



## Norse Atlantic Drugs and Alcohol Policy

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## 1. EU Regulations and Norse Atlantic policy principles.

### 1.1 *Background*

The Norse Atlantic drug and alcohol policy exists to ensure that the safety of our aircraft and their occupants is not endangered. Norse Atlantic does not tolerate any impairment of performance resulting from the use of psychoactive substances. This policy requires that flight and cabin crew, as well as other safety-sensitive personnel are dealt with in a consistent, just and fair manner. The policy implements training and education on the misuse of psychoactive substances as well as testing flight and cabin crew members and other safety-sensitive personnel for psychoactive substances.

The Norse Atlantic Drug and alcohol policy has been created in cooperation with OdiliaClark.

### 1.2 *Norse Atlantic Culture*

Norse Atlantic recognises the multi-pronged approach of EASA to the issues of wellbeing and substance abuse problems in employees, and will reflect this in its policies. Norse Atlantic promotes a culture of care and concern for all its employees, and also its clients and consultants, sub-contractors or agency workers (hereafter known as 'contractors'). Norse Atlantic operates in a safety-critical industry, so all employees have a responsibility to ensure that the workplace is a safe one.

### 1.3 *Norse Atlantic Policy Principles*

Accordingly, Norse Atlantic will:

- Treat all employees and contractors working as part of Norse Atlantic equally under the provisions of this policy, as Norse Atlantic believes that all its employees are safety-sensitive to some degree or other.
- Operate a zero tolerance to impairment in the workplace by alcohol, drugs or their effects.
- Introduce a consistent, just and fair policy for random (unannounced) testing for psychoactive substances during work time at any Norse Atlantic work location. With the exception of pre-employment and within the first 6 months, Norse Atlantic will test for the instantaneous presence of psychoactive substances and will not test for longer-term (ie. lifestyle) presence of drugs or alcohol.
- Actively promote employee support programmes<sup>1</sup>. Norse Atlantic is committed to creating an environment where employees and contractors feel comfortable self-referring into such programmes in order to get help for their issues.
- Recognise that addiction is a disease and commit to supporting employees with substance abuse issues, where appropriate, with a view to rehabilitation and continued employment.

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<sup>1</sup> These are: Peer Support Programme.



- Run a continued education programme for the whole workforce surrounding the issues above and as outlined in the EU Regulations <sup>2</sup>.
- Ensure that all policies and procedures relating to drugs and alcohol are compliant with national legislation, relevant codes of practice, and contractual requirements <sup>3</sup>.

This policy is linked to the Norse Atlantic Safety Policy <sup>4</sup> and Just Culture <sup>5</sup> approach to safety management, and is compliant under EU regulations <sup>6</sup>.

#### 1.4 *Support for wellbeing or drug and alcohol issues*

Any employee who comes forward voluntarily seeking help for wellbeing or drugs or alcohol problems (self-refers) will receive confidential help and support from Norse Atlantic, either from management or via employee support programmes. The Company strongly encourages employees to self-refer rather than suffer without help. Norse Atlantic commits to any employee self-referring that they will be sympathetic, treat the employee with dignity at all times, and ensure that they receive appropriate help and support which may include direction to external specialists. The primary aim is rehabilitation and return to full employment wherever possible.

All discussions will be in the strictest confidence.

## 2. **Percentage of workforce tested.**

This will be at a level agreed with the national authority in each of the countries Norse Atlantic operates in. This level will be the subject of frequent reviews based on the data gathered by Norse Atlantic on testing results.

## 3. **Responsibilities of employees / contractors and Norse Atlantic.**

### 3.1 ***Employees and contractors:***

- Must not report for work impaired by drugs or alcohol, or their effects. ‘Drugs’ includes prescribed and over the counter medications.
- Must not drink alcohol or take drugs that could impair their performance during working time. Working time is defined as the period between when an employee or contractor reports for work and the time they finish work including lunchtimes.
- Must not consume drugs or alcohol (except prescribed medications) whilst in uniform identifiable as Norse Atlantic or in any Norse Atlantic liveried vehicle.
- Should care for themselves, lead as healthy a lifestyle as possible, and look out for their fellow workers.

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<sup>2</sup> GM1 CAT.GEN.MPA.170(b)

<sup>3</sup> All testing, training and policy activity is conducted in line with the European Workplace Drug Testing Society (EWDTS) guidelines (<http://www.ewdts.org/ewdts-guidelines.html>)

<sup>4</sup> MANAGEMENT SYSTEM MANUAL 2.2

<sup>5</sup> MANAGEMENT SYSTEM MANUAL 2.3

<sup>6</sup> CAT.GEN.MPA.170



- Encourage colleagues they perceive as having difficulties with drugs or alcohol issues to seek help (*note: see Section 4.3 for responsibilities where a colleague is perceived to be a danger either to themselves or those around them*).

