

## Drug & Alcohol Policy



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# Drug & Alcohol Policy

## 1. Applies to

All Employees and visitors to Eureka Group Villages. For the purposes of this policy, the term “Employees” also includes managers, Managers, contractors, consultants and labour hire employees as defined in current Work, Health and Safety Legislation.

## 2. Purpose

Eureka Group is committed to providing employees with a safe and healthy environment within which to work. With our commitment to having a drug and alcohol-free workplace, the company aims to prevent incidents/injuries, improve employee well-being, and ensure they are fit for work.

The company expects responsible behaviour in the following areas and will not tolerate the following:

- Irresponsible consumption of alcohol and/or any use of illicit drugs during work hours.
- Employees being affected by drugs or alcohol that could impact upon the safety and well-being of themselves and/or others in the workplace.
- Employees who deliberately place others in harm's way by working unsafely, contravening company safety procedures or working whilst fatigued.

## 3. Objectives

- Eliminate the health and safety risks associated with employees using and abusing alcohol and illicit drugs and ensure the health and well-being of all employees, residents and visitors to Eureka Villages.
- Manage appropriately high-risk activities conducted within Eureka Villages.
- Ensure confidentiality of employees during any investigatory process implemented by this procedure.
- Clearly identify and disseminate to all employees the potential consequences of actions to be taken in the event of suspected alcohol and/or drug abuse.
- Provide work management guidelines where prescribed medication is being taken by an employee.
- Support and assist in guiding employees when extended working hours are required and sustaining the capacity to carry out duties safely.

## 4. Legislation

The Company recognises that fitness for work is a critical element for managing work health and safety. It acknowledges that the general mental and physical health of employees is a serious consideration when conducting work, including the impact of alcohol, drug use and fatigue. Work, Health & Safety Legislation requires:

That Eureka, as a Person Conducting a Business or Undertaking (PCBU), has a duty of care to ensure the health, safety and welfare at work of all employees and visitors.

Employees have a duty to take reasonable care for the health and safety of others and to co-operate with Eureka Group in its efforts to comply with Work, Health and Safety requirements.



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## 5. Eureka Group Operation Activities

Employees must be “fit for work” and not be impaired in such a way to introduce any risk into the workplace. This includes being fatigued or under the influence of drugs and/or alcohol when they work in any area of the business.

Refer to the Employee Performance Checklist (Appendix 1) for guidance on behaviours that may be indicating an employee being fatigued or influenced by drugs and/or alcohol.

## 6. Alcohol Consumption

Eureka Management acknowledges that general consumption of alcohol is a characteristic of society. This however does not negate our responsibility to manage workplace risks arising from impairment as a result of alcohol consumption. Impairment as a result of alcohol consumption is acknowledged across Australia as a significant contributor to an impairment that may result in accidents, injuries and significant community costs (including serious impacts on families).

Alcohol rehabilitation and counselling services are available to all Eureka employees via the Employee Assistance Program (EAP) – **Sonder**.

## 7. Legally prescribed drugs

- Medically or self-prescribed drugs may impair performance and impact on a person’s capacity to undertake normal activities.
- At any time of purchasing or being prescribed a potentially impairing medication the individual must inform the medical practitioner (including chemist) of their requirement to report to work and/ or undertake activities unimpaired and describe their usual work activities. It is also the responsibility of the employee to alert their Manager and / or People, Culture & Safety of any medication they are taking that may lead to performance impairment.
- Where it is determined that a medically prescribed drug or self-prescribed drug is leading to impairment, the employee is required to provide evidence they can safely attend work (such as a medical certificate) or alternatively take sick leave until the impairment no longer exists.
- Alternate duties may be made available, where appropriate, to employees unable to perform their inherent role as a result of prescribed medication. In circumstances where alternate duties are not available, Eureka will advise the employee confidentially and provide the option of taking sick and/ or annual leave during this period.

## 8. Alcohol and Illicit Drugs

The Company will not tolerate unauthorised possession, use and/or distribution of alcohol or illicit drugs (including synthetically derived substances) in the workplace. Employees doing so will subject themselves to the disciplinary procedures.

