

DRUGS & ALCOHOL POLICY & PROCEDURES – REVISION 8.0

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DRUGS & ALCOHOL POLICY

OVERVIEW

TMO Traffic Highways Ltd, (“The Company”) must provide a safe and healthy working environment. It recognises that that Drugs and Alcohol (including prescribed and over the counter medication) can impair users perception, reaction times and work performance leading to an increased likelihood of accidents and longer term ill health.

Drugs and alcohol can have an adverse effect on the safety, health and wellbeing of not only workers (who are users of Drugs and Alcohol) but the safety of others (who are affected by Drugs and Alcohol users acts or omissions) in the work place

The policy, which applies to all employees, aims to:

promote the health and well-being of employees and to minimise problems at work arising from the effects of alcohol or drugs;

identify employees with possible problems relating to the effects of alcohol or drugs at an early stage;

offer employees known to have alcohol or drug-related problems affecting their work referral to an appropriate source for diagnosis and treatment if necessary.

The policy does not apply to an employee who commits a clear breach of company rules due to overindulgence of alcohol or drugs on one or more occasions. In these cases, action will be taken under the disciplinary procedure as appropriate.

TMO Traffic Highways Ltd will ensure that all its employees work within the laws of the land. The UK laws on use of drugs and alcohol are clear:

- It is a criminal offence for certain workers, such as drivers or operators of public transport systems, to be unfit for their work due to taking drugs or alcohol.
- It is a criminal offence to be unfit to drive, attempt to drive or be in charge of a motor vehicle when under the influence of drugs or alcohol.
- The possession, supply or production of controlled drugs is unlawful except for in special circumstances (e.g. when they have been prescribed by a doctor).
- Employees are also legally required to take reasonable care of themselves and to behave in a way that does not pose risks to the health and safety of themselves or others in the workplace. This includes consideration of the effects that intoxication through taking alcohol or drugs may have.

In order to ensure compliance with the law, TMO Traffic Highways Ltd will undertake random drug / alcohol testing within the company. These will be carried as part of a random testing scheme or may come as a result of an incident/accident.

To ensure the testing is legal and safe the following arrangements will apply:

- Testing only to be carried out as a part of this policy, and only by trained staff who will carry out the test in a non-invasive way – usually by urine sample, exhalation or oral drug testing.
- Sample(s) to be collected under supervised conditions but respecting human dignity.
- Sample(s) to be kept under “Chain of Custody” at all times;
- Screening test for alcohol / common drugs to be carried out on this sample with either positive or negative results;
- Any positive results from screening to be confirmed by sending away for further analysis under scientific techniques and laboratory conditions.
- Confidentiality will be maintained at all times.

DEFINITIONS

- Alcohol means any beverage that contains ethyl alcohol (ethanol). Including but not limited to beer, wine and distilled spirits.
- Biological Testing means the scientific analysis of urine, blood, breath, saliva, hair tissue, and other specimens of the human body for the purpose of detecting an illegal drug or alcohol.
- Company Premises and facilities means all property of TMO including but not limited to, the office facilities, sites and areas where TMO carry out business. TMO-owned leased or used vehicles and equipment wherever located.
- Contraband means any article the possession of which on TMO premises or while on Company business causes an employee to be in violation of this policy or other work rule. Contraband includes, but is not limited, to illegal drugs, alcoholic beverages, and drug paraphernalia.
- Drug means all drugs and psychoactive substances (formerly known as "legal highs") that could adversely affect behavior or performance and lead to an increased risk of accident and/or injury occurring in the workplace.
- Fit for work means that an individual is in a physical, mental, and emotional state that enables the worker to perform the essential tasks of his or her work assignment. This fitness ensures the work is completed in a manner that does NOT threaten the safety or health of oneself, co-workers, property, or the public at large.
- For cause situation is any situation in which a worker’s job performance conflicts with established job standards relating to safety and efficiency. The term includes accidents, near accidents, erratic conduct, any unsafe performance behavior, excessive absenteeism and tardiness and unexplained deviations from productivity.