### 3.2 **Norse Atlantic:**

- Encourage colleagues in leading healthy lifestyles.
- Positively support colleagues who come forwards (self-refer) with personal issues including substance abuse. The aim wherever possible should be rehabilitation with a view to returning to full employment.
- Ensure that drugs and alcohol testing is carried out in a fair, open and transparent way, following due process and using a certified testing agency, working to approved EWDTs standards <sup>7</sup>
- Implement processes which will take appropriate action following a positive alcohol, confirmed non-negative drug, or a refused drug or alcohol test. These are detailed in Section 8.
- Alert the police in every case of criminal activity in the workplace involving drugs, and both the police and the licensing authority in the event of a positive alcohol or confirmed non-negative drugs test of a safety-critical worker.

### 3.3 **Contractors and Suppliers to Norse Atlantic**

- Any contractor or supplier to Norse Atlantic must have in place a drugs and alcohol policy which is appropriate and available for inspection by Norse Atlantic as required eg. for audit purposes <sup>8</sup>.
- All contractors and suppliers will be required to provide assurances that they have suitable testing processes in place for critical workers.

## 4. **Circumstances where drugs and alcohol testing can take place.**

### 4.1 *Pre-employment and within the first 6 months of employment.*

All new employees and contractors working as part of Norse Atlantic will be tested before they are allowed to commence work on any Norse Atlantic site or related site. This is the one instance that Norse Atlantic may additionally test for 'lifestyle' longer term drug or alcohol usage, eg. by blood, urine, nail clippings or hair <sup>9</sup>. These conditions will be notified to candidates in advance.

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<sup>7</sup> All testing, training and policy activity is conducted in line with the European Workplace Drug Testing Society (EWDTs) guidelines (<http://www.ewdts.org/ewdts-guidelines.html>)

<sup>8</sup> This is as detailed in GM3 CAT.GEN.MPA.170(b)

<sup>9</sup> Hair testing is used to detect seven main types of drugs (Amphetamines, Cannabis, Opiates, Methamphetamines, Cocaine, Tramadol, Benzodiazepines, Mephedrone). Hair and nail sample testing will typically give an overview of a donors history and is therefore considered more of a lifestyle test than an impairment test. Hair is normally taken from the head but can be taken from other areas of the body. Samples should always be taken in front of a witness. Hair samples are sent directly to a laboratory in the postal system.



The New Starter Testing Procedure can be found in Appendix A1 and A2.

4.2 *After any accident or serious incident.*

An employee or contractor working as part of Norse Atlantic will be tested for alcohol and drugs in all cases where they have had any involvement in a workplace accident, or in any incident that has caused or could have caused a danger to health or safety. This should take place as soon as possible after the accident or incident and no more than 12 hours after it, where achievable. Line managers should consult with VP People to decide whether post-incident testing is appropriate. This may be based on what the potential outcome of any event could have been as opposed to the actual outcome. Protocols surrounding post-accident or serious incident drugs and alcohol testing form part of the Norse Atlantic Emergency Response Manual.

Any testing will be done in addition to testing that may be performed by the police post-accident or incident

4.3 *With reasonable cause: belief that the individual is under the influence of drugs or alcohol whilst at work.*

This is when information is received and/or an individual's behaviour gives reasonable cause to suspect that they are unfit to continue working as a consequence of the misuse of drugs and/or alcohol.

Any employee who believes that another employee or contractor working on Norse Atlantic premises, related site or in connection with Norse Atlantic operations is unfit for work due to the effects of drugs and/or alcohol has a duty of care to report the matter. Such concerns should be reported to the Chief Pilot, Chief Cabin Crew or relevant manager on duty immediately. The Chief Pilot, Chief Cabin Crew or relevant manager must record the report and, as part of the process of investigating the issues, use their judgement and experience in making the decision whether to test the employee or not. The Chief Pilot, Chief Cabin Crew or relevant manager must have a clear, detailed and written rationale for their decisions and act reasonably and sensitively in coming to that decision.

**Any decision should be made using the defensible decision protocol of**

- **Legal**
- **Appropriate**
- **Necessary**
- **Proportionate**

Norse Atlantic will provide training to assist managers in this area<sup>10</sup>. Details of the With Reasonable Cause process can be found in Appendix C.

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<sup>10</sup> This requirement is laid out in AMC2 CAT.GEN.MPA.170(b)

4.4 *On a random (unannounced) basis at any time and any work location that Norse Atlantic operates at.*

The processes for such testing are detailed in Section 8 and are summarised in Appendix B.

