

	Drug & Alcohol Policy	People & Culture
	Version 1.1	14 pages
Target audience:	<ul style="list-style-type: none"> All Staff 	
Contact person:	Meredith Menzies, People & Culture	
Policy owner:	Mark Graham, People & Culture	
Related Standards:		Related Guidance documents:
<ul style="list-style-type: none"> 		<ul style="list-style-type: none"> Discipline & Misconduct Policy Occupational Health & Safety Policy Workplace Diversity Policy Fatigue Management Procedure
Effective date:	Updated as per:	Modification:
01-06-2018	21-04-2022	Format change to RGF branding
Approved by:		Approved on:
Chief People Officer and Chief Legal & Risk Officer		01-06-2018
<p>Group Policy compliance</p> <p>Primary responsibility for adherence to this Policy resides with the SBU Unit CEO. Local laws and regulations supersede this policy. Should this policy be found to be in contradiction with such regulations, it is the CEO's responsibility to immediately inform the General Counsel of this matter. This policy supersedes all local company policies. Should a local policy contradict this policy, it is the CEO's responsibility to align the local policy with this policy.</p>		

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I. PURPOSE OF THE POLICY

Ensuring the safety of Our People is a priority for all businesses at RGF Staffing APEJ (RGF).. Inappropriate use of drugs or alcohol in the workplace has the potential to cause injury to RGF People and others (including damage to physical and mental health).

Accordingly, this Policy sets out the mutual responsibility that the Company and RGF People have to ensure the safety of our colleagues and team mates in any location or site, in accordance with our Occupational Health & Safety (OH&S) obligations.

II. SCOPE OF THE POLICY

This Policy applies to all employees of, and third parties acting for or on behalf of RGF, including Entities over which RGF has control or which are trading under the name of RGF.

As well as complying with this Policy, RGF People who are working on client premises must also comply with any site-specific drug or alcohol policy implemented by the client or at the place where they are working.

III. COMPULSORY ITEMS

This policy applies to all RGF employees.

IV. GOLDEN RULES

All RGF People are required to be fit for work when on duty.

V. GLOSSARY

Official term	Explanation
Prohibited drug	Any drug which is prohibited or controlled by legislation.

1. Interaction with Client Policies

As well as complying with this Policy, RGF People who are working on client premises must also comply with any site-specific drug or alcohol policy implemented by the client or at the place where they are working.

Please be aware that many of RGF's clients have their own drug & alcohol policy, which RGF People will be made aware of as part of their site induction, and will be required to comply with.

If a RGF Person in this situation has any doubt about how to comply with both policies, or if the policies are inconsistent, the RGF Person should contact their manager or supervisor for clarification as soon as possible. In the interim, the RGF Person should refrain from any conduct which is likely to breach either of the policies.

2. Fitness for work

All RGF People are required to be **fit for work** when on duty.

Your obligations:

- Not being under the influence of alcohol. This means either maintaining a NIL blood alcohol where a client requires this or in all other circumstances less than 0.02mmol- (meaning a single or standard unit of alcohol such as a middy of beer, small glass of wine);
- Not being under the influence of any drugs (whether illicit or lawful) or medications, that may adversely impact your ability to perform work safely;
- Where operating machinery or vehicles, fully disclosed any alcohol, drugs or medication consumed within the nominated period, in the event that they may impact your ability to work safely;
- Undertake a drug test or medical examination if asked by a Company representative, or a client representative if you are working on-site; and
- Ring your RGF Consultant immediately if you undertake a drug test on site and it returns a non-negative result.

Your safety and that of your colleagues is too great to risk- **When in doubt disclose any issues that you suspect may prevent you from being fit to work.**

Where a RGF person is unfit while on duty without reasonable excuse and no extenuating circumstances exist; a disciplinary process is likely to result in recommending termination of employment or engagement.

Our Obligations:

Where a manager or client supervisor on behalf of the Company, suspects that a RGF Person may be unfit to perform their duties, it is the manager's responsibility to assess the risk and take appropriate action, in line with the Company's WHS systems.

Where the Company is satisfied or reasonably suspects that a RGF Person is unfit for normal duties:

- the RGF Person will not be allowed to undertake normal duties until they are deemed fit to do so;
- The RGF person may need to arrange alternative transport home if they cannot use or operate a vehicle;
- the RGF Person is to comply with any direction to undertake suitable modified or alternative duties;
- The RGF person may be unable to return to the current assignment or work at a particular client site (either for a period of time or indefinitely); and/or
- the person may be stood down on leave without pay for the duration of the period where the employee remains unfit and/or while any disciplinary process is underway.