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- Illegal drug means any drug which is not legally obtainable; any drug which is legally obtainable but has not been legally obtained; any prescribed drug not legally obtained; any dosage level different than recommended by the manufacturer or being used for a purpose other than intended by the manufacturer; and any drug being used for a purpose not in accordance with bona fide medical therapy. Examples of illegal drugs include, but are not limited to, cannabis substances, such as marijuana and hashish, cocaine, heroin, phencyclidine (PCP), amphetamine, opiate, methamphetamine, methadone, benzo's and so-called designer drugs and look-alike drugs.
- Legal drug means any prescribed drug or over-the-counter drug, which has been legally obtained and is being used for the purpose for which prescribed or manufactured.
- Possession is meant to also include the presence upon a person or within a person's personal property and in the body system of any detectable amount of an illegal drug.
- Random testing means a testing process in which selection for testing is made by a method employing objective, neutral criteria which ensures that every person subject to testing has a substantially equal statistical chance of being selected. The method does not permit subjective factors to play a role in selection.
- Reasonable belief means a belief based on objective facts sufficient to lead a prudent person to conclude that a particular person performed a particular act.
- Safety Critical Worker those involving activities where, because of risks to the individuals concerned or to others, the employees need to have full, unimpaired control of their physical and/or mental capabilities.

Source: Faculty of Occupational Medicine's "Guidance on alcohol and drug misuse in the workplace" 2006

- Under the influence means a condition in which a person is affected by any legal or illegal drug or alcohol in any detectable manner. The symptoms of influence are not confined to those consistent with misbehavior, or to obvious impairment of physical or mental ability, such as slurred speech or difficulty in maintaining balance. A determination of being under the influence can be established by a professional opinion, a scientifically valid test (e.g. urine analysis, blood analysis, breathalyser) and in some cases by the opinion of a lay person.
- Worker, anyone carrying out work on behalf of TMO at an TMO controlled work area.

EDUCATION, TRAINING AND AWARENESS

In order to maintain a drug and alcohol free workplace, TMO recognise the importance of maintaining awareness of the associated risks and importance of preventing occurrences. Drugs and alcohol risks will be covered at least annually via a toolbox talk and will also be revisited during the annual reinduction.

The company will provide sufficient information, instruction and training as is necessary to ensure that all employees have the knowledge required:

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- To understand the dangers associated with the effects of alcohol or drugs at work and the company policy regarding this;
- To understand the company procedures that will be adopted where there is found to be a deterioration in work performance from these effects;
- To understand the legal consequences of their actions.
- Managers and supervisors will be given additional training, including qualification on the testing of drugs and alcohol as the company deems necessary. There will be a strict procedure / form for the process of drug and alcohol testing.

TMO Traffic Highways Ltd recognises that there may be physiological problems that may arise as a result of the effects of alcohol or drugs upon work performance. The effects of alcohol or drugs at work can create serious health and safety risks. Therefore, the following rules should be adhered to.

- Do not come to work under the influence of alcohol or drugs.
- Do not bring alcohol or non-prescribed drugs on to company premises or construction sites;
- Check with your doctor or pharmacist about the side-effects of prescribed medications.
- Never drive or operate machinery if you are affected by alcohol or drugs.
- Ask your GP or the company for guidance and advice on sensible limits of alcohol consumption.
- Offer support and advice to colleagues who you suspect of suffering from alcohol or drug abuse; do not “protect” them by keeping silent.
- Ask for assistance if you feel that matters are beyond your own control.

REHABILITATION

Workers with drug or alcohol related problems can voluntarily seek help and support by speaking directly with their line Manager and/or the Company HR department prior to any announcement of testing. Such disclosures will be treated with confidence.

Any advice given by the line manager must only be performance and conduct related issues, advice on related personal health conditions is to be given by healthcare professionals.

If drug or alcohol dependency is discovered by means other than self-disclosure (e.g. as the result of random or with cause testing), the individual will be subject to disciplinary procedures.

Dependency will not be allowed as a mitigating circumstance within the disciplinary procedure.