## 5. Support for Employees or Contractors who self-refer

5.1 Norse Atlantic will commit to supporting employees who **voluntarily seek help for drugs and alcohol problems** by:

- Ensuring that any safety-critical worker who has admitted that they are struggling with drugs and/or alcohol dependency is temporarily withdrawn in a sensitive and confidential fashion from such duties to safeguard themselves and others.
- Identifying suitable alternative work where the employee cannot undertake their usual duties for the duration of rehabilitation. This will normally be no longer than 6 months, and the business may reserve the right to terminate employment if no suitable alternative work can be identified. Employees who are licence-holders and have that licence suspended for the duration of treatment will be dealt with on a case-by-case basis, as the licence may not be returned within 6 months.
- Treating any absence from work due to the employee's attendance for treatment in relation to alcohol or drug abuse as normal sickness absence that will be accounted for in Norse Atlantic's absence management policy <sup>11</sup>.
- Working with health professionals and People Department as appropriate if the employee has side effects or health complications from the addiction and/or therapy which affect their work capability.

5.2 The support from Norse Atlantic is dependent upon the employee:

- Admitting to drugs or alcohol dependency problems during or after the initial test. However, the context of such a declaration should be taken into account by the manager when assessing what action to take, particularly if the declaration took place before the test when the employee knew that they had been selected.
- Attending a rehabilitation programme for drugs and/or alcohol and committing to rehabilitation and abstinence. If the employee's performance is not satisfactory after the completion of the programme, then they will be managed according to the performance plan devised with their manager.
- Providing a statement of attendance and/or compliance with the rehabilitation service/support programme every 4 weeks <sup>12</sup> to their designated company mentor.
- Participation in unannounced random drugs/alcohol testing every time the testing agency is on site and the employee is at work, for the duration of employment. Any confirmed positive or non-negative test will result in termination of employment.
- Not withdrawing from the rehabilitation programme agreed with the relevant medical personnel. In such an instance, Norse Atlantic reserves the right to terminate the employee's contract.

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<sup>11</sup> Staff handbook

<sup>12</sup> For pilots, a designated company mentor can also be a Peer from the Peer Support Programme.

### 5.3 *Ongoing support*

Norse Atlantic understands that employees may continue to struggle with drug or alcohol dependency during and/or after a rehabilitation programme and will make appropriate efforts to provide ongoing support to employees provided the above conditions are met and this presents no significant danger to the staff, clients, contractors or operational nature of the business.

## **6. Overview of the drugs and alcohol testing process**

### 6.1 *General principles*

- Being required to undertake a drug or alcohol test does **not** imply that the employee is under any suspicion of wrongdoing.
- Employees will be selected at random for unannounced testing by the external testing agency and not by Norse Atlantic.
- Testing Associates will ensure that tests are carried out in a discrete and private location away from other work colleagues, with the least possible intrusion into employees' privacy.
- Employees notified that they are required to undergo an alcohol test must report to the testing location immediately. A 15 minute 'clean mouth' period is required before the first test <sup>13</sup>.
- Employees undergoing testing will be given a Testing Agency checklist detailing the full testing procedure so that they can satisfy themselves that the test is being conducted satisfactorily.
- Any test that is not a negative will be immediately followed by a second confirmatory test before any formal action is taken.
- A refused test will be treated as a failed test.
- Alcohol testing will be conducted using a breathalyser.
- Drug testing will be conducted using an oral fluid swab device <sup>14</sup>.

### 6.2 *Prescribed Medication*

The policy does not stop employees from using prescribed medication, over-the-counter medication or herbal remedies. These must be used as prescribed or professionally recommended, and in no other manner or dosage. Many medications can cause drowsiness and may affect work performance or the safety of the employee or others. If an employee is

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<sup>13</sup> Clean/Clear Mouth' – is part of the testing process and is in line with the equipment operation guidelines. It is an important part of the testing process to ensure that no spurious results occur as a result of anything having been in the mouth, this includes, Tea, Coffee, Chewing Gum, Mints, Mouthwash or Smoking.

<sup>14</sup> The Testing Agency uses Home Office and FDA Approved breathalysers and drug testing equipment which is maintained in line with original equipment manufacturers guidelines. All Testing Associates are trained and audited in the use of the equipment. The oral swab is taken from the oral cavity (mouth) including under the tongue, around the cheeks and on the gum line. The swab sample typically takes 30 seconds to collect.





taking any medication, they should:

- Check the possible side effects with their doctor or pharmacist;
- Consult with Occupational Health or AME if in any doubt; and
- Let their Chief Pilot, Chief Cabin Crew or relevant manager know in confidence who will, if necessary, make alternative arrangements for them.

There is no requirement for the employee to disclose personal medical details but the Chief Pilot, Chief Cabin Crew or relevant manager should make a confidential note of the discussion regarding the side effects and any advice sought from People Department or Occupational Health. The Chief Pilot, Chief Cabin Crew or relevant manager should seek advice from People Department or Occupational Health if the side effects last more than 7 days and the employee continues to be unable to work or if the Chief Pilot, Chief Cabin Crew or relevant manager considers them unfit to undertake their role. All documentation should have a decision and rationale to support the decision based on defensible decision criteria (as detailed in Section 4.3).

