Fit For Work (Drug & Alcohol) Procedure

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1. PURPOSE

This procedure is in place to maintain a safe working environment for all AAA Drug and Alcohol Testing employees, labour hire employees, visitors and contractors. This procedure supports the AAA Fit for Work (Drug & Alcohol) Policy and sets out the process to be followed for Drug and Alcohol Testing. These documents are to be read in conjunction with the AAA Fit for Work Policy Statement.

2. SCOPE

The requirements of this procedure apply to all AAA Drug and Alcohol Testing employees, labour hire employees, visitors and contractors performing work or work-related activities for AAA at any location.

3. DEFINITIONS

Alcohol - the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols in methyl and isopropyl alcohol.

Authorised functions - a function on or away from company premises where alcohol may be served and consumed. An authorised function requires approval from senior executives in accordance with the guidelines in section 11 of this Procedure.

Blood Alcohol Content (BAC) - the percentage of alcohol (ethyl alcohol or ethanol) in a person's blood stream, as tested through an approved means.

Contractor - any person or entity who performs work or provides a contract for service to AAA either as a contractor or as an employee of a contractor.

Employee - includes all AAA Drug and Alcohol Testing employees.

Employee Assistance Program (EAP) – a complimentary, confidential counselling service provided by a specialist external body as coordinated by AAA.

Illicit drugs – drugs that are illegal to make, sell, or use.

Labour hire employee – a worker that is employed by a labour hire agency that works for AAA in any capacity at any location.

Medication – consists of prescription and over the counter medication.

Negative result – 0.00 BAC in alcohol and/or no illicit drugs or derivatives from medication detected.

Non-negative result – alcohol, illicit drugs or derivatives from medication are detected.

Workplace – any AAA Drug and Alcohol Testing site, customer site, vehicle in which work is being performed or any location where work is performed by or on behalf of AAA including customer sites.

Worker – any AAA Drug and Alcohol Testing employee or labour hire employee.

Visitor – any person who is not a worker but is present at an AAA Drug and Alcohol Testing site or workplace.

4. ZERO TOLERANCE POLICY

As outlined in the AAA Drug and Alcohol Testing Policy, all workers, visitors and contractors in AAA Drug and Alcohol Testing workplaces must at all times have: A Blood Alcohol Level (BAC) of 0.00%; and no illicit drugs present in their system.

AAA Drug and Alcohol Testing will also not tolerate any worker, visitor, or contractor using any workplace to make, sell, distribute, or use illicit drugs or alcohol. This will be viewed seriously and will likely result in the termination of employment for serious misconduct in the case of an AAA Drug and Alcohol Testing employee. A labour hire employee, visitor, or contractor will be asked to leave the AAA Drug and Alcohol Testing workplace and will likely be banned from entering any AAA Drug and Alcohol Testing workplace in the future. Furthermore, AAA Drug and Alcohol Testing may report any unlawful conduct to appropriate authorities for investigation. For the purposes of this procedure, illicit drugs include medications (prescribed or over the counter) used contrary to medical and/or consumer advice.

5. PRESCRIPTION AND OVER THE COUNTER MEDICATION

Prescribed or over the counter medication can impair an individual's performance. All workers, visitors, and contractors must obtain and provide written information to their supervisor/manager about the effects of any medication they consume that may in any way impact their ability to perform their duties. This must be done as soon as practicable and before the individual attends for work and commences duties. Failure to do so may result in disciplinary action up to and including termination of employment or the cessation of services.

If a supervisor or manager is informed by an employee that they are taking medication (over the counter or prescription) that may impair their ability to perform their duties, they must immediately inform their manager and the AAA Drug and Alcohol Testing team to discuss the potential effects of the medication and the duties performed by the employee. Failure to follow this requirement and allowing the employee to resume duties may result in the supervisor/manager facing disciplinary action. Prescribed or over the counter medication used contrary to medical and/or consumer advice can impair an individual's performance. Therefore, this will be viewed seriously and may result in disciplinary action up to and including termination of employment or the cessation of services.

6. DRUG AND ALCOHOL TESTING

6.1 Methods of Testing

Testing for alcohol and illicit drugs will be conducted by suitably qualified professionals as directed by AAA Drug and Alcohol Testing at a designated medical centre, on the road (for drivers/passengers) or onsite. Methods of testing at either location may be through the form of saliva/oral fluid, breath and/or urine.

