



Alcohol and Other Drugs Policy

Policy Level:	1
Accountable Executive:	EGM People & Culture
Date Approved:	15 February 2019
Date Effective:	15 February 2019

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Previous Appendix 1 and 2 removed and incorporated into new *Procedure for the Management of Alcohol and Other Drug Testing*.
Previous Appendix 3 is now Appendix 1

Statement of Policy

Overview

Being Safe Everywhere is one of our shared values. Our goal is zero injuries, zero harm to anyone, and zero tolerance of unsafe acts or dangerous workplaces.

We recognise that persons affected by alcohol and other drugs (AOD) including prescription, non-prescription and illegal substances can contribute to unsafe workplaces, potentially exposing people to harm. AOD can also affect a person's work performance, the quality of our service and the reputation of our business.

AOD misuse is an increasing problem across the Australian community. Our position as one of Australia's largest employers exposes our workplaces to these issues. It is common for major Australian logistics organisations to adopt an AOD policy that includes testing, and the standards in this policy are based on relevant legislative requirements.

Rationale & Scope

This Policy applies to all Australia Post Group (APG) employees and contractors who act on our behalf. It also applies to all external applicants seeking employment with APG that require a pre-employment medical.

The objective of this Policy is to ensure:

- risks associated with AOD use are minimised within APG's business and Workplaces; and
- APG and its employees and contractors comply with any legal obligations arising in relation to AOD use.

Roles and Responsibilities

Employees and Contractors:

- must comply with this Policy, and its associated procedures;
- must report any AOD-related risks to their supervisor or manager if they have any immediate safety concerns regarding AOD; and
- must comply with the AOD policies (including testing requirements) of other businesses when they are performing work for APG at the sites of those businesses.

Managers:

- ensure effective communication and implementation of this Policy in the parts of the business that they are responsible for;
- take appropriate action where AOD-related risks are identified; and
- demonstrate responsible behaviour and a commitment to addressing the AOD issues faced by their employees.

Senior Leaders:

- encourage a culture within the business that is intolerant of AOD related risks; and
- ensure appropriate resources are available to managers to enable them to effectively implement this Policy.

Awareness, Training & Induction

Employees

APG is committed to providing all employees with information with respect to AOD related issues, including:

- the potential effects of AOD use on their health and wellbeing;
- the impact that AOD use may have on their ability to work safely;
- the requirements of this Policy;
- AOD testing, including random, reasonable suspicion and post-incident testing; and
- what employees should do if they have any concerns regarding AOD use or AOD-related risks.

Contractors

AOD-related information will be made available to Contractors.

Managers

Managers will receive management focussed AOD training to assist them with effective implementation of this Policy.

Review

This Policy will be reviewed at least every three years to enhance the delivery of efficient and effective outcomes.

Policy Guidelines

Alcohol

APG Standards

All external applicants for roles within APG that require a pre-employment medical assessment must not have a Breath Alcohol Content (BrAC) over 0.00% when tested as part of their pre-employment medical assessment.

All employees and contractors who drive a vehicle/motorcycle for work must not have a BrAC over the legal driving limit for the type of vehicle they use and type of licence they hold while they are on duty. This will range from 0.00% to 0.05%.

All other employees and contractors must not have a BrAC greater than 0.05% while they are on duty.

Alcohol-free Workplaces

All APG Workplaces are alcohol-free. This means that alcohol must not be made available or consumed at any APG Workplace other than at an Authorised Function.

Storage and possession

The possession and/or storage of alcohol is not permitted in APG Workplaces (including APG vehicles) unless it is:

- part of a consignment lodged within APG's network; or
- being temporarily stored for consumption elsewhere (subject to approval below) or for an Authorised Function.

Employees and contractors must seek APG management representative approval to store any unopened alcohol purchased for consumption elsewhere or received as a gift or benefit (and if the gift or benefit is over the value specified in the Gifts, Benefits and Hospitality Policy, it must be declared). Approval must be sought as soon as possible after bringing the unopened alcohol into an APG Workplace. The alcohol should not be stored for longer than 24 hours.