Refer to the Occupational Health & Safety Policy, Fatigue Management Procedure and Discipline & Misconduct Policy for further information.

3. Prohibited drugs

For the purposes of this policy, “**Prohibited Drug**” means any drug which is prohibited or controlled by legislation.

Your obligation:

You must not unlawfully use, possess, manufacture or distribute any Prohibited Drug whilst at work, in the workplace, using work resources including using RGF IT Facilities or at any other time in which you are representing the Company. This includes, but is not limited to, being under the influence of a Prohibited Drug during work time or in the workplace.

Any RGF Person who breaches this provision may be subject to disciplinary action, up to and including termination of employment or engagement. Further the Company may also report the conduct to the relevant authorities (e.g. Police).

4. Prescription / legal medication

Drugs including prescription, synthetic and legal, non-prescription drugs may affect fitness for work including, for example, pain relievers, sleeping pills, tranquillizers, cough medicine, anti-depressant medications, anti-nauseas anti-histamines, etc.

Your obligations:

- Investigate the side effects of any medication they are taking, or propose to take;
- Discuss any medication with health practitioner and explain your role and where you work to check if there is any impact to your fitness for work; and

- Notify us (and your site supervisor) where there is a possible impact and help us to understand this risk.

Our Obligations:

The information will be treated confidentially, meaning that only Company representatives such as the relevant manager/, OHS representatives or People and Culture representatives, may be notified for the purpose of assisting in determining any risk and any appropriate precautions.

If you attend a client worksite we may need to discuss with you making this information available to limited Client representatives for you to continue your assignment at that site.

5. Work related functions

During normal work hours, alcohol should not be consumed. However, there may be times when it is permitted for RGF People to consume alcohol during their work or during associated activities, should they choose to do so. For example, a RGF Person may from time to time participate in:

- work related functions during which alcohol is served;
- occasional celebrations during work hours;
- client development or networking activities (e.g. client lunches) where some alcohol consumption would be usual.

Whether it is appropriate to drink at these functions will depend on a range of factors. If you don't have express approval for consuming alcohol at a RGF workplace or client site- then don't.

At RGF sites, ultimately the Unit Manager will confirm their express approval for events where alcohol may be provided and/or consumed within each business.

It is not the intention of the Company to encourage or require any person to consume alcohol in circumstances where they would not otherwise do so. All RGF People should respect the decision of co-workers to refrain from drinking alcohol at work related events.

Your obligation at work related events:

Where alcohol is consumed during work related activities (including outside work hours), RGF People are to conduct themselves responsibly and appropriately. This includes:

- not becoming intoxicated to a level where the RGF Person is not in reasonable control of their actions;
- not engaging in conduct which could adversely impact the reputation of the Company or those associated with it, or to damage the Company's relationships with other parties (including clients);
- not encouraging another person to engage in Prohibited Drug use or irresponsible use of alcohol;
- not engaging in or encouraging any violent or intimidating behaviour, or other behaviour which would breach the Company's Workplace Diversity Policy or Anti Bullying Policies.

Refer to the Workplace Diversity Policy for further information.

6. Looking after each other

If you suspect that a colleague or a visitor is adversely affected by alcohol, medication or a Prohibited Drug, you must immediately notify their manager or a senior manager. The manager will take appropriate action immediately. This may, for example, include putting an individual into a taxi to get them to their home location or a safe place.

Any person who is hosting guests at a RGF sponsored function should ensure that, prior to the event, individuals invited to the event are reminded that they must act responsibly and professionally at the event. The person hosting the guests should also:

- refer to this Drug and Alcohol Policy and emphasise the importance of complying with this policy; and
- explain that excessive alcohol consumption is unacceptable (if alcohol is to be provided at the event).

7. Drink and Drug driving

Engaging in operation of a vehicle while under the influence of drugs or alcohol is a criminal offence in all states and territories. The impact to yourself or other road users could be severe including serious injury or death.

Your obligation

Where a RGF Person is under the influence of any lawful or unlawful drug that impairs their ability to drive or operate a vehicle safely; **OR**

where their blood alcohol concentration exceeds the legal limit appropriate for the vehicle and license.

They may not:

- drive a work vehicle;
- drive or operate a vehicle as part of their duties; or
- drive a vehicle on a trip to or from work (including to or from a work-related function),

We recommend that you don't drink any alcohol if you plan to drive. Alcohol affects different people in different ways and attempting to guess your blood alcohol concentration is difficult and inaccurate.

