



Standard

Alcohol and other drugs

Endorsed: 30 October 2017

Brief description

This Standard defines GPC's expectations for testing requirements for alcohol and other drugs.

Document information

Current version	7
First released	30 October 2017
Last updated	30 October 2017
Effective by	30 October 2017
Review frequency	Triennially
Review before	30 October 2020
Audience	All persons accessing GPC operating sites

Document accountability

Role	Position
Owner	Chief Executive Officer
Custodian	Safety Manager

This document contains confidential material relating to the business and financial interests of Gladstone Ports Corporation Limited. Gladstone Ports Corporation is to be contacted in accordance with Part 3, Division 3 Section 37 of the *Right to Information Act 2009* should any Government Agency receive a Right to Information application for this document. Contents of this document may either be in full or part exempt from disclosure pursuant to the *Right to Information Act 2009*.

© 2013 Gladstone Ports Corporation Limited ABN 96 263 788 242



Table of contents

Terms and definitions	2
1 Introduction	4
1.1 Standard purpose	4
1.2 Standard scope.....	4
1.3 Standard objectives	4
2 Alcohol and other drugs.....	4
2.1 Roles and responsibilities	4
2.2 General	5
2.3 Screening / testing methods	6
2.4 Timing for screening / testing.....	6
2.5 Fitness for work.....	8
2.6 Positive screening / test results	9
2.7 Rehabilitation	10
2.8 Managing non-conformances	10
2.9 Confidentiality	11
2.10 Education and Training.....	11
2.11 Disputes	12
3 More information.....	12
4 Appendices	13
4.1 Appendix 1 – Related documents.....	13

Terms and definitions

The following key terms and definitions apply to this Standard:

Term	Definition
Owner	Under the GPC governance structure, the Owner is accountable for approval and has the authorised discretion to implement or significantly change the system
Custodian	Under the GPC governance structure, the Custodian is accountable for monitoring the application of the system and advising the owner of the monitoring outcomes, and is also accountable for proposing system design or redesign and facilitation of conformance
Alcohol	Alcohol is a depressant class drug, meaning that it slows down vital functions—resulting in slurred speech, unsteady movement, disturbed perceptions and an inability to react quickly. The unmodified term ‘alcohol’ refers specifically to the chemical substance ethanol which may occur in either a liquid or gaseous form.



Alcohol breath test	A measurement of the alcohol content of an appropriate sample of expired air.
Drug	A substance that has a physiological effect on the body either itself or through its metabolite(s). The term 'drug' refers to the drug and/or its metabolites for the purpose of detecting a target drug in oral fluid (or urine).
Drug screen	A valid method used to exclude the presence of a drug or class of drug.
Candidate	Person required to undergo alcohol or other drug screening.
Confirmatory test	An analytical procedure that unequivocally identifies and quantifies the presence of a specific drug above the relevant target concentration.
Employee	A person who is employed by GPC including GMPS.
Fit for work	For the purpose of this Standard, is the state in which a person complies with the target concentrations set in this Standard.
Health management plan	A plan developed between the affected employee, their Supervisor and the Health and Wellbeing Officer/Specialist that monitors the health of that employee. It is used for monitoring medical conditions to ensure the employee remains fit for work and for rehabilitation to ensure the employee is progressing towards pre-injury/illness fitness including alcohol and other drug rehabilitation.
Negative result	A result below the target concentration used for initial testing or subsequent confirmatory testing.
Non-negative result	A result at or above the target concentration used for initial testing.
Non-GPC Employee	Includes contractors, port users and visitors, but not GPC employees.
Positive result	A result at or above the target concentration after confirmatory testing.
Reasonable Suspicion	A judgement of impairment based on the behaviours described in this Standard.
Screening Officer	Contractor or authorised GPC staff who have successfully completed a course of instruction for specimen collection and on-site screening, handling, storage and dispatch of specimens and has received the associated statement of attainment.
Target Concentration	A concentration expressed as ng/mL, that is sufficient to detect drug use by the donor. In relation to AS4760, target concentrations refer to threshold concentrations of drugs in undiluted oral fluid that represent concentrations attained some hours following common use of the list drug.
Workplace	A place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work. It also includes a vehicle, vessel, aircraft or other mobile structure; and any waters and any installation on land.



1 Introduction

1.1 Standard purpose

Gladstone Ports Corporation Limited (GPC) is committed to ensuring the health, safety and wellbeing of workers and visitors in its workplaces. Every person, who enters or intends to enter, a GPC site has a responsibility to ensure they present themselves in a fit for work state at the commencement of their shift and continue to remain in a fit for work state for the duration of that shift.

Any person (GPC employees, contractors, board members, port users or visitors) that present to site may be required to participate in a drug and alcohol test at any time whilst at GPC.

This Standard clarifies GPC's expectations for testing requirements for alcohol and other drugs.

1.2 Standard scope

This Standard applies to all GPC employees, contractors, board members, port users and visitors accessing any GPC site.

1.3 Standard objectives

This Standard has been developed to:

- Provide clarity about obligations, responsibilities and expectations for managing drug and alcohol testing and responses at GPC to help achieve a zero harm workplace.
- Ensure that GPC meets its responsibilities under the Work Health and Safety Act to provide a safe workplace.

2 Alcohol and other drugs

2.1 Roles and responsibilities

Role	Responsibility
GPC Management	<ul style="list-style-type: none">• Provide a safe and healthy working environment for employees and other persons on site through implementation of this Standard.• Develop and implement random selection process.
Every person entering, or intending to enter, a GPC site or conducting GPC business	<ul style="list-style-type: none">• Present themselves in a fit for work state and remain fit for work whilst on a GPC site or conducting GPC business.• Participate in alcohol and other drug testing / screening, as required.• Notify their supervisor of their absence if a self-assessment result is positive.• Maintain confidentiality of all personal information.• Comply with the requirements of this Standard and associated testing Procedure.
GPC employees	<ul style="list-style-type: none">• Seek assistance through Employee Assistance Program and/or Health and Wellbeing Centre for alcohol and other drug rehabilitation as required.• Comply with the requirements of this Standard and associated testing Procedure.
Immediate supervisor	<ul style="list-style-type: none">• Direct subordinates to present for random screening when requested.• Direct subordinates to present for post incident and health management screening when required.• Direct subordinates to present for screening based on reasonable suspicion.• Address non-conformances of their subordinates through the Managing Discipline Specification.• Maintain confidentiality of all personal information.• Decide how to manage an employee taking prescription medication that may impact their fitness for duty.



Screening Officer	<ul style="list-style-type: none">• Maintain appropriate training and qualifications.• Maintain confidentiality of all personal information.
Safety Section	<ul style="list-style-type: none">• Enter breaches identified through the screening process into Cintellate.• Maintain confidentiality of all personal information.
GPC Safety Committee	<ul style="list-style-type: none">• Recommend random selection processes for management approval.
Health & Wellbeing Section	<ul style="list-style-type: none">• Facilitate and support rehabilitation processes• Manage the EAP service• Develop and facilitate Health Management Plans
Medical Review Officer	<ul style="list-style-type: none">• Determine if the use of prescription medication is causing the person to be unfit for work and if suitable duties are advisable.• Determine if a positive result should be recorded if prescription medication is being used inappropriately.• Maintain confidentiality of all personal information.• Provide advice in relation to developing Health Management Plans

2.2 General

2.2.1 Prohibited behaviours

The following behaviour is prohibited and may result in disciplinary action including termination of employment or denial of access to site:

- Entering a GPC site or conducting GPC business anywhere while unfit for work because of drug and/or alcohol consumption;
- Possessing, consuming, distributing, procuring or selling alcohol or illicit drugs while on GPC premises;
- Using illegal drugs while on a GPC site or otherwise on GPC business.

The only exceptions to the above shall be:

- The distribution and consumption of alcohol at functions on GPC premises outside the operational boundary fences where authorised by the CEO;
- The distribution and consumption of alcohol at GPC social functions where authorised by the CEO;
- Delivery of alcohol by provedores as part of the ships provisions.

