

A) Policy Statement

It is the Policy and duty of the Company to maintain a safe, healthy and productive working environment for those involved in and affected by its operations including employees, contractors, sub-Contractors, visitors, clients and members of the public. The Company will act to prevent and eliminate, so far as reasonably practicable, alcohol and drug misuse which can increase the potential for ill health, accidents, absenteeism, substandard performance, poor morale, inappropriate behaviour and damage to reputation.

For the purpose of this policy, the term 'drug' is used to describe both illegal and other psychoactive (mind-altering) substances which may or may not be illegal. Please refer to Appendix 1 for definitions of drugs/substances and alcohol, use and abuse.

This Policy applies to all employees of ASW Property Services Ltd, with particular emphasis on those who work at or visit high risk sites and/or work in high risk or safety sensitive jobs (where the consequences of drugs and alcohol abuse are greatest). Due to the nature of the work carried out by the Company, all customer premises are classed as high-risk sites for the purposes of this Policy.

Contractors working on behalf of ASW Property Services Ltd are required to comply with the standards of this Policy. It should be noted that the Contractor's employing company will be responsible for managing any breach of the Policy by its employees.

This policy will be reviewed regularly in line with the needs of the business and UK legislation. Any queries on this Policy should be referred to the Health and Safety or Human Resource representatives.

B) Education and Training

It is the Company's belief that raising people's awareness of the effects of drugs and/or alcohol abuse is an essential step in encouraging those who have a dependency to recognise this and seek help before it becomes a serious problem. The company aims to raise awareness through providing educational and supportive material, tool box talks and through other wellbeing initiatives.

Information on help and support available can be found in Appendix 2.

C) Key Rules

Failure to follow these Key Rules will be regarded as gross misconduct and may lead to summary dismissal:

- a. Individuals must be fit and ready to carry out their work duties at all times when at work, including on-call duties. Individuals must not drink/use illegal drugs or substances during working hours (including breaks) and should also consider how long it takes for alcohol/substances to clear their system.
- b. Individuals are prohibited from being at work or on Company business while impaired by alcohol, any illegal drugs or controlled substance in their system.

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- c. The use, possession, storage, transportation, promotion and/or sale of illegal drugs or drug equipment is forbidden during working time, in the workplace, at the worksite and in company vehicles, and is a breach of this policy and the law.
- d. Where individuals are prescribed medication or are taking over-the-counter medicines or herbal remedies that may affect their work performance or the safety of themselves or others, they must advise their Line Manager, Health and Safety or Human Resource representative.
- e. Whilst some psychoactive substances are not illegal, they mimic the effect of illegal drugs and therefore pose the same risks to health and safety. They are therefore treated by the Company the same way as illegal drugs for the purposes of this Policy.
- f. Individuals are required to undergo testing for alcohol or drugs in their system as per the circumstances defined in this policy (refer to Section E).

D) Help, Support and Confidentiality

The Company wishes to ensure that individuals recognise the threat posed by alcohol and drug/substance abuse and recognises that dependency is an illness. Individuals are encouraged to come forward and seek help and support (this will be treated in the strictest of confidence). The aim of this Policy is to help the individual return to productive work following treatment and rehabilitation with minimal disruption to their work, personal and social life. As far as is reasonable, an individual acknowledging dependency will be supported in managing the effects and will be allowed to attend treatment and rehabilitation within work time.

Employees discovered to have a dependency on alcohol, drugs or substances by means other than self-disclosure may depending on circumstances, be offered support as above.

We acknowledge that relapse is common with alcohol, drug and substance dependencies and, so far as is reasonable, we will support individuals through a relapse after treatment. Relapse could include, but is not limited to, the refusal of advice, continuing to drink alcohol/ misuse drugs or substances or failure to co-operate in the prescribed or recommended treatment. We will treat subsequent relapses on a case-by-case basis. During any review, we will take into account the individual's job role and the business needs. Managers should make sure that individuals are aware that disciplinary procedures may begin following subsequent relapses.

E) Policy on Testing

In addition to Key Rules, awareness and support for individuals with dependencies, Testing may be required to enforce the Policy and ensure a drug and alcohol-free workplace. The following aspects of the Policy applies to all employees and contractors of ASW Property Services Ltd, with particular emphasis on those who work at or visit high risk sites and/or work in high risk or safety sensitive jobs (where the consequences of drugs and alcohol abuse are greatest). Due to the nature of the work carried out by the Company, all customer premises are classed as high-risk sites for the purpose of this Policy. The policy on testing is as follows:

Random Testing: individuals may be selected at random to be drug and alcohol tested throughout the year.

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For Cause Testing: individuals may be required to undertake a For Cause Test following an accident, incident or on reasonable grounds of suspicion. This can be invoked at short notice.

The test will be carried out by an independent and reputable external screening company, under a tightly controlled procedure, ensuring the results are fair, accurate and objective. Tests are carried out in the strictest confidence and privacy, and with dignity.

Tests will be carried out with the individual's consent. An individual refusing to be tested under the provisions of this Policy may be subject to appropriate action including disciplinary action under the Company's disciplinary procedures, up to and including dismissal.

When a test is carried out, an individual is deemed to have failed the test if there is a presence of drugs and/or alcohol over the legal limit (35µg of alcohol per 100ml of breath in England and Wales) in their system. Guidelines on the drugs/substances tested for can be found in Appendix 3. In the case of a non-negative result, the external screening company will determine whether a legitimate medical reason exists. If the results indicate a prescription drug that is legally taken, but likely to impair an individual's performance, then a negative result will be recorded but the likely impact of the prescription drug on individual's performance will be discussed with the employee and their Line Manager, H&S or HR Representatives (as appropriate).

