Drug & Alcohol Policy

1. Introduction

1.1 This policy applies to Briggs & Forrester (UK) Limited on its own behalf and on behalf of all its subsidiary companies within the Briggs & Forrester Group Ltd ('the Group').

1.2 The Group recognises the importance of safeguarding and promoting the Health and Safety of its employees, subcontractors' employees and communities who may be affected by its activities. Effective management of drug and alcohol abuse is an integral part of this.

2. About this policy

2.1 We are committed to providing a safe, healthy and productive working environment. This includes ensuring that all staff are fit to carry out their jobs safely and effectively in an environment which is free from alcohol and drug misuse.

2.2 The purpose of this policy is to increase awareness of the effects of alcohol and drug misuse and its likely symptoms and to ensure that:

- All staff, including supply chain operatives, are aware of their responsibilities regarding alcohol and drug misuse and related problems.
- All Staff, including supply chain operatives who have an alcohol or drug-related problem, are encouraged to seek help, in confidence, at an early stage.
- All staff, including supply chain operatives, who have an alcohol or drug-related problem affecting their work, are dealt with sympathetically, fairly and consistently.

2.3 This policy is not intended to apply to "one-off" incidents or offences caused by alcohol or drug misuse at or outside work where there is no evidence of an ongoing problem, which may damage our reputation, and which are likely to be dealt with under our Disciplinary Procedure.

2.4 This policy does not form part of any contract of employment or other policy to provide services, and we may amend it at any time.

2.5 Any information you provide to us about your health will be processed in accordance with our Data Protection (GDPR) Policy. We recognise that such data is sensitive and will handle it in a confidential manner.

3. Who does this policy apply to?

3.1 This policy applies to all employees, officers, consultants, self-employed contractors, sub-contractors, casual workers, agency workers, volunteers and interns.

4. Who is responsible for this policy?

4.1 The Group CEO has overall responsibility for the effective operation of this policy. The Group CEO has delegated responsibility for overseeing its implementation to the respective Managing Directors for the Group companies. Suggestions for changes to this policy should be reported to the Group's Regional Health & Safety Managers or the Services Manager.

4.2 Any questions you may have about the day-to-day application of this policy should be referred to the Group's Regional Health & Safety managers in the first instance.

4.3 This policy is reviewed annually by the Group's Regional Health & Safety Manager and the Services Manager.

5. Our approach to alcohol and drug misuse

5.1 We will not accept staff or persons representing the company arriving at work under the influence of alcohol or drugs, or whose ability to work is impaired in any way by reason of the consumption of alcohol or drugs, or who consume alcohol or take drugs (other than prescription or over the counter medication, as directed) on our premises.

6. Identifying a problem

6.1 If you notice a change in a colleague's or individual's pattern of behaviour you should encourage them to seek assistance through their line manager. If they will not seek help themselves, you should draw the matter to the attention of your line manager. You should not attempt to cover up for those whose work or behaviour is suffering as a result of an alcohol or drug-related problem.

6.2 If you believe that you have an alcohol or drug-related problem, you should seek advice and support from a specialist or business representative (i.e. Line Manager) as soon as possible.

7. Alcohol and drugs at work

7.1 Alcohol and drugs can lead to reduced levels of attendance, reduced efficiency and performance, impaired judgement and decision making and increased health and safety risks for you and other people. Irresponsible behaviour or the commission of offences resulting from the use of alcohol or drugs may damage our reputation and, as a result, our business.

7.2 You are expected to arrive at work fit to carry out your job and to be able to perform your duties safely without any limitations due to the use or after-effects of alcohol or drugs. In this policy drug use includes the use of controlled drugs, psychoactive (or mind-altering) substances formerly known as "legal highs", and the misuse of prescribed or over-the-counter medication.

7.3 You should not take non-prescribed drugs during the normal working day, at any official breaks or at official work-based meetings and events.

7.4 You should not drink alcohol during the normal working day, at any official breaks or at official work-based meetings and events, unless authorised to do so. Drinking alcohol while at work without authorisation or working under the influence of alcohol may be considered serious misconduct.

7.5 You must comply with drink-driving laws and drug-driving laws at all times. Conviction for drink-driving or drug-driving offence may harm our reputation and, if your job requires you to drive, you may be unable to continue to do your job. Committing a drink-driving or drug-driving offence while working for us or outside working hours may lead to action under our Disciplinary Procedure or Non-Conformance Procedures and could result in dismissal.

