



Alcohol and Drugs Policy

INTRODUCTION

EPIC International is committed to maintaining healthy, safe and productive working conditions for all its Employees, Customers and Suppliers. EPIC International recognises the impact that both alcohol and drugs may have upon an individual's ability to work safely and correctly and as such, EPIC International aims to ensure a working environment free from the inappropriate use of substances, where Employees are able to carry out their duties in a safe and efficient manner.

Alcohol and drug consumption/dependency not only affects an individual's health and work performance in terms of safety, efficiency, productivity and attendance as indicated, it can also have a detrimental effect on Colleagues and Dependants. Therefore as a responsible employer EPIC International has recognised the need to take measures to address the issue of drugs and alcohol in the workplace and as such, this EPIC International Care Policy has been introduced to protect the health and safety of employees and comply with relevant legislation.

The EPIC International Drug and Alcohol Policy has been designed to achieve the following:

- To educate and inform all EPIC International Employees of the effects of misusing alcohol, drugs and substances.
- To train EPIC International Management to deal effectively with alcohol and/or drugs incidents affecting the workplace.
- To contribute to the promotion of a healthy and safe working environment.
- To prevent the incidence of alcohol, drug or substance use related work impairment and accidents.
- To recognise and deal effectively with alcohol, drug and substance related problems.
- To encourage all EPIC International Employees who suspect or know they have an alcohol or drug related problem to seek help voluntarily.



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For the purposes of this Policy, the term drug includes:

- Alcohol.
- Substances covered by the 'Misuse of Drugs Act 1971'.
- Inappropriate use of prescribed and 'over the counter' drugs.
- Inappropriate use of solvents and any other substances.

The EPIC International Drug and Alcohol Policy classifies inappropriate behaviour as using a substance either in a way that affects an individual's ability to do their job effectively and safely in the workplace and/or while in the workplace renders the Employee over the limits specified in Appendix I.

POLICY STATEMENT

EPIC conducts its business against high standards of safety and as such, the Company is committed to promoting a healthy lifestyle, thus encouraging a safe and efficient workforce.

It is EPIC International Employee's responsibility, as set out in Health & Safety at Work legislation, to take reasonable care for the health and safety of themselves and that of other Employees such as colleagues, Customers and Suppliers who may be affected by their acts or omissions at work.

As the misuse use of alcohol or drugs may lead to health problems, including dependency, it is necessary to identify those EPIC International Employees with an alcohol or drug problem quickly, both to provide assistance and to ensure that the threat to health and safety is minimised. EPIC International wishes to ensure that all its Employees recognise this threat, aiming to minimise the risks involved.

EPIC International does not condone or tolerate its Employees being under the influence of alcohol and/or drugs whilst representing the company in any way.

To ensure that EPIC International meets its objectives, all EPIC International Employees are expected to be aware of, and comply with, the Alcohol and Drug Policy which prohibits the following:



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Dispensing, distributing, possessing, using, selling or offering to buy or sell alcohol and or drugs whilst at work. Supplying of drugs on any EPIC International premises will be reported immediately to the police.

Reporting for work, working or attempting to work whilst under the influence of alcohol and /or drugs including prescription drugs, except when under and in accordance with a Doctor's direction and when such use will not affect the Employee's ability to perform their duties safely.

To assist in the successful implementation of this EPIC International Alcohol and Drug Policy, the Company reserves the right to have tests carried out on Employees following any incident, where there is reasonable suspicion that alcohol and/or drug use may have been a contributory factor.

If an EPIC International Manager or Supervisor has reasonable cause to suspect that an EPIC International Employee is under the influence of alcohol and/or drugs and/or their work performance is impaired as a result of using alcohol and/or drugs, the Company likewise reserves the right to have tests carried out on the individual concerned.

Reasonable suspicion can be assumed to refer to abnormal behaviour being displayed by an individual or any other sign symptomatic of being under the influence of alcohol or drugs.

In addition EPIC International will establish a level of unannounced testing which will take place throughout the Company on all levels of staff.

Where testing takes place, the individual will be expected to sign a written consent to be tested. Failure to give consent, or refusal to provide a urine sample, will be considered to be a breach of this Policy and may lead to disciplinary action being taken as outlined in the EPIC International Disciplinary Procedures.

