



# Alcohol and Other Drugs Policy

Policy Level: 3

Accountable Executive: Executive General Manager Letters & Mail Network

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**Classification: Internal**

# Statement of Policy

## Overview

Safety is one of our culture pillars. Our vision is zero injuries, zero harm to anyone, and zero tolerance of unsafe acts or dangerous workplaces.

We recognise that persons affected by alcohol and other drugs (AOD) including prescription, non-prescription and illegal substances can contribute to unsafe workplaces, potentially exposing people to harm. AOD can also affect a person's work performance, the quality of our service and the reputation of our business.

AOD misuse is an increasing problem across the Australian community. Our position as one of Australia's largest employers exposes our workplaces to these issues.

## Rationale & Scope

This Policy applies to all Australia Post Transport Employees and Transport Contractors.

Due to the significant risks associated with AOD use in connection with heavy vehicle use, Australia Post has prioritised implementation of this AOD Policy to its Transport Employees and Transport Contractors. However, it is Australia Post's intention that the AOD Policy will be expanded to apply to other parts of its business following effective implementation in Transport.

The objective of this Policy is to ensure:

- Risks associated with AOD use are minimised within Australia Post's business and at Australia Post's Workplaces.
- Australia Post and its Transport Employees and Transport Contractors comply with any legal obligations arising in relation to AOD use.

## Roles and Responsibilities

### Transport Employees and Transport Contractors

- Must comply with this policy, its procedures and protocols
- Should report any AOD related risks and inform their supervisor if they have any immediate safety concerns regarding AOD
- Must comply with the AOD policies of other businesses, which they have been made aware of, while they are at those businesses' sites

### Transport Managers

- Ensure effective communication and implementation of this policy in the parts of the business that they are responsible for
- Take appropriate action where AOD related risks are identified
- Demonstrate responsible behaviour and a commitment to addressing the AOD issues faced by their employees

### Senior Leaders

- Encourage a culture within the business that is intolerant of AOD related risks
- Ensure appropriate resources are available to managers to enable them to effectively implement this policy.

## Awareness, Training & Induction

### Transport Employees

Australia Post is committed to ensuring all Transport Employees are provided with necessary information with respect to AOD related issues, including:

- safe AOD use;
- the impact that AOD use may have on their ability to work safely;

- the requirements of this Policy;
- random AOD testing;
- what Transport Employees should do if they have any concerns regarding AOD use or AOD related risks.

In addition to above, attendance at training provided in connection with the implementation of this Policy is compulsory for all Transport Employees. At completion of the training, all attendees will be required to confirm, in writing, their attendance and understanding of the training content. A record of this training will be kept locally and also centrally in a Learning and Development database. Transport Managers will be responsible for ensuring that all Transport Employees attend the training provided in connection with the implementation of this Policy.

#### **Transport Contractors**

An AOD Information Booklet will be made available to Transport Contractors as part of the education and training program.

#### **Transport Managers**

Transport Managers will receive additional, management focussed AOD training to assist them with effective implementation of the AOD Policy. This training will cover, in detail:

- the Policy requirements;
- additional training in relation to random AOD testing;
- communication with employees regarding safe AOD use and AOD related risks; and
- identification and response to AOD related risks, including recognition, management and referral for assistance of any employee whose fitness for work is (or may be) affected by the use of AOD Policy Principles

## **Review**

This policy will be reviewed at least every three years to enhance the delivery of efficient and effective outcomes.

# Policy Guidelines – if required

## Alcohol

### Australia Post Standards

Transport Employees and Transport Contractors must not have a Breath Alcohol Content (BrAC) over 0.00% while they are on duty.

### Alcohol-free Workplaces

All Australia Post Workplaces are alcohol-free. This means that alcohol must not be made available or consumed at any Australia Post Workplace other than at an Authorised Function.