Any individual that is tested under this procedure will be provided with a form and required to answer a series of questions prior to being tested. At this stage, clarification or further information may be sought by the suitably qualified professional conducting the testing. All information supplied will remain strictly confidential. If an employee refuses to provide requested information, or is dishonest or misleading, disciplinary action up to and including termination of employment or the cessation of services may be taken.

6.2 Pre-Employment Testing

Individuals who apply for a role with AAA Drug and Alcohol Testing will be required to undergo a preemployment medical test prior to commencing any work. As part of this testing, a urine and breath test for drug and alcohol will be conducted. The testing will be conducted at either an AAA Drug and Alcohol Testing designated medical centre, on site, or at another arranged location.

Labour hire agencies must ensure all labour hire employees who perform work for AAA Drug and Alcohol Testing have undergone Drug and Alcohol Testing, and that test results are provided to AAA Drug and Alcohol Testing before a labour hire employee commences work at any AAA Drug and Alcohol Testing workplace.

For the period in which results are pending for pre-employment test, the candidate cannot perform work for AAA Drug and Alcohol Testing or be offered any position.

6.3 Random Testing

AAA Drug and Alcohol Testing regularly conducts random Drug and Alcohol Testing. All persons covered by this Procedure who are on site at the time of testing may be subject to random testing and will be selected through a random selection process. For the avoidance of doubt, some or all persons on site may be required to undergo testing.

Random Drug and Alcohol Testing may be conducted on site, on the road (for drivers/passengers) or at a designated medical centre. The AAA Drug and Alcohol Testing Director - WHS and Work Care will direct when random testing is to be conducted. AAA Drug and Alcohol Testing workplaces will not be notified when this testing is scheduled to take place.

Once the suitably qualified professional arrives onsite an AAA Drug and Alcohol Testing workplace as directed by AAA Drug and Alcohol Testing, when a worker has been directed to attend a medical centre or when road testing commences, the testing process is deemed to have commenced, and the following applies immediately:

- Under no circumstances is any individual covered by this Procedure permitted to leave the workplace or location until the list of individuals to be tested has been determined, and the individuals selected have been notified. The only exception to leaving the site is with the express preapproval of the Site Manager and the AAA Drug and Alcohol Testing Work Care team (refer to section 9.1 of this Procedure).
- Should any person leave the site or the location in which testing is to be conducted without authorization, from the time the testing process is deemed to have commenced, this will be treated as an attempt to avoid a drug and alcohol test (refer to section 9 of this Procedure).
- The list of persons to be tested is to be notified.
- Once an individual is notified that they have been selected, they must report to the suitably qualified professional conducting testing immediately and be accompanied by an AAA Drug and Alcohol Testing leader or representative to the testing area.
- Testing will be conducted using a saliva/oral fluid and breath sample. Should a saliva/oral or breath test return a non-negative result, a urine test will be required (refer to section 7 of this Procedure). All forms of testing may be conducted either onsite or at an AAA Drug and Alcohol Testing designated centre.
- All forms of testing conducted at an AAA Drug and Alcohol Testing workplace will be conducted in a secure and private location, e.g., a meeting room/appropriate bathroom.

- In the event that a person who has been selected to be tested or has already been tested at an AAA Drug and Alcohol Testing workplace and is required to attend an AAA Drug and Alcohol Testing designated medical centre for any reason, suitable and safe transportation must be arranged by AAA Drug and Alcohol Testing. The person must be accompanied for testing by an AAA Drug and Alcohol Testing leader or representative. In the case of a labour hire employee, the employee must be accompanied by a representative of their company.
- The person that has been tested must not return to work until their test results have been confirmed (refer to section 7 of this Procedure).

6.4 For Cause Testing

All workers, visitors, and contractors may be directed to undergo for cause testing in the following situations:

- Where it is reasonable to suspect that a worker, visitor, or contractor may have illicit drugs or
- Alcohol in their system (suspicion may be based on but not limited to general behaviour, visual observation, or job performance);
- After being involved in a workplace incident, accident, or injury; or
- To monitor an individual in the event of positive test results related to medication.