It is a condition of employment that all employees carry out their work unaffected by the use of substances such as alcohol or drugs. This code also applies to all Labor Hire employees engaged from time to time.

- “Unaffected” means employees are “fit to work” and “unimpaired” across all site locations, ensuring the safety and wellbeing of themselves, other employees and visitors.

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## 9. Employee Responsibilities

Employees who suspect that another employee is fatigued or under the influence of drugs and / or alcohol are encouraged to report this to their immediate Manager/PC&S or Operations representatives.

### Employees shall:

- Present to work “fit for work” and “unimpaired” or notify their immediate Manager and/or Operations team if they are not.
- Not present for work while under the influence of alcohol and/or drugs.
- Not consume excessive alcohol or take performance affecting drugs during working hours.
- Notify their immediate Operations Manager and/or PC&S team of any personal medication (prescription or over the counter) which, if taken, may result in an increased risk to themselves and other employees; and
- Follow instructions provided by their Operations Manager associated with these procedures.

## 10. Pre-employment Medical

Employee recruits of Eureka may be required to undertake a medical assessment and a drug and alcohol screening which is managed by an Eureka preferred medical provider. The screening incorporated into the medical is a urine test and covers alcohol and other drugs with a full laboratory pathology review / confirmation as a secondary test when an initial non-negative result is obtained.

## 11. Examples of Incidents Requiring Fitness Assessment / Further Investigations

The following incidents have potential to result in a serious incident and indicate an employee may be unfit for work (please also refer to Employee Performance Checklist). All managers must consider these issues and determine, via initial discussions with the employee, whether a fitness assessment is required and initial breath testing on site.

The following should be regarded as “red flags” and indicating a need for fitness testing:

- Employees behaviours are indicative of not being fit for work due to the outcomes of a performance assessment (see Appendix 1 Work Performance Checklist).
- Manager / Manager suspects that an employee is under the influence of drugs or alcohol (see appendix 1 Work Performance Checklist).
- Employee is involved in a serious incident resulting in immediate off-site medical treatment.
- Employee engages in an unsafe act or dangerous work which puts themselves or others at risk of injury.
- Employee engages in a violent act, or harm to another person(s) on site.
- Employee is found to be engaged in alcohol or drug use that impairs them. This may be supported by identifying via evidence at work (i.e. drug utensils or paraphernalia) or is reported by a treating doctor or health professional.
- Employee admits to being unfit due to alcohol or illegal substances use in discussion with a Manager.

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## 12. Procedure for Handling Incidents

The process below will be followed if Manager:

- is informed by an employee that another employee is potentially impaired,
- has either a reasonable suspicion that a work performance is impaired, or
- has conducted an Employee Performance Checklist (Appendix 1) which has identified (there is little or no doubt) that the employee may be affected/impaired by alcohol and/or drugs.

## 13. People, Culture & Safety/Management Responsibilities

- Assist all parties where required in adhering to the policy and procedures.
- Provide support for employees who voluntarily seek counseling by organising their participation in the Employee Assistance Program (EAP) Sonder.
- Where required, facilitate the investigation and disciplinary meeting (adhering to the guidelines established below).
- Support the process for managing the well-being and safety of employees.
- Provide training initiatives with villages to ensure all employees and Managers understand the procedure requirements and maintaining confidentiality.
- Provide confidentiality during the investigation process for employees whether they are self-reporting, using prescription medication, undergoing fitness testing or subject to disciplinary action.
- Engage in disciplinary decision with site management.

## 14. Counselling Services

- If an employee has a problem with drug or alcohol dependency, and they request to seek help, the company will assist where appropriate. Any request for assistance/ counselling will be strictly confidential.
- Prior to any disciplinary action been taken by the company, consideration should be given to offering counseling services as an option to assist with rehabilitating employees who may have a drug and/or alcohol dependency problem.
- Assistance / counseling services are available via the Employee Wellbeing Program, Sonder or other counseling service as may be recommended by People, Culture & Safety. Employees who continue to breach this policy and fail to take up any assistance / counselling offered, may face disciplinary action.