### Storage and possession

The possession and/or storage of alcohol is not permitted in Australia Post Workplaces (including Australia Post vehicles) unless it is:

- part of a consignment lodged within Australia Post's network; or
- being temporarily stored for consumption elsewhere (subject to approval below) or for an Authorised Function

A Transport Employee must seek approval from their manager to store at work, for up to 24 hours, unopened alcohol purchased for consumption elsewhere or received as a gift or benefit (declare if over value specified in Gifts, Benefits and Hospitality Register). Approval must be sought as soon as possible after bringing the unopened alcohol into an Australia Post Workplace.

## Drugs

### Australia Post Standards

Transport Employees and Transport Contractors must not return a 'positive' drug test with levels over the target concentration/cut-off level specified in the relevant Australian Standard, namely:

- for saliva testing - AS/NZ 4760 (and any amendments) and
- for urine testing (pre-employment testing) – AS/NZ 4308 (and any amendments)

The target concentrations under AS/NZ 4760 (saliva testing) are:

Class of Drug	Target Concentration (nanograms per millilitre)
Amphetamine type	50 ng/mL
Cocaine and metabolites	50 ng/mL
Tetrahydrocannabinol (THC)	25 ng/mL
Opiates	50 ng/mL

The cut-off levels under AS/NZS 4308 (urine testing) are:

Class of Drug	Target Concentration (micrograms per litre)
Benzodiazepines	200 ug/L
Amphetamine type	300 ug/L
Cocaine metabolites	300 ug/L
Cannabis metabolites	50 ug/L
Opiates	300 ug/L

### Prohibited Drugs

In addition Transport Employees and Transport Contractors must not:

- consume, possess, manufacture, store, distribute, sell or purchase illegal drugs; or
- consume, possess, manufacture, store, share, distribute, sell or purchase personal prescription, non-prescription medications or alcohol other than as authorised under this Policy

while they are on duty, in Australia Post Workplaces (including Australia Post vehicles) or at Australia Post Authorised Functions.

### **Pharmacy and prescription drugs**

Transport Employees and Transport Contractors may take prescription and non-prescription drugs while they are on duty provided that they do so:

- on the advice of a registered medical practitioner (and/or a pharmacist in the case of non-prescription medication); and
- in accordance with relevant directions

Where a Transport Employee or Transport Contractor requires prescription or non-prescription medication they must:

- inform their registered medical practitioner (and/or pharmacist in the case of non-prescription medication) of the nature of their work to ensure appropriate medication is prescribed; and
- seek advice from their registered medical practitioner (or pharmacist in the case of non-prescription medication) about probable side-effects of the medication they will be taking, including whether it will affect their ability to perform their work safely

If a registered medical practitioner or pharmacist advises a Transport Employee or Transport Contractor that the prescription or non-prescription medication they will be taking is likely to affect their ability to perform their work safely or that they should not perform their work while taking the medication, then the Transport Employee or Transport Contractor must advise their manager or supervisor as soon as possible and in any event before performing any work on behalf of Australia Post after having commenced taking the medication.

If after a Transport Employee or Transport Contractor commences taking any prescription or non-prescription medication they believe that the medication is affecting their ability to perform their work safely or their performance at work then they must advise their manager or supervisor immediately so that appropriate management actions can be discussed and implemented.

### **Storage**

Transport Employees and Transport Contractors may store legally obtained prescription and non-prescription drugs in Australia Post Workplaces where that storage is necessary to enable their own personal use of the drugs in accordance with:

- the directions of the registered medical practitioner or pharmacist prescribing the drugs; and
- the manufacturer's or supplier's recommendations, if any

## **AOD Testing**

In order to monitor compliance with this Policy and identify AOD related risks within its business, Australia Post intends to implement the following testing:

- Pre-employment Testing; and
- Random Testing

All testing will be carried out by competent and authorised persons in accordance with relevant Australian Standards. Random testing will also be carried out in accordance with the Procedure for the Management of Random Alcohol and other Drug Testing.

### **Pre-employment testing**

Applies to applicants seeking employment with Australia Post as a Transport Employee. Applicants will be advised of the requirement for pre-employment testing and testing will be undertaken as part of the Pre-Placement Medical Examination.

