

GSGT Alcohol & other Drugs Policy and procedure:

Alcohol and other Drugs Policy.

1 Policy:

1.1 Reason for policy

Great Southern Group Training is committed to providing a safe and healthy workplace. It is from this commitment that the need for an alcohol and other drugs policy has been recognised.

Alcohol and other drugs, whether used in private life or at the workplace, are factors that might reduce a person's ability to work safely by impeding the ability to exercise judgment, coordination, motor control, concentration and alertness. Workers under the influence of alcohol and or other drugs increase the risk of injury and illness to themselves and to others.

This policy has been formulated to ensure that all workers are aware that drug use, or the consumption of alcohol, which might affect work performance and safety, will not be tolerated; and the possession of alcohol or prohibited drugs in the workplace is also forbidden. The organisation has a duty to ensure that the workplace is free from hazards and unnecessary risk. Workers have a responsibility to ensure their own safety and that of their fellow workers, clients and visitors to the workplace.

The Great Southern Group Training Inc. Alcohol and other Drugs policy and procedures is applicable to all premises/offices of Great Southern Group Training Inc., head office of any applicable host employer and any other factory, worksite, vehicle, place of work, or other place visited in connection with Great Southern Group Training Inc. or any applicable host employers.

The policy will apply to everyone who comes into the workplace. This includes host employers, managers, supervisors, directors, consultants, employees, as well as visitors, clients, customers and contractors. All employees will have access to the policy and may request a hardcopy for their own reference.

1.2 Testing for alcohol and other drugs

It is recognised that current methods of testing for the presence of alcohol and other drugs in the body do not determine the degree of impairment of the person tested. The policy is designed to reduce the risk of workers being impaired in the workplace through consumption of alcohol and other drugs. Workers required to be tested for alcohol or other drugs are required to cooperate with the testing agency and do what is necessary to provide a valid test result.

Failure to produce a valid test result is a breach of this policy.

1.3 What drugs will be tested for?

Drugs tested for will be: Alcohol, amphetamines, barbiturates, benzodiazepines, cannabinoids, cocaine, methadone, opiates and any other drugs that may be required.

1.4 What is a positive test result?

Testing will be carried out in accordance with Australian Standard AS/NZS 4308:2008 or any standard which replaces that standard. Each of the classes of drug tested for has an assigned value, or cut-off level, which is the level at which a decision is made whether or not a sample is positive or negative for a

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particular class of drug. The cut-off levels generally reflect the level of drugs which can be reliably detected in a laboratory.

The cut-off levels under AS/NZS 4308:2008 are as follows:

Amphetamines	0.3ug/mL
Barbiturates	0.2ug/mL
Benzodiazepines	0.2ug/mL
Cannabinoids	50ng/mL
Cocaine	0.3ug/mL
Methadone	0.3ug/mL
Opiates	0.3ug/mL

The cut-off level for alcohol under this policy will be a blood alcohol concentration of 0.000g/100mL. A test result which reveals a drug concentration higher than the cut-off levels above will be deemed, under this policy, to be a positive test result.

Testing positive to alcohol or other drugs is a breach of this policy.

1.5 When will testing be required?

Testing may be required where a manager or supervisor has reason to suspect that a worker may be affected by alcohol or other drugs or wishes to rule out the possibility of alcohol or other drugs being a contributing factor to a workplace incident. Examples of circumstances where **testing for cause** may be carried out include the following-

- After accidents or incidents
- Where an worker's general behaviour indicates to a supervisor that the worker may be influenced or adversely affected by alcohol or drugs;
- Where a supervisor becomes aware that a worker's performance has deteriorated such that in the opinion of the supervisor job performance standards are not met and the supervisor suspects the use of alcohol or drugs to be a cause;
- Where a supervisor has reason to believe that there has been inappropriate use of alcohol or drugs.

Testing for alcohol and other drugs will also be a requirement of any **pre-employment medical checks**. Employment will not be offered to any person that refuses to be tested during pre-employment medicals.

Refusal to undergo alcohol and other drug testing as required is a breach of this policy.

1.6 Prescription and Non-prescription (Over-the-counter) drugs

Drugs which are prescribed by medical practitioners or purchased over the counter may affect the ability of workers to safely perform their work. These medications may also register a test result positive to a drug listed in this policy. A worker who is prescribed medication by a medical practitioner must inform the practitioner of the nature of the worker's work and obtain advice about the likely effect of the medication on the worker's ability to perform that work safely.

Where a likely adverse effect is indicated the worker must inform his/her supervisor before commencing work. A worker whose ability to perform

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his/her usual work safely is impaired, or is likely to be impaired, because of prescription or over the counter drugs may be given other work or, if no suitable work is available, be required to take sick leave, either paid or unpaid.

A test result which gives a result above the cut-off levels listed in this policy will not be a positive result if the worker has declared, before the test is conducted,

- that the worker is taking prescribed or over the counter medication; and,
- the type of medication, and the test result is consistent with the proper use of that medication.

Failure to obtain advice of the likely effects of prescription medication and/or failure to inform a relevant supervisor of a likely adverse effect is a breach of this policy.

1.7 Drug use and possession

The drugs listed in this policy stay in the body for varying lengths of time depending on the characteristics of the drug and the amount of use. The following is a rough guide:

Alcohol	2 to 14 hours depending on consumption
Amphetamines	2 to 4 days
Barbiturates	long acting – 2 to 3 weeks short acting – 24 to 72 hours
Benzodiazepines	up to 4 to 6 weeks
Cocaine	2 to 4 days
Cannabinoids	acute use – 18 hours to 5 days light user (less than once per day) – up to 15 days heavy user (2-3 times/day for more than 3 months) - up to eight weeks
Methadone	3 days
Opiates	2 days

Except as allowed under the sections relating to prescription and non-prescription drugs, workers are required to ensure that they do not attend for work with levels of drugs in their bodies which would bring about a positive test result. Workers are not permitted to be in possession of alcohol or illicit drugs in the workplace. "Possession" includes causing such substances to be brought into the workplace.

Possession of alcohol and possession of any illicit drug in the workplace is a breach of this policy.

1.8 Payment for time lost

Workers who commit a breach of this policy will not be paid for any time lost as a consequence of that breach.

1.9 Breaches of this policy

Workers who breach this policy will, on the first occasion be issued with a warning and encouraged to undertake treatment or counselling to assist them to comply with policy requirements. Workers who have been issued a warning and who commit a further breach of the policy will be subject to disciplinary action which may result in termination of employment. Workers

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who believe that they will be unable to comply with this policy should discuss this issue with the General Manager.

Alcohol and other Drugs Procedures

2 Overview

The Fitness for Work - Alcohol and other Drugs Program in Great Southern Group Training Inc. incorporates assistance from Corporate and Host Employers who provide support in the application and management of the Program.

A successful FFW Program provides awareness and support. Awareness to ensure that individuals understand their obligation to be fit for work whilst working anywhere and support to ensure that individuals are given every opportunity to manage and maintain their own fitness for work issues. Where appropriate, individuals are provided with rehabilitative measures to assist them in overcoming FFW-related issues and problems.

The Great Southern Group Training Inc. FFW Program is designed to achieve awareness and support through:

- defined responsibilities for supervisors and employees
- education and training
- Employee Assistance Program (EAP)
- assessment of fitness for work
- management of assessment results
- management of individuals who are unfit for work
- disciplinary procedures, and
- data collection, analysis and reporting.

2.1 Employee Assistance Program

Great Southern Group Training Inc. has an Employee Assistance Program (EAP) which provides a wide range of confidential employee services with regard to Alcohol and other Drugs abuse. Information on the EAP can be found on site noticeboards, in lunch rooms and via the Administration Officers.

The EAP assists employees in managing potential or existing Alcohol and other Drugs related FFW issues and provides supervisors with access to professional advice in managing these FFW issues with their subordinates.

The cost of counselling for an agreed number of consultations provided for Great Southern Group Training Inc. employees under this Program may be met by the Company. The company may cover the cost of counselling beyond the number of agreed counselling sessions, with the EAP, at the discretion of the General Manager.

2.1.1 Referral to the EAP

Employees may access services directly by approaching the EAP provider for any Alcohol and other Drugs issues. Alternatively, supervisors may refer employees through to the EAP. The EAP provider for Great Southern Group Training regarding assistance with Alcohol and other Drugs may change from time to time and employees should contact GSGT administration to find out the current service provider.

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2.2 Assistance for Supervisors in Dealing with Fitness for Work Issues

Supervisors can access advice and assistance in dealing with any individual's problems or other fitness for work issues by contacting the General Manager, or a counsellor at the company's designated EAP provider. Counsellors can provide advice on:

- assessing concerns about the potential impact on an individual's fitness for work
- appropriate ways to approach the individual and to refer him/her for assistance
- assessing the risk associated with a fitness for work issue and the appropriate management plan process
- appropriate sources of advice or referral for various types of problems, and
- establishing appropriate criteria to determine if the issues have been resolved.

3 Assessment of Fitness for Work

As part of its duty of care, Great Southern Group Training Inc. will, prior to and during employment, assess the fitness for work of employees or potential employees.

The primary method for assessing an individual's fitness for work is through face-to-face discussion between supervisors and individuals at the start and during the work period.

Where appropriate, other assessment methods may be utilised. These include:

- alcohol and drug testing
- medical assessment
- other recognised assessments as appropriate, and

During any form of testing (random, for cause etc), if an individual states that they will test positive for drugs or alcohol, then they should not be allowed to enter the work site until the receipt of the confirmed result. If the result is positive, then they should be dealt with in accordance with a positive test.

4 Medical Assessment of Fitness for Work

4.1 Pre-employment Medical Examination

Great Southern Group Training Inc. may require applicants for employment to undergo a comprehensive pre-employment medical assessment. Where requested these assessments are designed to ensure that the individual is able to safely carry out the range of tasks involved in the position. This includes a substance abuse screening for alcohol and other drugs.

4.2 Medical Assessment of Fitness for Work

Through Great Southern Group Training Inc. contracts of employment, all employees consent to medical assessments as required. Great Southern Group Training Inc. Employment Contracts require individuals to undertake such medical tests as deemed appropriate including, without limitation, random Alcohol and other Drugs testing.

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Individuals may be requested to seek medical assessment where a supervisor or other person in the work place has reasonable grounds to believe that their fitness for work may be affected by their physical or psychological state, injury, stress, fatigue or any other condition. This assessment may also require referral to other professionals for specialist assessment.

5 Alcohol and Drug Testing Assessment of Fitness for Work

There are four types of testing that Great Southern Group Training Inc. has implemented as part of the FFW program. These are:

5.1 Pre-employment Assessment

Pre-employment assessment, including substance abuse screening will be conducted, as required, prior to an offer of employment to assess a prospective employee's fitness for work. Where applicable, offers of employment are conditional on an employee undertaking and passing the pre-employment medical examination.

5.2 Random Testing

The primary purpose of random or blanket alcohol and other drugs testing at Great Southern Group Training Inc. is to determine the effectiveness of the FFW awareness Program. Additionally, blanket alcohol and drug testing may be undertaken to establish baseline results in relation to fitness for work issues.

Regular random alcohol and drug screening may be conducted in all Great Southern Group Training Inc. workplaces. The timing of the tests and the persons to be tested will be determined by a random process developed by the General Manager.

Guidance on what might constitute 'sufficient' random testing can be found in Australian Standard AS1199 (Sampling Procedures for Inspection by Attributes). Estimates based on this standard suggest that 3 tests per person per year for both alcohol and other drugs will give a good indication of the performance of the site's FFW Program. However, due to the random nature of the selection process it may be that some individuals are selected more than three times and others are selected less than three times per year.

5.3 For Cause Testing

For cause testing will be conducted:

- following accidents or incidents where impairment of the individual due to a FFW issue may have been a contributing factor
- where an individual's erratic, unusual or inappropriate behaviour raises concern that the employee may be influenced by alcohol or drugs
- upon the request of any other person in the workplace who has reasonable grounds to believe that an individual may be affected by alcohol or other drugs, and where the supervisor agrees that this may be the case
- where any evidence is found of possible alcohol or other drug use at work (e.g. drug paraphernalia, alcohol containers on worksites or in vehicles) and Great Southern Group Training Inc. can identify with reasonable confidence those who may have been involved.

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For cause testing should be carried out at a frequency dictated by the circumstance.

If an individual returns a positive result for drugs or alcohol from a for cause test, the process outlined in Section 7 and Section 8 must be followed.

6 Alcohol and Drug Testing Cut Off Limits

6.1 Testing Limits for Positive Alcohol Screenings

The blood alcohol concentration (BAC) permitted for employees and contractors on all Great Southern Group Training Inc. sites, operations and offices is 0.000% BAC.

6.2 Testing Limits for Positive Drug Screenings

In assessing the misuse of drugs, screening for the presence of specific drugs in urine is conducted. Cut off levels of the drugs are those published in Table 1 or Table 2 of Australian Standard 4308-2008 "Procedures for the Collection, Detection and Quantification of Drugs of Abuse in Urine". The cut off levels indicate a positive detection beyond reasonable doubt.

Substances tested and the associated cut off levels for Immunoassay and Non-Immunoassay, as published in the AS4308-2008 are:

Table 1 – Immunoassay Initial Test Cut-off Levels

Class of drug	Cut-off level µg/L
Opiates	300
Sympathomimetic amines	300
Cannabis metabolites	50
Cocaine metabolites	300
Benzodiazepines*	200

Note: Where immunoassay is used as an initial test, then cross-reacting compounds should be included in the cut-off.

* Benzodiazepine is the generic name for a number of widely used prescription drugs, more commonly known by names such as Valium, Librium, Serapax, Mogadon, Rohypnol and Temazepam

Table 2 – Non-Immunoassay Initial Test Cut-off Levels

Compound	Cut-off level µg/L
Morphine	300
Codeine	300
Amphetamine	300
Methylamphetamine	300
Methylenedioxymethylamphetamine	300
Phentermine	500
Ephedrine	500
Pseudoephedrine	500
11-nor-Δ9-tetrahydrocannabinol-9-carboxylic acid	15
Benzoyllecgonine	150

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Compound	Cut-off level µg/L
Ecgonine methyl ester	150
Oxazepam	200
Temazepam	200
Diazepam	200
Nordiazepam	200
7-amino-clonazepam	200
7-amino-flunitrazepam	200
7-amino-nitrazepam	200

If an individual returns a positive drug screen, the sample will then be prepared for dispatch to a nominated laboratory for gas chromatography analysis (GCMS). The laboratory must be experienced in using the required analytical procedures and must be appropriately certified to the Australian Standard (AS 4308:2008).

In conducting confirmatory tests, the cut off levels are those published in Table 3 of Australian Standard 4308-2008 "Procedures for the Collection, Detection and Quantification of Drugs of Abuse in Urine". The cut off levels indicate a positive detection beyond reasonable doubt.

Substances tested and the associated cut off levels for Immunoassay and Non-Immunoassay, as published in the AS4308-2008 are:

Table 3 – GCSM Confirmatory Test Cut-Off Levels

Compound	Cut-off level# µg/L
Morphine*	300
Codeine	300
Amphetamine	300
Methylamphetamine	300
Methylenedioxymethylamphetamine	300
Phentermine	500
Ephedrine	500
Pseudoephedrine	500
11-nor-Δ9-tetrahydrocannabinol-9-carboxylic acid	15
Benzoylecgonine	150
Ecgonine methyl ester	150
Oxazepam	200
Temazepam	200
Diazepam	200
Nordiazepam	200
7-amino-clonazepam	200
7-amino-flunitrazepam	200
7-amino-nitrazepam	200

* 6-acetylmorphine should be reported when detected at a cut-off level of 10µg/L.

All cut-off levels are expressed as total concentration of drug or metabolite after hydrolysis of conjugates if necessary.

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Results of tests conducted at an off site laboratory will be conveyed by the laboratory to the Registered Manager. On receipt of positive test results, the General Manager shall contact the designated Great Southern Group Training Inc. medical provider for interpretation of the result and advice as to the management of the situation.

An individual's supervisor will be informed of any positive result and the procedure and disciplinary process outlined in Section 8 of this Program should be applied. Confidentiality shall be maintained.

6.3 Alcohol Testing Procedure

Alcohol tests may be conducted using a breathalyser. The breath test unit will comply with Australian Standard 3547:1997 (and as amended 2000) 'Breath Alcohol Testing Devices for Personal Use'.

The equipment will be used, maintained and calibrated to the instructions and standards recommended by the manufacturer.

Breath alcohol tests will be taken by an authorised Great Southern Group Training Inc. employee or contractor or an authorised collector from an independent agency.

Testing should be carried out in private. The individual may request the presence of a witness.

6.4 Drug Testing Procedure

Screening for the presence of drugs is performed from a sample of urine. All specimen collection and testing procedures shall be in accordance with the Australian Standard 4308:2008 "Procedures for the Collection, Detection and Quantification of Drugs of Abuse in Urine." Urine specimens for drug screening will be taken by a suitably trained and authorised Great Southern Group Training Inc. employee, or contractor, or an authorised collector from an independent testing agency. The individual being tested may request the presence of a witness.

Following collection, to ensure that the sample is protected from contamination, manipulation or confusion with other samples, strict chain of custody procedures will be observed from the samples collection to the reporting of results.

All specimen collection and testing procedures must ensure the privacy and confidentiality of the individual being tested.

Random drug testing on site will be conducted using instant test kits. Employees being tested will be asked to provide a urine sample.

6.5 Inability to Provide a Valid Sample

If an employee is unable to provide a sample when requested, the individual will be removed from their workplace to a suitable location until they can provide a sample for analysis.

6.6 Refusal to Test

Refusal by an employee without legitimate cause to submit to, or cooperate fully with the administration of an alcohol or other drug test, is considered a serious breach of this Program and will involve disciplinary procedures. This

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can result in action up to and including the termination of the individual's employment.

6.7 Falsification of Alcohol or Drug Test Results

Falsification of any alcohol or other drug test is considered a serious breach of this Program and will involve disciplinary procedures. This can result in action up to and including the termination of the individual's employment.

7 Management of Positive Assessment Results and Disciplinary Procedure

The philosophy behind the Great Southern Group Training Inc. FFW Program is to assist employees to address issues of concern, to ensure the safety and health of the individual and to provide a healthy and safe workplace.

This Section outlines the processes for managing employees who are not in compliance with the FFW Program.

7.1 Privacy

All appropriate effort must be made during the assessment of an individual's fitness for work to protect the individual's privacy and confidentiality in the workplace consistent with the overriding need to ensure safety. Results of tests will only be released to those who have a legitimate 'need to know'. In most cases, this will be confined to the individual tested, their supervisor, the General Manager and the site medics where applicable. Information referred to any other necessary personnel will be held confidentially.

7.2 Review of Results

Individuals testing positive will be given the opportunity to explain the result and, where possible, request confirmatory analysis of the sample provided. The individual may request review by an agreed occupational physician where they believe that there is a medical explanation for a positive test.

7.3 Storage and Access to Assessment Results

Any hard copy test results or notes produced from the fitness for work assessment process should be sealed and stored in a secure place, ideally in the individual's medical record. If a medical record file is not available or is impractical, results should be kept on the individual's personnel file in a sealed envelope clearly marked CONFIDENTIAL. Access to the test results will be restricted to authorised personnel only. All information will be treated and handled in accordance with the Recordkeeping and Privacy Legislation.

7.4 Isolating the Employee from the Workplace

If an individual has been deemed unfit for work using any of the assessment methods outlined, the following action shall be taken:

- the individual will be immediately isolated from their workplace
- where necessary in such circumstances, the supervisor will make arrangements for the individual to be transported back to their place of accommodation
- the supervisor shall discuss the breach with the individual.

7.5 No Access to Site

Where the individual is deemed unfit for work as a result of a positive alcohol or drug test, they will not be permitted to return to work until such time as they

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can provide a negative substance test result and are able to demonstrate that they are fit for work and that they will address their fitness for work issue.

8 **Disciplinary Procedures**

The company normally has a three strike rule for dealing with disciplinary breaches.

- On the first instance of a breach of company rules, the employee will be issued with a Written Warning, documenting the breach.
- On the Second Breach of company rules the employee will be issued a Final Written warning, also documenting the breach.
- On the third breach of company rules an employee will be dismissed.

Written warnings remain active on file for a period of 12 months. After a 12 month period has passed, if there are no further re-occurrences or breaches of Company Policy, employees will revert to having a clear disciplinary record.

8.1 **Positive Drug Test Procedures**

If a positive result is detected for amphetamines, barbiturates, benzodiazepines, cannabinoids, methadone or opiates, the disciplinary procedure (below) will be instigated. In addition, the sample taken will be sent away for laboratory confirmation. Strict chain of custody procedures will be observed with regard to urine samples.

If it is proven that the instant test was a false positive, the employee will not be penalised financially for being stood down and sent off site.

Each person who is asked to submit to a urine sample test must also provide a list of medications taken in the previous 10 days. Some prescription drugs may return a positive reading on a drug screen test (e.g. Panadeine will display as positive for opiates). If the drug screen test result is consistent with medication which has been declared prior to the test, and there is sufficient evidence (e.g. MIMS Annual - dictionary of medications) that the medication is not considered to affect the individual's performance in their role, the individual may be able to return to work pending laboratory confirmation of the sample by GCMS and will not be dealt with as having returned a positive drug screen. If the drug screen test result is inconsistent with the stated medications, then the disciplinary procedure below will be invoked.

Disciplinary Procedure – Positive Drug Test Result

First Occurrence

Any employee who returns a positive reading in relation to drug testing will:

- Be withdrawn from the workplace immediately.
- Any person requested to leave the workplace will be required to take sufficient annual leave to cover the absence.
- Employees removed from site due to a positive test will be eligible for return to site upon presentation of evidence of a subsequent negative result in a test carried out by the approved authorities.
- A letter (Written Warning) will be given to the employee documenting their first breach of the failure of a drug/alcohol test. A copy of the letter will be filed on their personnel file.
- Counselling via the EAP will be offered to the employee.

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Second Occurrence

Any employee who returns a second positive reading in relation to drug testing will:

- Be withdrawn from the workplace immediately.
- Any person requested to leave the workplace will be required to take sufficient annual leave to cover the absence.
- Employees removed from site due to a positive test will be eligible for return to site upon presentation of evidence of a subsequent negative result in a test carried out by the approved authorities.
- A letter (Final Warning) will be given to the employee documenting their second breach of the failure of a drug test. A copy of the letter will be filed.

Counselling via the EAP regarding Alcohol and other Drugs use will be strongly recommended to the employee.

Third Occurrence

Any employee who returns a third positive reading in relation to drug testing will:

- Have their employment terminated immediately.
- Counselling may be offered to the employee for a period of one month following termination of their employment.
- A letter will be given to the employee documenting their dismissal. A copy of the letter will be filed.

8.2 Positive Alcohol Test Procedures

A person who records an alcohol reading greater than 0.000 is considered unfit for work and the following disciplinary procedure is put into action.

First Occurrence

Any employee who presents for work and returns a positive reading in relation to Blood Alcohol Concentration (BAC) testing will:

- Be withdrawn from the workplace immediately. The employee must not be allowed to operate any machinery or drive any vehicle whilst considered to be unfit for work.
- The employee will not be allowed to work for the day, and as such will not receive payment for the day. Salaried employees will be required to record an annual leave day.
- A letter (Written Warning) will be given to the employee documenting their first breach of the failure of a drug/alcohol test. A copy of the letter will be filed on their personnel file.
- Counselling via the employee's Supervisor and the EAP will be offered to the employee.
- The employee must voluntarily present for a BAC test prior to returning to work.

Second Occurrence

Any employee who presents for work and returns a positive reading in relation to Blood Alcohol Concentration (BAC) testing will:

- As per the procedure above for the First Occurrence

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- A letter (Final Warning) will be given to the employee documenting their second/final breach of the failure of a drug/alcohol test. A copy of the letter will be filed on their personnel file. It will be explained to the employee that a further breach of the FFW Procedures may result in termination of employment.
- Counselling via the EAP regarding Alcohol and other Drugs use will be strongly recommended to the employee.
- The employee must voluntarily present for a BAC test prior to returning to work.

Third Occurrence

Any employee who presents for work and returns a positive reading in relation to Blood Alcohol Concentration (BAC) testing when there are two written warnings for previous FFW breaches on file will:

- Be withdrawn from the workplace immediately. The employee must not be allowed to operate any machinery or drive any vehicle whilst considered to be unfit for work.
- A letter will be given to the employee documenting termination of their employment.
- Counselling via the EAP will be offered to the employee for up to one month following the termination of employment with Great Southern Group Training Inc.

8.3 Call-Out Requirements

If your role requires you to be called out while you are off duty, you must be able to blow 0.000 before you can attend any call out in the workplace.

This is a challenge inherent with having a small workforce. If you are rostered to be on call, you are required to be fit for duty before attending any call out.

9 Guidelines for the Resolution of FFW Issues

The following general guidelines are provided to assist all parties to resolve concerns about an individual's fitness for work in a cooperative and constructive manner.

9.1 Limitation of Company Involvement in Issues of Legitimate Concern

An individual's personal problems or behaviour outside work are private matters. Great Southern Group Training Inc. will only become involved when these have the potential to interfere with job performance and / or safety in the workplace, or where an employee requests assistance in dealing with an issue or where an individual's behaviours in the workplace may warrant intervention.

9.2 Encouragement of Individuals to Address Potential Concerns

Employees who feel they are developing, or already have a problem that could impair their fitness for work are encouraged to discuss this with either their supervisor, Great Southern Group Training Inc.'s EAP Provider or the Great Southern Group Training Inc. Human Resources representative. These discussions will remain confidential and handled inline with the Company's Privacy Policy.

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9.3 Discussions Regarding Fitness for Work

Once it has become evident or suspected that an individual's fitness for work could be impaired, the individual concerned will be given the opportunity to discuss the matter in confidence with the supervisor or the appropriate human resources staff. Individuals will have the right, if they wish, to be accompanied at any discussion by a work colleague, family member or health and safety representative.

9.4 Need for Medical or Other Assessment

There may be legitimate medical or other reasons for impairment of an individual's fitness for work. In such circumstances, employees will be required to have their doctor discuss their circumstances with a Great Southern Group Training Inc. medical provider before they are permitted to return to work.

9.5 Duty of the Employee to Obtain Assistance

Employees who suspect that they have a problem that could impair their fitness for work, or require assistance to discuss issues which could impact on their fitness for work, should seek advice and treatment before their work performance is impaired. Employees have a Duty of Care towards themselves and others in the workplace.

9.6 Protection of Job Security and Promotional Opportunity

An employees' job security and promotional opportunities may not be jeopardised because of their voluntary decision to seek treatment. However, if after a reasonable time following treatment and following appropriate review and feedback, there is no clear and consistent improvement in the employee's job performance, then the Human Resource Policy and Procedures for dealing with these issues will be applied.

9.7 No Return to Work – Certain Medical Conditions

If an individual has been requested to seek medical assessment, or where a supervisor or other person in the work place has reasonable grounds to believe that the fitness for work of an individual may be affected by physical or mental illness, injury, stress, fatigue or any other condition, the individual will not be permitted to return to work until they have been appropriately assessed and cleared for return to work under procedures acceptable to one of Great Southern Group Training Inc.'s medical providers.

9.8 Offences

This Procedure does not exist to protect individuals who break the law.

9.9 Serious Misconduct

Serious misconduct in relation to FFW can occur where an individual:

- is involved in behaviour deemed as serious misconduct in the workplace including falsifying a sample or refusing to provide sample without an acceptable reason; and
- places themselves or others in the workplace at serious risk of injury.

In any of these circumstances, the individual will be subjected to disciplinary procedures which may result in the termination of employment of the individual.

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10 Procedures to Promote the Responsible Use of Alcohol

All Great Southern Group Training Inc. locations (including host employers) are required to have specific guidelines to promote the responsible use of alcohol. These guidelines shall address:

- A responsible approach to the serving of alcoholic beverages at company functions
- Health and education programs on the effects of alcohol
- Purchase of alcohol with company funds
- Consumption of alcoholic beverages at Great Southern Group Training Inc. or host employer facilities.

11 Data Collection and Reporting

Each Great Southern Group Training Inc. location and host employer will be required to record and maintain information relating to their Fitness for Work Program including:

- Numbers of employees deemed unfit for work. Information should be kept on the numbers of employees deemed to have been unfit for work for:
 - medical causes
 - fatigue
 - alcohol misuse
 - prescription drugs by type
 - non-prescription drugs by type, and
 - other causes.
- Alcohol and drug screening conducted:
 - details of the sites FFW testing Program, and
 - number of random Alcohol and other Drugs tests conducted and the number of positive and negative results.

For individuals who test positive to substances, the following information must be collected and maintained:

- name
- what substance caused the positive test, and
- level / concentration of substance (including BAC levels).
- Causal assessment. Number of employees assessed for cause where the following factors were present in an accident or incident:
 - medical causes
 - fatigue
 - alcohol misuse
 - prescription drugs by type
 - non-prescription drugs by type, and
 - other causes.
- **Disciplinary action taken:**
 - number of employees terminated for breaches of the FFW Program.

All information will be collected and maintained confidentially in accordance with the Great Southern Group Training Inc. Guidelines, and subject to privacy laws.

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12 **Auditing**

This procedure will be audited during scheduled Great Southern Group Training Inc. OSH management standard audits. Improvement plans will be prepared and executed to address non-conformities.

13 **Implementation**

Information, education and training sessions are important in ensuring that individuals and supervisors understand their roles and responsibilities within the Great Southern Group Training Inc. FFW Program. All individuals are also given the information and tools necessary to understand and manage their own fitness for work. As a minimum, education and training in fitness for work shall consist of:

- general inductions
- workforce education programs
- supervisor training, and
- periodic awareness / refresher sessions.

13.1 **General Induction**

As part of the induction process for new employees and contractors, individuals shall be given the following information on Fitness for Work:

- how to access the Great Southern Group Training Inc. Fitness for Work initiative information, and this Procedure.
- an explanation of the requirements of the Program and its practical application at the site
- information on the requirements of the Program and its practical application at the site, and
- information about the availability of professional assistance through the Employee Assistance Program.

These sessions are designed to familiarise employees with the requirements of the Program and to address any questions or concerns that may arise.

Contractors having FFW policies are also required to provide a general induction on their own policy.

13.2 **Workforce Education Program**

The information provided on the FFW Program during the induction will be supported by education programs to raise employee awareness of significant fitness for work issues, especially fatigue, emotional state, stress and the inappropriate use of alcohol and other drugs, and ways of reducing their impact on the individual.

All new employees should attend an education session within six months of employment, and a refresher course every two years thereafter.

Education sessions shall be led by people who are competent in the subject.

13.3 **Supervisor Training**

Supervisors will receive appropriate training in the recognition, management and referral for assistance of any concerns relating to fitness for work.

Training sessions shall be led by people who are competent and expert in the subject.

GSGT Alcohol & other Drugs Policy and procedure:

13.4 Awareness Sessions

In addition to formal education and training sessions, sites, operations and offices may wish to hold additional awareness sessions on FFW and EEO.

Awareness sessions can be facilitated by any member of the workforce competent or qualified in FFW issues, and can be of any duration.

14 Roles And Responsibilities

Under Federal and State occupational health and safety legislation and at common law, both the employer and the employee have 'duty of care' obligations. *Occupational Health and Safety Act 1984*

14.1 Duty of the Employer

Part of Great Southern Group Training Inc.'s duty of care includes taking reasonable precautions to ensure that all individuals working in Great Southern Group Training Inc. are in a fit state to work so as to minimise risks both to themselves and others.

14.2 Duty of the Employee

Employees have a duty to take reasonable care so as not to expose themselves or others to unnecessary health or safety risks. An important part of this duty is the responsibility to ensure that they are in a fit state to work at the start of, and throughout, the work period. They also have a duty to report situations where they are not fit for work, or become unfit for work during their work shift. Employees also have a duty to report situations where they observe other employees who are clearly not in a fit for work condition.

14.3 Responsibilities of Supervisors

Supervisors have the responsibility for the health, safety and welfare of all individuals under their control. In application of this procedure they should:

- ensure all individuals in their area of responsibility understand and comply with the requirements of the Program, and
- ensure the Program is applied fairly and consistently.

Additionally, Supervisors are responsible for assessing the fitness for work of individuals reporting to them at the start of, and throughout, the work period. In the situation where the supervisor believes an individual is not capable of working in a safe and effective manner, the supervisor is responsible for taking prompt and appropriate action. This may include isolating the individual from the workplace in a manner which shows fairness, respect, and has regard to the need to maintain confidentiality, so far as practicable.

Supervisors are also responsible for taking prompt and appropriate action when an individual's fitness for work is compromised. In this situation, supervisors should:

- intervene when an employee is displaying behaviours which indicate the individual is not fit for work or when performance is affected or unsatisfactory
- provide effective feedback to the employee concerning their behaviours or symptoms, and
- assist the employee to access support and assistance such as the Great Southern Group Training Inc. Employee Assistance Program.

GSGT Alcohol & other Drugs Policy and procedure:

14.4 Responsibilities of the Great Southern Group Training Inc. HR Advisor

The Great Southern Group Training Inc. HR Advisor is responsible for providing any HR support required by the supervisor in relation to the FFW program.

14.5 Responsibilities of the Individual

Individuals are responsible for reporting for work in a fit condition in which they are able to carry out their duties without risk to themselves or others. This includes ensuring that they are not in an unfit state for any reason including the adverse effects of drugs (including medications) or alcohol.

Great Southern Group Training Inc. understands that many factors, both those under the control of the individual and those that are not, may adversely impact on an individual's fitness for work. As such, it is the responsibility of the individual to notify their Line Manager of any concerns about, or potential impairment of, their fitness for work.

14.5.1 Use of Medications

Particular attention should be paid to the appropriate use of medication. Individuals must ensure that any prescription or non prescription medication is taken safely. This requires that individuals:

- discuss with the prescribing medical practitioner the nature of their duties and ascertain any possible side effects of the prescribed medication which may impact on their safety or performance at work
- notify their supervisor or medical centre staff of any medication they are taking which could affect their safety or performance at work
- take any medication strictly in accordance with the medical practitioner's or manufacturer's recommendations, and
- report any side effects that may impact on their safety or performance at work to their medical practitioner and their supervisor.

15 REFERENCED ITEMS

Australian / New Zealand Standard AS/NZS 4308:2001 - Procedures for the collection, detection and quantitation of drugs of abuse in urine

Australian Standard 3547:1997 (and as amended 2000) - Breath Alcohol Testing Devices for Personal Use.

Australian Standard AS1199: 2000 - Sampling Procedures for Inspection by Attributes

Occupational Health and Safety Act 1984