Our obligation

Where the Company holds a reasonable suspicion that a RGF Person is unfit to drive, the RGF Person may be directed to take an alternative form of transport to their next destination. Such directives relate to the health and safety of the RGF Person and others, and must be complied with.

Refer to the Occupational Health & Safety Policy for further information.

8. Drug & alcohol testing

Testing Procedure

At its discretion, the Company reserves the right to conduct drug and/or alcohol testing to ensure that RGF People are fit for duty and ensure that the workplace remains safe. The information requested in the Custodian and Consent form attached to this policy is required for the purposes of testing in accordance with this Policy.

The Company reserves the right to conduct the following kinds of drug and/or alcohol testing:

- **voluntary testing** (i.e. where the RGF Person voluntarily submits to testing, prior to presenting for work or continuing work, because they suspect that they may not be fit for work);
- **random testing** (i.e. where the Company requires a RGF Person, or groups of RGF People, chosen at random, to submit to testing, as a means of monitoring general compliance with this policy);
- **suspicion testing** (i.e. where the Company requires a specific RGF Person to submit to testing because the Company suspects the RGF Person of breaching this or a client's policy and/or being unfit for work);
- **mandatory testing** (i.e. where the Company introduces a predetermined pattern of regular or scheduled testing – an example would include a system which requires testing to occur whenever a health and safety incident or “near miss” is reported. Another example would be where a client requires a RGF Person to undergo testing prior to working on their site).

Apart from voluntary testing, the Company may conduct any drug and/or alcohol testing **with or without advance notice** to RGF People.

Your Obligations

- To undertake and comply with all testing requests as reasonably requested of you;
- To sign and complete the Custodian and Consent form annexed to this policy;
- To ensure that you do not tamper with or falsify any test sample;
- To never substitute samples with another person; and
- To aid, abet any of the above actions or attempt to disrupt the testing process in any way

If a RGF Person returns a non-negative result to a drug and/or alcohol test, the person will have the right to proceed with a confirmatory test.

Inability to submit to testing

Any RGF Person who, because of any significant personal injury or incapacity, is reasonably unable to submit to drug and/or alcohol testing in accordance with this Policy, may be granted additional time to enable them to complete drug and/or alcohol testing.

Prescription drugs

Any RGF Person who is taking a prescribed drug will not be in contravention of this Policy as a result of taking that drug in accordance with the prescription, provided that the RGF Person follows the steps outlined in section 5 of this Policy.

Where a RGF person returns a non negative outcome or engages in any breach of this section, this will be treated very seriously by the Company and may result in disciplinary action up to and including termination of employment or engagement. Should a RGF Person return such a result, the steps outlined in section 3 above may apply

Our Obligation:

Any drug and/or alcohol testing undertaken by the Company will be conducted by appropriately trained or qualified persons in accordance with accepted procedural standards (including Australian Standards relating to testing methods and threshold standards, where available).

This may include the use of procedures such as mouth swab, blood, urine and breath testing.

Complaints about testing process

Any complaint or objection by a RGF Person in relation to the procedural steps during the drug and/or alcohol testing should be put to the RGF Person's manager in writing before the end of the working day or shift during which the test was conducted.

Privacy and confidentiality

Any information obtained as a result of a drug and/or alcohol test, and investigations in relation to such test results will be confidential, but may need to be disclosed to a client as a requirement of entry or proof of fitness for duties.

Any information obtained, collected, stored and kept in accordance with a drug and/or alcohol test will comply with the requirements of any Commonwealth, State or Territory privacy legislation.

Consultation

The Company may consult with RGF People from time to time in relation to appropriate drug and/or alcohol testing procedures, including:

- methods used for testing;
- procedures for treating personal information sensitively and confidentially;
- threshold standards used to identify "positive" test results.

9. Consequences of breaching this Policy

Breaches of this policy:

- may result in disciplinary action being taken (which may result in termination of employment, or ending of the contract for an independent contractor or representative of an independent contractor);
- should be treated as incidents that may endanger health and safety, and reported in accordance with the Company's WH&S incident procedures; and
- may void the Company's obligations and/or any insurances, leaving RGF People liable for or exposed to any damages or losses they suffer arising from their breach.

Refer to the Discipline & Misconduct Policy and the Occupational Health & Safety Policy for further information.

