

Drugs and Alcohol at Work Policy

1. Purpose

Northern Trading is committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of all employees, contractors, and others who may be affected by its activities.

Employees and contractors must be **fit for work** and able to perform their duties safely and effectively, without impairment from alcohol, drugs, or other substances.

This policy aims to prevent alcohol and drug misuse at work through a **risk-based approach**, consistent with UK Health and Safety Executive (HSE) guidance.

2. HSE Alignment

This policy is informed by and aligned with guidance issued by the **UK Health and Safety Executive (HSE)**, including:

- *Drug misuse at work*
- *Driving at work*
- *Managing for health and safety (HSG65)*

In line with HSE guidance, Northern Trading's approach focuses on:

- Managing **risk**, not moral behaviour
 - Ensuring individuals are **fit for work**
 - Applying controls proportionate to the level of risk
 - Giving particular attention to **safety-critical roles**
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3. Scope

This policy applies to:

- All Northern Trading employees
- Contractors, agency workers, and self-employed persons working on behalf of Northern Trading
- Visitors while on Northern Trading premises

Additional requirements apply to safety-critical roles, including (but not limited to):

- HGV drivers
 - Vehicle, plant, and forklift operators
 - Any role involving hazardous activities or equipment
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4. Definitions

- **Alcohol:** Any beverage or substance containing alcohol.
 - **Drugs:** Illegal drugs, legal highs, and any substance capable of causing impairment, including misuse of prescription or over-the-counter medication.
 - **Impairment:** A reduction in physical, mental, or behavioural capacity that may affect safety, judgment, or performance.
 - **Fit for work:** Being in a physical and mental condition that allows duties to be carried out safely and effectively.
 - **Testing:** Alcohol and/or drug testing carried out by or on behalf of Northern Trading.
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5. Policy Statement

Northern Trading does not permit any employee or contractor to:

- Attend work while under the influence of alcohol or drugs
- Consume alcohol or drugs during working hours or on company premises
- Undertake work where alcohol or drug use may compromise health, safety, or performance

The safety of employees, contractors, customers, and the public is the company's highest priority.

6. Alcohol

Employees and contractors must not:

- Consume alcohol during working hours, breaks, or while on duty
- Report for work while impaired by alcohol

Individuals should be aware that alcohol consumed outside working hours may still result in impairment during work time.

Where **local site rules impose stricter alcohol limits**, those rules take precedence. Some delivery sites operate limits below the legal drink-drive limit.

7. Drugs and Medication

Employees and contractors must not:

- Use, possess, supply, or offer illegal drugs on company premises
- Consume substances (including legal highs or medication) that may impair their ability to work safely

Prescription and Over-the-Counter Medication

Some medicines may cause drowsiness, delayed reaction times, or impaired judgment.

- Individuals are responsible for understanding the effects of any medication they take
- Where medication may affect safety or driving ability, employees must inform their manager or supervisor as soon as reasonably practicable

- Information will be handled sensitively and confidentially

A list of common medicines that may affect driving or work performance is provided in the reference section of this document.

8. Testing (HSE-Aligned)

Northern Trading may require alcohol and/or drug testing where there are **reasonable grounds to believe** that an individual may be impaired, including:

- Following an accident, incident, or near miss
- Where behaviour, appearance, or conduct gives cause for concern
- Where required by contractual, site, or safety-critical role requirements

Employees and contractors are expected to comply with testing when requested.

Refusal to undertake a test **without valid reason** may be treated in the same manner as a positive result.

9. Breach of Policy

Where an employee or contractor:

- Tests positive for alcohol or drugs, or
- Refuses to comply with a required test

Northern Trading may:

- Remove the individual from site immediately for safety reasons
- Exclude the individual from site, temporarily or permanently
- Apply disciplinary procedures (employees)
- Treat the matter as a breach of contract (contractors)

All actions will be taken in accordance with company procedures and relevant legislation.

10. Management Responsibilities

Managers have the authority to take immediate action where there are **reasonable grounds to believe** alcohol or drug misuse may pose a risk to health and safety.

This includes:

- Removing individuals from work or site
- Suspending activities
- Requesting testing

Managers must record decisions and actions taken under this policy in line with company procedures.

11. Summary – Do and Don't

DO

- ✓ Attend work fit for duty and unimpaired
- ✓ Comply with alcohol and drug testing when requested
- ✓ Inform management if medication may affect safety
- ✓ Promote a culture where substance misuse is discouraged

DON'T

- ✗ Consume alcohol or drugs at work
- ✗ Attend work under the influence
- ✗ Use substances that may impair safety or performance
- ✗ Offer drugs or medication to colleagues

Appendix A – Driver & HGV Operative Alcohol and Drugs Standard

(DVSA & HSE Aligned)

A1. Scope

This appendix applies to:

- HGV drivers
- Company car and van drivers
- Agency or contractor drivers operating on behalf of Northern Trading

A2. Zero-Tolerance Approach

Due to the safety-critical nature of driving activities, Northern Trading operates a **zero-tolerance approach** to alcohol and drugs for drivers.

Drivers must not:

- Drive under the influence of alcohol or drugs
- Exceed any site-specific or contractual alcohol limits (which may be below the legal limit)

A3. Legal & DVSA Obligations

Drivers must comply with:

- Road Traffic Act requirements
- DVSA guidance on fitness to drive
- Licence conditions and endorsements

Failure to do so may result in:

- Immediate removal from driving duties
 - Disciplinary action or contract termination
 - Notification to relevant authorities where required
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A4. Medication and Driving

Drivers must:

- Check medication labels and patient information leaflets
- Seek medical or pharmaceutical advice where necessary
- Inform management if medication may affect driving ability

Driving must not be undertaken where medication may impair safety.

A5. Testing for Drivers

Drivers may be subject to:

- For-cause testing
- Post-incident testing
- Random or contractual testing

Refusal to test may be treated as a positive result.

A6. Fitness to Drive

Drivers are responsible for presenting themselves **fit to drive** at all times.

Where fitness is in doubt, drivers must not drive and must report concerns immediately.