For voluntarily disclosed problems TMO will support the worker by ensuring the worker is:

- Withdrawn from any work involving safety critical activities.
- Re-allocated to a non-safety critical role for the duration of their rehabilitation (lasting no longer than 6 months). Where a non-safety critical role is not available the company reserves the right to terminate employment.

TMO support is dependent on the worker agreeing to:

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- A full medical examination by a company appointed Medical Professional.
- Receiving suitable rehabilitation treatment.
- Proof of attendance of the above, any associated cost of which are borne by the worker.
- Participation in random and unannounced testing at the discretion of TMO for which all results must be negative.
- Job performance remains satisfactory
- No breach of company rules or relevant law occurs due to the use of Drugs and/or Alcohol.

Failure to meet any of the requirements agreed in the above may lead to disciplinary action.

Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers and their representatives:

Advise all existing employees and all persons starting work of the risks to health arising from the effects of alcohol or drugs (including some legitimately prescribed medications);

Encourage employees who may have alcohol or drug-related problems which affect their work to take advantage of the company referral procedure for diagnosis and treatment;

Enable supervisors and managers to identify job performance problems that may be attributable to the effects of alcohol or drugs and to consult with the appropriate company specialist to determine whether there is sufficient concern to warrant a medical evaluation;

In cases where the effects on work of misuse of alcohol or drugs is confirmed or admitted, agree upon a program of treatment in consultation with the company medical advisor and the employee;

The company will establish policy rules relating to an employee who is found to have misused alcohol or drugs or admits to the same. The policy rules may cover:

- Disciplinary action for refusal to accept help
- Conditions for accepting treatment
- Future employment if treatment proves to be successful
- Observation of medical confidentiality
- Effects upon pensions, benefits and employment rights.

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TESTING

• **ALCOHOL TEST**

The standard method for onsite alcohol testing is by means of breathalyser following the TMO Use of Breathalyser procedure. Should a medical professional consider it necessary for another type of test this will be agreed on a case-by-case basis.

ALCOHOL- TEST LIMITS

Refer to the relevant government agency of the country/territory where work is being undertaken.

Any worker giving a sample which shows any traces of alcohol, they will be requested to take another test after a short period (approx. 20 minutes) in case the alcohol had recently been consumed and as a result the detected alcohol content subsequently increases. The limit for alcohol for all employees for TMO is 15mcg per 100 milliliters of breath.

DRUG TEST METHOD(S)

TMO currently uses urine or saliva samples for drug testing, however the company reserve the right to use other methods if circumstances dictate e.g. testing for NPS's.

DRUG-TEST LIMITS

TMO consider all workers to be potentially at increased risk if they are using certain medicines (Over the Counter (OTC) or Prescribed Medicines), legal drugs (e.g. New Psychoactive Substances (NPS)) or illegal drugs.

TMO have a Zero tolerance for laboratory positive results for which no alternative medical explanation can be found.

The drugs tested for under the standard testing program include, but are not limited to:

- Amphetamines • Ketamine • Morphine
- Benzodiazepines • MDMA • Tramadol
- Cannabis (THC) • Methadone
- Cocaine • Methamphetamine

MEDICATION

It should be recognised that prescribed and over-the-counter medicines may also cause impairment at work. It is therefore the worker's responsibility to seek advice from their GP or pharmacist on any medicines they are taking prior to continuing work activities.

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Workers taking medication should inform their line manager of any possible side effects of their medication and assess its impact on their work. Any medical information will be treated in strictest confidence.

Workers are reminded that they should never take medication that is out of prescription date, or take another persons prescribed medication. This will be viewed the same as taking an illegal drug.