2.2.2 On Call Roster

Personnel that form part of an on call roster must remain in a fit for duty state during the time that they are the designated on-call person.

2.2.3 Searches

When Management has reasonable cause to suspect the sale, unauthorised possession or distribution of alcohol and/or illegal drugs is occurring in breach of the Health and Safety Policy and/or this Standard, they may conduct searches or inspections of GPC owned vehicles and property in accordance with Security protocols.

Failure to cooperate with, or attempting to obstruct reasonable requests may result in disciplinary action up to and including termination of employment or denial of access to GPC sites.

It is recognised that under law, a person has the right to refuse a search of personal effects.

2.2.4 Prescription and non-prescription medication

Some prescription and non-prescription medication may have adverse impacts on a person's fitness for duty. Individuals using medications should:



- Advise their Medical Practitioner or Pharmacist of their required duties at work and seek guidance on any contraindications that could prevent them performing those duties;
- Notify their Supervisor and / or attend the Health and Wellbeing Centre to discuss suitable duties whilst under the influence of that medication.

Declaration of medications taken should be made prior to undergoing alcohol and other drug screening tests if it is expected to impact on the screening test result.

2.3 Screening / testing methods

2.3.1 Alcohol testing methods

At GPC, alcohol testing is undertaken using alcohol breath analysers in accordance with AS/NZS 3547:1997 *Breath Alcohol testing devices for personal use*.

2.3.2 Drug screening methods

At GPC, drug screening is undertaken using an oral swab in accordance to AS 4760: 2006 *Procedures for the collection detection and quantification of drugs in oral fluid* in all situations except for pre-employment medicals and health management plans where a urine sample is required to be taken in accordance to AS/NZS 4308:2008 *Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine*.

Drug confirmation tests will be undertaken in a NATA accredited laboratory in accordance with the relevant Australian Standards listed above.

2.3.3 Screening Officers

All alcohol breath testing will be conducted by a suitably trained and qualified Screening Officer.

All drug screening will be conducted by a suitably trained and qualified Screening Officer.

Screening Officers may be the appointed specialist contractor or authorised GPC staff. Authorisation for GPC staff to become a Screening Officer is by application to the People, Community and Sustainability General Manager or their delegate. A list of authorised GPC Screening Officers is located under the Safety icon on the GPC intranet.

The drug and alcohol screening process is detailed in Procedure – Testing for Alcohol and Other Drugs.

2.4 Timing for screening / testing

At GPC, alcohol and other drugs will be tested voluntarily, randomly and on a needs basis.

2.4.1 Voluntary self-testing

GPC will provide devices and kits for the purpose of self-testing.

The results of a voluntary self-test are not recorded. Personnel are not required or obligated to divulge the results of any self-testing to GPC. Personnel are however required to inform their Supervisor of their absence from work in the event of a positive self-test.

2.4.2 Pre-employment medicals

As part of the normal recruitment process, GPC requires the preferred candidate to undertake a drug and alcohol test prior to their employment being finalised. This testing is undertaken by an off-site service provider and involves urine screening for substances as per the Australian Standard AS 4308, which currently includes:

- Opiates
- Sympathomimetic amines



- Cannabis metabolites
- Cocaine metabolites
- Benzodiazepines

Results of these screens are sent to the MRO for review and to advise certificate of fitness.

2.4.3 Random selection

Random selection makes up the majority of the screening / testing program at GPC and can take place at any time of the shift.

The GPC Management is responsible for developing and implementing an operationally appropriate random selection process.

The random selection process aims to:

- On average, select each GPC employee at least twice each year;
- Ensure that non-GPC workers are also tested.

Anyone who enters a GPC site will be subject to, and must participate in, drug and alcohol testing selection.

Anyone who is selected to complete a random drug and alcohol test will be required to present to the nominated testing area when scheduled, or prior to carrying out or continuing any work activity. Failure to submit to a test without an acceptable reason will be regarded as a positive result.

When a supervisor is requested by a Screening Officer (or their administrative support) to inform an individual that they are required to attend for random screening, the supervisor must immediately direct the subordinate to present for screening.

2.4.4 Reasonable suspicion

Testing as a result of reasonable suspicion will occur at GPC sites.

Any person assessed or reasonably suspected of being unfit for work because of drug and/or alcohol impairment will be screened.

The following list of behaviours may be regarded as indicators of impairment due to drugs and/or alcohol that would give rise to reasonable suspicion.

- Slurred or impaired speech;
- The person's breath smells of alcohol;
- The person staggered – their movements were jerky and off target;
- The person admitted to drinking a certain quantity of alcohol;
- The person's eyes were bleary and heavy;
- The person exhibited a dulled tired appearance;
- The person was aggressive in their speech or manner;
- The person's face was flushed;
- The person's pupils were large with sluggish reaction to light;
- The person behaves in an unusual, dangerous, erratic or euphoric state;
- Evidence of substance misuse within work areas, including vehicles (Supervisor must be able to identify with reasonable certainty who was involved);



- Evidence is provided by a co-worker that a worker may be under the effects of drugs and / or alcohol and this opinion is supported by the Supervisor;
- Injury sustained by apparent impairment (eg – lack of coordination or judgment).

The observed behaviours must be documented on the Reasonable Suspicion Form and signed by the Supervisor of the suspected person.

2.4.5 Post incident

Unless injury or a medical condition prevents screening, any person involved in the following will be directed to present for testing:

- An incident resulting in a medium, high or extreme, actual or potential risk, or
- An incident relating to driving/operating vehicles/equipment, or
- Any incident notifiable to a regulator such as Workplace Health and Safety Qld, Electrical Safety Office or similar.

Any person who may have contributed to the incident will also be screened.

2.4.6 Health management plan

Health Management Plans will require re-screening/testing at regular intervals to ensure the individual is complying with rehabilitation requirements. Drug screens will be monitored through urine samples. Frequency of testing will be assessed on a case by case scenario in consultation with the MRO.

2.4.7 3rd party

Employees attending other sites to conduct GPC business, must also meet the host site standards for alcohol and other drugs. Failure to meet both the host and GPC's requirements will result in an investigation and subsequent counselling and / or performance management (if required).

2.5 Fitness for work

GPC deems personnel to be fit for work, with regards to alcohol and other drugs, if they are below the following target concentrations.

2.5.1 Alcohol

The target blood alcohol concentration (BAC) for entry to site is below 0.02g/100mL.

To undertake high risk work licence or operate heavy vehicles, plant or machinery, BAC must be 0.00g/100mL.

2.5.2 Other Drugs – On-site initial testing

Table 1 indicates the on-site initial test target concentrations for drugs other than alcohol. These are the target concentrations as defined by AS4760:2006.

Table 1: On-site initial test target concentrations

Class of drug	Target Concentration (ng/mL)
Opiates	50
Amphetamine-type stimulants	50
Δ^9 tetrahydrocannabinol (THC)	25
Cocaine and metabolites	50

Note: these targets represent the undiluted oral fluid concentration.

Cut-off levels for urine screens are as per AS4308:2008.



2.5.3 Other Drugs – Confirmatory Testing

Confirmatory testing is required to validate unconfirmed results from initial screening before it can be declared positive. The targets defined in Table 2 below are defined by AS4760:2006.

Table 2: Confirmatory target concentrations

Compound	Target Concentration (ng/mL)
<i>Opiates</i>	
Morphine	25
Codeine	25
6-Acetyl morphine	10
<i>Amphetamine-type stimulants</i>	
Amphetamine	25
Methylamphetamine	25
Methelenedioxymethylamphetamine	25
Methelenedioxyamphetamine	25
Δ^9 tetrahydrocannabinol (THC)	10
<i>Cocaine and metabolites</i>	
Cocaine	25
Benzoylcegonine	25
Ecgonine methyl ester	25

Note: these targets represent the undiluted oral fluid concentration.

Confirmatory test cut-off concentrations for urine screens are as per AS4308:2008.