When a manager forms a view that a worker, contractor, or visitor may be affected by illicit drugs and/or alcohol, the manager must contact their Human Resources Business Partner and/or the AAA Drug and Alcohol Testing Team to arrange for the individual to undergo Drug and Alcohol Testing, without delay. The Vice President – Human Resources and/or Director - WHS and WorkCare in conjunction with a Site Manager/Manager (or delegate) is responsible for the decision to carry out for cause testing in the above circumstances. The testing must be conducted as soon as practicable.

For cause testing will occur on site or at a designated medical centre or onsite at a AAA Drug and Alcohol Testing workplace if permitted by the Director - WHS and WorkCare. Testing may occur through the form of saliva/oral fluid, breath and/or urine. If results are pending, the employee must be stood aside. At all times, the employee's manager must accompany the employee to the location of testing and ensure they do not leave site.

AAA Drug and Alcohol Testing employees

In the event an AAA Drug and Alcohol Testing employee is subject to for cause testing the following process is to take place immediately:

- The employee must be temporarily stood aside from AAA Drug and Alcohol Testing duties, and the employee must be directed to undergo testing at a AAA Drug and Alcohol Testing Designated Medical Centre immediately. The employee must be accompanied by a AAA Drug and Alcohol Testing leader or representative at all times.
- In the event an employee cannot be accompanied immediately to a AAA Drug and Alcohol Testing designated medical centre, the employee must remain supervised by a AAA Drug and Alcohol Testing leader or representative until such time that they can be accompanied. The AAA Drug and Alcohol Testing leader or representative must sit with the worker in a private room while waiting for a test to be completed or while seeking further instruction from the AAA Drug and Alcohol Testing Team or the HR Team.

• If there is any reason that the relevant AAA Drug and Alcohol Testing leader or representative perceives any risk at any time throughout the for-cause testing process, they should be accompanied by a secondary AAA Drug and Alcohol Testing leader or representative or seek further instruction from the AAA Drug and Alcohol Testing Team or HR Team.

Labour hire employee, contractors, and visitors

In the event a labour hire employee, contractor, or visitor is subject to for cause testing the following process must take place immediately:

- An AAA Drug and Alcohol Testing leader or representative must notify the worker's nominated company representative immediately.
- An AAA Drug and Alcohol Testing leader or representative must supervise the labour hire employee, contractor, or visitor until their company representative arrives.
- The company representative must accompany the labour hire employee, contractor, or visitor to perform the employer's testing process as soon as reasonably practicable. A urine sample and alcohol breath test will be required.
- The company representative must send the labour hire employee, contractor, or visitor's test results to AAA Drug and Alcohol Testing's Director WHS and WorkCare once received (including any confirmatory testing).

7. POST SCREENING PROCESS

Results pending

Any AAA Drug and Alcohol Testing participant who has undergone for cause testing and is awaiting confirmation of their result, must be stood aside from their employment on ordinary pay until a confirmatory result has been received. During this time, the participant must not be permitted to return to work duties and must remain out of AAA Drug and Alcohol Testing workplaces, vehicles and customer sites until cleared to return to work by AAA Drug and Alcohol Testing WorkCare. Additionally, AAA Drug and Alcohol Testing may assist in arranging alternative transport for the person, if required, for testing to occur in line with this procedure. All test results from for cause testing must only be communicated from the suitably qualified professional to the AAA Drug and Alcohol Testing Director - WHS and WorkCare who will then inform the appropriate manager.

Any worker, visitor, or contractor who has been tested and is awaiting confirmation of their result, must be stood aside from their duties (on ordinary pay for AAA Drug and Alcohol Testing employees) until a result has been received and cleared to return to work by AAA Drug and Alcohol Testing WorkCare. During this time, the individual must not be permitted to return to work duties. The individual must remain in the room the test was conducted or in a nominated area out of AAA Drug and Alcohol Testing operations until the test result has been confirmed and communicated to the appropriate Site Manager, Senior Manager or nominated representative.

In the case of labour hire employees, contractors, and visitors, they must not return to AAA Drug and Alcohol Testing workplaces until the confirmatory result has been received and cleared to return to work by AAA Drug and Alcohol Testing WorkCare.

