

This policy applies to all companies under Churchill Contract Services Group Holdings Ltd to include the following subsidiaries and trading names:

- Churchill Contract Services (CCS)
- Churchill Contract Services Rail (CCSR)
- Amulet (Churchill Security Solutions) (AMU)
- Churchill Environmental Services (CES)
- Churchill Contract Catering t/a Radish (RAD)
- Churchill Complete Compliance (CCC)
- Churchill Emergency Support Ambulance Services (CESAS)
- Churchill Make Ready Ambulance Services (CMRAS)

1. PURPOSE

The Churchill Group has a responsibility towards employees to provide a safe and healthy working environment and recognizes that this may be jeopardized by those who misuse Drugs, Alcohol and Substances (DAS) within the working environment. Churchill also aims to ensure that its business and commercial interest are not jeopardized as a consequence of any such misuse.

By having a Drug, Alcohol and Substance Policy, we are trying to prevent the following outcomes:

- Loss of productivity
- Increased colleague absence
- Possible theft from company
- Possible risk of manipulation
- Risk of harm to individual and others (including members of the public) caused by impairment
- Risk of harm to the environment caused by impairment.

It is therefore important that reasonable measures are put in place to protect the health & safety of all employees and others who may be affected by our actions and omissions.

We have committed to protecting our clients, employees and any associated parties from our working activities therefore we take safety measures seriously. As part of this protection of our interested parties Churchill has a ZERO tolerance policy on any alcohol, illegal drug or Novel Psychoactive Substances (NPS) consumed during working hours, and at all times while on work premises across the group. In certain sectors of the business and in specific roles, this zero-tolerance policy also extends to cover DAS consumed at home, which could still be in the bloodstream when commencing work.

The Managing Director supports this policy across all divisions of the business.

2. SCOPE

This policy applies to Churchill employees, its contractors, agency staff, visitors and any other persons who may carry out duties on behalf of the Churchill group. All employees will be made aware of and are required to adhere to the contents of this policy. Contractors and agency staff will be made aware of this policy as part of the initial job induction and/or briefing.

Many of the substances referred to within this Policy are highly addictive and anyone who believes that they may have an addiction is actively encouraged to seek assistance from their Doctor, and to confide in their Manager. Individuals seeking assistance will be treated with sensitivity and confidentiality.

Substances Included under this Policy:

- Alcohol.
- Any solvent intended to be used for inhalation.
- Substances covered by the “Misuse of Drugs Act 1997” e.g. heroin, cocaine, cannabis, methadone, amphetamines, etc.
- Legal substances used without permission or not as prescribed e.g. prescription drugs.
- Substances formerly known as “legal highs” (NPS) which are now illegal and covered by the “Psychoactive Substances Act 2016”

3. DEFINITION

D&A	Drug and Alcohol
DAS	Drugs, Alcohol and Substances
PTS Qualification	the Personal Track Safety Qualification
Sentinel PTS	the Network Rail Personal Track Safety Qualification
NPS	Novel Psychoactive Substances
Safety Critical Workers	These roles include high risk activities such as working on high voltage electrical circuits; working on rail tracksides or using equipment such as cranes or mobile elevated working platforms.
Chain of Custody	A process specifically designed to maintain and document an audit trail for a sample provided for analysis for possible presence of drugs and/or alcohol, in order to safeguard the identity and integrity of the sample from collection through to reporting of the test results, leading to the production of a legally defensible report.

DAS misuse can be defined by the following categories:

- Alcohol dependency/excessive alcohol consumption
- Taking or possession of illegal substances
- Misuse of legal substances such as prescribed medicines

This includes misuse of substances, which are categorised as illegal drugs, legal drugs and medicines/restricted drugs and alcohol.

Consultation - Churchill encourage joint consultation and participation between management, staff, trade unions (where applicable) and appointed health & safety representatives, and welcome constructive suggestions, preferably in writing, from colleagues.

Client policies - In the event that a client policy requires a lower tolerance level than that of the Churchill Group, the client’s policy shall supersede the Churchill policy and details will be made available by our client. We will communicate these tolerances to all employees affected by the Client’s Policy.

