

Alcohol and Drugs Policy

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Document Control Sheet and Version History

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1. Purpose

The purpose of this policy is to satisfy Network Rail's requirement for alcohol and Drugs as identified by: -

- Railway Group Standard RIS-8070-TOM - Drugs and alcohol testing for safety-critical workers
- Transport and Works Act 1992.
- Network Rail Company Standards NR/GN/CPR/401 Guidance on Contractual H&S Requirements

This work instruction mandates measures to control risks to the operation of Network Rail Managed Infrastructure (NRMI) caused by the effect of alcohol and/or drugs on D2 Global Limited sponsored employees and sub-contractors.

2. Scope

This policy and the requirements contained within it apply to all D2 Global Limited sponsored employees (including associates) and visitors who hold either a PTS competency and/or are carrying out tasks deemed as Safety Critical. The term 'Safety Critical' is identified in 'Guidance on the Definition of Activities Regarded as Safety Critical under the Railway and Other Guided Transport System (Safety) Regulations (ROGS) 2006.

3. Definitions and Terminology

Definitions for any specific terms or jargon used in the policy to ensure all readers have a clear understanding.

Term of reference	Definition/Description/Explanation of Term
NRMI	Network Rail Managed Infrastructure
ROGS	Railways and Other Guided Transport Systems
A&D	Alcohol & Drugs

4. Responsibilities

Directors/Senior Leadership Team:

- Responsible for ensuring that a process is established within the company to check for the use of drugs and alcohol.
- Responsible for ensuring there are resources available for random unannounced screening within the 12 month period of RISQS Audit (in line with the current Network Rail Standards)
- Reporting any misuse of alcohol and drugs.

- Providing resources to help support individuals through occupational health.
- Providing resources to establish "For Cause" testing

Capability Leads/Line Managers:

- Reporting any misuse of alcohol and drugs
- Including relevant safety awareness information and items in team meetings.
- Following safe work practices and ensuring the safety of themselves and others whilst at work

Sentinel Administrator:

- Ensuring pre-sponsorship alcohol and drugs testing is booked with appropriate RISQS approved supplier
- Ensuring "For cause" contract is kept up to date and active.
- Organising 20% random testing as per Network Rail standards.

Employees/Subcontractors

- Responsible for never reporting to work or working in an 'unfit state' due to drugs or alcohol
- Responsible for informing their employer/sponsor of any prescription or over the counter drug/medication that might lead them to be in an 'unfit state', or adversely affect their ability to perform their role safely.
- Must comply with all drugs and alcohol tests their employer/sponsor requires them to undertake.
- Must inform their employer/sponsor where they have a drugs and/or alcohol misuse concern that could endanger themselves or someone else.
- Must comply with active monitoring' drug and alcohol testing deemed necessary if a misuse is reported.
- Should not be in possession of alcohol or drugs in the workplace.
- Should not consume alcohol or drugs whilst on duty

5. Policy

D2 Global (known as 'the company') is fully committed to enforcing an Alcohol and Drugs Policy in accordance with the following standards and procedures:

- Network Rail Company Standard: NR/GN/CPR/401 Guidance on Contractual H&S Requirements – Safety

- Network Rail Company Standard NR/L1/OHS/051 Network Rail Alcohol & Drugs Policy,
- Network Rail Supporting Procedure NR/LS/OHS/00120 Testing for Drugs and Alcohol,
- Railway Group Standard RIS-8070-TOM Drugs and Alcohol and the Transport and Works Act 1992.

The company's Alcohol & Drugs Policy applies to all employees (both permanent and casual) and subcontractors working on Network Rail Managed Infrastructure who could affect the safety of the railway.

The company will take all reasonable steps to ensure that employees (both permanent and casual), subcontractors and visitors are made aware of this policy and procedures it complies with.

The company will undertake alcohol and drugs testing of its employees under the following circumstances:

- Pre-employment and routine medical examinations
- On first transfer to a post which requires the holder to be qualified in Personal Track Safety or is designated as a safety critical work post.
- Random unannounced screening within the 12 month period of RISQS Audit (in line with the current Network Rail Standards) This testing can also be undertaken by Clients or Network Rail.
- For Cause – where there is cause to suspect that an employee/sub-contractor is using or is under the influence of alcohol or drugs.
- Following an accident or incident where the use of alcohol and/or drugs may have been a factor.
- At the discretion of management.

This policy will be communicated to all employees prior to commencing work on Network Rail managed infrastructure.

6. Procedure

A copy of the Policy Statement will be displayed on the company notice-board and at site offices/cabins as appropriate and will be briefed and issued to all staff at induction. All company sponsored staff will sign acknowledging that they have been briefed and understand the requirements of the policy. This signed acknowledgement will be kept in staff personnel files.

A process is in place that enables relevant persons to report the use of prescribed and over-the-counter medicines to their site manager

Staff may voluntarily seek help for alcohol and/or drug related problems. Staff seeking assistance with rehabilitation will not be allowed to work on NRMI until rehabilitation is complete and they are found fit for duty.

Requests for help must be addressed to the HR department prior to Alcohol and Drugs testing and assistance with rehabilitation will be provided at the discretion of the company.