If there is no legitimate reason for failing the test, then a non-negative result will be recorded and the employee, along with their Line Manager/ H&S or HR Representative will be advised accordingly. This will be treated very seriously by the Company as a breach of our Policy, Key Rules and Site Rules and as such, the individual will be removed from site and suspended pending a full investigation. Confirmed positive results will usually result in disciplinary action (up to and including dismissal with or without notice) in accordance to the company's disciplinary procedures.

In the case of a Contractor being tested and a non-negative result, the Contractor's employer will be advised accordingly. It will be the responsibility of their employing Company to manage the case according to their Policy, but it will be classed as a breach of our Policy, Key Rules and Site Rules and as such, the individual will be excluded from site and any potentially any future work on behalf of the Company.

An individual may nominate a colleague or trade union representative to witness the test and where practical, the Company will try to arrange this where requested. The Company will take appropriate action in response to any attempt by an individual to falsify a test result and this may result in disciplinary action under the Company's disciplinary procedures, up to and including dismissal.

The Company can be prosecuted if it knowingly allows an individual who is intoxicated or under the influence of drugs to continue working, as this places other people at risk. If an individual is demonstrating signs of being intoxicated or under the influence of drugs, they will be suspended from duty (refer to Appendix 4 for Signs and Symptoms). If the screening result is not available by the time they should next start work, depending on the

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circumstances requiring them to be tested, they will either remain suspended from duty or be re-allocated alternative work until the result is confirmed.

F) Responsibilities & Compliance

Compliance to this Policy applies to all individuals, defined as employees (of all levels including management) and others under our control (sub-contractors/ self-employed individuals).

Breaches of the policy will be taken very seriously and for employees may be dealt with under the appropriate Company disciplinary procedure. In the case of sub-contractors/self-employed individuals, breaches of the policy may mean removal (temporary or permanent) from site and review of approval status.

Although all management have responsibilities for carrying out this Policy, the Operations Manager has overall responsibility in ensuring the Policy is enforced.

Signed:

Date: 4th January 2021
Version 5



Anthony Thomas
Managing Director
ASW Property Services Limited

Appendix 1: Definitions

Individuals – we define individuals as employees (of all levels and job type) and others under our control (contractors and sub-contractors).

Alcohol abuse – we define alcohol abuse as any drinking, either intermittent or continual, which interferes with health/ social functioning, work capability or conduct.

Drugs – we define drugs as illegal, prescribed and over the counter medicines and solvents and other psychoactive (mind-altering) substances which may or may not be illegal. In the case of prescribed and over the counter drugs, we recognise that their possession and use by the employee is legitimate.

Drug abuse – we define drug abuse as the use of illegal drugs, the deliberate misuse of prescribed or over the counter drugs, and the use of solvents, either intermittent or continuous, which interfere with health/social functioning and work capability or conduct.

Prescribed/Over the Counter Medicine use - prescribed medication, over-the-counter medication or herbal remedies used to treat a condition can have possible side effects or cause impaired performance. It is the worker's responsibility to inform their Line manager, Health and Safety or Human Resource representatives so that arrangements can be made where appropriate.

Appendix 2: Help and Support Information

Visit your GP

Drinkline: 0300 123 1110

Talk to FRANK: 0300 1236600

Alcoholics Anonymous: 0800 9177650

Narcotic Anonymous: 0300 9991212

Appendix 3: Guidelines of current substance testing

The 12 common drugs of abuse screened for in urine are:

Amphetamines

Barbiturates

Benzodiazepines

Buprenorphine

Cannabis

Cocaine

Ketamine

Methadone

Methamphetamines

Opiates

Phencyclidine

Propoxyphene

Alcohol (via a breath screening analyser)

Appendix 4: Symptoms and Signs of Drug Abuse

Unlike alcohol, where the symptoms of excessive consumption are obvious and easily recognisable, the symptoms of drug misuse can be misleading and ambiguous and be associated with medical conditions.

For these reasons, it is more appropriate in the first instance to concentrate on the job performance of the concerned individuals.

Changes in performance can manifest in many ways and could include the following:

- o Absenteeism and sickness
- o Sudden decrease in quality of work
- o Unexpected poor quality of work
- o Higher number of mistakes, misjudgement or accidents
- o Failure to meet deadlines
- o Bad employee relations

In addition to performance change, individuals may show:

- o Mood changes
- o Instability or aggression
- o Confusion
- o Fluctuation in concentration or energy

In more serious circumstances, evidence of drug misuse may be available in the following ways:

- o Scorched items of tin foil and matchbox covers
- o Syringes, needles and needle caps
- o Scorched spoons
- o Torn cigarette paper wrappings with filter still intact
- o Small mirror, razors and straws
- o Twists of square paper (for holding powder)
- o Record of crime to maintain the financially damaging drug habit



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SIGNATURES

Employees

I have read and understand the terms of this Drug & Alcohol Policy. I agree that these terms form part of my Contract of Employment:

Signature:.....

Date:.....

Name (print):

Contractors

For Contractors, please sign and date to confirm you have read and understand the terms of this Drug & Alcohol policy and understand the likely consequences of non-compliance:

Signature:.....

Date:.....

Individual's Name (print):

Company Name:.....