As a responsible employer, EPIC International also reserves the right to carry out follow up drug and alcohol testing as well as the right to search its Employees, their personal property and objects whilst at work.

Drug and alcohol testing is not intended to discriminate against or harass any individual or group of individuals, it is a preventative measure to assist in ensuring EPIC International



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Employee's safety and productivity and identifying and assessing the needs of those Employees with problems.

EPIC International will support its Employees who suspect or know they have a drug or alcohol related problem to seek help via a specialist agency recommended by EPIC International.

Where an EPIC International Employee's health, attendance and long term work performance is affected by an alcohol and/or drug related problem, they will be dealt with under the relevant EPIC International procedure for managing performance issues.

Misconduct due to the consumption, possession or sale of alcohol and/or drugs whilst at work will be dealt with under the EPIC International Disciplinary Procedures which may lead to dismissal.

EPIC International recognises the importance of ensuring that this Policy is understood at all levels of the organisation and will continue to offer advice and training on alcohol and drug related problem via a specialist agency. It will also be responsible for the maintenance and review of the Alcohol and Drug Policy on an ongoing basis.

This statement and accompanying EPIC International Policy will be communicated to all EPIC International Employees, Agency Staff, Contractors, Consultants or any other Employee working for, or on behalf of EPIC International. In addition to EPIC International Employees, this Policy should be observed by all Agency Staff, Contractors, Consultants or any other Employee working for, or on behalf of, EPIC International.

EPIC International Directors, Managers and Supervisors are responsible for the day to day implementation of this Alcohol and Drug Policy and any evidence of consumption or dependency due to alcohol and/or drugs will be dealt with under this Policy.

EPIC International SUPPORT

EPIC International Employees, who are involved with the use of drugs and/or alcohol, are advised to seek help and support either by:

- Contacting a Specialist Agency of their own choice. A suggested list of National Agencies is given in Appendix II.



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- Contacting the EPIC International (HSEQ department) and speaking to our HSEQ advisor. You will be advised of the help and assistance available and, if appropriate, an appointment can be made with a trained counsellor at a Specialist Agency. **Confidentiality will be preserved.**

Any EPIC International Employee who comes to the notice of EPIC International Management through observation of poor work performance, normal disciplinary procedures, random or with cause testing as having taken alcohol and/or drugs may be offered the opportunity to seek independent assessment of the problem. If applicable, confidential one to one counselling or other forms of help will be made available.

Any EPIC International Employee who seeks or accepts help via this Policy on drugs or other substances will be given an assurance of:

- **Confidentiality**
EPIC International Management will treat in the strictest confidence, all dealings with individuals coming within the scope of this Policy and any records associated with referral to a Specialist Agency.
- **Time off, if required**
If time off is requested to attend a recognised Agency for help within normal working hours, this will be treated as leave of absence without pay. In the unlikely event that specialist residential care is required, the EPIC International Employee will be regarded as on sick leave and subject to the normal conditions governing sick leave.
- **Job Security**
Any EPIC International Employee should be able to maintain or return to their previous job or comparable job unless it's mutually agreed that a change would be desirable and beneficial. Should the safety of the individual or that of work Colleagues, Customers or Suppliers be at risk during treatment, EPIC International Management may insist that a transfer be made.
- **Promotion Prospects**
Having accepted help and resolved the problem, the Employee's normal promotional prospects will not be impaired.



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Disciplinary action is likely to be held in abeyance where a problem with alcohol, drugs or other substances is a factor on condition that the EPIC International Employee involved follows an agreed and suitable course of action.

In the event of a relapse, where work performance suffers as a result of drugs or other substances, each case will be considered on its merits, and if appropriate, a further opportunity of help may be offered.

EPIC International Management wishes to make it clear however, that it will not hesitate considering taking disciplinary action under the EPIC International Disciplinary Procedures which may lead to dismissal where either:

- A second or subsequent relapse occurs after encouragement and support from the organisation to seek help

or

- An EPIC International Employee, having come to the notice of EPIC International management through observation of poor work performance, normal disciplinary procedures, random or with cause testing as having used drugs or other substances:
 - declines to accept referral for assessment and/or specialist help, or
 - discontinues help before the satisfactory completion but continues to put up an unsatisfactory level of work performance.

