



Alcohol and Other Drugs Management Procedure

Brief description

This Procedure outlines how GPC will undertake alcohol and other drug screening to enable GPC to manage the effects of alcohol, medications and other drugs in the workplace.

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1 Terms and definitions

In this Procedure:

“Authorised Person” means a person with approval to have access to the schedule for alcohol and other drug testing to communicate the nominations to the relevant Supervisors.

“Cardax” means GPC’s site access card control software.

“Confirmatory test” means an analytical procedure that unequivocally identifies and quantifies the presence of a specific drug above the relevant target concentration.

“Drug screen” means a valid method used to exclude the presence of a drug or class of drug.

“MRO” means Medical Review Officer. MROs are registered medical practitioners who have knowledge and understanding of:

- substance abuse disorders and their management
- A&OD testing procedures and methodologies
- interpretation of test results including alternative medical explanations for laboratory confirmed test results as well as issues relating to adulterated and substituted specimens
- pharmacology of illicit drugs
- ethical and privacy issues surrounding workplace drug and alcohol testing
- laboratory methodology and quality control
- legislation and recommended standards as they relate to A&OD programs
- fitness for work and other medical related safety issues

“Reasonable Suspicion” means a judgement of being under the influence of drugs or alcohol based on the behaviours described in this Procedure.

“Screening Officer” means a Contractor or authorised GPC Employee who has 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.

Terms that are capitalised and not otherwise defined in this Procedure are defined in the GPC Corporate Glossary Instruction (as listed in Appendix 1 – Related documents).

2 Introduction

2.1 Purpose

This Procedure details how GPC will achieve its objectives of ensuring that the health and safety of people at GPC sites are not put at risk by the actions of people presenting to site who are unfit for duty. It outlines how GPC will undertake alcohol and other drug screening to enable GPC to manage the effects of alcohol, medications and other drugs in the workplace.

2.2 Scope

This Procedure applies to all GPC Employees, Contractors, Workers, Board members, port users and visitors accessing GPC sites.

2.3 Objectives

This Procedure has been developed to:

- provide clarity about obligations, responsibilities and expectations for managing drug and alcohol testing and responses at GPC to help address the risk associated with individuals presenting unfit for work; and
- ensure that GPC meets its responsibilities under the WHS Act to provide a safe workplace.

This Procedure describes the processes to be followed to mitigate the risk associated with alcohol and other drugs at GPC by:

- Describing how alcohol testing and drug screening will be conducted; and
- Detailing the actions required for when not-negative screening and positive confirmation results are returned.

3 Alcohol and other drugs general requirements

3.1 General

(a) Code of Conduct

GPC expects all persons to act in a responsible manner consistent with the Code of Conduct when in the workplace or representing the organisation.

(b) Prohibited behaviours

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

- i. Entering a GPC site or conducting GPC business anywhere while unfit for work because of drug and/or alcohol consumption;
- ii. Possessing, consuming, distributing, procuring or selling alcohol or illicit drugs while on GPC premises; and
- iii. 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; and
- Delivery of alcohol by provedores as part of the ship's provisions.

(c) 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.

(d) Searches

When the Executive Leadership Team or a Manager or GPC Representative has reasonable cause to suspect the sale, unauthorised possession or distribution of alcohol and/or illegal drugs is occurring in breach of the Safety Policy and/or this Procedure, 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.

3.2 Fitness for work

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

(a) Alcohol

The target breath alcohol concentration for entry to site is 0.00g/100mL.

(b) 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 AS4760:2019.

Table 1: On-site initial test target concentrations

Class of drug	Target Concentration (ng/mL)
Opiates	50
Amphetamine-type stimulants	50
Δ ⁹ -tetrahydrocannabinol	15
Cocaine and metabolites	50
Oxycodone	40

Note: these targets represent the undiluted oral fluid concentration.

(c) 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 AS4760:2019.

Table 2: Confirmatory target concentrations

Compound	Target Concentration (ng/mL)
Opiates	
Morphine	25
Codeine	25
6-Acetyl morphine	10
Oxycodone	20
Amphetamine-type stimulants	
Amphetamine	25

Methylamphetamine	25
Methelenedioxymethylamphetamine	25
Methelenedioxyamphetamine	25
Δ^9 -tetrahydrocannabinol	5
Cocaine and metabolites	
Cocaine	25
Benzoyllecgonine	25
Ecgonine methyl ester	25

Note: these targets represent the undiluted oral fluid concentration.

(d) Other Drugs – Urine Screening

Test cut-off concentrations for urine screens conducted as part of health monitoring or pre-employment medicals are as per AS4308:2008.

3.3 Positive screening / test results

(a) 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/remain on 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 under the appropriate GPC policy document, rather than being dealt with under this Procedure as a positive result.

If a Worker is called in to work in an emergency or short notice call-in and subsequently self-assesses unfit for work that Worker must refuse to go to site. As long as the Worker was not being paid to be on call, this instance will not be counted as absenteeism or sick leave.

(b) Positive result for all other testing / screening

The following is considered to be a positive reading and will be documented in SAI360:

- i. The confirmatory sample provided returns results that exceed the testing limits as described in this Procedure.
- ii. Refusal to undergo drug or alcohol screening.
- iii. Failure to report for random screening without valid reasoning.

(c) Prescription medication

If a not-negative screening result is potentially due to the taking of medication, the MRO will advise after speaking with the individual whether:

- i. Normal duties could be carried out;
- ii. Other duties that reduce any potential safety risk could be carried out; or
- iii. Is not fit for work.

The MRO is to communicate the advice to the relevant Supervisor. The final decision on how to manage a person in this situation will remain with the relevant Manager of the affected person and should be communicated adequately to the impacted individual and relevant leaders.