Employee Duties –

No employee, worker or contractor shall:

- Report or try to report for work when unfit due to alcohol or drugs (whether illegal or not) or because of substance abuse. Be in possession of or consume alcohol, illegal drugs or NPS in the workplace
- Supply others with illegal drugs in the workplace.

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- Supply others with alcohol in the workplace, except in the course of work duties for example serving customers alcoholic drinks at the bar.

All employees, workers and contractors must:

- Seek assistance with addiction at the earliest possible opportunity. Subsequent discovery, or a disclosure prompted by impending screening, will not be acceptable and will not provide immunity to an individual from consequential disciplinary action.
- Advise their line manager or a member of their management team prior to their work shift commencing of any prescription / over the counter drugs which could affect their judgement.
- Ensure they are aware of the side effects of any prescription drugs and inform their manager.

Under the Health and Safety at Work etc. Act 1974, it is every employee's duty to take reasonable care for their own health and safety and other persons who may be affected by their acts and omissions at work.

Supervisor Duties:

Supervisors shall:

- Notify their immediate line manager if anyone has advised them that they are on prescribed/over the counter medication that could impair their judgment or have an impact on any work activities that they carry out.
- Support the rehabilitation of employees who voluntarily seek professional help for drug and alcohol related problems.

Management Duties:

Management shall:

- Notify the HSEQ department if anyone has advised they are on prescribed / over the counter medication that could impair their judgment or have an impact on any work activities that they carry out.
- Undertake a personal risk assessment (CG-SSRA24) with the employee concerned.
- Determine whether safety critical workers, who are taking legal medication, are fit to undertake safety critical duties. They must take advice from Occupational Health concerning the possible side effects of the medication for example drowsiness, fatigue and/or an impact on coordination or balance.
- Support the rehabilitation of employees who voluntarily seek professional help for drug and alcohol related problems.
- Undertake training as required in relation to conducting testing and searches.
- Complete a Return to Work interview with any Safety Critical Worker returning to work after a period of sickness. This is to establish whether the employee is taking any medication that could affect their fitness to work. Before allowing the safety critical worker to resume safety critical work, the line manager should consult Occupational Health for guidance or advice, if necessary.

The HSEQ Department Duties:

The HSEQ department shall:

- Be the point of contact for co-ordination of applicable training;
- Be the point of contact for the ordering of drug testing kits;
- Be responsible for the calibration of breathalysers;
- Provide advice as and when required;
- The HSEQ department will seek the involvement of the HR Department and Occupational Health if determined as being required for employee welfare advice;
- Monitor the usage of testing equipment by contract;
- Ensure that testing equipment is appropriately used and is the recommended method for assessing fitness to work (for DAS) in line with UK health and safety legislation, guidance and good practice.

1. IMPLEMENTATION OF THE POLICY

HSEQ is responsible for the update and implementation of this policy and is actively supported by employee representatives, management and employees.

The Account Manager / Site Manager / Supervisors and all line managers will strive to ensure that all employees under their direct control and any other visitors, contractors and agency staff meet the full requirement of this policy.

A copy of this policy is available on the company's internal management system (IMS). This policy is also displayed on staff notice boards at all sites where DAS may be tested for at random intervals, that is, sites which may involve safety critical activities. As part of the HSEQ induction, all employees are made aware of our DAS stance. Should any person require a copy of this policy, it is available upon request.

2. LEVELS OF EXPECTATION AND LEGISLATION

Drugs

Churchill drug tolerance level is ZERO (unless prescriptive and consultation has occurred with HR and GP).

Please note UK legal penalties will depend on the drug, type ("class"), the amount you have, and whether you are also dealing (supplying) and/or producing the drug. The most severe penalty can be an unlimited fine and life in prison.

"Legal Highs" or Novel Psychoactive Substances (NPS)

The Psychoactive Substances Act came into effect on 26 May 2016. The Act creates a blanket ban on the production, distribution, sale and supply of psychoactive substances (known as 'legal highs' or NPS) in the United Kingdom for human consumption.

If any employee is found to be selling or giving away psychoactive substances on any Churchill site, they will be immediately suspended and subjected to the corporate disciplinary procedure.

If any employee has tested negative for drug and alcohol consumption and management believe that they are under the influence of another substance, or at risk to themselves and others around them, then they may be removed from site under the applicable company policy.