7.1 Negative result (Zero Alcohol or Illicit Drugs)

Any AAA Drug and Alcohol Testing participant who has been tested and the suitably qualified professional confirms with evidence to the Director - WHS and WorkCare that their results are negative, the Site Manager/Senior Manager of the AAA Drug and Alcohol Testing participant will be informed. The Site Manager/Senior Manager shall then advise the AAA Drug and Alcohol Testing participant and confirm they may return to work duties as normal. In the case of labour hire employees, contractors, and visitors, once their company representative confirms with evidence to the Director - WHS and WorkCare that results are negative, they may return to AAA Drug and Alcohol Testing workplaces to perform their duties.

7.2 Non-Negative Result (alcohol and/or illicit drugs detected)

Any non-negative result will be recorded by the testing staff and the individual will be directed to sign any relevant documentation. This documentation must include time, date and location of the testing, the worker/visitor/contractor details, the screening reference number and a clear record of the illicit drugs and/or alcohol present in the individual's system.

Any person who returns a non-negative result to illicit drugs or an individual's BAC is above the State/Territory legal limit or D&A is detected, to ensure duty of care is maintained, they will not be permitted to drive a vehicle. AAA Drug and Alcohol Testing shall offer suitable and safe transportation for the person to return home.

AAA Drug and Alcohol Testing participants who have performed a for cause test and the suitably qualified professional confirms with evidence to the Director - WHS and WorkCare or Vice President Human Resources that the AAA Drug and Alcohol Testing participant's results are non-negative, the appropriate AAA Drug and Alcohol Testing representatives will be informed immediately. The non-negative result for illicit drugs and/or alcohol will be viewed seriously and will likely result in termination of employment.

Where a suitably qualified professional confirms the individual has returned a non-negative result with evidence to the Director - WHS and WorkCare appropriate AAA Drug and Alcohol Testing representatives will be informed immediately. The non-negative result will be addressed according to the test method as follows:

Saliva or breath test:

 The DSC employee will be required to undergo a urine drug and alcohol breath test either onsite or at a DSC designated medical centre as per for cause process and secondary testing will be completed by a AAA Drug and Alcohol Testing nominated laboratory. While awaiting results of secondary urine test the DSC employee must be temporarily stood down from DSC duties, and not be permitted to attend any DSC workplaces, and will be paid their ordinary hours of work for the period they are stood aside. The analytical laboratory will supply a certificate of the independent screening result to the Vice President – Human Resources or Director - WHS and WorkCare. A copy of the results can be provided to the person being tested upon request from the Vice President – Human Resources or Director - WHS and WorkCare. If the secondary urine testing returns a non-negative result for illicit drugs and/or alcohol, the matter will be viewed seriously and will likely result in termination of employment.

Urine test:

• The non-negative result for illicit drugs and/or alcohol will be viewed seriously and will likely result in the termination of employment.

Labour hire employees, contractors, and visitors

Labour hire employees, contractors, and visitors, who have performed Drug and Alcohol Testing and their company representative confirms with evidence to the Director - WHS and WorkCare that results are non-negative, they will not be permitted to return to DSC workplaces to perform their duties and will likely be banned from entering any DSC workplace in the future.

7.3 Non-Negative Result (Medication Detected)

Should a worker, visitor, or contractor who is tested under this procedure record a non-negative result for illicit drugs as a consequence of taking over the counter or prescription medication, the suitably qualified professional will request the individual to provide appropriate evidence of the medication they are taking. This may include a prescription that was dispensed in the individual's name, before the date of the test/s, or documentation from the individual's duly qualified medical practitioner confirming a prescription and medication dosage. In this situation the person will be required to undergo secondary testing for confirmation of the primary sample and identification of the medication at a AAA Drug and Alcohol Testing Designated Medical Centre as per the for-cause testing process in accordance with this procedure.

Should the worker, visitor, or contractor not be able to produce the appropriate evidence to explain the non-negative result as a result of medication, a secondary sample will be taken for further analysis for confirmation of the primary sample and identification of the medication. This will be undertaken at a AAA Drug and Alcohol Testing Designated Medical Centre as per the for-cause testing process in accordance with this procedure.