REFERRAL PROCEDURES

Voluntary Request for Assistance and Non-Disciplinary Referral

1. The EPIC International Employee voluntarily decides to seek help through the Policy where they suspect that they have an alcohol and/ or drug problem (common signs of alcohol and/or drug dependence are outlined in Appendix III).
2. The EPIC International Employee contacts their Line Manager, if initial contact has been made in this manner regarding a drug or alcohol problem.



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3. The line manager offers the EPIC International Employee a referral to an external Specialist Agency of their choice, for assessment.
4. The external Agency assesses the nature and extent of the problem and arranges, if indicated, a Programme of help and support for the EPIC International Employee.
5. The external Agency notifies the line manager and only if, absence from work is entailed in the agreed Programme of help and support and/or the co-operation of EPIC International management is required regarding any aspects of continuing support.
6. In these circumstances, all discussions, meetings and records with the line manager and Specialist Agency Personnel will be confidential and a Senior Manager will only be notified where treatment, rehabilitation or counselling requires absence from work or consideration is required to a change in the EPIC International Employee's duties or working environment.

Referral by Management

Work Performance Problem

1. The EPIC International Employee has been identified by EPIC International Management as having poor health, attendance and work performance which may be due to an alcohol or drug related problem (common signs of alcohol and/ or drug dependency are outlined in Appendix III).
2. The EPIC International Manager interviews the Employee concerned in the normal course of duties to explore the nature and cause of the problem and seek ways in which this can be remedied. The EPIC International Employee should be reasonably encouraged to acknowledge that they have a problem. Any interview will be in the presence of the Employee's representative (subject to the EPIC International Employee's wishes).
3. The EPIC International Employee is asked for permission to give a urine sample, to test for the presence of drugs, alcohol or other substances. Minimum concentration values for drugs or alcohol which will render the test positive are given in Appendix I.



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4. As an alternative to taking disciplinary action, the EPIC International Manager offers the EPIC International Employee the opportunity to accept referral to any outside Specialist Agency for an independent assessment of the problem and subsequent confidential one to one counselling or other forms or help, if necessary.
5. The EPIC International Manager should note that EPIC International Employee may have undergone past treatment or may be undergoing treatment at other Specialist Centres. This should be considered when identifying suitable Specialist Agencies which could help the EPIC International Employee.
6. A referral by EPIC International Management will only be given on the understanding that a EPIC International Employee consents in writing to giving further urine samples to ensure effectiveness of any subsequent treatment, where appropriate.
7. If the EPIC International Employee rejects the offer of referral, then normal disciplinary action will be taken as per the EPIC International Disciplinary Procedures, which may lead to dismissal.
8. Where referral is accepted by the EPIC International Employee, it is emphasised that discipline is only held in abeyance, providing the EPIC International Employee follows a suitable course of action.
9. The line manager will arrange an interview with the Specialist Counselling Agency which will report back to the line manager indicating the outcome of the Assessment Interview(s) and, if relevant, what co-operation is required from EPIC International Management to help support the individual.
10. Whilst it is intended that EPIC International Employees undergoing treatment will continue to carry out their usual duties, it must be realised that this will not always be practical. This is especially so where continued employment in the Employees current position may jeopardise the health and safety of work Colleagues and Customers.
11. EPIC International will establish through its line manager whether the Employee is fit to carry out their responsibilities. Each Employee will be judged according to the individual circumstances pertaining. Where a programme of counselling and/or specialist treatment is prescribed, a reasonable time will be specified for the EPIC



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International Employee to attain an acceptable standard of work performance and/or attendance.

12. If passed fit for work, the EPIC International Management at local level, will carry out a Risk Assessment to establish whether the Employee should be deployed elsewhere, or continue their duties under tighter control and/or supervision. Adhering to this would be a condition of delaying/cancelling any proposed disciplinary action as per the EPIC International Disciplinary Procedures.
13. During the course of any agreed action, should the EPIC International Employee cease to co-operate in any way with the designated Specialist Agency and continue to put up an unsatisfactory level of work performance, the suspended disciplinary action would again be enforced.