Includes testing for:

- Drugs – Urine testing to be undertaken in accordance with Australian Standard AS/NZ 4308 (and any amendments) Procedures for Specimen Collection and the Detection and Quantitation of Drugs of Abuse in Urine.

### **Random Testing**

Random selection and testing of Transport Employees and Transport Contractors will be undertaken without notice by AOD Technicians from an external testing agency. The most senior Transport Manager on-duty at an Australia Post Transport facility when random testing is being conducted will be automatically tested. The random testing methodology is outlined in the Procedure for the Management of Random Alcohol and Other Drug Testing – Transport

Employees (Appendix 1) and the Procedure for the Management of Random Alcohol and Other Drug Testing – Transport Contractors (Appendix 2).

Includes testing for:

- Alcohol – Testing will be undertaken using breathalyser devices in accordance with AS 3547 Breath Testing Devices for Personal Use (and any amendments); and
- Drugs – Saliva testing to be undertaken in accordance with Australian Standard AS/NZ 4760 Procedures for Specimen Collection and the Detection and Quantitation of Drugs in Oral Fluid (and any amendments).

## Test Results

A 'positive' test result is a test result that exceeds the Australia Post Standards set out above.

A test result that 'requires further investigation' is a preliminary on-site drug screening result, which suggests the presence of drugs over the target concentration/cut-off level, however, confirmatory testing in a laboratory is required to confirm whether the test result is 'positive'.

### Alcohol Testing

If a person's initial test is 'positive' then a final confirmatory test will be undertaken within approximately 30 minutes.

### Drug – Saliva Testing

If a person's initial test result 'requires further investigation' then a second saliva sample will be taken and the second sample will be subjected to confirmatory testing in a laboratory in order to determine whether it is a 'positive' result.

## Refusal to Test

A refusal to undergo testing in accordance with this Policy will be treated as a 'positive' test result and managed accordingly. This means that the Transport Employee or Transport Contractor will be directed to leave the workplace and not to complete the remainder of their shift for Australia Post after refusing to be tested.

## Responding to Test Results

### Pre-employment Testing

Applicants, who test 'positive' in their urine drug test or who refuse to submit to testing may be considered unsuitable for employment.

### Random Testing

A Transport Employee or Transport Contractor who has an on-site test result that is 'positive' (alcohol) or 'requires further investigation' (drugs) will:

- be deemed to have presented for work in an unacceptable state; and
- be directed to leave the workplace and not to complete the remainder of the shift for Australia Post after the on-site testing.

For Transport Employees, leave for the remainder of the shift after on-site testing will be regarded as sick leave.

Transport Managers are responsible for ensuring appropriate arrangements are made for Transport Employees who are directed to leave the workplace, to travel home safely after the on-site testing is completed.

Where a Transport Employee or Transport Contractor's test result 'requires further investigation' and is subject to confirmatory testing in a laboratory, they must not perform driving duties for Australia Post until after the confirmatory test results are received.

While confirmatory testing is being undertaken a Transport Employee may:

- return to work and perform non-driving duties, if available; or
- remain at home and utilise their leave entitlements (e.g. Recreation Leave or LWOP)

Where a test result that 'requires further investigation' is confirmed as negative, a Transport Employee who has performed non-driving duties while awaiting the confirmatory test result will be paid as per their roster with the exception of Travel Allowance where a driver is scheduled for an overnight stay.



## Disciplinary Action

Breaches of this policy by a Transport Employee may result in disciplinary action in accordance with Australia Post's policies and procedures, including the Employee Counselling and Discipline Process (ECDP).

Disciplinary action will take into account the individual circumstances of the case.

Breaches by a Transport Contractor may result in termination of the relevant contract for services or work arrangement.

A positive test result will not be provided to the police.

## Counselling and Assistance

A confidential and specialised counselling service is available to all employees and their immediate families through the Employee Assistance Program (EAP).

Employees who are having difficulty in managing use of AOD are encouraged to access Australia Post's EAP service for assistance with counselling and rehabilitation. Employees can contact the EAP themselves or may be referred by their manager (ManagerAssist®). The EAP is available on 1300 360 364.