Should the suitably qualified medical professional deem the worker, contractor, or visitor to have taken medication contrary to medical advice as a result of further analysis from the secondary sample, it will be viewed as a breach of this procedure and accordingly the worker will likely be subject to DSC disciplinary action up to and including termination of employment in the case of DSC employees. In the case of labour hire employees, contractors, and visitors the person may not be permitted to return to DSC workplaces to perform their duties and will likely be banned from entering any DSC centre in the future.

8. FAILURE TO COMPLETE A DRUG AND ALCOHOL TEST

In the event that an individual is not able to complete an initial or secondary drug and alcohol test (e.g. not being able to provide an adequate saliva or urine sample), an alternative test will be arranged that could involve an alternative method of collection. This may involve the individual being directed to attend a AAA Drug and Alcohol Testing designated medical centre.

In the event that an individual is unable to complete an alternative drug and alcohol test for any reason, it will be treated as a refusal of a drug and alcohol test and the disciplinary process will commence in accordance with this procedure. This will be treated as a refusal to comply with a lawful and reasonable instruction and termination of employment for serious misconduct is likely to result.

In the event that an individual completes a sample which detects illicit substances, and the individual refuses to provide a secondary sample, the first sample will be relied on.

9. AVOIDANCE, TAMPERING OR REFUSAL OF A DRUG AND ALCOHOL TEST

9.1 Avoidance of a Drug and Alcohol Test

If an individual in any manner avoids or attempts to avoid undergoing any drug and alcohol test in

accordance with this procedure:

- The matter will be viewed as serious misconduct and likely result in termination of employment for AAA Drug and Alcohol Testing employee as the employee has refused to comply with a lawful and reasonable instruction; or
- Any labour hire employee, visitor or contractor will be directed to leave the AAA Drug and Alcohol Testing workplace immediately, and likely be banned from entering any AAA Drug and Alcohol Testing workplace in the future.

Should any worker, visitor, or contractor formally request to leave a AAA Drug and Alcohol Testing Workplace or AAA Drug and Alcohol Testing designated medical centre for any reason once any testing process has commenced, the Site Manager or nominated representative must approve this in consultation with AAA Drug and Alcohol Testing WorkCare. The worker, visitor or contractor will be required to undergo a drug and alcohol test and complete the relevant testing process at the workplace, or if necessary, at a designated medical centre in accordance with this procedure, prior to leaving the workplace or medical centre (regardless of them having been selected or not to undergo a random test at that point in time).

Should a worker, visitor, or contractor leave a AAA Drug and Alcohol Testing Workplace or AAA Drug and Alcohol Testing designated medical centre for any reason once testing has commenced without authorisation from the Site Manager or nominated representative in conjunction with AAA Drug and Alcohol Testing WorkCare:

- Will be viewed as serious misconduct and likely result in termination of employment for a AAA Drug and Alcohol Testing employee; or
- Will be directed to leave the AAA Drug and Alcohol Testing workplace immediately and will likely be banned from entering any AAA Drug and Alcohol Testing workplace in the future for any labour hire employee, visitor or contractor.

Any worker that does not attend work or calls in absent for any reason on the day of any testing, AAA Drug and Alcohol Testing may request that the worker attends a designated medical centre prior to the commencement of their next shift to undergo a for cause test in accordance with this Procedure.

9.2 Refusal of a Drug and Alcohol Test

Any individual who refuses to perform any drug and alcohol test in accordance with this Procedure in any manner will constitute a failure to comply with a reasonable and lawful direction. Refusal in of a drug and alcohol test:

- Will be viewed as serious misconduct and likely result in termination of employment for a AAA Drug and Alcohol Testing employee; or
- Will be directed to leave the AAA Drug and Alcohol Testing workplace immediately and will likely be banned from entering any AAA Drug and Alcohol Testing workplace in the future for any labour hire employee, visitor or contractor.

If an individual refuses to complete a drug and alcohol test, this will be treated as a refusal to comply with a lawful and reasonable instruction and termination of employment for serious misconduct is likely to result.

9.3 Tampering with a Drug and Alcohol Test

Any individual who tampering or attempting to tamper with any drug and alcohol test or test result in accordance with this Procedure in any manner:

- Will be viewed as serious misconduct and likely result in termination of employment for an AAA Drug and Alcohol Testing employee; or
- Will be directed to leave the AAA Drug and Alcohol Testing workplace immediately and will likely be banned from entering any AAA Drug and Alcohol Testing workplace in the future for any labour hire employee, visitor or contractor.