Where a safety critical worker is returning to work following any period of sickness, the Chief Pilot, Chief Cabin Crew or relevant manager must establish the following during the return to work interview and prior to recommencing work:

- whether the employee is taking any medication that could affect their fitness for duty;
- whether they are under the supervision of a medical professional for their medication;
- what will be the review period relating to the continued use of medication;
- that they report immediately any issues that make them unfit for duty relating to the medication being taken.

## **7. Limits**

### *7.1 Philosophy*

Norse Atlantic operates a zero-tolerance policy towards impairment by drugs or alcohol or their effects in the workplace. Modern equipment is capable of detecting the presence of very low levels of alcohol or drugs in an individual's system, so Norse Atlantic recognises that:

- Certain physiological conditions <sup>15</sup> can generate an amount of naturally-occurring alcohol; and,
- Certain drugs which are legally available over the counter contain small amounts of substances which in larger quantities are illegal eg. Benylin cough mixture may produce a non-negative result for amphetamines.

Accordingly, Norse Atlantic will operate to the following detection limits:

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<sup>15</sup> Eg. auto-brewery syndrome

## 7.2 Alcohol

9 micrograms of alcohol per 100 ml/of breath.

## 7.3 Drugs

Drugs	Detection Levels – ng/ml
Amphetamines	50
Benzodiazepines	15
Delta-9-tetrahydrocannabinol (THC (cannabis))	10
Cocaine	20
Methamphetamines	35
Opiates	20
Methadone	20
Ketamine	300

The list above of drugs / substances may be revised or amended as necessary

## 8. The Testing Process Outcomes

### 8.1. Alcohol Testing

#### 8.1.1. Results of Alcohol Testing (Screening)

There are two possible outcomes of the first alcohol test:

- Negative – nothing detected and the employee can return to work; or
- Positive – the breath alcohol level is above zero.

If the result of the breathalyser screening is positive (i.e above zero) then a second test is carried out after a period of 15 minutes.

This second test may be carried out on the same breathalyser, or on a second, separate breathalyser.

If this second test is below the company cut-off level, then the employee has the option to return to work subject to it being safe to do so.

#### 8.1.2 Action after a second positive test

If the second test records a reading which is at or above the company cut-off level, then the immediate actions will depend on the category of employment:

- a) Safety-critical workers



A criminal act is likely to have occurred <sup>16</sup> and the police should be informed. Regardless of any action the police take, the employee should be immediately suspended from duty and a formal investigation initiated. The licencing authority of the employee must be informed if appropriate.

b) Other employees/contractors

The employee's manager and People Department will be informed by the Testing Associate. The manager will arrange for the employee or contractor to be suspended from duty with immediate effect and ensure that safe and appropriate arrangements should be made for the employee/contractor to travel home. Such arrangements normally involve being driven home by taxi or family / friends.

In all cases, Norse Atlantic will initiate formal action and investigate the incident.

## 8.2 Drug Testing

### 8.2.1 *Result of the initial drug test (screening)*

There are two possible outcomes of the first drug test:

- Negative - nothing detected, and the employee can return to work; or
- Non-Negative – there are substances identified which will need further investigation (*note: this could be as a result of prescription medications or some foodstuffs and does not necessarily indicate the presence of illegal substances*).

### 8.2.2 *Confirmatory samples after a non-negative drugs test.*

Following an initial non-negative result, two further confirmatory samples will be required. These consist of oral fluid and are sealed and kept in a separate chain of custody (see Appendix G FAQ #11). A 'clean mouth' period is not necessary. The Testing Associate will conduct an interview with the employee, and the samples are then sent off for laboratory analysis to confirm the substance(s) identified. This confirmatory process can take up to 5 days.

### 8.2.3 *Handling of employee / contractor whilst awaiting laboratory confirmation of a non-negative test*

This is shown in Appendix D. The Testing Associate will inform the employee's manager. Handling will be done on a case-by-case basis, but according to the category of employment:

#### a) Safety-critical workers

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<sup>16</sup> This will depend on the jurisdiction where the testing takes place.



They must be suspended from duty on grounds of safety.

*b) Non-safety critical workers*

The manager, in conjunction with People Department and H&S managers, may decide to suspend the employee on safety grounds. Alternatively, they may decide that the employee can remain at work under the caveat that they must not operate any company vehicles or machinery (including pool cars or motorised plant) and/or be present on a site and/or undertake any safety critical activities. These alternative working arrangements may only be accommodated should business capacity be able to support them, and will remain in place until confirmation of results are returned from the laboratory. The employee's fitness to operate must be carefully considered in these circumstances.

Managers should make careful notes of the process, and explain clearly any decision to suspend the employee, including the possibility that if the sample returns as a confirmed non-negative then this may constitute a criminal act. Hence all statements and documents must be recorded and signed by the employee as true records.