Where a person is on prescription medication for continual use and is unlikely to provide a negative initial saliva drug sample, a Health Management Plan will need to be developed to ensure that the medication will not impact on the individual person's fitness for work.

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

If there is a dispute in relation to fitness for work and/or prescription medication, GPC's MRO can discuss directly with the prescribing doctor (with approval from the involved employee).

Declaration of medications taken should be made prior to undergoing alcohol and other drug screening tests.

(d) Safe transfer home

GPC Employees: If a positive alcohol breath test or not-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 not-negative drug screen is returned, the affected person's Supervisor should follow their company process.

3.4 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 Team.

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 Workers in jeopardy, provided that:

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

Note: Contractor companies are encouraged to rehabilitate their Worker's in a similar manner.

3.5 Education

GPC will provide all employees with education and awareness on alcohol and other drugs use and their responsibilities under this Procedure. The education will aim to provide employees

with information to assist them in managing their own fitness for work. The education program will be flexible and respond to review of trends in test results.

3.6 Managing non-conformances

(a) All non-conformances

Any breaches of this Procedure (including actions as listed below) will be reported to the person's relevant Supervisor who will in turn escalate to their Manager and/or General Manager.

The following will also be considered breaches of this Procedure:

- i. Failure to complete the required documentation and declaration prior to undertaking the screen / test;
- ii. Deliberately tampering with the testing equipment or sample provided;
- iii. Failure to follow instruction when providing a sample; or
- iv. A false declaration regarding fitness for work following a not-negative drug test result using the prescription drug cross sensitivity chart.

Note: Breaches identified through the testing confirmation process will be recorded and managed in SAI360 by the Health and Wellbeing Team.

(b) Non-conformance by GPC Employees

Breaches of this Procedure by GPC Employees will be addressed by the Supervisor in accordance with this Procedure and the Managing Discipline Specification, which may involve up to and including termination of employment.

(c) Non-conformance by non-GPC Employees

Any Contractor (or Employee of a Contractor), visitor or port user found to be in violation of this 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.

4 Arranging an alcohol test or other drug screen

4.1 Pre-employment

Prior to their employment being finalised, the preferred candidate(s) will be contacted by GPC's Human Resources Team to arrange a pre-employment medical, including alcohol breath testing and other drug screening. The Human Resources Team will make the appointment with the preferred medical provider for the pre-employment screening.

4.2 Random tests

Random alcohol and other drug screening will be scheduled and arranged by the Safety Team.

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

4.3 Voluntary self-testing

GPC will provide devices and kits for the purpose of self-testing. Workers will not be classified as 'onsite' if accessing a GPC site location for the purpose of accessing a device/kit for self-testing.

The results of a voluntary self-test are not recorded. Workers 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.

4.4 Reasonable suspicion and post incident

The Supervisor of the affected person is responsible for contacting an approved Screening Officer to attend site for the purpose of post incident and Reasonable Suspicion testing. The Supervisor must escort the candidate to the testing room and remain with them in the vicinity of the testing room until the test is complete.

4.5 Health management plan

A Health Management Plan is to be developed based on the recommendation from the MRO and discussed with the affected employee, their Supervisor and the Health and Wellbeing Officer/Specialist that monitors the health of that employee. It will be 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.

The GPC Health and Wellbeing Team will make arrangements for:

- a. pre-determined alcohol and or drug screening to be conducted as per an individual's health management plan for GPC Employees.
- b. Health Management Plans for GPC employees on continual prescribed medication when the individual is unlikely to provide a negative initial saliva screening result.

4.6 Third party sites

Employees attending other sites to conduct GPC business, must also meet the host site's standards for alcohol and other drugs, including participating in any random testing as requested.

Note: Failure to meet both the host and GPC's requirements will result in an investigation and subsequent counselling and / or performance management (if required).

5 Candidate selection

A summary of this section is illustrated in *Flowchart 1 – Candidate selection* in Appendix 2 of this Procedure.

5.1 Random selection

The approved random selection processes currently includes:

- a. **Ball selection** – The candidate selects one ball from a non-see-through bag containing two white and two coloured balls. If a coloured ball is selected then the candidate is required to present for testing.

Note: when a vehicle is stopped at a site entry, each person in the vehicle is required to select a ball. Only those who select a coloured ball are required to present for testing.

To avoid lengthy waiting times, the Screening Officers may stop ball selections, when there are more than five (5) people waiting per Screening Officer, until the queue reduces to an acceptable level.

- b. **Cardax record selection** – Can be applied during the shift at any time of the day or night. A list of all persons on site is sourced from Cardax and entered into an excel spread sheet random number generator.

An authorised person (Safety Team or contractor screening company delegate performing this duty) will contact the Supervisor of the candidate on the list to inform them of their selection and the requirement to present for screening.

- c. **Cardax random selection through Gallagher** – Can be scheduled for anytime of the day or night to randomly select persons entering site or provide a list for mid-shift testing.

When a schedule is created, an authorised person will contact the Supervisor of the candidate on the list to inform them of their selection and the requirement to present for screening.

Note: Alternative random selection processes may be applied following approval by the Executive Leadership Team.

5.2 Reasonable suspicion

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 or
- Injury sustained by apparent impairment (e.g. – lack of coordination or judgment).

Note: the observed behaviours must be documented on the Reasonable Suspicion form.

The person(s) who identifies behaviours in another, that gives rise to Reasonable Suspicion, must notify the Supervisor of the suspected person (or report it to their own Supervisor if unknown).

The Supervisor and the person reporting suspicion will complete the Reasonable Suspicion form to identify the specific behaviour.

The Supervisor of the suspected person will notify the person that they are required to present for testing.

Note: the completed Reasonable Suspicion form must be treated as a confidential document and is to be returned to Health and Wellbeing Team for filing.

5.3 Post incident

Refer to the Incident Management and Investigation Procedure for post incident testing requirements.