It is the responsibility of every employee to inform the company if they are prescribed any medication that may impair their ability to perform everyday tasks. These include but are not limited to:

- ALFENTANIL
- ASPIRIN WITH CODEINE
- BUPIVACAINE WITH FENTANYL
- BUPRENORPHINE
- BUPRENORPHINE WITH NALOXONE
- CO-CODAMOL
- CO-PROXAMOL
- CO-DYDRAMOL
- CODEINE PHOSPHATE
- DIAMORPHINE HYDROCHLORIDE
- DIHYDROCODEINE TARTRATE
- DIHYDROCODEINE WITH PARACETAMOL
- DIPIPANONE HYDROCHLORIDE WITH CYCLIZINE
- FENTANYL
- HYDROMORPHONE HYDROCHLORIDE
- MEPTAZINOL
- MORPHINE
- MORPHINE WITH CYCLIZINE
- OXYCODONE HYDROCHLORIDE
- OXYCODONE WITH NALOXONE
- PAPAVERETUM
- PAPAVERETUM WITH HYOSCINE HYDROBROMIDE

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- PARACETAMOL WITH BUCLIZINE HYDROCHLORIDE AND CODEINE PHOSPHATE
- PENTAZOCINE
- PETHIDINE HYDROCHLORIDE
- REMIFENTANIL
- SUFENTANIL
- TAPENTADOL
- TRAMADOL HYDROCHLORIDE
- TRAMADOL WITH DEXKETOPROFEN
- TRAMADOL WITH PARACETAMOL
- TEMAZEPAM
- DIAZEPAM
- OXAZEPAM
- ALPRAZOLAM (Xanax)
- METHADONE

TESTING PROGRAM

Testing will take place in the following circumstances:

1. AT INTERVIEW & INDUCTION

The company reserves the right to drug and alcohol test anyone attending an interview for a position within the company or as part of any induction process. Any refusal to take part in this testing process will be reasonable grounds to withdraw the companies offer of employment.

2. RANDOM

Workers and contractors will be randomly selected and tested at each of the company's premises throughout the course of the year. This process is regardless of the worker's job function. This is to ensure fairness within the policy and gives a clear message that the misuse of drugs or alcohol cannot be tolerated by the Company.

3. FOR CAUSE (On Suspicion)

Where it is suspected that an individual is in contravention of this policy or where it is suspected that an individual is impaired due to the use of drugs or alcohol.

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4. POST ACCIDENT, INCIDENT OR NEAR MISS

As part of an incident investigation, testing may be carried out on those individuals involved, where possible, to determine whether or not drugs or alcohol may have been a contributory factor. These individuals must be held separate to other witnesses and under the supervision of an TMO responsible person at all times until tested.

5. FOLLOW UP TESTING

If an individual's performance is affected through a dependency to drugs or alcohol, or where they are being supported by the Company for drug or alcohol dependency, they may be required to undergo monitoring testing as agreed by a relevant medical professional.

MANAGEMENT OF DONORS WHILST WAITING FOR THE COLLECTION OFFICER

When an individual has been identified for testing it is important that they are monitored to ensure that they do not take action or consume other substances which may compromise test results.

Individuals are to be taken to a location where they can be monitored in full view of an TMO representative.

If the individual asks to use the toilet whilst waiting for the collection officer they can be requested to wait, but for no longer than 20 minutes.

Cigarette breaks are not allowed as these can affect the test results.

The ingestion of food and liquids must be strictly controlled whilst the donor is waiting to give a sample. If they insist that they must have a drink or something to eat then this must be in line with the following:

- The donor may consume up to 250ml of water from a factory sealed bottle of water- no more than 500ml in total.
- Food can be given to the donor from a reliable source, preferably pre-packed if they have a medical condition that requires them to eat at certain times.

INDEPENDENT (LABORATORY ANALYSIS)

In the event of a dispute of result, non-negative drug test results obtained at the workface will be confirmed by laboratory analysis strictly following TMO Chain of Custody arrangements and documentation.

CHAIN OF CUSTODY

Chain of custody will be utilised on all tests where samples are taken and may be required to be independently tested. The sample will be divided into two containers in front of the donor and then sealed in an appropriate package. All chain of custody documentation will be reviewed by the Collecting Officer to ensure that the correct process is being followed.

