



GSJP South Ltd – Drugs and Alcohol Policy

The Management team at GSJP South Ltd are committed to ensuring that all employees, subcontractor personnel and others conducting business on our sites, in offices and depots undertake their duties free from the effects of drugs or alcohol.

For the purpose of this policy, the term 'drugs' refers to a 'controlled drug', as defined by the Misuse of Drugs Act 1971 and its subsequent modification order, and other substances that could affect a person's ability to carry out their duties. This includes medication, whether administered or provided by a medical practitioner or dentist, prescribed or purchased separately over the counter.

1.1 In compliance with the Health & Safety at Work Act 1974 we are committed to providing a safe working environment. This includes, as far as is reasonably practicable, promoting the good health and wellbeing of all our employees and any other person(s) associated with the Company.

1.2 Our policy is therefore to control, if not eliminate, the risks that may arise from the use / abuse of alcohol or drugs by our employees and those working on our behalf.

1.3 The Company does not wish to infringe upon employee's private lives and social and recreational activities and acknowledges everyone's right to freedom of choice. The purpose of our policy is to ensure that the use of alcohol or drugs by any of our employees, or those working on our behalf does not impinge on the company and does not affect the safety or efficiency of our business or put at risk to the health, safety or welfare of our employees or others.

1.4 We will aim to ensure all employees are clear about the rules concerning alcohol and drugs, and the consequences of breaking those rules (see Section 2 & 6 below).

1.5 In support of our policy we will arrange alcohol and/or drug testing through an impartial specialist collection agency in certain circumstances (see Sections 3 & 4, below).

1.6 The Company considers that the misuse of alcohol and drugs, insofar as it impinges upon the working environment, is a health and safety issue and will deal with any associated incidents as a contravention of health and safety rules and procedures. The contravention of health and safety rules and procedures is considered an act of Gross Misconduct.

1.7 We will provide advice, coaching and training to employees / managers as appropriate.

1.8 We will ensure that third parties (e.g. contractors / employment agencies) who work on our behalf or supply us with workers are aware of our policy and rules and agree to comply with them to our satisfaction irrespective of their own policies and practices.

1.9 This Policy is reviewed on an annual basis or more frequently if business requirements or changes in legislation demand a revision.

2. Alcohol & Drugs Rules

2.1 Disregard of these rules may be treated as serious misconduct and could lead to disciplinary action and possibly dismissal (either with or without notice).

a) Employees must not report for work whilst under the influence of alcohol or drugs.

b) Employees must not drink alcohol during working hours or during lunch / other work breaks.

c) Whilst representing GSJP outside normal working hours (e.g. whilst staying overnight on GSJP business, whilst entertaining or being entertained by GSJP clients, or whilst attending any function on behalf of GSJP or associated with GSJP), employees must approach social drinking sensibly and responsibly.

d) Employees must not consume, possess, buy or sell drugs during working hours, or during lunch / other work breaks, or from any of our premises / work sites / vehicles, or whilst representing us outside normal working hours (e.g. whilst staying overnight on GSJP business, whilst entertaining or being entertained by GSJP clients, or whilst attending any function on behalf of GSJP or associated with GSJP).

e) Employees found to be buying, selling or in possession of any illegal substance will be reported to the police without exception as these are classed as criminal offences under the Misuse of Drugs Act 1971.

f) Employees must submit to testing where required in accordance with this Policy.

2.2 Note that for the purpose of these rules, 'drugs' includes all illegal drugs (covered by the Misuse of Drugs Act 1971) and any other substance that we could reasonably assume is possessed or has been consumed, bought or sold for the primary purpose of enabling the user to experience changed moods, thought process or perception, and which could therefore potentially impair their work performance.

2.3 Where an employee is on prescription drugs or over-the-counter medication, they are responsible for finding out from their GP or pharmacist whether this may have any side effects that could impair their work performance. If they are advised that there is such a possibility, they must inform either their appropriate line manager or HR at the very earliest opportunity. Any medical information will be treated in strictest confidence, and in this specific context employees will not normally have to disclose the actual medical condition they are suffering from if they do not want to.

3. Alcohol and Drug testing

3.1 We will conduct alcohol and / or drug testing (arranged via HR) in support of our Alcohol & Drug policy, to ensure compliance with our rules, and where necessary to establish whether an employee is under the influence of alcohol and / or drugs. Employees may be accompanied by a fellow employee if it is practical and reasonable in the circumstances.