6 Testing/screening procedures

A summary of this section is illustrated in *Flowchart 2 – Testing process* in Appendix 3 and *Flowchart 3 – Receipt of confirmatory testing* in Appendix 4 of this Procedure.

6.1 Consent and declarations

Prior to providing any breath, oral fluid or urine specimens for screening, the candidate must complete a test consent declaration with the Screening Officer. The consent covers:

- (a) Acknowledgment that a specimen is to be provided for the purpose of testing for alcohol and other drugs as required by GPC;
- (b) Consent that the sample(s) provided will be analysed either on-site or at an approved laboratory, if required, and that the results will be released to authorised GPC personnel; and
- (c) Certification that the specimen provided will be the candidates own and that all information provided to the Screening Officer is true and correct.

6.2 Interference with breath or oral fluid specimens

The candidate must not place any drink or food in their mouth from 20 minutes before testing. Screening Officers have the right to examine the candidate's mouth to ensure no food or excess fluid remains that will impact the testing/screening results.

6.3 Alcohol breath testing

Alcohol testing will be undertaken using alcohol breath analysers in accordance with AS 3547:2019.

- i. The Screening Officer will request the candidate to supply an air sample from their lungs directed into an approved breath analysis instrument. The sample must be sufficient to obtain a valid reading on the instrument.

Note: A result of 0.00g/100mL is considered as a **negative** result and the person may return to work.

- ii. If the result is above 0.00g/100mL, a confirmation test will be carried out after a waiting period of 20 minutes after the initial test.
- iii. If the **confirmation test** indicates a result greater than 0.00g/100ml, the result is recorded as **positive**. The Screening Officer will notify the persons Supervisor.

- iv. The Supervisor will escort the affected person to a private room to have a confidential discussion and the Supervisor will offer to arrange safe travel home and have their site access card disabled. The person's Supervisor must arrange with Security to suspend the person's site access with notification to be made to the relevant Manager of the person. Should this occur after hours and unable to arrange with Security, the person must surrender their site access card to their Supervisor.
- v. Personnel will have their access re-instated when they are able to produce a negative sample at their next scheduled attendance in relation to their roster.

Note: all positive alcohol breath tests will be recorded in SAI360 by the Health and Wellbeing Team.

6.4 Drug screening – oral fluid (saliva)

Oral fluid (saliva) drug screens will be conducted as per AS 4760:2019.

The candidate will be required to supply a saliva sample on the approved screening device provided to them by the Screening Officer. The sample must be sufficient to obtain a valid reading on the device.

- i. If a **negative** screen result is returned:
 - The collected specimen will be disposed of and the candidate can return to work.
- ii. If the screen result is **not-negative** the candidate will be required to provide a second sample to be sent for confirmatory testing in an approved laboratory. The process below will then be followed based on person type.

Note¹: If the screen result **is contested** by the candidate, the Screening Officer will confirm if there has been consumption of any potential medications that could interfere with the screening test.

Note²: If **medications** are **not declared**, the candidate may request to undertake a second screen immediately during that appointment.

- If the **second test** result is **negative**, the candidate can return to work. The Screening Officer will still notify the candidates Supervisor of the initial not-negative result.
- If the **second test** result is **not-negative** the Screening Officer will follow the process as outlined below based on person type.

a. **Process following not-negative and confirmatory sample collection:**

Non-GPC Employees: The Screening Officer will notify the candidate's Supervisor and GPC Representative/Contract Supervisor. The candidate's Supervisor will follow their company process and the GPC Representative/Contract supervisor will ensure the person is escorted from site and have their site access card disabled.

Employees: The Screening Officer will contact the MRO of the initial screen result.

- i. The affected candidate will be provided a private room to have a confidential discussion with the MRO for advice on the cause of the not-negative result. Once finished talking to the candidate, the MRO will advise the Supervisor whether the person is fit to return to work (normal duties or modified duties that reduce any potential safety risk could be carried out) or is unfit for work.

- ii. The final decision on how to manage a person deemed fit for work will remain with the relevant Manager of the affected person and should be communicated adequately to the impacted individual and relevant leaders.
- iii. If deemed unfit for work by the MRO or the outcome from the not-negative result requires site access to be disabled (e.g. relevant Manager decision), the person shall be escorted from site, have their site access card disabled and be temporarily stood down while awaiting confirmatory testing results.
- iv. The person's Supervisor must arrange with Security to suspend the person's site access with notification to be made to the relevant Manager of the person. Should this occur after hours and unable to arrange with Security, the person must surrender their site access card to their Supervisor.

Note¹: The temporary stand aside process is not part of the disciplinary process. Any employees on temporary stand aside will maintain full pay. The relevant Manager will notify the person of the temporary stand aside in a verbal conversation. The Manager will document the conversation and notify Human Resources Team and Payroll. The Manager (or their delegate) will maintain regular communication with the employee to ensure their safety and wellbeing is attended to and to keep them abreast of the next steps.

Note²: MRO will provide confidential report to Health and Wellbeing Specialist that summarises discussion and recommendation.

6.5 Drug screening – urine

Urine drug screening will be conducted as per AS 4308:2008, at the nominated medical provider's venue or a secure location deemed fit for specimen collection. Urine drug screening is undertaken for pre-employment medicals and health management plans.

6.6 Confirmatory testing

All not-negative drug screens (both urine and saliva) will be sent to a suitable laboratory for confirmatory testing. The Screening Officer will prepare samples for the laboratory confirmation and complete the chain of custody documentation to accompany the sample.

All not-negative drug tests will be sent to a National Association of Testing Authorities accredited laboratory for confirmation. The Screening Officer will notify the GPC Health and Wellbeing Team of the not-negative confirmatory test requirement.

6.7 Receipt of confirmatory testing results

The MRO and Health and Wellbeing Specialist will receive laboratory confirmation results. The Health and Wellbeing Specialist will inform the affected persons Supervisor and Manager if the confirmatory test was negative or positive.