Drugs

APG Standards

All external applicants for roles within APG that require a pre-employment medical assessment, and all employees and contractors, must not return a 'positive' drug test with levels over the target concentration/cut-off level specified in the relevant Australian Standard, namely:

- for saliva testing - AS/NZ 4760 as amended from time to time; and
- for urine testing (pre-employment testing) – AS/NZ 4308 as amended from time to time.

The current target concentrations to be adopted by APG under AS/NZ 4760 (saliva testing) are:

Class of Drug	Target Concentration (nanograms per millilitre)
Amphetamine type	50 ng/mL
Cocaine and metabolites	50 ng/mL
Tetrahydrocannabinol (THC)	25 ng/mL
Opiates	50 ng/mL

The current cut-off levels under AS/NZS 4308 (urine testing) are:

Class of Drug	Target Concentration (micrograms per litre)
Benzodiazepines	200 ug/L
Amphetamine type	300 ug/L
Cocaine metabolites	300 ug/L
Cannabis metabolites	50 ug/L
Opiates	300 ug/L

Prohibited Drugs

Employees and contractors **must not**:

- consume, possess, manufacture, store, distribute, sell or purchase illegal drugs; or
- consume, possess, manufacture, store, share, distribute, sell or purchase personal prescription, non-prescription medications or alcohol other than as authorised under this Policy,

while they are on duty, in APG Workplaces (including APG vehicles) or at APG Authorised Functions.

Pharmacy and prescription drugs

Employees and contractors may take non-prescription and prescription drugs while they are on duty provided they do so in accordance with:

- the directions of the manufacturers or suppliers; and
- in the case of prescription drugs - the advice of a registered medical practitioner.

Where an employee or contractor requires prescription medication they must:

- inform their registered medical practitioner of the nature of their work; and
- seek advice from their registered medical practitioner about probable side-effects of the medication they will be taking, including whether it will affect their ability to perform their work safely.

If a registered medical practitioner or pharmacist advises an employee or contractor that the prescription or non-prescription medication they will be taking is likely to affect their ability to perform their work safely, or that they should not perform their work while taking the medication, then the employee or contractor must advise their manager or supervisor as soon as possible before performing any work on behalf of APG after having commenced taking the medication.

If an employee or contractor takes any prescription or non-prescription medication and they believe that the medication is affecting their ability to perform their work safely, or their performance at work, then they must advise their manager or supervisor immediately so that appropriate management actions can be discussed and implemented.

Storage

Employees and contractors may store legally obtained prescription and non-prescription drugs in APG Workplaces where that storage is necessary to enable their own personal use of the drugs in accordance with:

- the directions of the manufacturer or supplier; and
- the directions of the registered medical practitioner or pharmacist prescribing the drugs.

AOD Testing

In order to monitor compliance with this Policy and identify AOD-related risks within its business, APG will implement the following testing:

- pre-employment testing;

- random testing; and
- 'for cause' testing (including reasonable suspicion, post-incident and return to work following a positive test).

All testing will be carried out by competent and authorised persons in accordance with relevant Australian Standards, as follows:

- Alcohol – BrAC testing will be undertaken using breathalyser devices in accordance with *AS3547 Breath Testing Devices for Personal Use* (as amended from time to time);
- Drugs (pre-employment testing) – urine testing to be undertaken in accordance with *AS/NZ 4308 Procedures for Specimen Collection and the Detection and Quantitation of Drugs of Abuse in Urine* (as amended from time to time); and
- Drugs (random and 'for cause' testing) – saliva testing to be undertaken in accordance with *AS/NZ 4760 Procedures for Specimen Collection and the Detection and Quantitation of Drugs in Oral Fluid* (as amended from time to time).