Please note: Any person found in possession or dealing illegal drugs on Company premises will, without exception, be reported to the Police.

Alcohol

UK Legislation

The below table shows the legal limits of alcohol in drivers' breath, urine or blood as set by the UK Government. The limits in Scotland are different to the rest of the UK.

All drivers who exceed the below readings are subject to an automatic suspension from work pending dismissal for Gross Misconduct.

Level of Alcohol	England, Wales and Northern Ireland	Scotland
Micrograms per 100 millilitres of breath	35	22
Milligrams per 100 millilitres of blood	80	50
Milligrams per 100 millilitres of urine	107	67

Churchill Levels of Expectation

Safety is our Number One priority across our Group.

THE SAFE LIMIT IS ZERO. YOU ARE CONSIDERED 'UNFIT THROUGH ALCOHOL' AND IN BREACH OF THE POLICY IF YOU HAVE MORE THAN 13 MICROGRAMS* OF ALCOHOL IN 100 MILLILITRES OF BREATH.

You will be considered unfit for duty if you have the following levels in your blood, breath or urine:

Level of alcohol*	England, Wales and Northern Ireland & Scotland
More than 13 Micrograms of alcohol in 100 millilitres of breath	13
More than 29 Milligrams of alcohol per 100 millilitres of blood (0.29 micrograms)	29
More than 39 Milligrams per 100 millilitres of urine	39

(*These levels have been set in accordance with those set by Network Rail.)

3. SCOPE OF TESTING

a) Drug Testing

A multi-drug test screen kit (supplied by a UKAS accredited external testing supplier) will be used to test for the presence of drugs in urine.

The following substances are tested during our routine urine drug screening:

- Amphetamine (AMP)
- Benzodiazepines (BENZO/BZO)
- Alcohol
- Methadone (EDDP/MTD)
- Barbiturate (BAR)
- Cannabis (THC)
- Cocaine (COC)
- Methadone (EDDP/MTD)
- Ketamine (KET)
- Opiates (OPI/MOP)
- Buprenorphine (BUP)
- Methamphetamine / Ecstasy (METH AMP/MET/XTC)

Drugs testing will be conducted via competent members of the Churchill Management Team. Training is provided by our accredited external testing supplier and also by the HSEQ Department, and records are maintained of this training.

b) Alcohol Testing

Methods of testing for alcohol will be undertaken via a calibrated breathalyzer concurrent with the methods employed by the British Police Force and also approved by the Home Office. Competent, authorized persons will conduct these tests. Training is provided by our accredited external testing supplier and by the HSEQ Department, and records are maintained of this training.

c) Searches and Tests

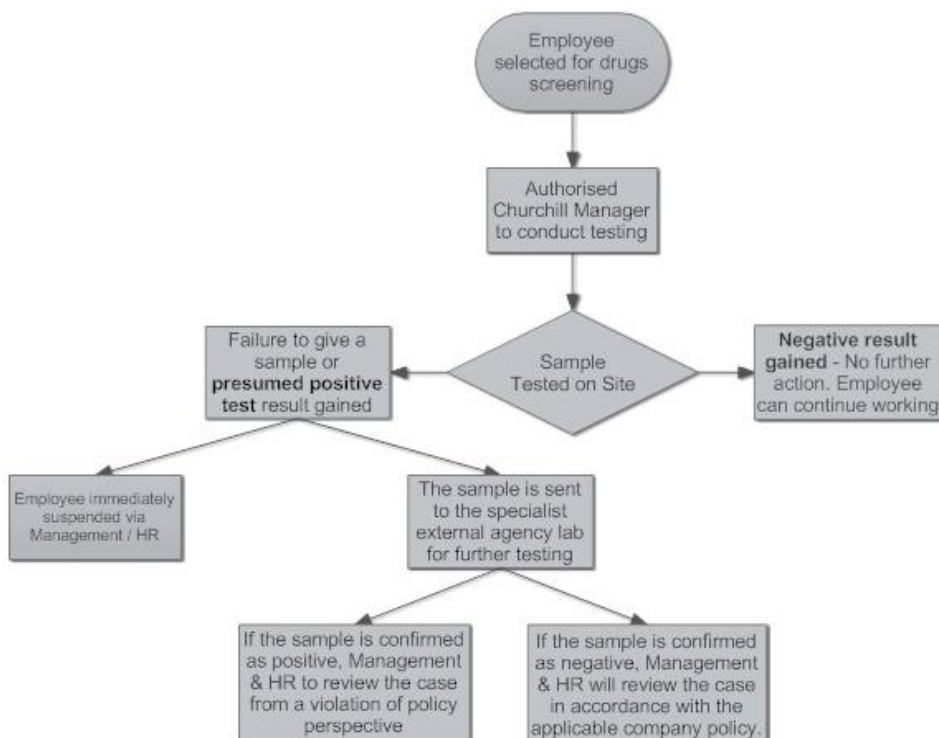
In some areas of the business employees may be required to undergo random testing. Churchill reserves the right to conduct searches of personal effects, lockers, company vehicles and unannounced screenings of any person covered under this Policy. In particular searches or tests may be conducted under the following circumstances:

