirmation analysis result is positive, then the employee shall be informed accordingly and suspended from work in accordance with the Company disciplinary procedure pending the implementation of disciplinary proceedings. If the laboratory result is negative, the employee will be informed accordingly.

11. RECORD KEEPING

Confidential records will be kept to demonstrate that the Company has taken all reasonable and practicable precautions to safeguard the health, safety, and welfare of its employees. Where it has become necessary to discuss an alcohol or drug dependency issue with an employee, written notes will be retained, but the Company acknowledges it has an obligation to maintain medical confidentiality.

12. RESPONSIBILITY

The HR team is responsible for the application of this policy, whilst having to consider the safety of other employees, contractors and the general public and the long-term business needs of the Company. The HR team is responsible for communicating this policy to managers. They also have the responsibility for ensuring the maintenance, regular review and updating of this Policy. Revisions, amendments, or alteration to this policy can only be implemented following consideration and approval by the Director of HR. Individual managers are responsible for ensuring that this policy is applied within their own area. Managers are also responsible for informing the HR team, where they have a concern that an employee has or is developing an alcohol or drug dependency. Where managers have a concern that an employee is in breach of the policy, they should take the appropriate action in line with the Company's procedures.