Tampering with a drug and alcohol test includes but is not limited to:

- Providing a false specimen, or attempting to do so;
- Attempting to adulterate, dilute or otherwise tamper with a test specimen;
- Offering, suggesting, accepting, soliciting, or facilitating a bribe;
- Providing false or misleading information; and
- Hindering, obstructing, or refusing to follow the direction of the suitably qualified professional conducting the testing, or a company representative.

10. TESTING-RELATED COSTS

The cost of the Pre-Employment Test will be covered by AAA Drug and Alcohol Testing for any person selected by AAA Drug and Alcohol Testing.

The cost of random testing, for cause testing and associated travel costs as directed by AAA Drug and Alcohol Testing will be covered by AAA Drug and Alcohol Testing for AAA Drug and Alcohol Testing employees. Shall a secondary test be required offsite, associated travel costs as directed by AAA Drug and Alcohol Testing will be covered by AAA Drug and Alcohol Testing for AAA Drug and Alcohol Testing will be covered by AAA Drug and Alcohol Testing for AAA Drug and Alcohol Testing employees.

Costs involved with for cause testing and secondary testing for a labour hire employee, contractor, or visitor will be covered by their employer. In the case of a labour hire employee, visitor, or contractor, it is the responsibility of their employer to arrange suitable and safe transportation and cover the associated travel costs.

11. AUTHORISED FUNCTIONS

An authorised function must have a clearly defined purpose. It must be a company sanctioned and financially supported event.

Alcohol shall not be displayed, made available or offered in a manner which encourages excessive consumption (e.g. unsupervised self service).

In addition to alcohol, soft drinks, and low alcohol beverages and food will be provided.

The function will be supervised by a member of the management team or outsourced to an authorised caterer to ensure:

- The control of alcohol distribution;
- Cessation of alcohol service at the designated time; and
- Consideration of participant's ability to return home safely.
- Any person under the age of 18 years will not be served alcohol.

Scheduling of authorised functions should not interfere or disrupt normal operational requirements of the Company. Where alcohol is served/consumed, a person (including workers, contractors, and visitors) must not return to work, where they may potentially be in breach of the AAA Drug and Alcohol Testing Fit for Work policy.

12. RECORD RETENTION – TESTING MATERIALS, RECORDS AND DOCUMENTATION

All records, registers and copies of all results will be retained for the duration of a worker's employment, and a minimum of seven (7) years thereafter. In the event a non-negative result is returned, all testing materials for the individual must be retained. Access to view materials and/or request for copies of results of all alcohol and illicit drugs tests will be made available to the employee upon request.

13. PRIVACY AND CONFIDENTIALITY

Any non-negative test result will remain confidential between the person that was tested, and AAA Drug and Alcohol Testing representative/s involved.

Information obtained during the process of conducting tests will be treated in the strictest confidence.

Individual test results may not be released to anyone who is not directly involved in the testing process without specific written authorisation by the individual that has been tested except under the following circumstances:

- When the results of the test become subject to a dispute. Information will only be released to other
- parties as authorised by the Vice President Human Resources on a "need to know" basis.
- When complying with any legal requirement; and
- When any form of action is required by the Human Resources Team in conjunction with AAA Drug and Alcohol Testing.

14. EMPLOYEE ASSISTANCE PROGAM

AAA Drug and Alcohol Testing is committed to providing a safe, healthy and productive work environment for all workers. AAA Drug and Alcohol Testing has a commitment and a responsibility to provide a reliable and efficient service to our customers.

Assistance for employees suffering from misuse of alcohol and illicit drugs may be requested and arranged through the AAA Drug and Alcohol Testing Human Resources team. All matters relating to these discussions will remain confidential between the external provider and the employee.

Assistance may be provided where employees need to undertake counselling sessions. These sessions will be conducted during an employee's own time and may be at their own cost. It is ultimately the employee impaired by the alcohol and/or illicit drugs who must be prepared to take steps to rectify their situation.

AAA Drug and Alcohol Testing Team; Responsible Officers List; AAA Drug and Alcohol Testing AU Distribution List.