If the results are **negative**, the individual will be informed that no further action will be required and no records will be maintained on their personnel file. If site access was disabled, the Supervisor of the affected person will arrange for access to be re-instated.

Note: all confirmed positive drug screens (not consistent with declared medication) will be treated as confidential and recorded in SAI360 by the GPC Health and Wellbeing Team.

GPC Employees: If the results are **positive and consistent with declared medication**, follow up testing or review of any Health Management Plans will be in line with MRO recommendation and facilitated by Health and Wellbeing Specialist.

Follow up testing may be requested to be completed by the employee. If the results are **positive (not consistent with medication)**, then the affected persons Manager will engage the Human Resources Specialist and Health and Wellbeing Specialist to determine suitable management of the individual and will arrange a formal meeting to discuss with the individual.

Where the personnel have had their site access disabled, this will be reinstated in accordance with requirements of Health Management Plan. The Supervisor of the affected person will arrange for access to be re-instated.

Non-GPC Employees: If the results are **positive**, then the affected person will have their site access card disabled with a note on Cardax “Not to be re-activated” and a reference to the SAI360 incident.

Re-instatement of access may only be granted by both the Safety Manager and relevant Manager on receipt of an investigation and suitable proof of a management plan / rehabilitation endorsed by an MRO.

7 Testing/screening equipment maintenance

7.1 Alcohol breath testing equipment

The GPC Safety Team is responsible for arranging all maintenance and calibration of the alcohol breath testers provided for self-testing to applicable Australian Standard and original equipment manufacturer specification. A record of maintenance and calibration is maintained in the occupational hygiene equipment register.

7.2 Drug screen kits

Drug screen kits made available for self-testing, and used for all other testing, will be able to detect drugs to the quantities specified in AS 4760 or AS/NZS 4308. Drug screen kits provided must be within their used by date.

8 Records management

At completion of the alcohol and other drug screen, the Screening Officer will provide the candidate with a copy of their results.

At completion of the alcohol and other drug screening period, the Screening Officer will provide the nominated representative from the GPC Health and Wellbeing Team, the employer copy for all positive alcohol and not-negative drug screen results. For confidentiality the copy will be emailed securely to Health and Wellbeing Team.

For GPC Employees, these will be filed on the person’s medical file with the Health and Wellbeing Team.

For non-GPC Employees, these will be passed onto the relevant company, via Health and Wellbeing Team.

9 Roles and responsibilities

To assist GPC Representatives and all persons entering or intending on entering a GPC site, to better understand their respective responsibilities and accountabilities, they are as summarised below:

Role	Responsibilities
Every person entering, or intending to enter, a GPC site or conducting GPC business	To ensure that GPC complies with its obligations by: <ul style="list-style-type: none">Presenting themselves in a fit for work state and remaining fit for work whilst on a GPC site or conducting GPC business.

	<ul style="list-style-type: none"> • Participating in alcohol and other drug testing/screening as required. • Maintaining confidentiality of all personal information. • When selected for screening: <ul style="list-style-type: none"> – Completing the consent form – Declaring any medications that may interfere with the test/screen; and – Not eating or drinking until after the test is complete. • Complying with the requirements of this Procedure.
<p>GPC Executive Leadership Team</p>	<p>To ensure that GPC complies with its obligations by:</p> <ul style="list-style-type: none"> • Providing a safe and healthy working environment for all workers and other persons on site through implementation of this Procedure. • Developing and implementing random selection processes.
<p>Manager</p>	<p>To ensure that GPC complies with its obligations by:</p> <ul style="list-style-type: none"> • Making final decision based on MRO advice on how to manage an employee taking prescription medication that may impact their fitness for duty. • Addressing non-conformances of their subordinates through the Managing Discipline Specification. • Maintaining confidentiality of all personal information.
<p>Supervisor</p>	<p>To ensure that GPC complies with its obligations by:</p> <ul style="list-style-type: none"> • Directing subordinates to present for random screening when requested. • Directing subordinates to present for post incident and health management screening when required. • Directing subordinates to present for screening based on reasonable suspicion. • Arranging a Screening Officer for post incident and suspicion testing. • Arranging site access card of an affected person to be disabled when positive / not-negative results are returned and re-instated once negative result is returned. • Addressing non-conformances of their subordinates through the Managing Discipline Specification.

	<ul style="list-style-type: none"> • Maintaining confidentiality of all personal information. • Deciding how to manage an employee taking prescription medication that may impact their fitness for duty in conjunction with line manager support.
Screening Officer	<p>To ensure that GPC complies with its obligations by:</p> <ul style="list-style-type: none"> • Directing a candidate on how to provide samples in accordance with the relevant AS/NZS Standard. • Notifying Supervisor of not-negative results. • Preparing samples for confirmatory testing. • Maintaining appropriate training and qualifications. • Maintaining confidentiality of all personal information.
Testing provider	<p>To ensure that GPC complies with its obligations by:</p> <ul style="list-style-type: none"> • Notifying Health and Wellbeing Specialist of results of confirmatory testing. • Complying with requirements of this Procedure.
Health and Wellbeing Specialist	<p>To ensure that GPC complies with its obligations by:</p> <ul style="list-style-type: none"> • Informing relevant Supervisor of results of confirmatory testing. • Entering confirmed positive results in SAI360.
Safety Team	<p>To ensure that GPC complies with its obligations by:</p> <ul style="list-style-type: none"> • Coordinating random testing process. • Maintaining confidentiality of all personal information.
Health and Wellbeing Team	<p>To ensure that GPC complies with its obligations by:</p> <ul style="list-style-type: none"> • Facilitating and supporting rehabilitation processes. • Facilitating and supporting the education and awareness programs. • Promoting the Employee Assistance Program. • Developing and facilitating Health Management Plans. • Arranging for screening for Health Management Plans. • Maintaining confidentiality of all personal information.