6.1 Conducting Tests

Tests for alcohol & drugs shall be carried out by a suitably qualified agent of Network Rail's licensed testing provider. Testing shall include the collection and testing of a urine sample using a strict chain of custody procedure as detailed in NR/L2/OHS/00120. A refusal of test will be deemed as a positive result

6.2 Medication Declaration

Prior to collecting the sample, the candidate (employee) will be asked to declare any medication which they may be taking, have taken or had administered within recent weeks. If the candidate (employee) declares that they are taking or have recently taken or administered any medication, the testing agent shall arrange for the sample to be sent to an approved laboratory for testing in line with NR/L2/OHS/00120. If no medication is declared by the candidate, the sample shall be testing in the presence of the candidate using an instant drugs testing kit approved by Network Rail for the purpose. In addition, a sample of breath shall be taken using a breathalyser device calibrated to Network Rail's breath alcohol limit.

6.3 Pre-Employment Alcohol & Drug Testing

If an employee or sub-contractor have had a valid drugs and alcohol screening within the last 12 months that is recorded on the Sentinel database, then a further screening at pre-employment is not required. However, pre-employment screening is required on any company employees and sub-contractors that have not undertaken a screening within the last 12 months

6.4 20% Unannounced Alcohol & Drugs Screening

To comply with Railway Group Standard RIS-8070-TOM (current issue) Alcohol & Drugs, the company will screen a minimum of 20% of its operational workforce who work on Network Rail Infrastructure. Only sub-contractors who comply with this standard and carry out unannounced sampling will be approved and used by the company

Unannounced generation of names will be selected blind from a container and the relevant screening will be arranged using RISQS approved Medical and A&D Providers. All results will be input to the Sentinel system as an Unannounced Alcohol and Drugs Test. Records of unannounced generation together with unannounced A&D certificates will be stored securely. All unannounced certifications will indicate that it is an unannounced test

Individuals will not be notified that they have been selected for testing until immediately prior to the test and refusal to submit to testing will be treated as a positive result and will be dealt with accordingly.

6.5 For Cause. Accidents and/or Incidents

For Cause testing will be carried out following any accident or incident where it is suspected that safety has been compromised through the consumption of alcohol or drugs. The accident will be subject to a formal inquiry if it has resulted in major injury to more than one person or has resulted in a passenger or workforce fatality. All test results will be forward to the person responsible for investigating the cause of the accident.

6.6 For Cause. Behaviour

Where the behaviour of an individual undertaking any work gives cause to suspect that he/she is unfit to work due to the effects of alcohol and/or drugs, the Line Manager must not allow that individual to continue with any work activities

6.7 Arrangements for 'For Cause' Testing

For Cause Testing shall be undertaken using the approved For Cause Testing Medical Provider. The procedure to be followed and the contact details are made available to all staff authorised to make For Cause requests

Specimens for 'For Cause' Testing will be collected using a 'chain of custody' procedure, which are detailed below.

- Line Managers shall ensure that each person to be tested is removed to a secure place of safety and is accompanied at all times prior to testing. Any person tested will not carry out work on NRMI until a negative result has been confirmed.
- The person to be tested must not eat anything unless essential nor drink anything other than small quantities of water (except those who may be suffering shock may be offered a warm drink such as tea).
- The person to be tested must not take any medication, whether prescribed or 'over the counter' unless this is essential (i.e. insulin for diabetics).
- The person to be tested must not use the lavatory unless this is absolutely unavoidable

Until a negative result has been received staff must be prevented from work within Network Rail Infrastructure

6.8 Positive Results of Screening

When the results of any screening for alcohol and drugs prove to be positive the following action will be taken

Pre-employment

Any person giving a positive result will not be considered for employment and Network Rail & Sentinel will be notified accordingly

Unannounced

Should the unannounced test provide a positive result, the individual will be removed from site immediately. The individual will then be notified of a positive result via disciplinary action and possible dismissal. Their Sentinel card will be removed immediately. Sentinel and Network Rail will be notified, and the individual will no longer be allowed to work on NRMI.

For Cause

This procedure will be the same as unannounced (positive results of screening). Individuals receiving a positive result shall not recommence work on the NRMI for five years.

6.9 Communicating & Recording Results

Results of all drugs and alcohol tests shall be communicated to candidates and recruiting manager as soon as possible. Tests results will also be communicated to Sentinel and recorded on the Sentinel database.

Anyone failing or refusing the A&D test shall be prevented from carrying out any works in Network Rails infrastructure and Sentinel will be immediately informed.

Candidates will be made aware of their rights of appeal and the appeal procedures by the approved screening agent should a positive result be recorded.

7. Review

This policy is reviewed at least every year to ensure it remains effective, relevant, and appropriate to our organisation, and reflect legislative requirements, or earlier if:

- There is a newly identified risk to the business.
- an investigation which gives reason to doubt the effectiveness of the arrangements
- Audit results demonstrate that the procedure failed to deliver the required outcomes.
- There are changes in associated legislation.

8. Records

All records of screening (hard copy) will be kept on individual's personnel file for a minimum of 10 years. Records of all positive tests shall be retained indefinitely.

All documentation is held in the personnel files on the HR restricted SharePoint site.

All documentation and records generated are retained and managed in accordance with the Business Document Management Policy D2-GLB-QMS-POL-00001

9. Appendices/Document Reference

ROGS 2006

Transport and Works Act 1992

Network Rail Company Standard NR NR/GN/CPR/401 Guidance on Contractual H&S Requirements

Railway Group Standard RIS-8070-TOM (current issue) Testing Railway Safety Critical Workers for Drugs & Alcohol

Network Rail Supporting Procedure NR/L2/OHS/00120 Alcohol and Substance Misuse in the Work-
place.