



SITE SERVICES
HOLDINGS

DRUG & ALCOHOL MANAGEMENT PROCEDURE

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1. PURPOSE

These guidelines detail the requirements for the management of individuals through Drug and Alcohol testing for Site Services Holdings (Company).

The Company is committed to providing a workplace free of hazards associated with Alcohol and other Drug use.

The purpose of these guidelines is to outline the process in regard to:

- An avoidance / refusal to submit to testing;
- The management of an initial non negative;
- The management of an actionable positive test; and
- The management of for cause testing.

2. SCOPE

This procedure applies to all Company Employees, Contractors, Sub-Contractors and Visitors, which includes all Site Services Holdings owned, controlled and occupied premises and workplaces where activities are being carried out on behalf of the Company.

3. DEFINITIONS & ABBREVIATIONS

Term	Definition
AOD	Alcohol and Other Drugs, has the same meaning as drug and alcohol
Company	Site Services Holdings, inclusive of all subsidiaries
Confirmed Positive - Alcohol	A confirmed positive result for alcohol means breath testing demonstrated the presence of alcohol in excess of the Company's cut off level of 0.00%, which has been confirmed through a secondary BAC test, or a result from a urine test.
Confirmed Positive - Drugs	A confirmed positive for other drugs means the presence of a known drug has been detected through an approved testing laboratory using Gas Chromatography – Mass Spectrometry (GC-MS) test, or other approved testing, that confirms the initial non negative test result.
Confirmatory Test	An analytical procedure that uses mass spectrometry to identify and quantify unequivocally a specific drug or metabolite. In the case of alcohol, a second breath test, or urine test.
Drug	A substance that has a physiological effect on the body either itself or through its metabolite(s).



Initial Non Negative Drug Test	An initial non-negative result means a result for a known drug through testing, which reveals the presence of a substance but has not yet been confirmed as a positive result by a laboratory GCMS. Note: Illicit, licit drugs (over the counter and prescription) and a number of other everyday substances, e.g. poppy seeds, can cause initial non negative results.
Negative Result	A negative results means the drug test has failed to detect the presence of drugs has been found through testing.
PIC	Person in Charge
Two Strike (breach) Rule	Two breaches of the Drug and Alcohol Policy will lead to termination of employment.
Visitor	A person attending a location or company controlled work site that is not their normal workplace. Any reference to 'worker' will include a visitor as defined.
Work Site	Refers to any work site where employees or sub-contractors of the Company perform work.
Worker	A person engaged on a Company worksite providing service through Site Services Holdings, a contractor, sub-contractor or visitor to the worksite.

4. RESPONSIBILITIES

4.1. Director

Responsible to ensure:

- Information on the risks associated with the use or misuse of drugs and alcohol in the workplace is provided;
- These guidelines are rolled out in their entirety across the Company;
- Compliance to these guidelines are monitored; and
- These guidelines are up to date, reviewed periodically and accessible to all personnel.
- Confidentiality and privacy of personnel records are maintained;
- Disciplinary process is effectively applied for non-compliance of this guideline and/or the Drug and Alcohol Policy

4.2. Managers

Responsible to ensure:

- This guideline is actively implemented and promoted;



- Personnel are provided with appropriate information, instruction and training;
- Compliance to this guideline is monitored and corrective actions applied in a timely manner;
- Risks associated with drug and alcohol use, misuse or dependency are identified, assessed and mitigated;
- Confidentiality of test records and privacy of personal details are maintained.

4.3. Supervisors

Responsible to ensure:

- This guideline is actively implemented and promoted;
- Employees actively participate in the Drug and Alcohol Policy and Guideline;
- Identification and management of potentially impaired persons;
- Assist with the provision of information, instruction and training;
- Corrective action is taken in accordance with the policy and this guideline.

