

Policy Document:**Guest Drug and Alcohol Policy****HOST Guest Drug and Alcohol Policy Statement**

HOST is committed to maintaining a proactive, safe and responsible environment for guests, visitors and team members.

Any issues surrounding the use of illicit drugs or alcohol related issues will be taken seriously and investigated fully by HOST Management.

HOST reserve the right to refuse future reservations and/or refuse entry to any persons of concern. Where necessary, HOST will prevent them from using the Campus accommodation and/or facilities.

HOST reserve the right to evict any persons of concern from residing or using the Campus accommodation and/or facilities.

Guest eviction from Campuses may be necessary where evidence obtained supports a serious breach of the guest agreed Accommodation Terms and Conditions or a serious breach of the Hinkley Point C (HPC) Workers Code of Conduct (COC).

The HPC workforce sign up to the project COC - designed to set clear expectations for the behaviour of all workers - this includes whilst residing at Campus or using the Campus facilities. The HOST Guest D&A Policy statement supports our commitment to the COC, namely in points 2 & 4:

'Be ambassadors for the HPC project through behaviours and actions both on and off site by not engaging in any conduct or activity that may affect the HPC Project's reputation or otherwise cause embarrassment to the HPC Project'

'Come to work fit for work. Workers must ensure that they are not intoxicated by alcohol or under the influence of illegal drugs. Workers should not work under the influence of prescription drugs if they could reasonably expect that there may be effects on their work performance or on the safety of themselves or others. Random and For Cause Alcohol and Drug tests are regularly performed on the HPC Project. Alcohol and illegal drugs are not to be brought onto any HPC project site or office.'

HOST may amend the Guest Drug and Alcohol Policy Statement at any time.

Purpose

The use of illicit drugs or alcohol related issues are associated with all licensed premises and hospitality settings. Even the most responsible and well-run licensed premises are not immune from issues. HOST will take a proactive approach to tackling any issues and building strong relations with the Police and local authorities.

The purpose of this policy is to detail how HOST will manage all drug and alcohol related issues

1. General measures in place
2. Response to illicit drug use
3. Response to alcohol related issues

1. General measures in place

- 1.1. Entry to the Campuses is limited to individuals who have been project inducted or closed user groups vetted by HOST. Production of a site access pass, confirmation of a booking reservation with identification shown, or client approval enables individuals to be permitted onto Campus by access gates controlled by the security team
- 1.2. A 24/7 security team holding Door Supervisor licenses is dedicated to each Campus. A qualified and experienced security professional is dedicated to both Campuses known as the Campus Security Manager and/or Security Responsible Person (SRP)
- 1.3. The Campus security team will conduct random patrols of the entire premises consisting of physical perimeter patrols, accommodation block checks, CCTV visual patrols of the external grounds and CCTV visual patrols of the premises licensed areas within the Central Amenity Building (CAB). Any suspicious activities, health and safety, or security issues will be responded to and reported to the Senior Management for review and escalation where necessary
- 1.4. CCTV will always stay in place within the CAB in all premises licensed areas. The requirements for CCTV have been met by the guidance of the HPC Policing team
 - 1.4.1. CCTV recordings are retained for a maximum of 31 days, copies will be made on request by the Police, or request by the HOST Information Officer for a client request
 - 1.4.2. The security team are equipped with Body Worn Video (BWV) to record evidence, to act as a visual deterrent and to act as a third-party witness
 - 1.4.3. HOST is the data controller. The SRP and the Campus security team are the operators of the CCTV system and BWV
- 1.5. All possible measures are put in place to ensure confidentiality and are included in the HOST privacy notices. If a guest believes the HOST organisation has not

- complied with data protection rights, they can write to the HOST Information Officer by the email address displayed on the premises and in Privacy Notice
- 1.6. HOST and the Campus security team have a joined up and holistic approach with the HPC security team. Any incidents or issues that could affect the efficiency of NNB/HPC, put site operations at risk or impact the wider business reputation will be reported to the Security Control Room (SCR) and/or NNB Campus Service Manager in the agreed reporting structure
 - 1.7. HOST and the Campus security team will support all NNB/HPC initiatives for health and safety, security and guest/team welfare. HOST will collaborate and lend support to the HPC Police Liaison Officer and the HPC Security Enquiries Lead for appropriate information sharing and gathering for the prevention and detection of crime, and/or risk to the wider business reputation. These working relations are managed by the SRP and the Campus Operations Director
 - 1.8. The SRP will maintain the relation with the Avon and Somerset Police and the HPC Policing team, reviewing any drug, alcohol or project reputational issues that may arise within the Campuses
 - 1.9. HOST supply a Duty Management team lending support to the Campus security team and Senior Management. The Duty Managers' patrol and monitor the CAB areas and accommodation areas, the team are trained in identifying issues to report to the Campus security team
 - 1.10. HOST Senior Management and the SRP will maintain a guest anti-social behaviour tracker to record all issues with guest conduct which do not comply with HOST standards or comply with the HPC COC
 - 1.10.1. Any guest found to be in breach of the HOST Accommodation Terms and Conditions or the HPC COC may be investigated and interviewed in serious situations. Pending a review by the SRP and Campus Operations Director, a guest could be provided with an appropriate warning or evicted from Campus as a final measure. Any evictees or serious guest issues of concern will be reported to the NNB Service Manager, Site Operations Programme Manager and site IR Manager
 - 1.11. HOST room attendants and CAB cleaners will monitor and report any suspicious activity or finds to the Campus security team during routine guest room cleans or CAB cleaning as per the HOST standard operating procedures
 - 1.12. Annual reviews of reporting suspicious behaviours process and policies are overseen by the SRP in collaboration with HOST Senior Management team
 - 1.13. HOST recognises in some cases, alcohol or drug dependence can be an illness and, in cases where there is a health problem related to the use of drugs or alcohol, including prescribed or 'over the counter' medication, individuals who make a declaration will be treated sympathetically. HOST will treat all data, declarations and information in accordance with its Data Protection Policies and Privacy Notices
 - 1.14. HOST will promote awareness to drug and alcohol issues within the Campuses. HOST provide campaign posters targeted at recognising drug and alcohol related issues and guidance on how an individual can seek help and support