- Random / Contract requirement – Churchill may be contractually obliged to undertake screening. Sentinel PTS requirements also state that a minimum 5% screen takes place per annum. (Refer to section 6 for more details).
- Pre-employment (new employee) – This may be a contractual requirement.
- Pre-appointment (already employed by Churchill, however this is a new post) - It may be possible that a new role within the organization may require screening due to either a contract or role specific requirement.
- For-cause / post-incident / reasonable suspicion - Any employee suspected of being unfit for work through the effects of drugs or alcohol will be required to stop work immediately and to undergo “For Cause” testing either by a competent in-house individual or an external “For Cause” testing company. This testing may also be instigated following accidents and serious incidents or following a credible report or tip off relating to a group of workers or a work location. A contract is in place with an approved supplier to ensure 24/7 and full geographical coverage of staff.
- Periodic - HR medical review / Return to work / ongoing monitoring – should any operative be off due to sickness or any ill health issues then it may necessary to undertake periodic screening.

Testing will be witnessed where required, and all permission forms are to be signed by the Collector and the Donor undergoing testing, before the testing is to commence.

Important Note: No notice will be given to selected individuals for unannounced testing.

d) **Screening/Testing Procedures and Protocols;**



8) ONGOING WELFARE

Churchill will provide support to employees who voluntarily seek help for drug and/or alcohol related problems.

Such individuals must seek assistance with addiction at the earliest possible opportunity. Subsequent discovery, or a disclosure prompted by impending screening, will not be acceptable and will not provide immunity to an individual from consequential disciplinary action.

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Individuals can voluntarily seek support by speaking directly with their line manager or from the company's HR Department. In all cases, their line manager and HR must be kept informed and involved as a means to providing an individually tailored regime of support.

The line manager will ensure that any workers holding the PTS competency, who have declared their dependency, are withdrawn from safety critical duties immediately.

In such circumstances and thereafter, a regime of unannounced screening may be required to monitor the employee's continued commitment to the rehabilitation program put in place.

9) DISCIPLINARY ACTION

Anyone who is found to be in violation of this Policy or who fails or refuses to undergo the drugs and alcohol screening at the stated intervals in certain areas of the business shall be suspended immediately in line with our disciplinary policy, pending the outcome of a disciplinary hearing. A breach of this Policy or refusal by a contractor or agency worker to provide a sample will result in the individual being removed from the premises. Their employer will be notified of this decision.

Secondary External Test Appeals against Alcohol and Drug testing results – Should an individual want to appeal against a positive result confirmed by our external laboratory, they must request this in writing to the Churchill HR department within 10 months of original testing.

Document retention - All documentation, which is generated from testing will be treated confidentially and comply with the current data protection legislation. This information will be held within the personnel files with restricted access. These will be kept for a minimum of 10 years.

10) DIVISIONAL SPECIFIC REQUIREMENTS

Rail Specific requirement

Pre-Employment Testing - Prior to commencement of employment, all Rail employees are advised of the Churchill policy CG-P-01 regarding Alcohol and Drugs as part of their HSEQ Rail specific induction.