7.6 If you are prescribed medication, you must seek advice from your GP or pharmacist about the possible effect on your ability to carry out your job and whether your duties should be modified or you should be temporarily reassigned to a different role. If so, you must tell your line manager or Supervisor without delay.

8. Searches

8.1 We reserve the right to conduct searches for alcohol or drugs on our premises, including, but not limited to, searches of lockers, filing cabinets, desks, bags, clothing, packages, toolboxes/bags/containers or other belongings.

8.2 Any alcohol or drugs found as a result of a search will be confiscated, and action may be taken under our Disciplinary Procedure or Non-Conformance Procedures.

9. Drug screening

9.1 We will operate a programme of drug testing for all staff in line with our Substance Testing Procedures.

9.2 Drug screening will be conducted by an external provider. Arrangements will be discussed with affected members of staff at the start of each screening programme.

10. Managing suspected substance misuse

10.1 Where a line manager considers that a deterioration in work performance or changes in patterns of behaviour may be due to alcohol or drug misuse, they should seek advice and assistance from senior management.

10.2 If your line manager has reason to believe that you are suffering the effects of alcohol or drugs misuse, they will invite you to an investigatory interview. The purpose of the interview is to:

- discuss the reason for the investigation and seek your views on, for example, the deterioration of your work performance or behaviour; and
- where appropriate, offer to refer you to a medical or specialist advice.

10.3 If you arrive at work and a manager reasonably believes you are under the influence of alcohol or drugs, they shall immediately contact senior management in order that you can be provided with assistance, and an investigation can be undertaken.

10.4 If you agree to be referred to as a medical advisor or specialist, your line manager will request an urgent appointment and prepare a letter of referral, a copy of which will be provided to you.

10.5 Your line manager may ask for your consent to approach your GP for advice. A report will be sent to your line manager, who will then reassess the reasons for their investigatory meeting with you and decide on the way forward.

10.6 If, as the result of the meeting or investigation, your line manager continues to believe that you are suffering the effects of alcohol or drugs misuse, and you refuse an offer of appropriate treatment providers the matter may be dealt with under our Disciplinary Procedure.

11. Procedures

11.1 <u>Reasons for testing</u>

Briggs & Forrester Group retain the right to undertake Drug & Alcohol Tests under, but not limited to, the following reasons/requirements:

a) Random – *non-biased testing and completely random selection form various parties.*

b) 'For Cause' – *Drug & alcohol screening that is undertaken when a manager or company believes that a colleague or individual may be under the influence of drugs or alcohol. It is a preventative measure.*

c) Company/Site Induction

d) Client-requested

e) Post-event (accident, incident, near miss, dangerous occurrence, damage to property/plant/equipment/vehicles).

11.2 Testing methods

Briggs & Forrester Group may utilise the following testing methods:

a) Oral Drug &/or Alcohol Test (saliva) – UKCA certified
Approx. 6-10 Panel.

b) Drug & Alcohol Screening Provider (Urine / Hair) – UKAS or associated.

Drug & Alcohol Screening will be undertaken via a dedicated, accredited screening provider. The provider will have specific operating criteria for screening/testing. The requirements for that screening provider must be fulfilled.

Persons to be tested are to be removed to a secure place of safety and must be accompanied at all times. Those accompanying the person must ensure prior to testing that the person does not:

a) Eat anything, unless essential (e.g. to prevent hypoglycemia for diabetics).

b) Drink anything, other than small quantities of water, except for those who may be suffering from shock.

c) Take any medication either prescribed or 'over the counter' unless this is essential (e.g. insulin for diabetics).

d) Use the lavatory, unless this is absolutely unavoidable.

If it is necessary for the person awaiting the test to be allowed to take food/water/medicine the amount taken, the time and frequency must be recorded.

11.3 Test results

a) Oral Drug &/or Alcohol Test (saliva)

An individual who returns a Negative (PASS) test result will be permitted to resume work immediately following confirmation of test results.

An individual who returns a Non-Negative (FAIL) test result will be considered not fit-for-work and be subject to B&F Disciplinary or Non-Conformance Procedure, including suspension from work/Project. Where necessary, the individual will be required to undertake a full Drug & Alcohol Screening (urine/hair).

b) Drug & Alcohol Screening

An individual who returns a Negative (PASS) test result will be permitted to resume work immediately following confirmation of the test results.