Human Resources Team	To ensure that GPC complies with its obligations by: <ul style="list-style-type: none"> • Arranging pre-employment medicals. • Addressing non-conformances through the Managing Discipline Specification.
MRO	To ensure that GPC complies with its obligations by: <ul style="list-style-type: none"> • Determining if the use of prescription medication is causing the person to be unfit for work and if suitable duties are advisable. • Determining if a positive result should be recorded if prescription medication is being used inappropriately. • Maintaining confidentiality of all personal information. • Providing advice in relation to developing Health Management Plans
Authorised person	To ensure that GPC complies with its obligations by: <ul style="list-style-type: none"> • Communicating alcohol and other drug testing nominations to relevant supervisors.

10 Appendices

10.1 Appendix 1 – Related documents

(a) Legislation and regulation

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

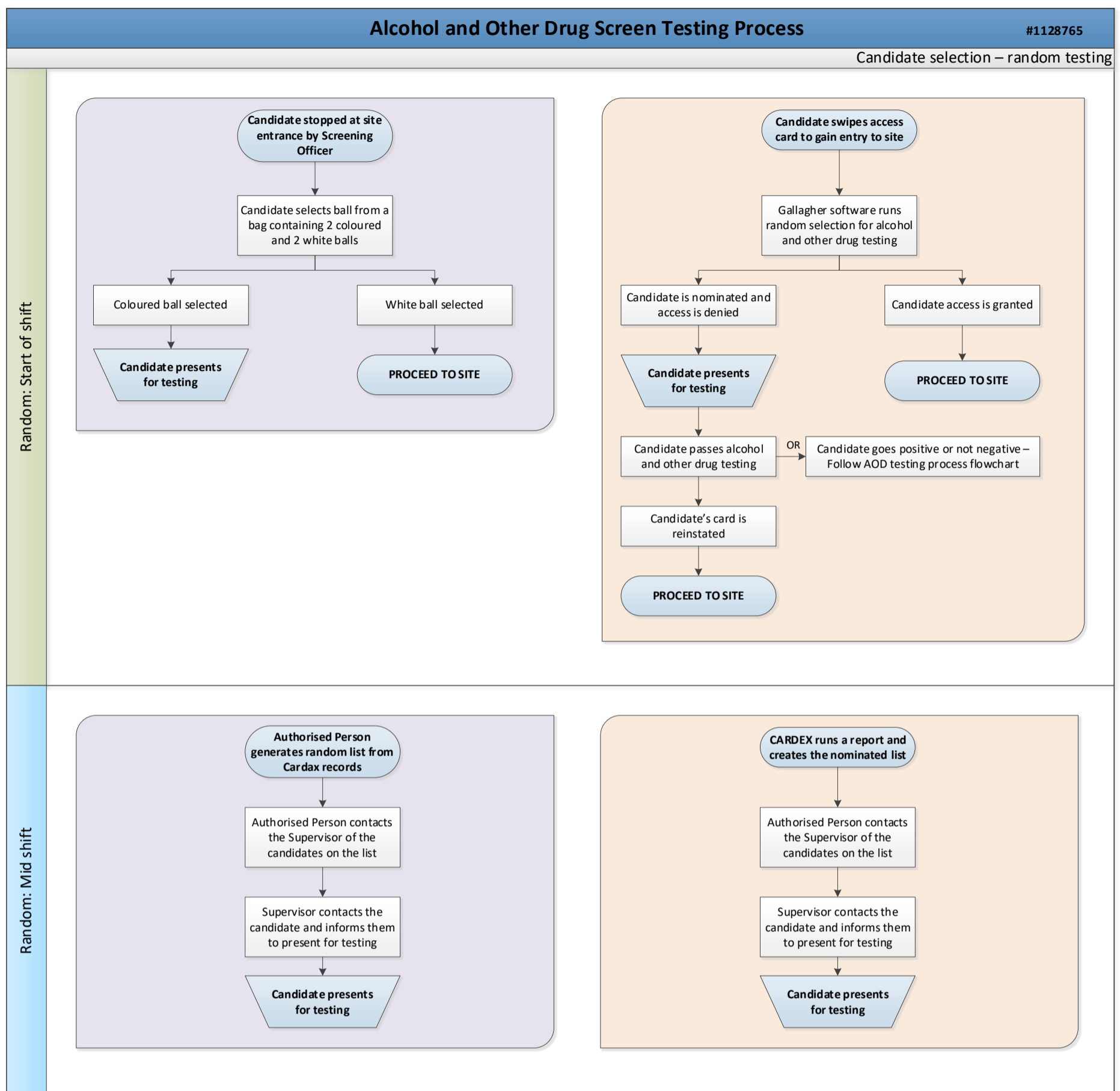
Type	Legislation/regulation
Federal Acts	Nil
State Acts	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i> <i>Information Privacy Act 2009 (Qld)</i> <i>Right to Information Act 2009 (Qld)</i>
Other	AS3547:2019 Breath alcohol testing devices for personal use AS4760:2019 Procedures for specimen collection and the detection and quantitation of drugs in oral fluid

Type	Legislation/regulation
	AS/NZS4308:2008 Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine

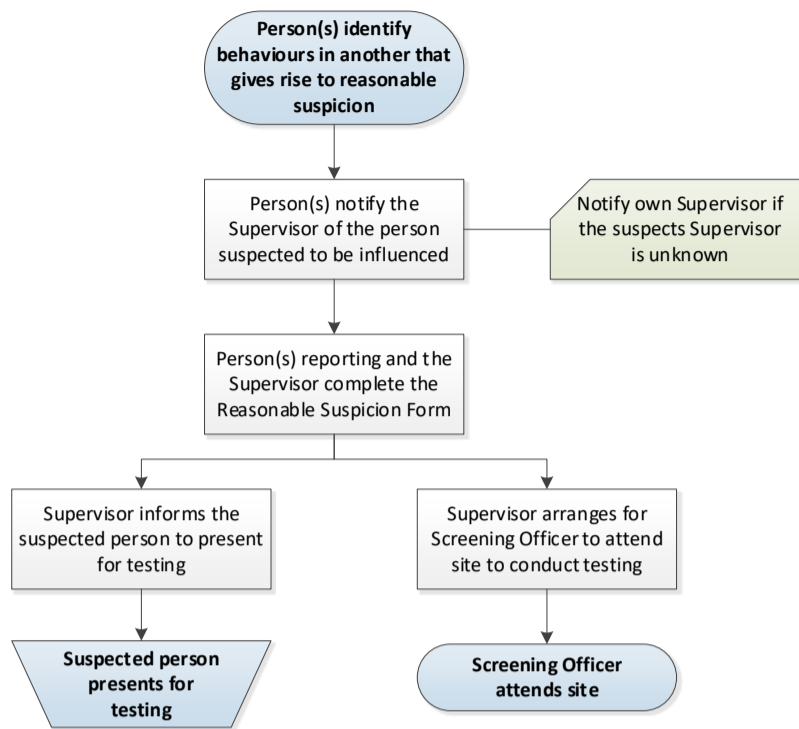
(b) Gladstone Ports Corporation documents

The following documents relate to this Procedure:

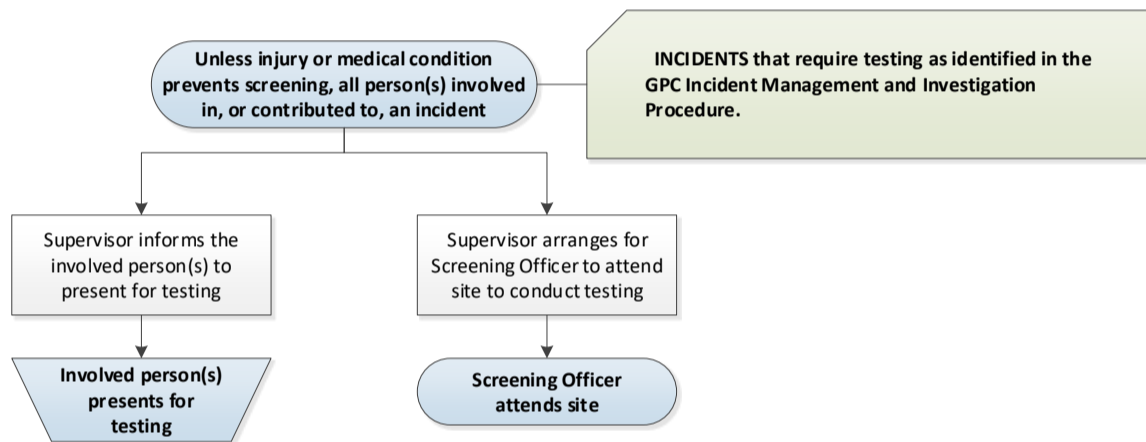
Type	Document number and title
Tier 1: Policy	#365624 Safety Policy
Tier 2: Standard/Strategy	#854303 Safety Management Framework Standard #1331115 Fit for Work Standard
Tier 3: Specification/ Procedure/Plan	#697854 Safety Management System Plan #960456 Managing Discipline Specification
Tier 4: Instruction/Form/ Template/Checklist	#1324425 Reasonable Suspicion Form #1621179 GPC Corporate Glossary Instruction