3.2 Testing may be required in the circumstances listed in section 4, below, and will be conducted by professional, gender appropriate, testers from a specialist agency. They will always aim to maintain the privacy and dignity of those being tested.

3.3 Testing will usually take place during normal working hours. All testing must be carried out expeditiously i.e. as soon as practically possible and usually within a 24-hour period.

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3.4 Alcohol testing will comprise of a breath sample collection using a calibrated digital alcoholmeter. If they test 'above the legal drink-driving limit', they will be deemed as being 'under the influence of alcohol' and have therefore 'failed' the test.

3.5 Drug testing will comprise of the collection of a urine sample, and (as appropriate) the sample being tested straight away using an approved test kit. Test-kit results will simply be advised as 'nonnegative' (provisional fail) or 'negative' (pass). Non-negative results will be sent to a laboratory for further analysis. If this confirms the employee had drugs (as per 2.2, above) in their system at the time of the test, they have 'failed' the test.

3.6 All results will be handled / processed sensitively and confidentially. Refusal to submit a specimen of breath or urine for testing will automatically be deemed as a fail and will be dealt with in accordance with our Disciplinary Procedure.

4. Circumstances in which testing may be required

4.1 NEW STARTERS. New starters may be tested as part of recruitment process. Those who 'fail', or who refuse to take the test, may have their employment / offer terminated.

4.2 WITH CAUSE. If we have a genuine and reasonable belief that an employee is in breach of our alcohol and drugs rules we may instigate "with cause" testing at our discretion. Depending on the circumstances, we may suspend the employee or temporarily transfer them onto alternative duties pending the results.

4.3 POST INCIDENT. We may at our discretion test employees who keep having minor incidents indicating a pattern of unsafe behaviors, or those involved in any incident which is subject to a safety or disciplinary fact-finding investigation. We may suspend or temporarily transfer them onto alternative duties pending the results.

4.4 RANDOM. In support of our Alcohol & Drugs Policy, we may randomly test up to 5% of all employees (including managers) each year. Test dates and locations will be chosen at our discretion, but thereafter individuals will be picked at random by the specialist collection agency from employee lists. We will not influence this process in any way.

4.5 COMPLIANCE TESTING. We may at any time at our discretion test employees who have received a warning under our disciplinary procedure for breach of our alcohol & drugs rules, or who we are helping and supporting through a period / program of rehabilitation. Such testing is to determine compliance with any warning given (and can only take place during the currency of the warning) or to determine continuing commitment to rehabilitate to our satisfaction, and if appropriate to resume normal duties, within a reasonable timescale.

4.6 WHOLE COMPANY. Employees may be tested upon a decision from the Management Team to check for company compliance to this policy

4.7 EXTERNAL CONTRACT TESTING. Employees may be tested (random or otherwise) if so, required under the terms of an external contract / contract for services.

5. Treatment of those who 'come forward' and request help

5.1 Employees who have or think they may have an alcohol or drug dependency are encouraged to come forward (to a manager, or to HR) to seek assistance. Evidence suggests that the earlier an employee comes forward in such circumstances, the better the chances of a good outcome.

5.2 Those who do step forward openly will be treated confidentially and with understanding and if appropriate will be referred (via HR) to a Company medical adviser or other specialist for advice on what sort of help and support they need

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/ we might provide. They will also be encouraged to contact the Drug and Alcohol Workplace Service, website, www.alcoholconcern.org.uk.

6. Treatment of those 'exposed' through testing

6.1 Employees who fail an alcohol and / or drugs test, and who aren't already being provided with help and support under section 5 (above), are in clear breach of our drug & alcohol rules and will be dealt with in accordance with our disciplinary procedure.

6.2 Following due process, and unless the case is so serious that summary dismissal results, the employee will receive a final warning that if during the warning's currency they fail a compliance test (under section 4.5 above) they are likely to be dismissed.

6.3 If evidence arises that an employee 'caught' through testing has an underlying dependency (confirmed by a medical practitioner if necessary) then as a reasonable employer we will offer them some support and assistance to help them rehabilitate. However, in reflection of the circumstances, the final disciplinary warning will stand.

The Management Team acknowledge that the Drugs and Alcohol policy applies to all GSJP operations, staff and subcontractors. It is available at all work locations and the policy is reviewed annually and amended as necessary.

Signed: