

Drug & Alcohol Policy

Bellway p.l.c

Document Control

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1. Introduction

Bellway p.l.c. and its group companies ('Bellway Group') are committed to make all reasonable efforts to provide a safe and productive working environment for all of its employees, contractors, customers and visitors.

While the implementation and upholding of this policy is the duty of the Bellway Group's Board, Directors and Managers; all employees including sub-contractors/agency workers have a responsibility to ensure that the requirements of the policy are upheld.

2. Purpose & Scope

Being under the influence of drugs or alcohol can seriously impair an individual's judgement and reactions leading to an increased risk of accidents and injuries occurring. This policy outlines our approach regarding drug and alcohol misuse and aims to ensure that employees and contractors understand the health and safety risks associated with the misuse of drugs and alcohol as well as the consequences of misusing drugs and/or alcohol in the workplace. This policy also draws attention to the help and advice available to support individuals who have reported a problem with drug dependence and/or alcohol.

All employees, consultants, casual workers, agency workers, work placement/interns and contractors must be made aware of this policy and become familiar with its content.

3. Policy

The use of drugs, alcohol and other substances is prohibited in the workplace. All employees, agency workers and contractors are expected to arrive at work to carry out their duties and to be able to perform them safely without limitations due to the use or after-effects of drugs and/or alcohol.

Consequently, employees, agency workers and contractors must not:

- Report for work when unfit for duty due to the influence of alcohol, drugs, prescribed medications or other substances.
- Abuse drugs, solvents, prescribed medications or consume alcohol while at work.
- Be in the possession of or under the influence of illegal or controlled drugs (including but not limited to heroin, cocaine, ecstasy, amphetamines, cannabis or marijuana) within the workplace.
- Drive on company business whilst under the influence of drugs, alcohol or other substances that may affect the ability to drive safely, regardless of whether you are under or over the legal limitation at set out in clause 6

If an employee, agency worker or contractor is prescribed medication they must seek advice from their GP or pharmacist about the possible effect on their ability to carry out their job and whether their duties should be modified or they should be temporarily reassigned to a different role. If so, then in the case of employees they must tell their line manager or, the Group HR Department and in the case of agency workers, they should inform the recruitment agency or contractors, they must tell their employer.

At company functions and corporate/business events the moderate and responsible consumption of alcohol is permitted but individuals are responsible for knowing their limits, exercising self-discipline and being accountable for their behaviour when representing the Bellway Group at all times.

All individuals are encouraged to report any concerns they may have regarding their colleagues' misuse of substances. Under no circumstance should individuals cover up for colleagues who demonstrate signs of substance misuse or abuse, or any breach of this policy. Collusion represents a false sense of loyalty and in the longer term these actions could be to the detriment of a colleague, the individual and the Bellway Group and will be treated as misconduct in accordance with the Company Disciplinary Policy. In the case of the agency workers and contractors, this will be referred to the employer and the individual will be required to leave the site permanently.

4. Implementation and Enforcement of the Policy

4.1 Pre-Appointment Screening

All successful applicants for positions (whether an employee, agency worker or contractor) with the Bellway Group be required to complete a pre-employment health questionnaire. If the applicant has detailed a history of drug or alcohol related problems, screening for drug, alcohol and substance use, in conjunction with the Bellway Group testing provider may be carried out. However, where such screening provides an indication of the use of illegal drugs or substance abuse, any offer of employment will be withdrawn. Or, in the case of agency workers and contractors, the individual will be required to leave site permanently.

4.2 Searches

The Bellway Group reserves the right to conduct searches for alcohol or drugs on Bellway Group premises, and sites including, but not limited to, searches of lockers, filing cabinets and desks, bags, clothing, packages or vehicles. Any alcohol or drugs found as a result of a search will be confiscated and action may be taken under our Disciplinary Procedure.

4.3 Unannounced Random Drug and Alcohol Testing

Bellway will carry out random drugs and alcohol testing on a sample of employees and contractors who operate in a safety critical environment per annum.

Any individual subject to unannounced random testing will receive no more than 12 hours' notice of the appointment. There is no minimum timescale for advising the individual and therefore "on the spot" testing may be carried out. Any individual subject to a test must inform the collecting officer of any prescribed or non-prescribed medication that they are taking prior to any testing being carried out. Individuals will be allowed to continue working after the test and before the results are known unless there are reasonable grounds to suspect they are unfit for duty at the time of testing.

The testing will be carried out by a suitably trained Bellway employee or external provider at the absolute discretion of the Bellway Group.

4.4 For Cause Testing

An employee, agency worker or contractor involved in an accident or altercation at work may be tested for alcohol, drugs or other substances if there is reason to believe that consumption or use of such substances may have contributed to the incident. In addition to this, where a Director or Manager reasonably believes that any employee, agency worker or contractor is under the influence of drugs, alcohol or other substances while at work or have received information that this may be the case; the individual may be tested. This testing may be carried out by the Police or by a suitably trained Bellway employee at the absolute discretion of the Bellway Group.