Transport Contractors should seek assistance where appropriate through the EAP arrangements that are in place with their employer or principal contractor.

Transport Employees and Transport Contractors may also wish to consult their GP or access a community based program for assistance. A list of resources is provided in appendix 3.

# Glossary

Term	Definition
APG	Australia Post Group (APG).The APG is defined as the Australian Postal Corporation and its subsidiaries.
Authorised Function	An Australia Post sponsored or hosted function on Australia Post or external premises where an appropriate executive manager (or their delegate) has given authorisation for the serving and consumption of alcohol. In these circumstances all employees are to adhere to the principles of reasonable serving and consumption of alcohol.
Manager Assist® EAP Referral	A referral that includes feedback to the manager with the written consent of the employee.
On Duty	The time between the commencement and conclusion of work activities for Australia Post on any given day (including lunch and rest breaks).
Transport Contractor	A person engaged by Australia Post on a contract basis to perform work which involves driving a truck or heavy vehicle.
Transport Employee	An individual who is employed on a permanent, fixed term or casual basis by Australia Post and is performing work which involves: <ul style="list-style-type: none"><li>• driving a truck or heavy vehicle</li><li>• supervising employees who drive a truck or heavy vehicle</li><li>• managing an Australia Post workplace where random testing may be conducted</li></ul>
Transport Manager	A manager or supervisor at an Australia Post transport facility who is, from time to time, the most senior person on duty at that facility
Workplace	Anywhere work is carried out for business or undertaking and includes any place where a Transport Employee or Contractor goes, or is likely to be, while at work (includes vehicle or mobile structure).

# Policy Administration

## Key Policy Information

Administrative Area	Policy Information
Document Title	Alcohol and Other Drugs Policy
Policy Level	3
Version No	1.1

## Policy Owners and Governance Forums

Administrative Area	Owner / Forum
Accountable Executive	Executive General Manager Letters and Mail Network
Policy Owner	Head of Enterprise Safety
Policy Administrator	General Manager, Risk & Compliance
Policy Content Owner	Manager Safety Program and Investigations
Review and Approval Body	Accountable Executive – Approval Enterprise Portfolio Forum - Noting

## Key Dates

Administrative Area	Date
Policy Approval Date	1 July 2016
Policy Effective Date	1 July 2016
Next scheduled review	October 2017

# Appendix 1 - Procedure for the Management of Random Alcohol and Other Drug (AOD) Testing – Transport Employees

All random testing will be carried out by competent and authorised AOD technicians from an external testing agency in accordance with the AOD policy and the relevant Australian Standards.

## Selection of Employees for Testing

- AOD Co-ordinator, in conjunction with the AOD Technician, develops a schedule for random AOD Testing
  - AOD Co-ordinator provides the AOD Technician with a list of all Transport Employees at the nominated site and agreed timelines
  - The list of Transport Employees is fed through a computer based randomiser by the AOD Technician to determine the names of those employees to be tested (plus spare names if a Transport Employee is absent on the day)
- AOD Technician arrives on site with the names of Transport Employees to be tested and advises AP management representative of their arrival.
- AP management representative arranges for the AOD Technician to be inducted to the facility and guided to a private testing room.
- The most senior Transport Manager on-site undergoes testing (not random selection)
- AP management representative arranges for those selected for testing to be notified and directed to the testing room.
- Selected Transport Employees are asked to consent to the testing, provide photo identification and sign a consent form.
- AP management representative addresses any concerns or questions raised about the random testing by any Transport Employees.
- AOD Technician conducts tests in accordance with current and relevant Australian Standards (Alcohol-breath and Drug-saliva).

## Refusal to Test

- AP management representative discusses with the Transport Employee the reasons for their refusal.
  - The AOD policy is referenced and the Transport Employee advised that refusal to be tested will be treated as a positive test result.
  - The Transport Employee can have a support person at this discussion if requested, however the support person must be immediately available.
- If reasons for refusal are not considered valid, then the refusal is treated as 'positive' and the Transport Employee is directed not to complete the remainder of the shift.
- AP management representative notifies AOD Co-ordinator of Transport Employee's refusal to be tested
- This procedure also applies if a Transport Employee cannot be located for testing and they do not provide an acceptable reason for their absence

## Negative Test Results

- A copy of the test result is kept by the AOD Technician. A copy is provided to the Transport Employee.
- The Transport Employee returns to work.