*8.2.4 Procedure upon return of the confirmatory laboratory test*

There are two possible outcomes:

- Negative – the test has demonstrated that the substance(s) identified were present for legitimate reasons. The employee is informed, may return to work, and no record is kept; or
- Confirmed non-negative – this indicates that a psychoactive substance on the testing list has been identified above the permissible levels. The employee is informed, formally suspended (if not already) and formal action is initiated.

*8.2.5 Formal action after a positive alcohol or confirmed non-negative drugs test.*

A confirmed positive alcohol or non-negative drugs test constitutes gross misconduct. Formal disciplinary action will be initiated, which may result in dismissal. The employee will be invited to attend an interview with their manager. The employee will have the right to be accompanied by a colleague or trade union official at this interview.

For details of Norse Atlantic's disciplinary procedure, refer to the Staff handbook.

In the event of the disciplinary process resulting in dismissal, re-employment with Norse Atlantic will not be considered for a minimum period of five years.

**9. Additional Considerations of Drugs and Alcohol Policies**



### *9.1 Data Protection and Privacy*

All possible measures will be in put in place to ensure confidentiality of test results and checks will take place to avoid any false results. Test results are processed in accordance with Norse Atlantic's data protection policy. Access to test results is strictly limited to the people for whom it is necessary, such as the employee's manager, People Department and Occupational Health. Unauthorised access to test results will be treated as a disciplinary matter and dealt with in accordance with Norse Atlantic's disciplinary procedure.

Norse Atlantic has arrangements in place with the external drug and alcohol testing company to ensure that it has measures in place to safely and securely process employees' test results.

Confirmed positive alcohol and non-negative test results are only retained long enough for them to be investigated and dealt with under Norse Atlantic's disciplinary procedure. Negative test results for an individual are not retained.

Employees and contractors have a number of rights in relation to their data including the right to make a subject access request and rights to have data rectified or erased in some circumstances. You can find further details of these rights and how to exercise them in Norse Atlantic's data protection policy. If employees or contractors believe that Norse Atlantic has not complied with their data protection rights, they can complain to the Information Commissioner.

### *9.2 Record Keeping*

- a) Negative tests - Each individual (employee or contractor) will be provided with a copy of the Testing Form.
- b) Non-negative tests – Each individual (employee or contractor) may request a copy of the Testing Form from their manager.

All confirmed non-negative test results are electronically stored by the nominated laboratory. If required, the VP People or Head of Occupational Health can request a copy of an individual's results from the external drug and alcohol testing company or the nominated laboratory. The final lab results will be emailed using encryption to the VP People or Head of Occupational Health who will discuss them with the employee's manager. These results will form part of the formal disciplinary action taken against the employee.

### *9.3 Monitoring and Review*

The VP People will ensure that the screening results are regularly monitored to identify any trends that indicate changes in the level of drug and/or alcohol abuse within Norse Atlantic employees or contractors.



An annual report commenting on screening programme, trends and recommendations will be generated by the VP People and distributed to members of the senior management Board.

#### 9.4 *Complaints*

If an employee or contractor has a complaint about the way in which a drug and/or alcohol test has been conducted, they can raise this informally with their manager and/or the People department. If an employee prefers to raise a formal complaint, they should refer to the grievance procedure.

#### 9.5 *Equal Opportunities*

In line with its Equal Opportunities and Dignity at Work policies, Norse Atlantic will take steps to ensure that this policy is not used in a discriminatory manner against any employee and that no individual is unfairly targeted. Norse Atlantic will take steps to ensure that employees' dignity is respected at all times.

## 10. **References**

This policy should be read in conjunction with the following Norse Atlantic policies:

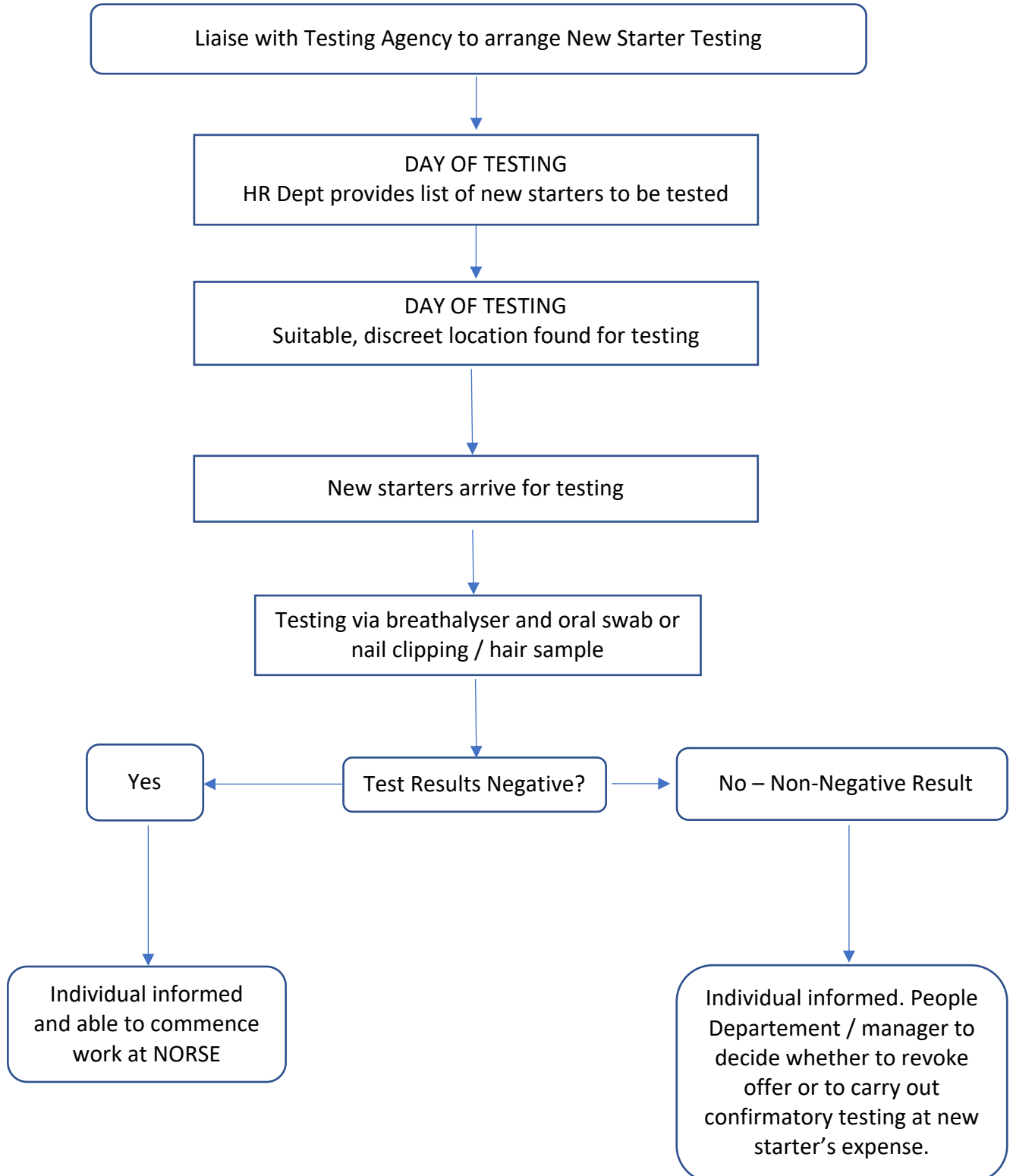
- Disciplinary <sup>17</sup>
- Grievance or Reporting Policy <sup>18</sup>
- Absence Management <sup>19</sup>
- Performance
- Data Protection
- Equal Opportunities and Dignity at Work
- Peer Support Programme

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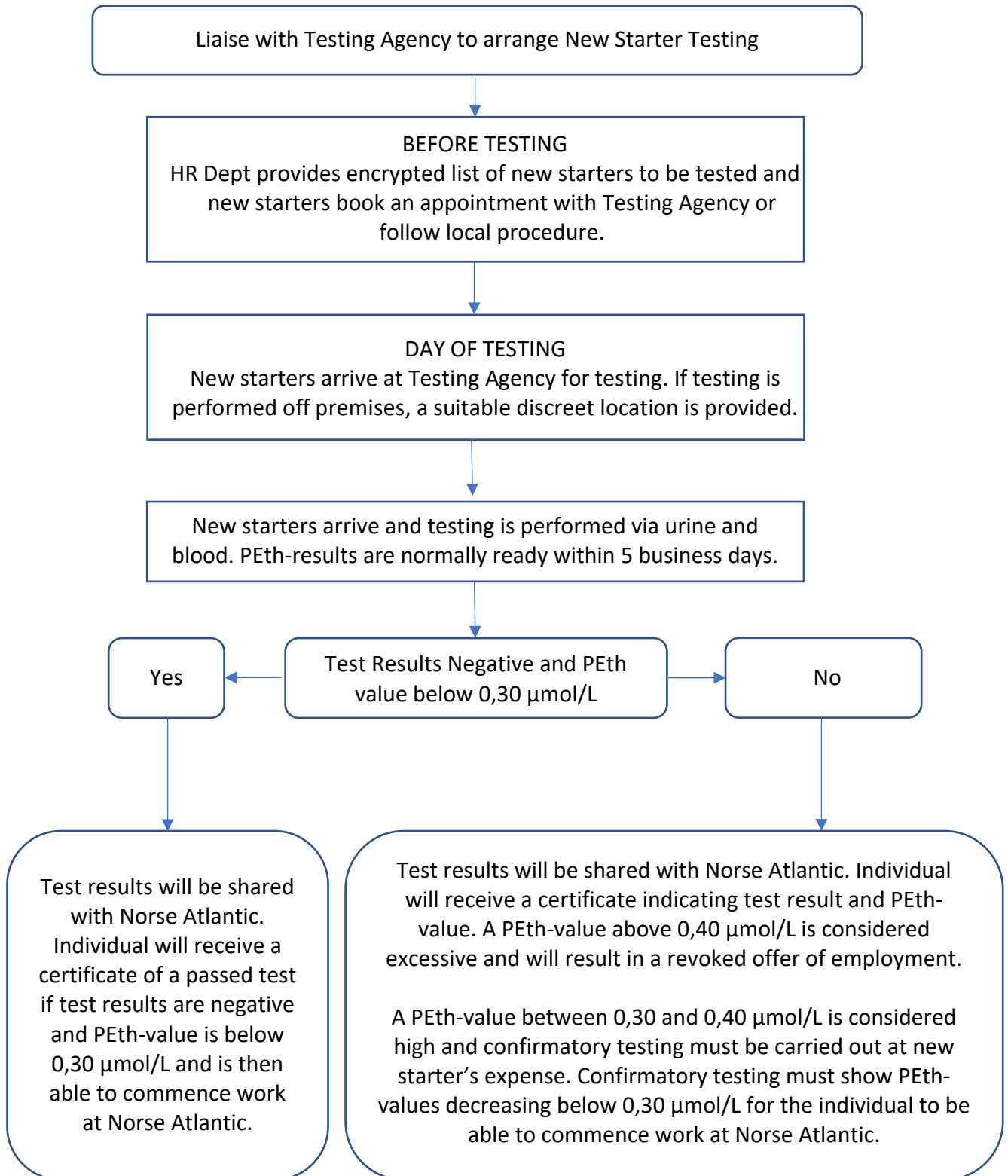
<sup>17</sup> Found in Staff handbook