Testing

As referred to within the Policy Statement section of this EPIC International Alcohol and Drug Policy (page 2), EPIC International reserves the right to ask any EPIC International Employee or group of EPIC International Employees to undertake drugs testing in the following situations:

- Post incident
- With cause
- Random unannounced

The following procedures apply to all three situations where EPIC International may decide to initiate drug testing:

- EPIC International will request an individual Employee or group of its Employees, selected at random, give permission in writing to provide a urine sample, to test for the presence of drugs, alcohol or other substances.
- Failure to give this permission will be seen as breach of contract and normal disciplinary action will be taken as per the EPIC International Disciplinary Procedures.
- The minimum concentration values for drugs and alcohol which render the test positive are given in Appendix I.



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- Where a positive test result is the outcome, this may be regarded as Gross Misconduct and disciplinary action may be taken as per the EPIC International Disciplinary Procedures which could lead to Dismissal, subject to the outcome of the aforementioned action.

POLICY SUMMARY

EPIC International's Policy on drugs and alcohol has been introduced to support the Company's commitment to maintaining healthy, safe and productive working conditions for all its Employees and Customers. EPIC International recognises the impact that both alcohol and drugs may have upon an individual's health and also their ability to work safely and effectively.

Overcoming alcohol and drug related problems brings benefit to the individual concerned, their work Colleagues, EPIC International's Customers and to the Company itself. EPIC International is strongly committed to maintaining quality standards which contribute to the health and safety of all EPIC International Employees and our Customers. This EPIC International Care Policy has been developed in support of this commitment.

All EPIC International Employees who have alcohol or drug related problems are encouraged to seek and accept help as detailed in the EPIC International Support Section of this Care Policy. Help should be sought in the knowledge that EPIC International Management is committed to providing confidential assistance. EPIC International Managers, on an ongoing basis, will receive training through a series of Workshops which will assist them in the implementation of this Policy. This will enable them to recognise drugs and substance use and help them deal effectively with drug and substance related problems.

The nature of drug and alcohol related problems is such that it is recognised that EPIC International Employees may not wish to discuss their problems with their immediate Superior. EPIC International Employees who are involved with the use of substances are therefore advised to seek help and support through the detailed external Specialist Agencies and the Company's line management.

EPIC International does recognise the serious nature of alcohol and drug problems and the effect that these can have on the health and safety of all its Employees and Customers. As such, it has introduced an unannounced and 'with cause' Testing Programme which



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will take place throughout the Company on all levels of staff. It should be reiterated that where a positive test is the outcome, the normal course of action will be to support any EPIC International Employee who needs help, as long as the individual themselves is committed to overcoming any drug, alcohol and substance problem they may have.

All EPIC International Employees who believe that they have an alcohol and/or drugs related problems are therefore strongly advised to take up the offer of EPIC International Support as detailed in the Policy.

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APPENDIX I

Positive Test Results

SUBSTANCE	IMMUNOASSAY	GC/MS
Cannabis Metabolites (includes cannabis, grass, resin) 9 – Carboxy THC	50 ng/ml	15 ng/ml
Cocaine Metabolites (includes cocaine) Benze/Lecgonine	300 ng/ml	150 ng/ml
Opiate Metabolites (includes heroine and morphine) Morphine Metamorphine	300 ng/ml	300 ng/ml 300 ng/ml
Amphetamines (includes speed, LSD and ecstasy) Metamphetamine	100 ng/ml	500 ng/ml
Methadone	300 ng/ml	200 ng/ml
Benzodiazepines (includes tranquilisers and Valium)	300 ng/ml	200 ng/ml
Barbiturates (includes tranquilisers)	300 ng/ml	200 ng/ml
<u>Alcohol:</u> (includes methyl and ethyl) Breath Urine Blood	35 mg/ 100ml 53 mg/ 100ml 40 mg/ 100ml	

Note:

- i. Alcohol content is measured in milligrams of alcohol per 100 millilitres of blood/urine/breath. At the time of writing this policy, the UK driving limit is Breath: 35 mg/ 100ml, Urine: 106 mg/ 100ml, Blood: 80 mg/ 100ml.