2.6 Positive screening / test results

2.6.1 Positive result for voluntary self-testing

A positive result on a self-test will not be recorded as a positive screening result. If a person returns a positive result on self-test they must not access site. The person is responsible for notifying their Supervisor of their absence and applying for leave.

Absenteeism issues from being unfit for work because of drug and/or alcohol consumption, either from calling in unfit for work or returning home after producing a positive result from self-assessing, will be addressed by their Supervisor as a performance issue, rather than being dealt with under this Standard as a positive result.

If an employee is called in to work in an emergency or short notice call-in and subsequently self-assesses unfit for work, that employee must refuse to go to site. This instance will not be counted as absenteeism or sick leave.

2.6.2 Positive result for all other testing / screening

The following are considered to be a positive reading and will be documented in Cintellate:

- The confirmatory sample provided returns results that exceed the testing limits as described in this Standard; or
- Refusal to undergo drug or alcohol screening; or
- Failure to report for random screening without valid reasoning; or
- Failure to complete the required documentation and declaration prior to undertaking the screen / test; or
- Deliberately tampering with the testing equipment or sample provided; or



- Failure to follow instruction when providing a sample; or
- A false declaration regarding fitness for work following a non-negative drug test result using the prescription drug cross sensitivity chart.

2.6.3 Prescription medication

If a non-negative screening result is potentially due to the taking of medication, the Medical Review Officer will advise after speaking with the individual whether:

- Normal duties could be carried out; or
- Other duties that reduce any potential safety risk could be carried out; or
- Leave should be taken until the person is fit for work.

The final decision on how to manage a person in this situation will remain with the Manager of the affected person.

No positive result due to the taking of medication will be recorded against the person, unless in the opinion of the Medical Review Officer, the person is using the medication inappropriately causing them to be unfit for work, or the confirmatory test result indicates misuse of the medication.

2.6.4 Safe transfer home

GPC employees: If a positive alcohol breath test or non-negative drug screen is returned, the affected person's Supervisor will arrange for the person to be transferred home safely. If the affected person refuses the offer and chooses to drive themselves, they may not be covered by insurance or WorkCover and could be fined by police should they be involved in an accident on that journey.

Non-GPC employees: If a positive alcohol breath test or non-negative drug screen is returned, the affected person's Supervisor should follow their company process.

2.7 Rehabilitation

GPC recognises that drug and alcohol dependency is a treatable condition. GPC will actively support rehabilitation for GPC employees who have a dependency on alcohol and/or drugs. Assistance may be sought through the employee assistance program or the Health and Wellbeing Centre.

GPC recognises that continuity of employment can be an essential factor in rehabilitation success, and will not, unless it is considered appropriate, put the employment of participant employees in jeopardy, provided that:

- The employee seeks treatment, and the rehabilitation process proceeds satisfactorily; and
- Job performance becomes satisfactory within a reasonable time after treatment begins; and
- The employees conduct does not adversely impact the health and safety of others; and
- The employee does not breach their employment contract or GPC policies and procedures.

Contractor companies are encouraged to rehabilitate their employees in a similar manner.

2.8 Managing non-conformances

2.8.1 All non-conformances

Any breaches to this Standard and associated testing Procedure will be reported to the person's relevant Supervisor who will in turn escalate to their Manager and General Manager. Breaches identified through the testing confirmation process will be recorded and managed in Cintellate by the Safety Section.



2.8.2 Non-conformance by GPC employees

Breaches to this Standard (including any positive results indicated in section 2.6.2) or associated screening procedure by GPC employees will be addressed by the Supervisor in accordance with the Procedure – Testing for alcohol and other drugs and the Managing Discipline Specification, which may involve up to and including termination of employment.

2.8.3 Non-conformance by non-GPC employees

Any contractor (or employee of a contractor), visitor or port user found to be in violation of this Standard (including any positive results indicated in section 2.6.2) or associated testing procedure will be removed from site and denied access to GPC premises until the relevant company provides an investigation and management plan that is acceptable to GPC.