4.5 Enforcement

Any employee tested for drugs and alcohol and returning a non-negative result will be immediately suspended from duty pending investigation in accordance with the Company Disciplinary Procedure and will be asked to carry out one further test. The second test will be sent to an external laboratory for verification. After the second test is taken the local manager must ensure that the individual is sent

home in a taxi (at the individual's own cost) or is collected from the site. Any breach of this policy is likely to be treated as gross misconduct under the Company Disciplinary Policy and this may result in summary dismissal.

Any contractor or agency worker tested for drugs and alcohol and returning a positive result will be asked to carry out a further test. The second test will be sent to the laboratory for verification. The agency worker or contractor will be asked to leave Bellway premises immediately after the second test sample is taken, and the matter should be referred to the appropriate recruitment agency or sub-contractor to manage accordingly.

Refusal by a person of a request to be tested for drugs and alcohol when required by this procedure will be considered the same as if that person had tested positive for drugs or alcohol.

5. Guidance & Support for Bellway Employees (N.B. for Bellway employees only, not contractors)

5.1 Support

Bellway has a policy of assistance with the rehabilitation of any employee who voluntarily seeks help for alcohol or drug related problems. Such employees must however seek assistance at the earliest possible opportunity. Subsequent discovery or disclosure prompted by impending screening, or a positive test result will not be acceptable.

Employees who recognise that they have a problem with drugs or alcohol or feel that they are at risk of developing one, are encouraged to seek confidential support. The individual should contact their Line-Manager or alternatively the Group HR Department, who will advise and provide information about outside agencies where help can be obtained as may be appropriate.

Directors and Managers should be mindful that the misuse of drugs or alcohol by employees may become evident in various ways, including for example increasing absence patterns, accidents, poor work performance, mood swings, misconduct or even self-declaration. Where such abuse is reasonably suspected, the Director or Manager should discuss the issue with the employee.

Where the employee acknowledges that they have a problem, the Director or Manager should endeavour to support the employee in so far as is reasonable. The employee should be encouraged to seek assistance from their GP, or a recognised agency (e.g. Alcoholics Anonymous) and given details of the Employee Assistance Programme.

Where reasonable steps have been taken and substance misuse remains an issue, this will normally be treated as a matter of 'Capability' under the Company Attendance Management Policy. However, if the issue presents a risk to the safety of staff, contractors or the public Bellway reserves the right to deal with this as misconduct. In cases where the employee denies that a drug or alcohol problem exists and refuses assistance, problems that subsequently arise will be dealt with as 'misconduct' under the Company Disciplinary Policy.

5.2 Alcohol

Alcohol impairs performance at any level and the impairment increases exponentially with the amount taken. After drinking alcohol it is not possible without testing to know the exact quantity in the bloodstream. If following government advice on safe unit levels of alcohol consumption, employees should remember that the rate that alcohol is absorbed into the blood varies according to age, gender, height, weight and metabolism. To ensure that there is not an unacceptable level of alcohol in the bloodstream when at work it is advisable to follow safe limits for alcohol consumption between work days and avoid alcohol completely in the eight hours preceding the start of your working day.

5.3 Prescriptions & Medication

Many medicines, whether prescribed by a GP or obtained over the counter or by other means (e.g. over the internet) can impair performance. Medicine and drugs obtained with or without prescription can produce some side effects, which may adversely affect your performance at work. All employees have a responsibility to check with their GP or pharmacist about the side effects of prescribed or over the counter medication that could potentially negatively affect their ability to do their job safely. Employees must notify their Line-Manager if they are prescribed medication that may cause serious side effects and which is likely to impair their ability to undertake their duties safely and effectively. Where required, Line-Managers may obtain advice through the Group HR Team who will liaise with the Company's Occupational Health Provider.

6. Testing Limits

When testing for alcohol, a positive result will be in accordance with the current limits set in legislation for driving. This is currently 80 milligrams of alcohol in 100 millilitres of blood or 35 micrograms per 100 millilitres of breath or 107 milligrams per 100 millilitres of urine in England and Wales. In Scotland the legal limit is 50 milligrams of alcohol in 100 millilitres of blood or 22 micrograms of alcohol for every 100 millilitres of breath or 67 milligrams of alcohol for every 100 millilitres of urine. When testing for drugs a positive result is anything above zero, this includes illegal drugs and the presence of other substances for which there is no legitimate medical need for their use or the quantity of use.

When testing for drugs other than alcohol a positive result is anything above zero. This includes illegal drugs and the presence of other substances for which there is no legitimate medical need for their use or quantity of use.

7. Confidentiality

We aim to ensure that the confidentiality of any member of staff experiencing alcohol or drug-related dependency issues is maintained appropriately. However, it needs to be recognised that, in supporting staff, some degree of information sharing is likely to be necessary.

If an employee seeks help with an alcohol or drug-related dependency directly from Group HR and wishes to keep matters confidential from their line-manager and colleagues, this will be respected unless there is reason to believe that this could put the employee, colleagues or anyone else at risk or carries some other material risk for the business. In those circumstances Group HR will encourage the employee to inform their line-manager and will give the employee sufficient time to do so before seeking to discuss the matter with the line -manager directly.