

PETRONAS TECHNICAL STANDARDS
HEALTH, SAFETY AND ENVIRONMENT

**DRUG AND ALCOHOL ABUSE EMPLOYMENT
GUIDELINES**
(STANDARD)

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PREFACE

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AMENDMENT RECORD SHEET

Chap. No.	Section No.	Description	Issue No.	Date	Rev., No.	Date	App by: (initial)
All	All		1	Sept 04	0	0	IGA

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1. **SUMMARY**

This document is intended to assist OPU/JV updating their drugs and alcohol policies. It covers the main principles of Group policy and proposes a model for local company policy statements which may be adapted and amplified to suit local circumstances. The appendices give detailed legal and technical guidance required for implementation of a successful policy.

1.1 **MAIN POLICY ELEMENTS**

PETRONAS OPU/JV should have policies and practices which reflect the risk to safety and environment from the abuse of drugs and alcohol. The practices are likely to differ between work sites and businesses, depending on risk and industry practice, but the application of common criteria ensures consistent enforcement.

The policy should be expressed in clear rules, which take account of national law and practice. Consultation with employees prior to implementation is likely to enhance effectiveness.

Prevention of abuse through increased awareness and individual responsibility can be achieved by clear communication of objectives and rules, by assistance towards rehabilitation, and by example. In the latter context, alcohol use should be discouraged or eliminated even at work places where the risk to safety and environment is low.

Key rules should cover the possession, sale or use of drugs and alcohol at work sites, work impairment as a result of use, and sanctions on infringement.

Serious consideration should be given to screening and testing procedures, such as:

- Pre-employment drugs testing.
- Testing for drugs prior to placement in safety and environmentally sensitive positions.
- Random testing for use of drugs and alcohol in safety and environmentally sensitive positions, or locations.
- Similar testing procedures for management staff to provide a common purpose.
- Possibility to test for drugs and alcohol after accidents, near-misses, unsafe acts, and other job-related circumstances.
- Clear procedures to cover positive test results, ranging from temporary suspension and rehabilitation to dismissal.
- The medical profession should be involved in the execution of a drugs and alcohol policy.
- To qualify for work, contractors must have similar drugs and alcohol policies.

2. INTRODUCTION

A policy on drugs and alcohol will be most effective if it is understood and accepted as an integral part of a company's business objectives. A clear relationship with objectives in the areas of health, safety, environmental protection and productivity is essential.

The processes adopted to gain understanding and acceptance will differ between companies since they are often dictated by local legislation and employee relations practices. They may range from education programmes and information through the line, to staff council consultation or union negotiation.

Since alcohol and drug use affects most industrial activities in a country, PETRONAS companies should develop a common approach, particularly with other oil and chemical companies. Also, governments may be amenable to review the consistency of their positions vis a vis legislation on health, safety and environment on the one hand and industrial relations and civil liberties on the other. Finally, national medical associations and state health authorities may need to be consulted. If the proposed policy cannot be reconciled with the wishes and perceptions of staff, or cannot gain support in the local environment, consideration should be given to accept a legal challenge to implementation in order to clarify and safeguard the company's position.

The components of a successful drugs and alcohol policy are:

- A planned approach to the provision of education and training,
- An enlightened policy of treatment and rehabilitation,
- Clear rules at work,
- Controls to ensure compliance with the rules.

3. GROUP GUIDELINES

3.1 EDUCATION AND TRAINING

Education and training programmes have most effect if they are designed and timed to fit in with the introduction of a new or changed drugs and alcohol policy. They normally include:

Information about the adverse effects which drugs and alcohol may have on health and job performance, and the related risks to safety and the environment.

Encouragement to employees with alcohol or drug dependence to seek treatment and rehabilitation, with advice about employee assistance programmes.

Training to recognise impaired performance resulting from alcohol or drug abuse, and to handle the resulting employee relations issues.

Clear information about the company's rules in the area of drugs and alcohol.

3.2 TREATMENT AND REHABILITATION

The same considerations should be given to employees with alcohol or drugs dependence as to those having an illness, with the objective of minimising risks to job performance, safety and the environment. Employees with a dependence should be encouraged to seek medical advice, and to follow appropriate treatment promptly. Supervisors and peers have an important role to play in convincing employees to come forward for treatment, and to recognise symptoms of dependence. Employees who seek help should not place their employment in jeopardy by doing so, although alternative work may be considered. Company benefits which apply in the case of illness should be available.