## 15. Procedure for Contractors and Labour Hire Employees

- If a labour hire employee or contractor is suspected of being affected by, or consuming alcohol or illicit drugs at work and is considered unfit for work, Eureka will refer the issue to the labour hire company or direct employer and remove the employee from the workplace.
- Payment of wages will cease at the point of being stood down.
- Breach of this policy may lead to permanent removal of the labour hire/contractor employee from the Eureka facility and follow-up actions with the labour hire agency or contractor. A negative test result will be communicated to the employee's employer and after consultation with them the employee may then be allowed to return to work.

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## 16. Company functions

Company functions to which employees are invited and alcohol is served must have prior management approval. Management must ensure the following requirements are in place prior to the function occurring:

- Both light- and non- alcoholic drinks should be made available.
- A set time limit on supply of alcohol and this is communicated to attendees prior to the event.
- Management encourages responsible drinking over the duration of the event and intervene as required where insobriety is noted.
- Provision of alternate transport to and from the event must be provided and may include public transport, car-pooling, taxi or bus hire.
- Prior to the event, communicate to attendee's appropriate behaviours and the Eureka Code of Conduct policy.
- Managers should ensure that all employees maintain appropriate behaviour in line with the company policies.

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## Appendix 1 -EMPLOYEE PERFORMANCE CHECKLIST

One singular behaviour/issue or a combination of both (as per list below) may indicate an Employee influenced by drugs / alcohol.

### ABSENTEEISM:

- ☐ Excessive absenteeism, without management authorisation or an approved medical certificate
- ☐ Frequent end and start of week absences (i.e. Mondays and Fridays) without a medical certificate
- ☐ Ongoing minor illnesses without a medical certificate
- ☐ Taking of unauthorised leave and on a regular basis
- ☐ Starting work late or leaving early

### ON THE JOB ABSENTEEISM:

- ☐ Continued absence from site or difficult to locate on site
- ☐ Frequent trips to toilet or lunch room / smoking area
- ☐ Long tea breaks
- ☐ Leaving workplace without authorisation /management approval

### QUALITY OF WORK:

- ☐ Difficulty in recalling instructions or assigned duties (cannot specify job tasks)
- ☐ Misinterpreting instructions given
- ☐ Unable to recall or accept mistakes in work
- ☐ Difficulties in learning new tasks
- ☐ Unreliable
- ☐ Significantly reduced levels of concentration (may be early in shift)

### QUANTITY OF WORK:

- ☐ Jobs typically taking more time
- ☐ Unable to maintain effort and inconsistent work pace, decreased productivity
- ☐ Performance appears acceptable because other Employees support them or there are fewer demands placed on them. (team members may cover up their poor performance / mistakes so they don't get disciplined)

### SAFETY ISSUES:

- ☐ More accidents on the job (in their area or injuries to individual)
- ☐ Near misses reported regarding individual
- ☐ Causing others to have accidents or injured due to their behaviour
- ☐ Incidents off the job (i.e. car accidents, indiscretion with police)



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## EFFECTS ON WORK TEAM:

- Increased conflict and arguments with team members
- Overreaction to real or imagined criticisms
- Tendency to blame others for their work / errors
- Wide swings in moods, morale and response to comments
- Borrowing money from other Employees / employer
- Complaints from other Employees (tensions and refusal to work with person)
- Regularly involved in arguments or fights

## EFFECTS ON RESIDENTS:

- Comments from residents or complaints on attitude
- Loss of relationship with residents

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## EFFECTS ON RESIDENTS:

- Comments from residents or complaints on attitude
- Loss of relationship with residents

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## 1. Assessment Details:

Date of assessment:		Site/Location	
Time assessment Commenced:		Time Assessment Completed:	

## 2. Reason for Assessment:

- ☐ Requested by Supervisor / Manager (may be as a result of co-Employee reporting)
- ☐ Requested by Regional Safety Adviser / RTW Coordinator
- ☐ Discrete Test – Requested by Assessed Person
- ☐ Accidental Exposure - Requested by Assessed Persons Manager / HSE / HR

Justification (MUST BE COMPLETED):

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## 3. Details of Persons Involved in the Assessment:

Assessed Person:		Position Title:	
Normal Work Location:			
Assessor:		Position Title:	
Normal Work Location:			

## 4. Impairment Assessment Observations

<b>A/ Speech</b>	<input type="radio"/> Normal <input type="radio"/> Slurred	<input type="radio"/> Clear <input type="radio"/> Confused	<input type="radio"/> Fast <input type="radio"/> Incoherent	<input type="radio"/> Slow <input type="radio"/> Other_____
<b>B/ Eyes</b>	<input type="radio"/> Normal <input type="radio"/> Pupils enlarged	<input type="radio"/> Glazed <input type="radio"/> Pupils pinpoint	<input type="radio"/> Bloodshot <input type="radio"/> Watery	<input type="radio"/> Eyelids drooping <input type="radio"/> Other_____
<b>C/ Breathing</b>	<input type="radio"/> Normal <input type="radio"/> Short	<input type="radio"/> Rapid <input type="radio"/> Jerky	<input type="radio"/> Slow <input type="radio"/> Shallow	<input type="radio"/> Laboured <input type="radio"/> Other_____
<b>D/ Skin</b>	<input type="radio"/> Normal <input type="radio"/> Abscesses	<input type="radio"/> Flushed <input type="radio"/> Ulcers	<input type="radio"/> Pale <input type="radio"/> Needle marks	<input type="radio"/> Perspiration <input type="radio"/> Other_____
<b>E/ Actions</b>	<input type="radio"/> Normal <input type="radio"/> Restless <input type="radio"/> Emotional	<input type="radio"/> Violent <input type="radio"/> Vomiting <input type="radio"/> Belching	<input type="radio"/> Swearing <input type="radio"/> Drooling <input type="radio"/> Scratching	<input type="radio"/> Hiccupping <input type="radio"/> Runny Nose <input type="radio"/> Other_____
<b>F/ Movement</b>	<input type="radio"/> Normal <input type="radio"/> Support required	<input type="radio"/> Violent <input type="radio"/> Clumsy	<input type="radio"/> Sluggish <input type="radio"/> Deliberate	<input type="radio"/> Tremor / shaking <input type="radio"/> Other_____
<b>G/ Balance</b>	<input type="radio"/> Normal <input type="radio"/> Unsteady	<input type="radio"/> Swaying <input type="radio"/> Falling	<input type="radio"/> Sagging <input type="radio"/> Staggering	<input type="radio"/> Other_____ _____

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<b>H/ Attitude</b>	<input type="radio"/> Cooperative <input type="radio"/> Anxious <input type="radio"/> Subdued <input type="radio"/> Relaxed	<input type="radio"/> Hostile <input type="radio"/> Talkative <input type="radio"/> Antagonistic <input type="radio"/> Irritable	<input type="radio"/> Excited <input type="radio"/> Dreamy <input type="radio"/> Depressed <input type="radio"/> Hallucinating____ _____	<input type="radio"/> Indifferent <input type="radio"/> Cocky <input type="radio"/> Other_____ _____
<b>i/ Comprehension</b>	<input type="radio"/> Good	<input type="radio"/> Poor	<input type="radio"/> None	<input type="radio"/> Other_____ _____

## 5. Comments from Assessed Person

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## 6. Other Observations / Comments

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## 7. Outcome *(this section to only be completed by Authorised Officer)*

**Yes**

**No**

Opinion: I believe the assessed person may be impaired: (This is based on cluster of items identified in section 4 above)	<input type="radio"/>	<input type="radio"/>
Opinion: I believe the assessed person should undertake fitness for work Assessment (drug and alcohol testing) as per the VGA Procedure (This is determined in consultation with HSE / HR operative)	<input type="radio"/>	<input type="radio"/>

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## 8. Sign Off

Position	Name	Signature	Date
Assessed person (not required)			
Authorised person			
HR / HSE Representative			
Supervisor / Manager			
Department / Business / Branch Manager			
Only the signatures of the authorised Assessor and Supervisor are required to progress the assessment to drug and alcohol testing			
<i>A copy of this document must be retained in the assessed person's personal file and forward copy to HR Service Centre</i>			