10. Support

The Company acknowledges that alcohol and drug use can result in illness (including dependency). Accordingly, where a RGF Person is counselled or disciplined regarding drug or alcohol issue the manager may also refer him/her to appropriate counselling or support services.

Any RGF Person who is concerned or aware that they may suffer from a dependency or other medical condition related to drug or alcohol use is encouraged to seek assistance from the Company or from a suitable service provider.

The Company may approve leave (with pay for those so entitled, or without pay) or otherwise subsidise participation in suitable treatment programs, subject to the Company's approval and provided the employee participates fully and positively. The provision of such assistance (if any) is at the discretion of the Company and will be determined on a case by case basis.

RGF Provides an Employee Assistance Program (**EAP**) which offers confidential support from external counsellors. The Company may make EAP available to external employees on a case by case basis. For more information about accessing EAP, contact:

- your direct manager or supervisor;
- your People & Culture contact for your business; or
- your RGF Consultant (if you are placed on assignment at a client site).

11. Drug & Alcohol Test – Custodian and Consent Form

STEP 1 – To be completed by a RGF Person undertaking a drug/alcohol test

Surname:		
Given name:		
DOB:		M/F
Address:		
Identity of Worker verified by	<input type="checkbox"/> Photo ID ID Type ID Number <input type="checkbox"/> Non Photo ID	
Reason for test:	<input type="checkbox"/> Random <input type="checkbox"/> Voluntary <input type="checkbox"/> Mandatory <input type="checkbox"/> Suspicion <input type="checkbox"/> Re-test	
<p>Worker Certification/Consent/Declaration (To be completed by donor or parent/guardian)</p> <p><i>I consent to the testing of my urine and or/oral fluid and/or blood and/or sample of my breath by an external testing/laboratory facility selected by Chandler Macleod Group Limited. I certify that the sample accompanying this test is my own and has been provided to me by the individual authorised to take such samples. I certify that the sample was obtained in my presence. Also, I certify that for any samples taken from me that are to be sent for laboratory testing, the containers were appropriately sealed and the information provided on the labels is correct. Also, I certify that the information provided on this form is correct. I consent to the release of results obtained from testing of the samples, together with all relevant details on this form, to Chandler Macleod Group Limited and any client of Chandler Macleod Group Limited which requires the results as a requirement of entry or proof of fitness for duties.</i></p>		
Medication / Drug Declaration:		
I have taken the following <u>drugs OR medication OR prescribed medication/s</u> within the last seven (7) days:		
1.	Date & Time:	

2.	Date & Time:
3.	Date & Time:
Name of Prescribing Doctor: (if applicable)	Dr.
I certify that the above information is accurate (RGF Person or guardian to sign):	
Signature and Date:	

STEP 2 – To be completed by testing personnel

<i>I certify that the sample identified on this form is that provided to me by the RGF Person named on this form who has provided the declaration above, and I have analysed the sample.</i>	
Collector Name:	Date of Collection:
Signature:	Time of Collection:
Comments:	Collection Site:

STEP 3 – To be completed by testing personnel

Test Conducted	<input type="checkbox"/> Alcohol Other <input type="checkbox"/> Cannabinoids (THC) <input type="checkbox"/> <input type="checkbox"/> Cocaine (COC) <input type="checkbox"/> <input type="checkbox"/> Opiates (OPI) <input type="checkbox"/> <input type="checkbox"/> Methamphetamine (MET) <input type="checkbox"/> <input type="checkbox"/> Benzodiazepines (BZO) <input type="checkbox"/>
Test Results: Time:	Alcohol Reading – initial: Alcohol Reading – re-test (if required): Cannabinoids (THC) <input type="checkbox"/> Negative <input type="checkbox"/> Positive Cocaine (COC) <input type="checkbox"/> Negative <input type="checkbox"/> Positive Opiates (OPI) <input type="checkbox"/> Negative <input type="checkbox"/> Positive Methamphetamine (MET) <input type="checkbox"/> Negative <input type="checkbox"/> Positive Benzodiazepines (BZO) <input type="checkbox"/> Negative <input type="checkbox"/> Positive Other <input type="checkbox"/> Negative <input type="checkbox"/> Positive Other <input type="checkbox"/> Negative <input type="checkbox"/> Positive
Provide Test Results:	Is Confirmatory test required: <input type="checkbox"/> Yes <input type="checkbox"/> No

Note. *This original document must accompany any specimen(s) dispatched for laboratory testing and be sealed inside the specimen bag.*

Follow-up Action Required

- None, this drug screen result was negative*
- Confirmatory tests required*