- 1.15. HOST are committed to maintaining an appropriate resource of Mental Health First aiders to support all guests and team members on Campus
- 1.16. Where concerns are raised over guest's welfare, HOST will do their utmost to keep in contact with the guest. However, it remains the employer's responsibility for the duty of care of their employees

2. Responding to illicit drug use

- 2.1. The security team are trained in understanding the law for illicit drugs, identifying types of drugs and the understanding of offences regarding illicit drugs
 - 2.1.1. The team are trained to identify suspected drug use and the management of searches (with consent) and how to deal with those suspected as being in possession of illicit drugs whilst residing as a Campus guest or using the Campus facilities
- 2.2. HOST employ security officers who hold Door Supervisor licenses. Door Supervisors have no statutory legal rights to search individuals and any search must be conducted with the individual's consent. If there is due cause to request a search and the individual does not consent to being searched, the Campus security team reserve the right to refuse entry to the Campus and/or Campus licensed premises areas
 - 2.2.1. If an individual is found to be in possession of a controlled substance, the campus security team will seize the item(s), and if applicable, request the individual to leave the licensed premises area of the CAB or seize the item and request the individual remains present with the security team whilst the Police are contacted
 - 2.2.2. The Campus security team will take lead from the Police on their preferred option and make a distinction between the number of drugs for personal use and number of drugs for intended for sale. Any seized items will be placed into a self-sealed evidence bag. The front side of the evidence bag will be completed at the time of seal to include, but not limited to, name of security officer reporting, date, time, location, description and officer signature
 - 2.2.3. A colleague of the security officer, and utilisation of the BWV, should always be present and used to witness this process to protect the integrity of teams against any potential allegations. The Campus security gatehouses have safe drawers for seized items to be contained with only the SRP to have access preventing allegations or misuse
- 2.3. If the security team believe an individual to be in possession of or inhabited by illicit drugs whilst in the CAB, they must politely state the Campus policy on illicit drugs and ask the individual to vacate the premises emphasising our legal obligations and stating we could face prosecution for allowing drug use on our licensed premises
- 2.4. HOST teams will look to tackle illicit drug related issues in the first instance but will not put teams or guests in any unnecessary risk. If the security team or duty management feel that the situation is unsafe, they will call the Police to ask for advice or assistance

- 2.5. A detailed Drug Log is kept by the SRP recording all drug related searches, findings and observations within the Campuses. These records will be made available, upon request, to the Police or to an authorised Licensing authority
 - 2.6. Cocaine detection wipes are managed by the Campus security team and SRP. The wipes will be used in common public areas and for due cause. They can presumptively identify cocaine from trace amounts of residue on surfaces that been in contact with cocaine. The results are immediate and the wipe will turn blue. Regular monitoring of public area surfaces will identify any potential scale of an issue or rule out suspicious reside. This will enable the Campus security team to take appropriate action to assist investigations
 - 2.7. HOST conduct internal team member, embedded subcontractors and partners random and 'for cause' drug and alcohol testing
 - 2.7.1. The process is conducted by HOST HR Team and the SRP as per the HOST Drug and Alcohol Testing Policy (HR P03)
 - 2.7.2. The drug test is through an oral swab test and the alcohol test is carried out using a breathalyser with immediate results
- 3. Response to alcohol related issues**
- 3.1. The mandatory conditions and operating schedule of the Campus premises license (Licensing Act 2003) authorised by Somerset West & Taunton Council will be followed and adhered to by the South West Larder (SWL) teams. The bars are operated by SWL, who are the holders of the premises license
 - 3.2. A Bound Register containing all refusals will be maintained for each Campus and audited by the Designated Premises Supervisor (DPS) within the SWL teams
 - 3.3. All SWL bar team members are trained for the safe and responsible sales of alcohol
 - 3.4. The Campus security team patrol the bar areas and public toilets regularly during bar opening times, HOST and the security team will support and liaise with the SWL team to comply with licensing requirements
 - 3.5. Radios are situated behind each bar serverly area enabling the SWL bar teams to contact a security officer for assistance when needed
 - 3.6. If an individual is deemed to be intoxicated and disorderly, service of further alcohol will be refused and the guest will not be allowed to enter the premises licensed area or remain within those areas
 - 3.7. HOST teams will conduct necessary welfare towards intoxicated guests as per the HOST standard operating procedures of intoxicated guests
 - 3.8. HOST and SWL teams will look to tackle all alcohol related issues in the first instance but will not put teams or guests in any unnecessary risk. If the security team or duty management feel that the situation is unsafe, they will call the Police to ask for advice or assistance