<sup>18</sup> MANAGEMENT SYSTEM MANUAL 2.6.6.2

<sup>19</sup> Found in Staff handbook

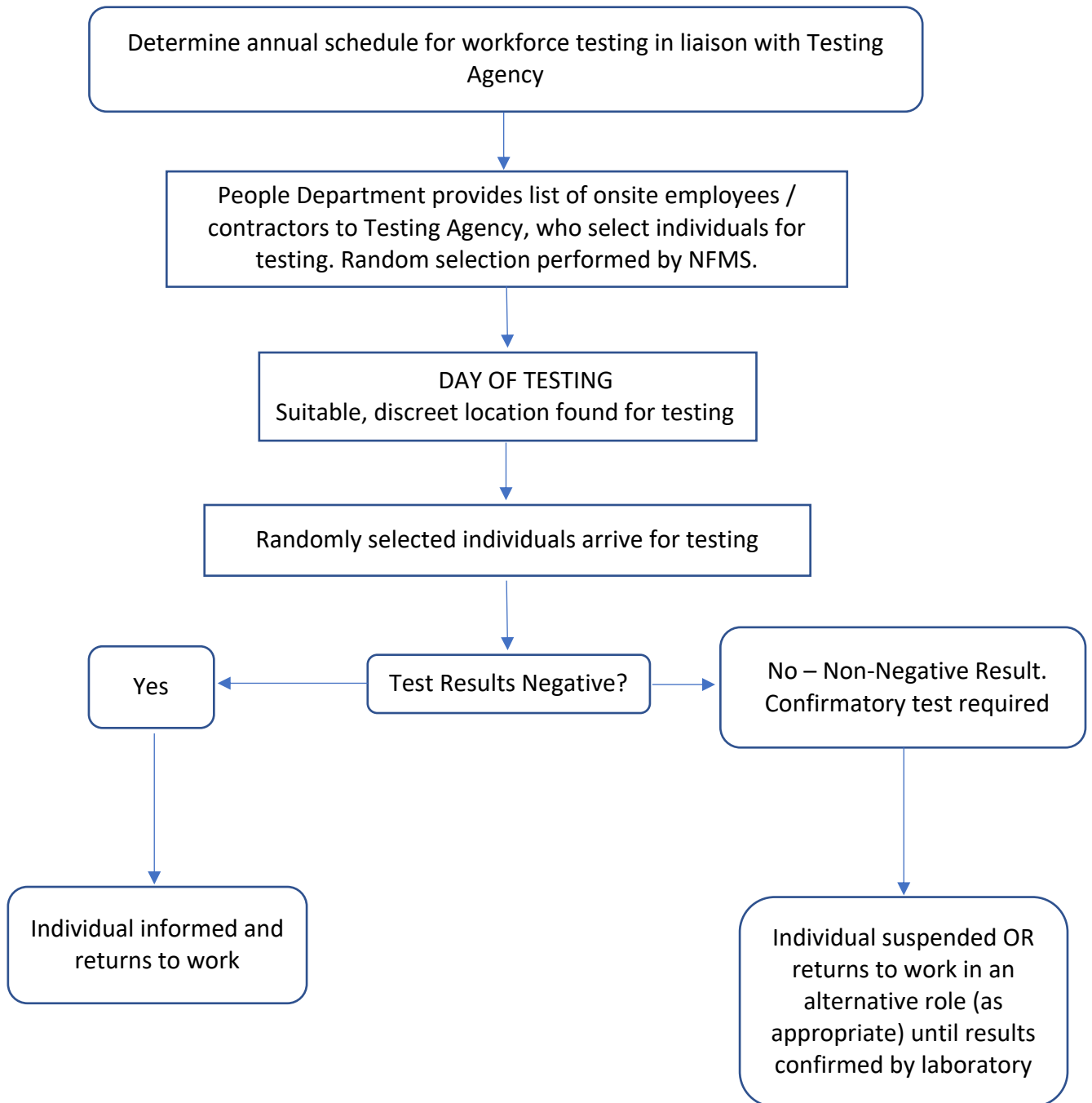