4.4. All Personnel (Employees, Contractors, Sub-Contractors)

Responsible to ensure that whilst on company owned and/or operated premises, that:

- All requirements of this guideline are complied with;
- They participate in the drug and alcohol testing process;
- They are fit for work to perform assigned duties safely;
- They are not under the influence of drugs or alcohol during work hours;
- They do not consume alcohol during work hours;
- They are not using or are in the possession of illegal drugs;
- They notify their Supervisor, Manager or site escort immediately where there is evidence of potential impairment of themselves or other persons;
- Report to the relevant Manager, Supervisor or site escort:
 - a) Any person that is potentially impaired;
 - b) Any prescription medication being taken that has the potential to cause impairment; and
 - c) Any illness, disability or medical requirement (prior to entering the site) if it will prohibit or impair the carrying out of assigned duties in a safe manner.

4.5. Visitors

- Shall follow the instruction of the site escort or contact; and
- Submit to testing requirements as required.



5. AVOIDANCE / REFUSAL TO UNDERGO TESTING

The following are steps to manage a situation where a worker avoids or refuses to participate in AOD testing. Avoidance and/or continued refusal to participate in testing without a mitigating circumstance will be considered a breach of the Site Services Holdings Drug and Alcohol Policy and deemed as an Actionable Positive (clause 8).

5.1. Actions

1. When a worker avoids or refuses to participate in testing, the relevant PIC will be notified;
2. The PIC, and if applicable the worker's Manager, will meet with the worker to discuss the reason for their avoidance or refusal;
3. Where the avoidance is a non-attendance due to the worker's Manager not informing the worker of the testing or not providing transport to the testing facility at the scheduled time, this action will be considered a serious breach and will be subject to disciplinary action;
4. Unless there are mitigating circumstances, the worker will be advised that avoidance and/or refusal to participate is a breach of the Site Services Holdings Drug and Alcohol Policy which will result in an actionable positive result under this guideline;
5. If the worker refuses to participate following this discussion, the worker will be issued a final written warning for a breach Site Services Holdings Drug and Alcohol Policy based on the avoidance/ refusal to submit to testing;
6. The worker is then advised they cannot return to the worksite and will be expected to undergo an AOD test prior to commencing work the following day. A second refusal will result in the worker being advised that they face the consequences of a second actionable positive which will lead to a possible termination of employment; and
7. If there is a second refusal the worker will be removed from the worksite pending a formal meeting with the Director to discuss the avoidance / refusal.

6. INABILITY OR FAILURE TO PROVIDE A URINE SAMPLE

Where a worker has difficulty in producing a urine sample at the scheduled testing time, the worker is to remain in the testing area until such time as they are able to provide a sample.

If the worker is dehydrated and is “reasonably” unable to provide a breath and/or urine sample at the specified time they will be required to provide a sample at the earliest opportunity (within 3 hours).



6.1. Actions

1. When the worker is unable to provide a urine sample they should be asked to wait in the testing area until they are able to provide a sample;
2. If they continue to be unable to provide a urine sample, and there is no medical reason for this issue, they will be advised to remain at the designated testing area and provided three (3) hours to produce a result;
3. If there is no medical reason and the worker continues to be unable to provide a sample (after a further 3 hours), the PIC and the worker's Manager, will be advised of the worker's inability to provide a urine sample;
4. The PIC will inform the worker the inability to provide a sample within the designated time frame is deemed to be an Actionable Positive (clause 8);
5. The worker is then advised they cannot return to the worksite and will be expected to undergo an AOD test prior to commencing work the following day. Should the worker be unable to produce a urine sample on a second occasion worker will be advised they face the consequences of a second actionable positive which will lead to a termination of employment;
6. If there is a second instance of the inability to provide a urine sample, the worker will be removed from the worksite pending a formal meeting with the Director, to discuss the inability to provide a sample;
7. If there is a medical reason, the worker may leave the testing facility for the purpose of seeking medical advice to overcome this issue. The worker must then return to the testing facility for the purposes of providing a sample, within 24 hours of the initial testing time. Not providing a sample within the designated time frame is deemed to be an Actionable Positive (clause 8).

7. INITIAL NON NEGATIVE ALCOHOL AND/OR DRUG TEST

An initial non-negative result occurs when:

1. The initial Blood Alcohol Concentration (BAC) reading collected via breath test confirms the presence of alcohol. Confirmation of the initial non-negative result is then required through a secondary test; NOTE: if the BAC reading is collected via a urine test, no secondary test is required, this is an Actionable Positive test.
2. The urine drug screen identifies the potential presence of a drug group(s). Confirmatory testing of the initial non-negative result is then required through an approved laboratory which will identify the individual substances present in the sample provided. Medications (prescribed and over the counter) can cause a non- negative result in a preliminary screen e.g. codeine will register for opiates and pseudo-ephedrine for amphetamines.