RANDOM SAMPLE COLLECTION PROCEDURE

1. PROCEDURE FOR URINE SAMPLE COLLECTION

PREPARATION

- Check toilet area and remove all items which would not maintain integrity of sample.
- Check for blue colouring in toilet bowl.
- Seal water taps and toilet cistern so liquid cannot be obtained from them.
- Check that toilet is secure for use of donor so that no one else has access.
- Ensure that you have enough kits, including chain of custody kits for testing.
- Ensure that the donor has had nothing in their mouth for 15 minutes prior to the test.
- Ensure that you have the donor consent forms, latex gloves and timer.
- Advise donor who you are, what you are doing, what you expect from them and explain the procedures.
- Request donor to remove outer clothing (overalls, coats etc.) ensure that they have clothing on underneath before asking them to remove.
- Read the donor statement and ask them to sign.
- List any medication either prescribed or over the counter preparations that they have taken in the past 2 weeks.
- Put on a pair of latex gloves.
- Place 4-5 drug kits on the table in front of the donor and ask them to select one at random.
- Ask the donor to check the package has not been opened and that they are happy with the kit, if not ask them to select another.
- Write the lot number and expiry date of the kit (found on the packaging) onto the donor consent form.
- Open the drug kit package in front of the donor and place all the contents onto the table.
- If the donor states that they cannot pass urine at this time, offer them a 500ml factory sealed bottle of water (do not use water from the tap or water fountain).

UNDERTAKING

- *Ask the donor to go to the toilet with the co-assessor/witness. Make sure no one else is in the area.*
- *b) If the donor wishes to wash their hands before they begin, this is ok, but make sure you can see them at all times.*
- *c) Remove the key from the top of the collection device and then give the pot to the donor. Ask them to urinate into the pot at least as far as the minimum fill volume line. Ask them not to overfill the pot.*
- *d) Ask the donor not to flush the toilet before or after use, this is so the toilet can be checked afterwards if needed for any foreign articles/contaminants.*
- *e) Stand in the doorway while the donor is urinating. Usually they will have their back to you.*
- *f) Once the donor is finished ask them to hand you the collection device and allow them to wash their hands. Check the toilet area and bowl for foreign items, which could alter the sample.*

POST TEST

- Escort the donor back into the testing room.
- b) Check the thermometer reading on the front of the collection device is registering the sample at body temperature. This should be between 32 -38°C
- c) Check the sample to see if there are any foreign objects within the pot.
- d) Insert the key into the side of the pot, and make a note of the time the test began on the donor consent form. Peel off the label covering the rear panel.
- e) Start the timer for ten minutes. You should be able to read the results within 2-3 minutes. But where lines do not appear, you should give a full ten minutes before you read the results.
- Do not allow the donor to touch the collection device.
- If the donor provides a non-negative (positive) test, remember you will need to use the urine for the second line Chain of Custody test. So do not throw away.
- Continue with the completion of the donor consent collection form
- Even a faint line should be treated as though the line is fully visible
 - NEGATIVE result – (control and test line both visible)
 - NON-NEGATIVE result – (control line visible but no line visible for test)
 - INVALID result – (only test line visible or no lines at all)

2. PROCEDURE FOR SALIVA SAMPLE COLLECTION

PREPARATION

- Welcome the person
- Ask the person to confirm their identity – it has been known for people to stand in for someone and give a false name.
- Identify yourself and explain that they will be required to produce a saliva fluid sample for drug analysis and that you will explain the procedures to them.
- Ensure the person has nothing in their mouth that they might be able to use to adulterate the test (some people have been known to drink vinegar to adulterate the sample).
- If you feel that the person is trying to adulterate the results in any way, offer them a factory sealed bottle of still mineral water, no more than 500ml. Then wait 10 minutes before you take the saliva sample.
- Ask if the person has had or is on any medications, prescribed or non-prescribed in the last two weeks. You will need to record the date when last taken and the duration of the course if applicable.
- Try to obtain the precise name of any medication either prescribed or OTC (over the counter drugs) drugs.
- Women do not need to disclose information about birth control preparations.
- Record all this information on the donor consent form.
- Ask the person to choose a collection kit at random and check that it is correctly sealed. Open kit in front of them. Offer them a choice of at least 4 test kits.