An individual who returns a Non-Negative (FAIL) test result will be considered a Positive (FAIL) test result. Where applicable, this test result will be verified by the associated laboratory. This individual will be considered not fit-for-work and be subject to B&F Disciplinary or Non-Conformance Procedure, including suspension from work/Project.

c) Unauthorised Non-Attendance

Unauthorised non-attendance (e.g. test avoidance) by an individual will be treated as a positive (FAIL) result and will be dealt with according to B&F's Disciplinary or Non-Conformance Procedure, including suspension from work/Project.

12. Medication Declaration

12.1 Any person selected for Drug &/or Alcohol testing who is taking either prescription or non-prescription medication must declare these to the testing agent/staff, prior to the test. However, if a genuine mistake is made and a person forgets to declare a prescriptive medication which leads to a Non-Negative/Positive (FAIL) result being returned, then a prescription must be produced for the associated medication which in turn will be reviewed for authenticity.

13. Appeals Process Declaration

13.1 Any employee has the right to appeal against the outcome of a Non-Negative / Positive Drug & Alcohol test. All appeals will be directed to the Drug & Alcohol test screening provider who undertook the test. The individual will continue to be considered not fit-for-work for the duration of the appeal process. During the appeal process, the individual may be suspended from work/Project. Any suspension will remain in place for the duration of the appeal so long as it is reasonable to do so.

13.2 The company will at all times keep the individual informed of their appeal progress. All information will be managed in strictest confidence on behalf of the individual, the company and the testing provider.

13.3 On completion of the appeal the individual will be informed of the results. Any further action taken with regard to the outcome of the appeal will be managed as per the processes detailed within this procedure.

14. Providing Support

14.1 Alcohol and drug-related problems may develop for a variety of reasons and over a considerable period of time. We are committed, in so far as possible, to treating these problems in a similar way to other health issues. We will provide support where possible with a view to a return to full duties. This may include:

- Referral to appropriate treatment providers, where necessary in conjunction with your GP.
- Time off work to attend treatment.
- Adjusting your duties or other support as recommended by Occupational Health, your GP or specialist during treatment and for an agreed period afterwards, subject to operational requirements and feasibility.

14.2 If you do not finish a programme of treatment, or your recovery and return to work does not go as planned, your line manager will meet with you to decide what further action if any should be taken.

15. Confidentiality

15.1 We aim to ensure that the confidentiality of any member of staff or a member of our supply chain experiencing alcohol or drug-related problems is maintained appropriately. However, it needs to be recognised that in supporting staff and supply chain operatives, some degree of information sharing is likely to be necessary.

15.2 If you seek help with an alcohol or drug-related problem directly from a medical advisor or specialist and you wish to keep matters confidential from your line manager and colleagues, this will be respected unless there is reason to believe that this could put you, your colleagues or anyone else at risk or carries some other material risk for the business. In those circumstances the medical or specialist will encourage you to inform your line manager and will give you sufficient time to do so before discussing the matter with them

16. Performance and disciplinary procedures

16.1 If you agree to undertake appropriate treatment or rehabilitation for an acknowledged alcohol or drug-related problem, we may decide to suspend any ongoing disciplinary action against you for related misconduct or poor performance, pending the outcome of the treatment.

16.2 Our intention is to support all staff with alcohol or drug-related problems to regain good health. Depending on the progress made on the course of treatment, any disciplinary action may be suspended for a specified period, discontinued or restarted at any time as we see fit.

17. Records

17.1 Records of Drug & Alcohol tests completed, appeals lodged and their outcomes will be retained for the specific period below:

a) Negative Result- 6 months after the date of the negative test result.

b) Records of Non-Negative / Positive Drug & Alcohol tests will be for 6 years after the date of a positive test result.

17.2 Information & correspondence will comply with Briggs & Forrester Group Data Protection (GDPR) Policy.

18. Review and updating of this Policy

18.1 This policy is reviewed and updated annually and amended as necessary to reflect any changes to the Group, or related policies and plans, its management systems, best practices, stakeholder feedback or relevant legislation.

18.2 The Group's Senior Management Team continually monitor this policy's procedures to ensure compliance and continual improvement. All reports, cases, reviews and results of monitoring processes will be recorded and records retained.

Paul Burton
Group Chairman and Chief Executive