Pre-employment Testing

Applies to all external applicants for roles within APG that require a pre-employment medical assessment. Applicants will be advised of the requirement for pre-employment testing and testing will be undertaken as part of the pre-employment medical examination.

Random Testing

Random testing of employees and on-site contractors will be undertaken without notice by AOD Technicians from an external testing agency.

'For Cause' Testing

- Reasonable suspicion: employees and contractors will be tested for AOD where an APG management representative observes, or is made aware of, circumstances that leads them to reasonably suspect that an employee or contractor may be impaired by alcohol and/or other drugs;
- Post-incident: employees and contractors directly involved in a safety incident involving vehicles/motorcycles/other modes of transport, or powered load shifting equipment may be subject to AOD testing; AND
- Return to work following positive test: following a confirmed positive result, employees and contractors may be required to undergo AOD testing upon their return to the Workplace.

The methodology for random testing and 'for cause' testing is outlined in the *Procedure for the Management of Alcohol and Other Drug Testing*.

Test Results

A 'positive' test result is a test result that exceeds the APG Standards set out above.

A test result that 'requires further investigation' is a preliminary on-site drug screening result, which suggests the presence of drugs over the target concentration/cut-off level, however, confirmatory testing in a laboratory is required to confirm whether the test result is 'positive'.

Alcohol Testing

If a person's initial test is 'positive', a further test will be conducted immediately. If the second test is 'positive', a final confirmatory test will be undertaken within approximately 30 minutes.

Drug – Saliva Testing

If a person's initial test result 'requires further investigation', a second saliva sample will be taken and subjected to confirmatory testing in a laboratory in order to determine whether it is a 'positive' result.

Drug - Urine Testing

If a job applicant's initial test result 'requires further investigation', their sample will be subjected to confirmatory testing in a laboratory in order to determine whether it is a 'positive' result.

Refusal to Test

A refusal to undergo testing in accordance with this Policy will be treated as a confirmed 'positive' test result and managed accordingly. This means that employees or contractors will be directed not to complete the remainder of their work day or shift for APG and to leave the Workplace after refusing to be tested.

Job applicants who refuse AOD testing may be considered unsuitable for employment with APG. This will be considered and determined on a case-by-case basis.

For further information about refusal to test, see the *Procedure for the Management of Alcohol and Other Drug Testing*.

Responding to Test Results

Pre-employment Testing

Applicants who test 'positive' in an AOD test (including by refusing to submit to testing) may be considered unsuitable for employment. This will be considered and determined on a case-by-case basis.

Random Testing and 'For Cause' Testing

An employee or contractor who refuses testing, or has an on-site test result that is 'positive' (alcohol) or 'requires further testing' (drugs), will be:

- deemed to be unfit for duty;
- stood down from all duties pending further notification; and
- directed not to complete the remainder of the work day or shift and to leave the Workplace.

Employees will receive their normal pay (including any applicable penalties, but not overtime) for the day or shift when they are stood down and any subsequent days.

Managers are responsible for ensuring appropriate arrangements are made for employees and contractors to travel home safely after the on-site testing is completed.

Disciplinary Action

Breaches of this Policy by an employee may result in disciplinary action in accordance with APG's policies and procedures, including the Employee Counselling and Discipline Process (ECDP), the StarTrack Fair Treatment Policy or other relevant discipline process as amended from time to time.

Disciplinary action will take into account the individual circumstances of the case.

Breaches of this Policy by a contractor may result in termination of the relevant contract for services or work arrangement.

A positive test result will not be provided to the police unless legally required.

Counselling and Assistance

A confidential and specialised counselling service is available to all employees, contractors and their immediate families through the Employee Assistance Program (EAP) and Workforce Assistance Program (WAP).

Employees and contractors who are having difficulty in managing use of AOD are encouraged to access APG's EAP or WAP service for assistance with counselling and rehabilitation. They can make contact themselves or may be referred by their manager (Manager Assist). The EAP and WAP are available on 1300 687 327.