2.9 Confidentiality

The use of information gained as a result of an alcohol or other drug test will be strictly limited to purposes consistent with this Standard and associated Procedure. To ensure confidentiality of results, GPC and the testing company will be the only entities able to match a specific saliva sample with a specific person.

Unless required by law, all matters relating to treatment of drug and alcohol problems shall be kept confidential between the supervisor and the employee and those persons required to know of the problem to give effect to this Standard.

Any assistance supplied to an employee by a counsellor or medical officer shall be regarded as confidential and shall not be released to GPC without the consent of the employee or unless required by law.

De-identified, gross data relating to the testing program/schedule and screening/testing results may be communicated to management for the purpose of reporting to Board Meetings and/or Safety Committee Meetings.

GPC will take all reasonable steps to respect the privacy and confidentiality of individuals' test results. The behaviour and actions of all parties involved will be under close scrutiny with regards to maintaining privacy and confidentiality of an individuals' test results.

Concerns regarding the privacy and confidentiality of screening/testing results should be reported to the relevant Supervisor or Manager. GPC considers any unauthorised release of personal information as a serious breach of the GPC Code of Conduct and will be managed in accordance to the Managing Discipline Specification.

2.10 Education and Training

This Standard will be supported by information, education and training programs. Persons entering GPC sites will be made aware of this Standard through the induction process.

Regular updates and awareness sessions will occur as part of the minimum compliance training program at safety/team meetings and through site communications.

Training will be made available for supervisors to enable them to recognise behaviour which may demonstrate that an individual is unfit for work.

Screening Officers will maintain currency of, and be appropriately trained and qualified in, at least one of the following:

- 31002QLD – Course in Drug and Alcohol Screening;
- 10414NAT – Course in Drug and Alcohol Testing;
- 10440NAT – Course in On-Site Drug and Alcohol Testing;
- 10327NAT – Course in Workplace Alcohol and Drug Monitoring;



- 10275NAT – Course in Workplace Drug Testing.

Screening officers must be familiar with the Standard and associated procedure to the extent required to perform screening tests.

2.11 Disputes

Any disputes regarding this Standard or the associated testing Procedure should, in the first instance, be raised with the relevant Manager and Employee Relations, if required. All disputes will be managed in accordance with the GPC Disputes Procedure.

3 More information

This Standard will be available to all personnel, vendors, port users, contractors and visitors.

This document is uncontrolled when printed. The current version of this Standard is available on Gladstone Ports Corporation's Intranet.

If you require any further information, please contact the Custodian, listed under Document Accountability on the cover page.



4 Appendices

4.1 Appendix 1 – Related documents

4.1.1 Legislation and regulation

Key relevant legislation and regulation, as amended from time to time, includes but is not limited to:

Type	Legislation / regulation
Federal Legislation	nil
State Legislation	Work Health and Safety Act 2011 Information Privacy Act 2009 Right to Information Act 2009
Australian Standards	AS 3547:1997 Breath alcohol testing devices for personal use AS 4760:2006 Procedures for specimen collection and the detection and quantitation of drugs in oral fluid AS/NZS 4308:2008 Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine.

4.1.2 Gladstone Ports Corporation documents

The following documents relate to this Standard:

Type	Document number and title
Policy	DOCSCQPA#365624 Policy – Health and Safety DOCSCQPA#614529 Policy – Rehabilitation
Standard	DOCSCQPA#854303 Standard – Safety Management DOCSCQPA#1331115 Standard – Fit for Work DOCSCQPA#1276408 Standard – Injury/Illness Management DOCSCQPA#995910 Standard – Contractors and Port Users Safety, Environment and Security Standard
Specification/Procedure	DOCSCQPA#697854 Plan – Safety Management System DOCSCQPA#367499 Procedure – Rehabilitation DOCSCQPA#163222 Procedure – Testing for alcohol and other drugs DOCSCQPA#1075526 Procedure – Incident Management and Investigation DOCSCQPA#TBA Procedure – Health Surveillance DOCSCQPA#1067296 Procedure – Information Privacy
Work Instruction/Template/Form	DOCSCQPA#1324425 Form – Reasonable Suspicion