7.1. Actions – Non-Negative Alcohol – Breath Test Only

1. The AOD screener carrying out the alcohol screen should advise the Company of an initial non- negative result;
2. The Site Manager / Supervisor is to record the initial non-negative result; and
3. The person is then to be moved to a private location to undergo a secondary test, with an alternate testing device, twenty (20) minutes after registering the initial non-negative result. The result of which becomes the confirmatory test result either positive or negative:
 - a) A confirmed positive is then to be treated as an Actionable Positive (clause 8); or
 - b) A confirmed negative result means the person is fit to return to work following a discussion with the Site Manager /Supervisor on the likely causes for the initial non-negative result.

7.2. Actions – Non-Negative Drugs

1. If the worker produces a non-negative result to drugs, the AOD screener will contact the PIC and the worker's Line Manager and advise of an initial non- negative test. The PIC must request confirmatory testing of the sample by GCMS **immediately** to avoid sample disposal;
2. For all initial non-negative samples detecting the presence of drugs, where the worker has not declared the use of licit drugs, or the result is inconsistent with licit drugs declared, the worker will not be permitted to return to the work site and will be stood down pending the confirmatory results via GCMS:
 - a) Should the person admit to using an illicit substance after producing a non-negative, the worker is to be removed from site and managed as an Actionable Positive (clause 8); or
 - b) If the worker is working on a remote site and does not admit to using an illicit substance the worker is to remain in the accommodation village until the confirmatory test is received. The Company may elect to return the worker to their point of hire.
3. The worker will be informed that the sample will be sent off for verification and the consequences of a positive result, which may include disciplinary action up to and including termination of employment, based on providing false information;
4. All initial non negative results for declared licit prescription / non-prescription medications require a Fitness for Work Assessment (Appendix 1) is to be completed prior to the worker returning to site;
5. The risk assessment is to be completed by the relevant Director who is to consider, with the assistance of an AOD Screener and/ or Safety Advisor:



- a) The type of work being performed;
 - b) The drug classification and side effects; and
 - c) The declared medications and dosage.
6. The worker may be requested to obtain medical verification of prescription medication;
7. If there are any concerns regarding the workers fitness for work, they are to be stood down until verification of the actual impairment can be established through medical review and/or the confirmatory test result; and
8. In the event that the confirmatory test result reveals a negative result, and therefore is no longer actionable breach, the worker is to be returned to work and receive the same payment they would have earned but for any time off work.

8. ACTIONABLE POSITIVE

The following steps are to assist in the management of a worker who returns a confirmatory positive result to alcohol or other drugs (confirmed through laboratory analysis) or the positive is a result arising from clauses 5 or 6.

Upon receiving a confirmatory test or an action resulting from clause 5 or 6, the worker is to be stood down on unauthorised leave (without pay) from the time of the initial non-negative result, or action(s) covered by clause 5 and/or 6.

Note: If the laboratory analysis returns a negative result the worker is to be returned to work and receive payment for any stand down period enforced whilst awaiting confirmation.

8.1. Actions

1. The PIC receives notification of a confirmed positive test result from an approved laboratory. The PIC/ Director is to then conduct a review, with assistance from an AOD Screener, against any declared substances at the time of the sample being taken to confirm the declared substances are consistent with the result (the lab report may contain this detail).
 - a) If the result is consistent with declared medications and does not impose any potential impairment leading to a health and safety risk, the worker can return to the workplace;
 - b) If the result is not consistent with declared medications or demonstrates the presence of illicit substance(s), the appropriate management action shall be implemented.
2. The Director is then to conduct a review of any previous breaches and arrange a formal meeting to meet with the worker to discuss the result;



3. At the meeting the Director, together with the worker's Manager if appropriate, will advise the worker of the test results, the required actions by the worker and disciplinary action to be applied as a consequence of the positive result, which includes:

7.2.1. First Breach

- Confirmation of a Negative Test Result must be produced to the PIC within two (2) weeks of the meeting before a return to the workplace is permitted;
- Once the negative test has been reviewed by the Director/ PIC, arrangements to return to work will be the normal roster/ work arrangements. In some cases it may mean waiting for that scheduled day, resulting in a stand down with no pay. However, other arrangements can be made at the discretion of the Director.
- If the employee has performance concerns or other warnings in place, or is receiving counselling, this will be taken into consideration when determining the level of discipline required, which may result in termination of the person's employment;
- The worker is to supply confirmation of attendance with a medical professional, outlining the assistance being sought in relation to AOD;
- The worker will consent to additional testing over the next 12 months;
- The PIC/ Director is to develop a plan for further testing and management on the workers return; and
- Any further breaches will result in the termination of employment.

7.2.2. Second Breach (within two years)

- The PIC will issue a termination letter for a secondary breach of the Site Services Holdings Drug and Alcohol Policy.

8.2. Tampering with Test Samples

Tampering with an alcohol or drug sample or substituting a test specimen with another person's urine will be treated as serious misconduct and will result in immediate dismissal.

9. FOR CAUSE TESTING

The Company reserves the right to conduct testing for substance use in accordance with the Site Services Holdings Drug and Alcohol Policy on any worker who is involved in, or may have contributed



to, any incident. Workers may be requested to undergo additional drug and alcohol for one or more of the following circumstances:

- Within one (1) hour following any incident, whether or not an injury may have resulted;
- A worker displays erratic, dangerous, unusual or inappropriate behaviour which may place themselves or others at risk;
- Upon the request of any other person in the workplace who has reasonable grounds to believe that a worker may be under the influence of drugs or alcohol and where a Supervisor / Manager believes that this may be the case;
- Where any evidence is found of possible drug and/ or alcohol use at work (e.g. paraphernalia, alcohol containers in baggage on worksites or in vehicles or accommodation), and the Supervisor / Manager can identify with reasonable confidence those who may have been involved; or
- If a worker leaves or does not attend the workplace whilst a Random Testing Program is being conducted.

For Cause testing should be carried out at a frequency dictated by evidence or the circumstance.

If there are reasonable grounds to suspect a worker may be affected by drugs or alcohol, that worker is to be stood down and escorted from the work site to a testing facility. The worker will be requested to undertake drug and alcohol testing as a determining factor for compliance with the Company OHS procedures by ensuring the worker is not impaired by being outside of the prescribed limits for drugs and/ or alcohol. This will occur as soon as reasonably practicable after the observation or incident, with the preferred time frame being within one (1) hour.

If for some reason the test is not able to be performed immediately following an incident, the worker involved is not to be left unsupervised until the test is conducted. Should a valid negative test be produced, payment will be made for that shift and any costs directly associated with the testing process.

Workers shall be stood down if refusal to undertake an Alcohol and Other Drugs Test occurs and the worker will be subject to the provisions of clause 5 - "Avoidance / Refusal to undergo testing".

9.1. Actions

1. When a reason to implement For Cause testing is identified, the Director is notified to provide approval;
2. The worker's Manager will then be required to send the worker for a For Cause drug and alcohol test;



3. The Director or delegate is responsible for arranging for the worker to attend the testing facility as soon as is practicable;
4. The worker will be tested in accordance with the Site Services Holdings Drug and Alcohol Policy and this guideline; and
5. The AOD Screener will provide the test results to the Director/ PIC who will then be responsible for carrying out the appropriate consequence management under these guidelines.

10. RECORDS

Managers must ensure that copies of warning notices issued as a result of a breach of the Site Services Holdings Drug and Alcohol Policy are sent to the Director or delegate, to be maintained in personnel files.

11. APPENDICES

11.1. APPENDIX 1 – FITNESS FOR WORK ASSESSMENT

Director/ Supervisor shall discuss with worker and complete assessment.