Contractors may also seek assistance where appropriate through EAP arrangements that are in place with their employer or principal contractor.

Employees and contractors may also wish to consult their GP or access a community based program for assistance. A list of resources is provided in Appendix 1.

Glossary

Term	Definition
AOD	Alcohol and other drugs including prescription, non-prescription and illegal substances.
APG	Australia Post Group. For the purposes of this policy, the APG is defined as the Australian Postal Corporation and its subsidiaries.
Authorised Function	An APG sponsored or hosted function on APG or external premises where an executive general manager (or their delegate) has given authorisation for the serving and consumption of alcohol. In these circumstances all Employees and Contractors are to adhere to the principles of responsible serving and consumption of alcohol.
Contractor	A person or company who performs work for a member of the APG under a contract for services. For the purposes of this Policy, 'Contractor' includes any personnel engaged by the Contractor who perform that work under the contract for services.
EAP	APG's Employee Assistance Program. This includes Directors of APG.
Employee	An individual who is employed on a permanent, fixed term or casual basis.
On Duty	The time between the commencement and conclusion of work activities for APG on any given day (including lunch and rest breaks).
Policy	APG's Alcohol and Other Drugs Policy.
WAP	APG's Workforce Assistance Program – available for contractors.
Workplace	Anywhere work is carried out for APG and includes any place where an Employee or Contractor goes, or is likely to be, while on duty (includes vehicles or mobile structures).

Policy Administration

Key Policy Information

Administrative Area	Policy Information
Document Title	Alcohol and Other Drugs Policy
Policy Level	3
Version No	2.0

Policy Owners and Governance Forums

Administrative Area	Owner / Forum
Accountable Executive	Group Executive, Safety, Wellbeing & Injury Management
Policy Owner	Head of Safety and Wellbeing Governance
Policy Administrator	General Manager, Enterprise Compliance
Policy Content Owner	Manager, Safety Standards and Compliance
Review and Approval Body	Accountable Executive – Approval Enterprise Portfolio Forum - Noting

Key Dates

Administrative Area	Date
Policy Approval Date	15 February 2019
Policy Effective Date	15 February 2019
Next scheduled review	January 2022

Appendix 1 - Resources

Specialised Alcohol and Drug Information Websites

- Australian Drug Foundation: www.adf.org.au
- National Health and Medical Research Council: www.nhmrc.gov.au
- Alcoholics Anonymous Australia: www.aa.org.au
- National Drug Research Institute, Curtin University of Technology: www.ndri.curtin.edu.au
- Australian National Research Centre on AOD Workforce Development, Flinders University: www.nceta.flinders.edu.au

State Health Departments and Resources

- Department of Health NSW: www.health.nsw.gov.au
- Department of Health ACT: www.health.act.gov.au
- Department of Health South Australia: www.health.sa.gov.au
- Tasmanian Department of Health and Human Services: www.dhhs.tas.gov.au
- Department of Health Western Australia: www.health.wa.gov.au
- Department of Health Victoria: www.health.vic.gov.au
- Better Health Channel Victoria: www.betterhealth.vic.gov.au
- Department of Health Northern Territory: www.health.nt.gov.au
- Department of Health Queensland: www.health.qld.gov.au

Federal and State WHS Authorities

- Comcare: www.comcare.gov.au
- WorkCover NSW: www.safework.nsw.gov.au
- WorkSafe ACT: www.worksafe.act.gov.au
- Worksafe WA: www.worksafe.wa.gov.au
- WorkCover Tasmania: www.workcover.tas.gov.au
- Worksafe Victoria: www.worksafe.vic.gov.au
- Worksafe NT: www.worksafe.nt.gov.au
- SafeWork SA: www.safework.sa.gov.au

Privacy Resources

- Office of the Australian Information Commissioner: www.privacy.gov.au
- The Australian Privacy Foundation: www.privacy.org.au