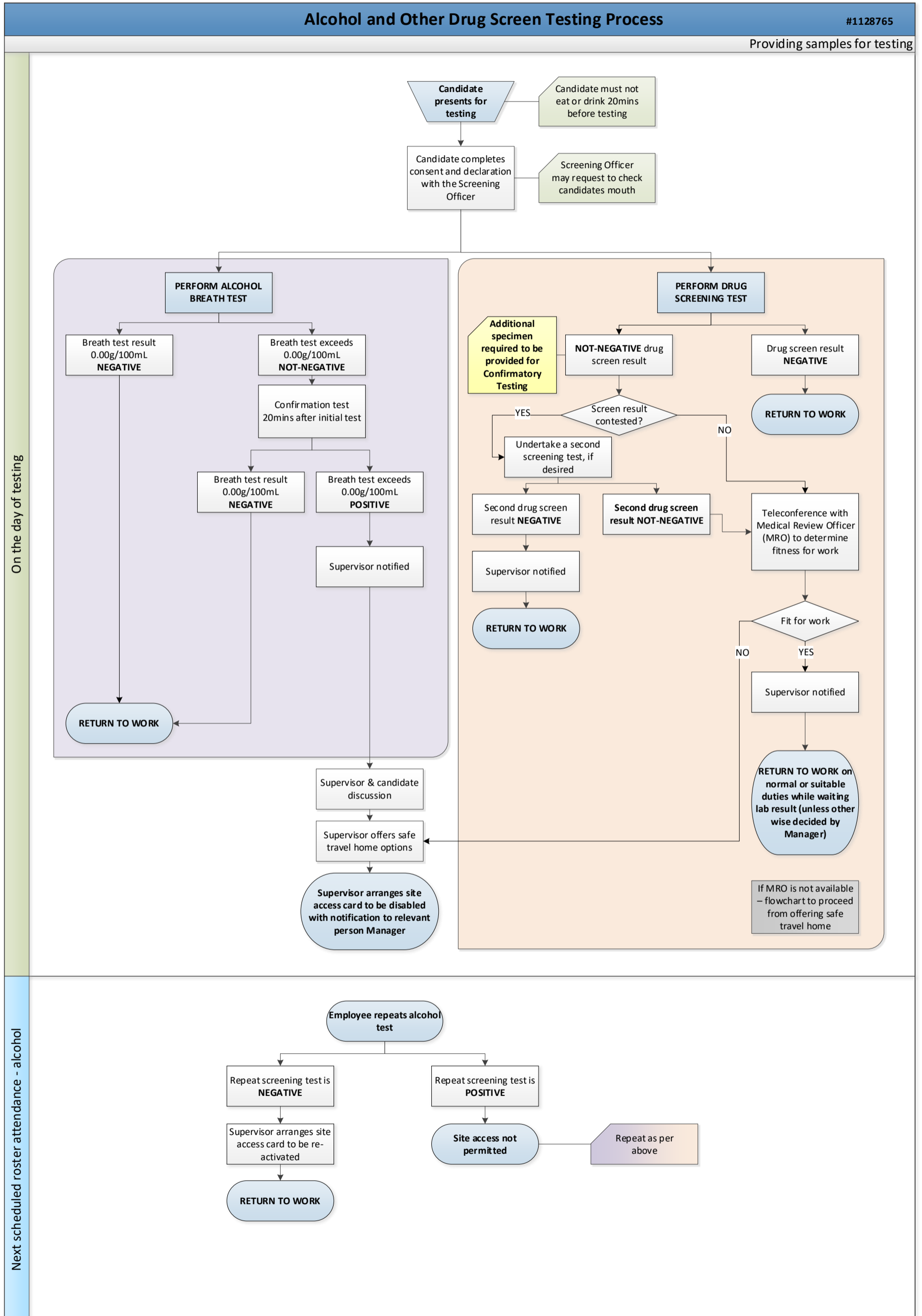


Reasonable suspicion

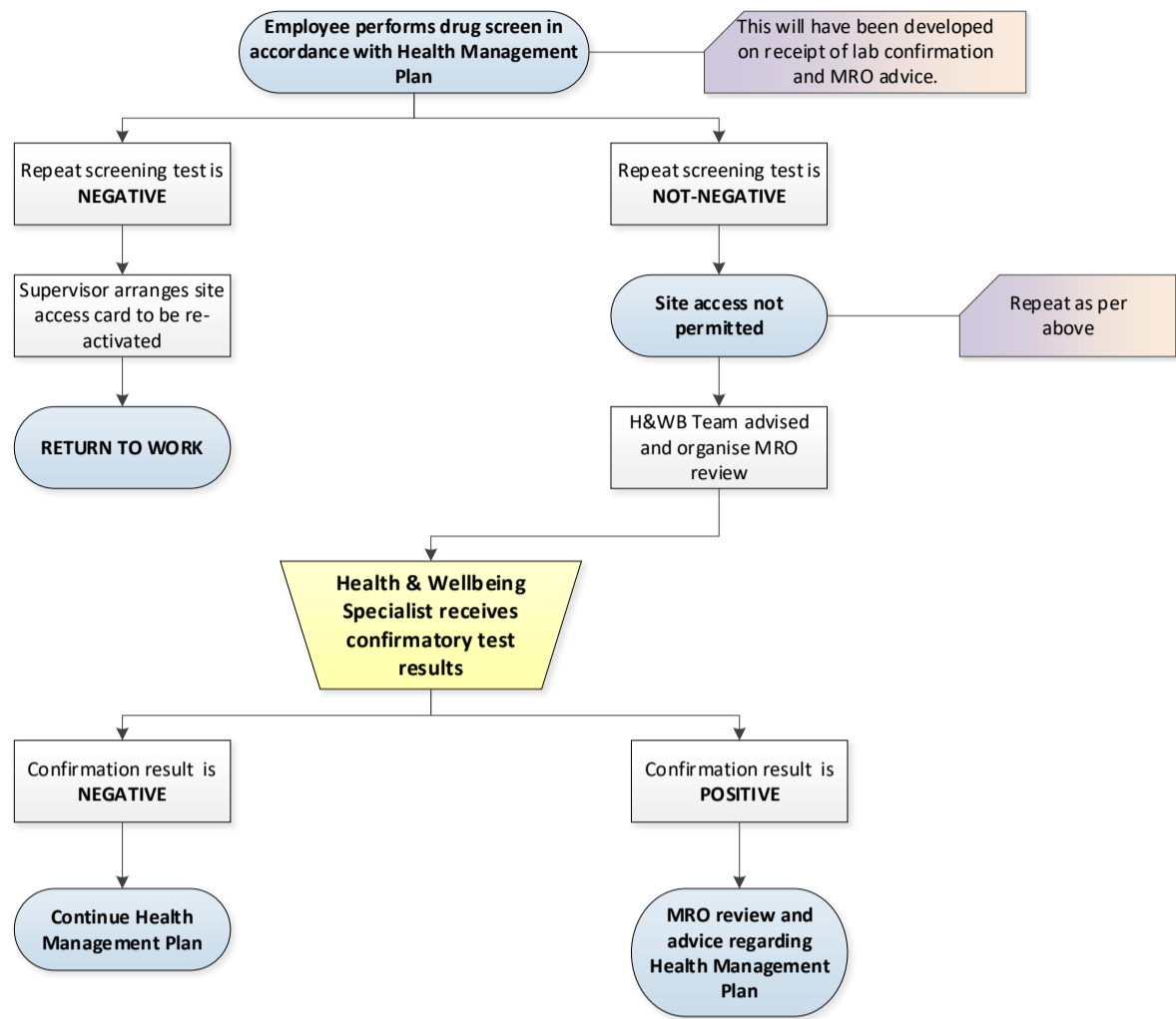


Post-incident

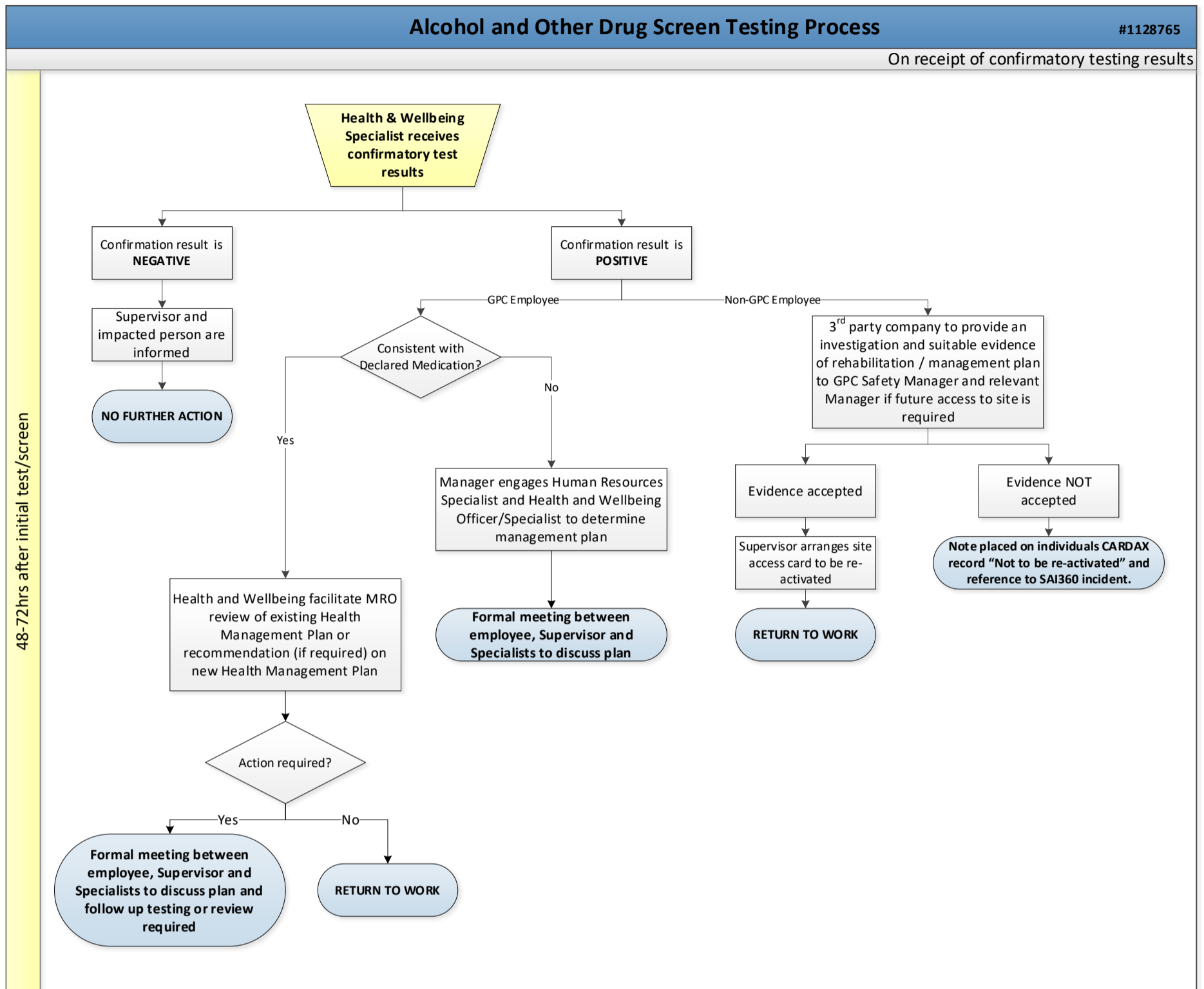




Return to work following 'not fit for work' or not consistent with medication result - drugs



10.4 Appendix 4 – Flow chart 3 – Receipt of confirmatory test results



10.5 Appendix 5 – Revision history

Revision date	Revision description	Author	Endorsed by	Approved by
01/03/2007	The written procedure to be applied in conjunction with the CQPA Drug and Alcohol Policy Version 1.0, 22/09/06 V11	Gail Williams Employee Relations Advisor	Peter O'Sullivan Employee Relations Manager	Peter O'Sullivan Employee Relations Manager
30/06/2016	Published version V18	Alison Dickinson OHS Systems Advisor	John Sherriff Corporate Relations Manager	John Sherriff Corporate Relations Manager
30/10/2017	AOD Standard created to remove higher level process	Tony Young Safety Manager	Rowen Winsor People Community and Sustainability General Manager	Rowen Winsor People Community and Sustainability General Manager
1/01/2019	Included changes to align with updates to AS 4760:2019. Modifications to Section 2.4.4 (site access suspension process)	Julie Meinberg Safety Specialist	Tony Young Safety Manager	Rowen Winsor People Community and Sustainability General Manager
14/01/2020	Updated as per findings from KPMG audit. Changed Occ Physician back to Medical Review Officer. Amendments to Section 2.4.4	Julie Meinberg Safety Specialist	Tony Young Safety Manager	Rowen Winsor People Community and Sustainability General Manager
25/11/20	Updated as per HSF legal review. Standard merged into Procedure. Addition of Health Management Plan requirements for ongoing prescription medication use. Removal of HR approval for card suspension.	Kirsty Iszlaub Acting Safety and Training Specialist - Systems	Tony Young Safety and Training Manager	Rowen Winsor People Community and Sustainability General Manager

Revision date	Revision description	Author	Endorsed by	Approved by
15/12/2023	v32 Change to 0.00 for site BAC. Review of MRO, return to work testing and HMP processes to clarify requirements.	Kirsty Iszlaub, S&E Systems Lead	Tony Young, Safety Manager	Richard Haward, EGM Safety & ESG