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- ii. The collection will be carried out by a qualified member of staff or a specialist independent Agency, who will be responsible for testing. Prior to providing a urine sample, any EPIC International Employee will be required to give his/her consent. A positive test result may be regarded as Gross Misconduct and disciplinary action may be taken against the EPIC International Employee, subject to the outcome of the aforementioned actions.

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APPENDIX II - Drug/Alcohol – National Agencies

Name	Telephone No	Open Hours	Who For?	Purpose
Alcoholics Anonymous	0800 9177 650	24 hours a day 7 days a week.	Anyone concerned about their own or someone else's drinking	Provides information and advice. Fellowship of approx. 2000 groups in the UK.
Alcohol Change	020 3907 8480	TBC	Anyone concerned about their own or someone else's drinking	Provides information and advice. Encourages self help and can refer callers to local alcohol advice agencies.
Know the Score Helpline	0800 587 587 9 (Freephone) ** Language Services	08.00 – 23.00 7 days a week.	Anyone concerned about drug misuse including drug users, their friends, family etc.	Offers information, advice and counselling about all aspects of drug misuse. Makes referrals to local and national agencies and can send out written information in a range of languages.
Adfam International	01603 514096 020 3817 9410	Monday to Friday 10.00am to 5.00pm	Families and friends of drug users.	Provides support and counselling relating to the callers own concerns, family/relationships and anything which has an impact on the drug using situation.
City Roads Crisis Intervention	020 7278 8671	24 hours a day 7 days a week.	For drug users and their families.	Offers information and support relating to street drugs and associated problems. Issues dealt with include effects of use, withdrawal, safer drug use and the law.
Lifeline	0161 839 2054	Monday to Thursday 9.30am to 8.00pm Friday – 9.30am to 5.00pm	Young Employees	Provide advice, information and support about drugs and illegal substance abuse.
Drinkline	0300 123 1110	Mon to Fri 09.00 to 20.00 Sat to Sun 11.00 to 16.00	Anyone who is concerned about their own or someone else's drinking	Runs a free, confidential helpline for people who are concerned about their drinking, or someone else's.
Release	0171 603 8654	24 hours a day 7 days a week.	Drug users, their families and friends.	Offers counselling and advice on drug related health issues, welfare and legal issues. Also provides referrals to local drug agencies.

** From 6pm to 10pm on specified day
Bengali – 0800 37 11 42 (Tues), **Cantonese** – 0800 37 11 37 (Mon), **Gujarati** – 0800 37 11 44 (Wed), **Hindi** – 0800 37 11 46 (Wed),
Italian – 0800 37 11 38 (Mon), **Portuguese** – 0800 37 11 39 (Thurs), **Punjabi** – 0800 37 11 43 (Wed), **Spanish** – 0800 37 11 40 (Mon)
Urdu – 0800 37 11 45 (Wed), **Welsh** – 0800 37 11 41 (Daily 10am to 2am)



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APPENDIX III

Common Signs of Alcohol and/or drug Dependence

The following characteristics, especially when arising in combination, **may** indicate the presence of a drug or alcohol related problem, however it is recognised that these characteristics can be exhibited from time to time in Employees who do not have a drug or alcohol related problem.

Reduced Work Performance	
Difficulty in concentrating	Higher accident levels
Impaired memory	Lowered quality/quantity
Confusion	Missed deadlines and appointments
Periods of high and low productivity	Increased mistakes

Absenteeism and Timekeeping	
Poor timekeeping	Increased Friday/Monday absences
Arriving late/leaving early	Excessive levels of sickness absence
Unexplained disappearances	Improbable excuses for absence
Long coffee/lunch breaks	Imprecise medical certificates
Increased unauthorised leave	

Personality Changes	
Mood changes	Depression
Irritability and aggression	Paranoia
Friction with colleagues	Confusion
Over reaction to criticism	Unreasonable resentments

Physical Signs	
Smelling of alcohol	Unkempt appearance/ greater care with appearance



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Lack of hygiene	Tremors, sweats, dilated/constricted pupils, marked skin etc.
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General Signs	
Falling Asleep	Petty theft
Use of breath purifiers	Court appearances
Attempts to borrow money	Deterioration of relationships with friends/family.
Dishonesty	

This is not an exhaustive list of common signs of alcohol and/or drug dependence.