## Initial Positive Test Results

### Alcohol

- AOD technician notifies the tested Transport Employee that testing indicates the presence of alcohol above the threshold concentration.
- A final test is taken approximately 30 minutes after the first positive test. The AOD technician advises the tested Transport Employee if the final test indicates a positive reading. The final test is the determining test result.

### Drugs

- AOD Technician notifies the Transport Employee that the result requires further investigation and that a second sample will be required.
- AOD Technician advises the tested Transport Employee that the second sample taken will be forwarded to an approved laboratory for confirmatory testing.

### Alcohol and/or drugs

- AOD Technician advises AP management representative of the positive test result (alcohol) or a result that requires further testing (drugs).
- AOD Technician notifies the AOD Co-ordinator and provides the AOD Co-ordinator with a copy of the Testing Results.
- AP management representative discusses the positive result with the Transport Employee and directs the Transport Employee not to complete the remainder of the shift.

### Confirmatory Test Results (Drugs)

- The AOD Technician notifies the AOD Co-ordinator of confirmatory test result. AOD Co-ordinator advises AP management representative of the outcome and discusses available options.
- AP management representative arranges for the confirmatory test result (whether negative or positive) to be communicated to the relevant Transport Employee.

# Appendix 2 - Procedure for the Management of Random Alcohol and Other Drug (AOD) Testing – Transport Contractors

All random testing will be carried out by competent and authorised AOD technicians from an external testing agency in accordance with the AOD policy and the relevant Australian Standards.

## Selection of Contractors for Testing

- AOD Co-ordinator, in conjunction with the AOD Technician, develops a schedule for random AOD Testing of Transport Contractors.
- AOD Co-ordinator provides the AOD Technician with a nominated site and timeframe when testing will be undertaken.
- AOD Technician arrives on site and advises AP management representative of their arrival.
- AP management representative arranges for the AOD Technician to be inducted to the facility and guided to a private testing room.
- AP management representative notifies any Transport Contractor who is present at the site during the appointed timeframe that they have been selected for testing and directed to the testing room.
- AOD Technician will ask Transport Contractor to consent to the testing, provide photo identification and sign a consent form.
- AP management representative addresses any concerns or questions raised about the random testing by any Transport Contractor.
- AOD Technician conducts tests in accordance with current and relevant Australian Standards (Alcohol-breath and Drug-saliva).

## Refusal to Test

- AP management representative discusses with the Transport Contractor the reasons for their refusal.
  - The AOD policy is referenced and the Transport Contractor advised that refusal to be tested will be treated as a positive test result.
  - The Transport Contractor can have a support person at this discussion if requested, however the support person must be immediately available.
- If reasons for refusal are not considered valid, then the refusal is treated as 'positive' and the Transport Contractor is directed not to complete the remainder of the shift for Australia Post.
- AP management representative notifies AOD Co-ordinator of Transport Contractor's refusal to be tested.
- This procedure also applies if a Transport Contractor cannot be located for testing and they do not provide an acceptable reason for their absence.

## Negative Test Results

- A copy of the test result is kept by the AOD Technician. A copy is provided to the Transport Contractor.
- The Transport Contractor returns to work.

## Initial Positive Test Results

### Alcohol

- AOD technician notifies the tested Transport Contractor that testing indicates the presence of alcohol above the threshold concentration.
- A final test is taken approximately 30 minutes after the first positive test. The AOD technician advises the tested Transport Contractor if the final test indicates a positive reading. The final test is the determining test result.

### Drugs

- AOD Technician notifies the Transport Contractor that the result requires further investigation and that a second sample will be required.
- AOD Technician advises the tested Transport Contractor that the second sample taken will be forwarded to an approved laboratory for confirmatory testing.