3.3 RULES AT WORK

Key elements of the policy should be the setting of clear rules regarding fitness for work, and the availability, possession and use of alcohol and drugs on company business or locations.

3.3.1 Fitness for work

It is the employee's responsibility to be fit for work. Employees should be prohibited from being on company business or locations while impaired by alcohol or drugs.

The effects of alcohol and drugs vary both in the same person and between individuals. It is, therefore, not possible scientifically to define the limits of alcohol or drugs in the human body which produce conclusive evidence of impairment. A drugs and alcohol policy must establish cutoff levels, recommendations for which are given in section 3.4.6. Employees must be informed that they may be tested against those levels.

3.3.2 Availability, Possession and Use of Alcohol and Drugs

Alcohol

The availability of alcohol on company business or locations depends on the risk to job performance, safety and the environment, on business requirements, and on national, social and religious traditions.

As a general rule, alcohol should not be used during working hours. Exceptions should have senior management approval, and be clearly defined. Even where the risk to safety or the environment is low, such as in an office environment, exceptions should be rare.

The possession, distribution or sale of alcohol on company business or locations should not be permitted without prior approval.

Drugs

The use, possession, distribution or sale of illegal drugs should be strictly prohibited. This prohibition should also apply to illicitly used legal drugs.

3.4 CONTROLS: SEARCHES AND TESTING

Controls introduced to ensure compliance with the rules will vary according to the extent of the problem, the level of risk and the impact of local laws. (In respect of the latter, see also Appendix B.)

In the case of legal drugs, care must be taken to ensure that, particularly in safety and environmentally sensitive positions, no drugs are used which have a performance-disabling effect. The employee is responsible for advising line management, preferably through the company medical adviser, that such medication is required, after which sick leave may be granted or alternative work arranged.

As to the assessed level of risk, controls should take account of the sensitivity of positions to safety and environment. To provide leadership and example, consideration should be given to designating certain management as equivalent to safety and environmentally sensitive positions (see Appendix C).

When formulating a policy of controls, the following options should be considered:

3.4.1 Searches

Unannounced searches for drugs and alcohol on company locations, particularly in safety and environmentally sensitive positions, are a suitable first line deterrent for possession.

3.4.2 Pre-employment Testing

Pre-employment testing gives a clear signal to potential employees on the standards applied within the company. The scope of the testing should be made clear to the

applicant and the results included in a judgement of 'fit' or 'unfit' for employment.

It is usually sufficient to test for drug use only. The need to test for recent alcohol use will be dictated by circumstances. Testing for long-lasting effects of alcohol abuse is unreliable and not recommended. However, consideration of existing or potential alcohol or drug problems is included in pre-employment medical evaluations.

3.4.3 Testing before Placement in Sensitive Positions

A procedure similar to pre-employment testing may be followed before placement of an employee in a safety and environmentally sensitive position.

3.4.4 Random and Periodic Testing

This testing takes place 'without cause', in the absence of indications that drugs or alcohol are used. It is intended to provide a strong deterrent and a strict level of control, and can only be justified in safety and environmentally sensitive positions, and for designated management positions.

Random testing follows a pre-determined selection formula (see Appendix F), and should aim to test at least 50% of the defined population each year.

Periodic testing has been shown to be of little value in detecting alcohol or drug abuse as it enables abusers to beat the system. If associated with periodic medical examinations it may also compromise the role of the company medical adviser, jeopardise the value of the medical examination and lead to a less effective medical service.

3.4.5 Testing 'with cause'

Testing 'with cause' can take place when factors such as impaired performance, reliable information or disputed possession give good reason to question whether the employee may be in violation of the policy.

This may also include testing after accidents, near-misses, and unsafe acts, providing good reason exists to suspect impairment as a result of drugs or alcohol abuse.

3.4.6 Cut-off Levels and Testing Standards

The policy should define cut-off levels for alcohol and drug concentrations in body fluids above which specimens are called positive and further interpretation is necessary to determine whether the overall test result should be 'positive' or 'negative'.

It is recommended that the cut-off level for alcohol in breath correspond with a blood alcohol concentration of 0.5 g/l.

For illegal and illicitly used legal drugs, it is not justifiable to accept any presence which would be compatible with active drug use.