ASSESSMENT	ANSWER	LOW RISK	MEDIUM RISK	HIGH RISK
1. What work activity will be performed? <u>Rating Description</u> <ul style="list-style-type: none">Office Work - 1Manual Labour - 2Operating Heavy Machinery or other high risk equipment - 3		1	2	3
2. How many hours of sleep have been had in the last 24 hours?	Hours	7 or more	5 to <7	Less than 5
3. How many hours sleep have been had in the last 48 hours?	Hours	14 or more	12 to <14	Less than 12
4. How long has the person been awake? Risk Score = Q4 minus Q3 <u>Example:</u> If you have been awake 16hrs and you had 14hrs sleep in the last 48hrs, your score will be 16 -14= 2 (Medium Risk).	Hours	Q4 – Q3 = 0 or negative	Q4 – Q3 = 1 or 2	Q4 – Q3 = 3 or more



<p>5. Does the person feel alert?</p> <p><u>Rating Description</u></p> <ul style="list-style-type: none"> Feeling active, alert or wide awake - 1 Functioning at a good level, but not at peak, able to concentrate - 2 OK, but not fully alert - 3 A bit groggy or tired, hard to concentrate - 4 Sleepy, groggy, would like to lie down - 5 		1- 2	3	4 - 5
<p>6. How many alcoholic drinks were had before the worker went to sleep?</p> <p><i>Alcohol affects the quality of sleep.</i></p>		0 - 3	4 - 5	6 or more
<p>7. Is the worker on any medication or other substances that could cause drowsiness or cause them to be unfit for work?</p>		No		Yes
<p>8. If yes to the above, what are the medication(s) and their side effects?</p> <p>_____</p> <p>_____</p> <p><u>Rating Description</u></p> <ul style="list-style-type: none"> No side effects - 0 Likely to cause side effects which may impair mental or physical function - 3 Impairs mental and/or physical function e.g. causes drowsiness - 8 				
<p>9. Does the worker have any stress, health problems or other personal problems that are significantly affecting concentration and/ or sleep?</p>		No		Yes
<p>Score the responses as below:</p> <ul style="list-style-type: none"> Add the number of each column; Times this number by the respective multiplier to get a risk score for each Add the risk scores together. 		Total Green boxes	Total Yellow boxes	Total Red boxes
Raw Total				
Multiplier x		0	1	2
Risk Score				
TOTAL RISK SCORE (add scores together)				



LEVEL OF RISK		SUGGESTED ACTION	
LOW RISK Scored 0-3 on the risk assessment AND individual is: <ul style="list-style-type: none"> • Alert, normal eye blinks (less than 1 second); • Attends to surroundings; • Coordinated body movements; and • Tolerant of others. 		<ul style="list-style-type: none"> • Continue to monitor; and • Remind individuals about fatigue and alertness management strategies (interaction with others, coffee, exercise, cold air on face, etc.). 	
MEDIUM RISK Scored 4-10 on the risk assessment. Individual may be showing the following signs: <ul style="list-style-type: none"> • Irritable / impatient; • Longer eyelid closure (1-2 seconds); • Wandering thoughts; • Rubs eyes or face; • Facial contortions; • Restless movements; and • Yawning. 		As above plus: <ul style="list-style-type: none"> • Rotate tasks; • Encourage the use of alertness strategies (stretches, quick walk etc.); • Provide opportunity for a short break of no more than 15 minutes; • Have personnel work together (if possible); • Remove from safety sensitive work; • Assess fitness for work before you allow person to return to work; and • Schedule regular supervision for shift. 	
HIGH RISK Scored 11-17 on the risk assessment OR the individual reports he/she is significantly fatigued. Individual may be showing the following signs: <ul style="list-style-type: none"> • Quiet and withdrawn; • Long eyelid closure (2 or more seconds); • Fixed staring; and • Frequent yawning. 		<ul style="list-style-type: none"> • Immediately prevent person from working; • Send home (provide transportation- do not allow the person to drive themselves); • Complete incident report in STEMS; and • Review situation to determine possible causes and action required (see next section). 	
I have had a one-on-one discussion with my Director/ Supervisor and have responded honestly to all questions. I agree to follow the controls listed below to manage any identified fatigue issues.			
Action Taken: <input type="checkbox"/> No action required – individual to report any further fatigue issues to Supervisor <input type="checkbox"/> Controls implemented: _____ <input type="checkbox"/> Individual sent home – transport arrangements: _____			
Worker Name:		Supervisor Name:	
Signature:		Signature:	
Date:		Time:	