### Alcohol and/or drugs

- AOD Technician advises AP management representative of the positive test result (alcohol) or a result that requires further testing (drugs).
- AOD Technician notifies the AOD Co-ordinator and provides the AOD Co-ordinator with a copy of the Testing Results.
- AP management representative discusses the positive result with the Transport Contractor and directs the Transport Contractor not to complete the remainder of the shift for Australia Post.
- Where the Transport Contractor is not engaged directly by Australia Post (i.e. is an employee or subcontractor of a principal contractor engaged by Australia Post) then the AP management representative advises the Transport Contractor that Australia Post will notify the principal contractor of the test result.

## Confirmatory Test Results (Drugs)

- The AOD Technician notifies the AOD Co-ordinator of confirmatory test result. AOD Co-ordinator advises AP management representative of the outcome and discusses available options.
- AP management representative arranges for the confirmatory test result (whether negative or positive) to be communicated to the relevant Transport Contractor.
- Where the Transport Contractor is not engaged directly by Australia Post (i.e. is an employee or subcontractor of a principal contractor engaged by Australia Post) then the AP management representative arranges for the confirmatory test result (whether negative or positive) to be communicated to the principal contractor.

# Appendix 3 - Resources

## Specialised Alcohol and Drug Information Websites

- Australian Drug Foundation: [www.adf.org.au](http://www.adf.org.au)
- National Health and Medical Research Council: [www.nhmrc.gov.au](http://www.nhmrc.gov.au)
- Alcoholics Anonymous Australia: [www.aa.org.au](http://www.aa.org.au)
- National Drug Research Institute, Curtin University of Technology: [www.ndri.curtin.edu.au](http://www.ndri.curtin.edu.au)
- Australian National Research Centre on AOD Workforce Development, Flinders University: [www.nceta.flinders.edu.au](http://www.nceta.flinders.edu.au)

## State Health Departments and Resources

- Department of Health NSW: [www.health.nsw.gov.au](http://www.health.nsw.gov.au)
- Department of Health ACT: [www.health.act.gov.au](http://www.health.act.gov.au)
- Department of Health South Australia: [www.health.sa.gov.au](http://www.health.sa.gov.au)
- Drug and Alcohol Services South Australia: [www.dassa.sa.gov.au](http://www.dassa.sa.gov.au)
- Tasmanian Department of Health and Human Services: [www.dhhs.tas.gov.au](http://www.dhhs.tas.gov.au)
- Department of Health Western Australia: [www.health.wa.gov.au](http://www.health.wa.gov.au)
- Department of Health Victoria: [www.health.vic.gov.au](http://www.health.vic.gov.au)
- Better Health Channel Victoria: [www.betterhealth.vic.gov.au](http://www.betterhealth.vic.gov.au)
- Department of Health Northern Territory: [www.health.nt.gov.au](http://www.health.nt.gov.au)
- Department of Health Queensland: [www.health.qld.gov.au](http://www.health.qld.gov.au)

## Federal and State WHS Authorities

- Comcare: [www.comcare.gov.au](http://www.comcare.gov.au)
- WorkCover NSW: [www.workcover.nsw.gov.au](http://www.workcover.nsw.gov.au)
- WorkSafe ACT: [www.worksafe.act.gov.au](http://www.worksafe.act.gov.au)
- Worksafe WA: [www.worksafe.wa.gov.au](http://www.worksafe.wa.gov.au)
- WorkCover Tasmania: [www.workcover.tas.gov.au](http://www.workcover.tas.gov.au)
- Worksafe Victoria: [www.worksafe.vic.gov.au](http://www.worksafe.vic.gov.au)
- Worksafe NT: [www.worksafe.nt.gov.au](http://www.worksafe.nt.gov.au)
- SafeWork SA: [www.safework.sa.gov.au](http://www.safework.sa.gov.au)

## Privacy Resources

- Office of the Australian Information Commissioner: [www.privacy.gov.au](http://www.privacy.gov.au)
- The Australian Privacy Foundation: [www.privacy.org.au](http://www.privacy.org.au)