Sentinel PTS Competency - If any employee is required to work on Network Rail Controlled Infrastructure under the Personal Track Safety Scheme (PTS) then they will be required to undertake pre-employment Alcohol and Drugs screening. Where an employee currently holds the Sentinel PTS competency and has received an Alcohol and Drug test within the last 3 months (through prior employment), this can be validated via the Sentinel Scheme website utilising the Pre-recruitment check facility, and a printout should be retained on the personnel file. Where this occurs, the individual is permitted to commence employment (subject to additional Churchill / client training requirements i.e. induction) at the required Safety Critical Work location.

Where an employee has either not previously undergone an Alcohol and Drugs test or their D&A test results are more than 3 months old, Churchill will arrange the appropriate tests to be carried out by an approved Occupational Health provider prior to the operative working in the location that has been deemed a Sentinel PTS working zone.

Once the pre-recruitment Alcohol and Drug certificate has been received it is the responsibility of the Account Manager to:

- Ensure the certificate clearly shows that it is a pre-employment record
- Validate all details including confirmation of a negative result

A copy of the certificate will also be held for reference in the employees personnel file

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Note: - A copy of the certificate will also need to be forwarded to the approved training company prior to the undertaking of any track safety training

Train Operating Company (TOC) - There may be cases where a TOC requires pre-employment D&A test, along with random periodic testing.

Unannounced Testing

Rail Specific - Unannounced Drugs and Alcohol screening will be undertaken on a minimum of 5% of rail employees (Sentinel PTS Specific) of rail contracts in accordance with Network Rail Standards. All results of testing will be recorded on a central database held by the Rail administration. If the test has been undertaken by our external provider on a Sentinel PTS card holder, then it is the duty of the external provider to update the Sentinel scheme database. Records of the screening will also be kept on the individuals personnel file.

Rail Sentinel PTS Procedures following positive screening:

If a **'positive'** result is recorded, the Donor shall be considered in breach of the Company Drugs and Alcohol Policy and therefore the employee:

- Shall be suspended immediately.
- Shall not be permitted to undertake any work which requires PTS certification or is designated as Safety Critical Work post for five years from the date of the Drug and Alcohol Test; **and**
- Shall have any Sentinel card issued cancelled forthwith, and shall surrender to Network Rail the Sentinel card as soon as possible; **and**
- Shall be subject to Network Rail's or Contractor Disciplinary Procedure; **and**
- shall, after five years, pass a Drug and Alcohol Test before they can carry out Safety Critical Work or obtain Personal Track Safety certification; **and**
- shall, if after five years they pass a Drug and Alcohol test and are appointed to a role which includes Safety Critical Work or obtain Personal Track Safety certification, be required to undergo a special regime of additional unannounced tests for at least two years.

11) ASSOCIATED DOCUMENTS

The following supporting documents are to be used in conjunction with this policy:

- CG-P-01 Appendix A Breath Testing Procedure
- CG-P-01 Appendix B Urine Testing Procedure
- CG-P-01 Appendix C Rail Requirements
- CG-P-01 Appendix D City of London Assured Advice
- CG-PF-15 Ordering of Drug & Alcohol Kits
- CG-F-388 Drugs & Alcohol Sample Collection Form
- CG-F-388 Appendix A Drug & Alcohol Compliance Pack
- CG-F-388 Appendix B Drug & Alcohol Do Not Enter Door Sign
- CG-F-407 Drug and Alcohol Testing Assessment Questionnaire

12) RELEVANT LEGISLATION

The main legislation applicable to this Policy includes:

- Health & Safety at Work etc. Act 1974
- Misuse of Drugs Act 1971
- Road Traffic Act 1988
- Corporate Manslaughter and Corporate Homicide Bill
- Human Rights Act 1998
- Data Protection Act 1998
- Transport and Works Act 1992.
- The Psychoactive Substances Act 2016

13) PRIMARY AUTHORITY ADVICE

The City of London Corporation, being the Primary Authority for Churchill Contract Services Ltd., has reviewed and provided Assured Advice on this policy and associated documents. For further information in relation to the specific advice given, please contact the City of London via the Primary Authority Register or by email to: publicprotection@cityoflondon.gov.uk

This policy will be formally reviewed annually and updated as required.

Signed on behalf of Churchill Contract Services Group Holdings Ltd

A handwritten signature in black ink, appearing to read "J.M. Briggs".

J.M. Briggs, Group Managing Director

Date: July 2018

Review date: July 2018