

Policy on Drugs and Alcohol



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Document purpose and scope

This document sets out the Drugs and Alcohol Policy of JBA Group Limited and its subsidiary Operating Companies, collectively known as 'JBA'. It covers activities undertaken by the Group throughout all office locations and operations worldwide.

This document will be reviewed for continued suitability, will be communicated within the JBA Group and, if appropriate, made available to interested parties. The review interval for this document is 1 year.

Aim

This policy aims to provide a safe working environment free from risk to health for staff, clients, sub-contractors, visitors and third parties affected by our undertakings by ensuring all our workplaces are drug and alcohol-free environments.

Policy statement

We are committed to providing our employees and those working for us, so far as reasonably practicable, with a safe and healthy working environment and appropriate welfare and wellbeing arrangements. We are committed to ensuring, so far as reasonably practicable, that our activities do not place anyone at risk. We recognise that there is no place in our business for the misuse of drugs and alcohol. The use of such substances has the potential to reduce safety levels and increase the risk of an accident or incident and so all our workplaces are drug and alcohol-free environments.

We will comply with all legislation, standards, statutory and other obligations and best practices that are relevant to our activities and the jurisdictions in which we operate. We expect our suppliers to meet the requirements set out in legislation, regulation, and good industry practice and to ensure that their suppliers do the same. We will seek to comply with client policies where required and reasonably possible to do so without conflicting with our own policies or other obligations.

Responsibilities

The JBA Group Board is responsible for reviewing and approving the content and implementation of this policy and will help each Operating Company to apply this policy through appropriate procedures, guidance and monitoring.

Overall compliance with the requirements of this policy is the responsibility of each Operating Company within the Group. The Managing Director of each Operating Company will oversee their company's adherence to this policy. Operating Company Directors and Management Teams are responsible for taking measures to promote this policy and help their staff to comply with its requirements.

All staff are required to comply with our policy requirements and share responsibility for our performance in implementing it.

Line managers are required to check that their staff are aware of this policy and any associated guidance.

Staff must not be under the influence of alcohol on JBA property or while conducting business for us. This prohibits alcoholic drinks at lunchtime for any member of staff intending to undertake JBA business in the afternoon and also applies to those who could still be under the influence from activities completed outside of the working environment or normal hours e.g. social/personal events the previous evening. For the purposes of corporate entertaining this must be agreed in advance with the responsible director and boundaries and limitations defined.

Those working for or on behalf of JBA must not use, possess or sell illegal or controlled / intoxicating substances or substances of misuse whether legal or otherwise on JBA property or while conducting business for us.

Smoking is prohibited anywhere within our offices and company vehicles. It is also prohibited in other locations specified by local legislation whilst conducting business for us. This applies to both tobacco and all forms of e-cigarettes and 'vaping'.

Staff must inform their line manager if they are taking prescribed or non-prescribed medication that could affect their ability to carry out their duties, so that appropriate advice or measures can be taken, including, where required, obtaining advice from medical professionals and conducting personal risk assessments to minimise risk to the individual and others.

Staff are required to report any incident where they witness those working for or on JBA business who they feel are under the influence of either drugs or alcohol.

Where we employ external organisations to provide rail staff, the JBA project manager is required to identify those that are RISQS approved and, therefore, have in place, and operate, an approved system in accordance with Sentinel rules and Network Rail standards, Transport for London, Translink or Iarnród Éireann policy. Any external organisation that is not RISQS approved will be required to conform to our Drugs and Alcohol Policy and will be issued with copies as required.

Implementation

Detailed information discussing the implementation of this policy is available from IMS in the **JBA Guide to Drugs and Alcohol Screening**.

Information dissemination

All JBA staff are informed of our policy on drugs and alcohol use in the workplace through CMS.

Sub-contractors we employ are informed of our drugs and alcohol policy as part of the registration and procurement process.

Drugs and alcohol screening

We will only use registered and appropriately approved specialist suppliers to complete drugs and alcohol testing and medical screenings. Those completing testing and medicals for rail work will be RISQS approved.

Employees deemed unfit to carry out their duties will not be allowed to work until it is demonstrated that they are no longer under the influence of the medication.

Random screening

Any employee who drives a vehicle for work purposes whether a JBA owned 'pool', hired or private vehicle may be subject to random drug and alcohol screening whilst on JBA business. We will test at least 1% of all drivers every year.

In addition, Sentinel sponsored staff may be subjected to random drug and alcohol screening whilst on JBA business in accordance with Railway Standards. This is in addition to for cause and periodic screening. Screening may be carried out for alcohol, intoxicating substances, prescribed medication and over the counter medication.

We will test at least 20% of our railway Sentinel Sponsored Staff during each RISQS audit cycle.

'For Cause' screening

Any staff may be subject to 'For Cause' drugs and alcohol screening if

- an individual demonstrates behaviour that may indicate being under the influence of an intoxicating substance whilst on JBA business; or
- we are informed of such behaviour being exhibited by an individual through supervisory staff.

Further information on For Cause Testing is available from the JBA Railway Co-ordinator or the JBA Group Health and Safety Adviser.

Accident, incident and near miss screening

In the event of an accident, incident or near miss the individual(s) may be required to undergo drugs and alcohol screening.

In the event of an accident, incident or near miss on the railway or other work activity/location, all personnel directly or indirectly involved, or whose actions have contributed to it, may be

required to undergo screening for the presence of an intoxicating substance. Any such incident will be reported to the operating authority immediately. The individual's railway competences will be suspended pending results of tests and findings of investigations.

Client specific screening

Additional screening requirements may be imposed upon staff as a result of working for particular clients, such as Network Rail, Transport for London, Translink or Iarnród Éireann. Further details are provided in the **JBA Guide to Drugs and Alcohol Screening**.

Test results

Any person who produces a positive test will be reported to the appropriate company management, other bodies required by our contractual arrangements with the client and, where applicable, to the enforcing authorities. Refusal to provide a specimen or undergo a screening will be treated as a positive result and dealt with accordingly.

A person may request a re-test of the original sample if they believe the original test to be unsound or contaminated. If after the re-test, the result is still positive, the result will be reported as above, and where applicable to the enforcing authorities.

Management of records

All screening records are kept on personnel files and other databases, as appropriate. This may include databases held by our clients.

We maintain a database of safety certification which is subject to regular review to ensure certification levels are maintained.

Records relating to screening of personnel will be subject to audit and inspection by a competent person who will monitor the percentage of random testing and the manner in which the records are managed.

Approval

This document was approved by the Board of JBA Group Limited on 13/03/2023.



Executive Chair, JBA Group