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- Write the drug test kit Lot number and expiry date (found on the front of the packaging) onto the consent form.
- Put on a pair of nitrile gloves.
- Open the kit and place the contents onto the table. Write the donors name on the back of the test kit, in pen. Before you hand it to them
- Inspect the persons mouth just before performing the test.
- You are now ready to begin the test.

UNDERTAKING

You should instruct the donor to place the pad on top of the tongue and then 30 seconds later move it to the underside of the tongue. Moving it every 30 seconds thereafter. It must be in constant contact with the tongue to ensure that the pad soaks up saliva.

It should only be removed from the mouth when all three membranes have started to turn purple or magenta in colour. If it is removed too soon, there may not be enough oral fluid on the pad to run all the way up the three membranes.

The last lines to form will be the control lines at the top of each membrane.

POST TEST

This is a used drug test kit. The saliva has now run all the way along each membrane and line have formed.

The lines that form along the top across the letter C are the control lines. These tell you that each membrane is working correctly.

Under the control lines are the test lines.

The left membrane is testing for:

- 1) OPI (opioids)
- 2) COC (cocaine)
- 3) AMP (amphetamine)

The middle membrane is testing for:

- 1) MET (methamphetamine)
- 2) BZO (benzodiazepines)

The right membrane is testing for:

- 1) THC (Cannabis)

3. PROCEDURE FOR BREATHALYSER PROCEDURE

- Remove the mouthpiece from the packaging.
- For hygiene reasons, leave the protective wrapping around the mouth contact area until the mouthpiece is firmly attached to the instrument.
- Attach the mouthpiece to the machine. The mouthpiece audibly snaps into place
- Remove all packaging.
- Keep the button pressed for approx.1 second until the startup screen is displayed. The visual display should now say 'Ready'.
- Ask the donor to blow evenly and without interruptions into the mouthpiece. With some breathalyser machines, a progress bar is displayed. An adequate breath flow is signalled by a continuous tone.
- When an adequate breath sample is provided, the continuous tone stops with an audible click. The test subject can stop blowing.
- The test result is displayed with the date and time after a few seconds. In the case of a negative alcohol test, 0.00 will be displayed. In the case of a positive alcohol test, the measured alcohol level will be displayed.
- After the sensor's recovery time, READY is displayed and the device is ready to use again.

A minimum of 2x readings to be taken, 20 minutes. If the second reading is HIGHER than the first a further 2x more reading to be taken 20 minutes apart.

Important points to remember:

- a) Never leave the donor unattended.
- b) Never allow the donor to drink, eat or chew anything 15 minutes prior to the test
- c) Should the donor ask for a witness (during the paperwork completion only) this can be permitted but they must be a silent witness.
- d) Always ensure that the Data Protection arrangements are adhered to.
- e) Always ensure that all persons are treated with dignity and respect.
- f) Always refer to the company drug and alcohol policy
- g) Ensure at all times the integrity of the sample
- h) Under no circumstances should you allow the person to drive home if they have provided a positive drug or alcohol test.

SUMMARY

1. TMO Traffic Highways Ltd believes that effective workplace drug and alcohol policies are a better way of achieving results than drug/alcohol testing and that providing an environment where employees can discuss any drug/alcohol problems they have, with the prospect of gaining help and support will be more effective than a testing regime.
2. The company wants to promote a culture of safety and wellbeing to all of its employees, clients as part of its drug and alcohol policy, screening will be undertaken on new applicants prior to employment being offered. Failure at this stage will result in the applicant being rejected on suitability grounds. As a responsible company reserve the right to notify local authorities in the event of failure should the applicant be driving under the influence of drugs, or alcohol exceeding the legal limits in the UK.

I have read and understood the above policy and agree to act within the constraints set out above

(print name) (position)

(signature) (date)

Signed:



Printed Name: Ben Green
Job Title Operations Director
Date: 1st December 2025
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