**New Starter Testing Procedure**

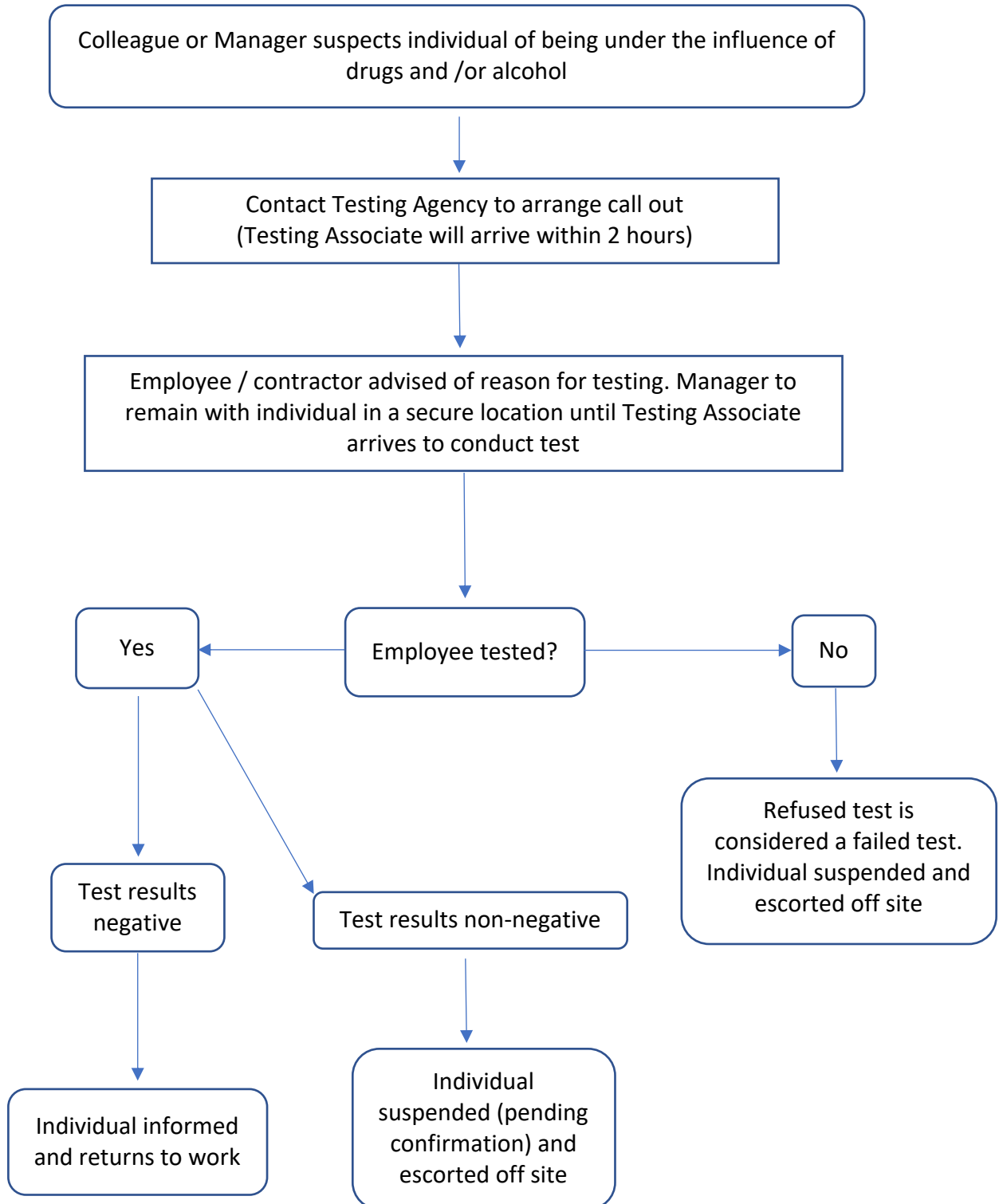
### New Starter Testing Procedure – lifestyle testing (PEth)<sup>20</sup>

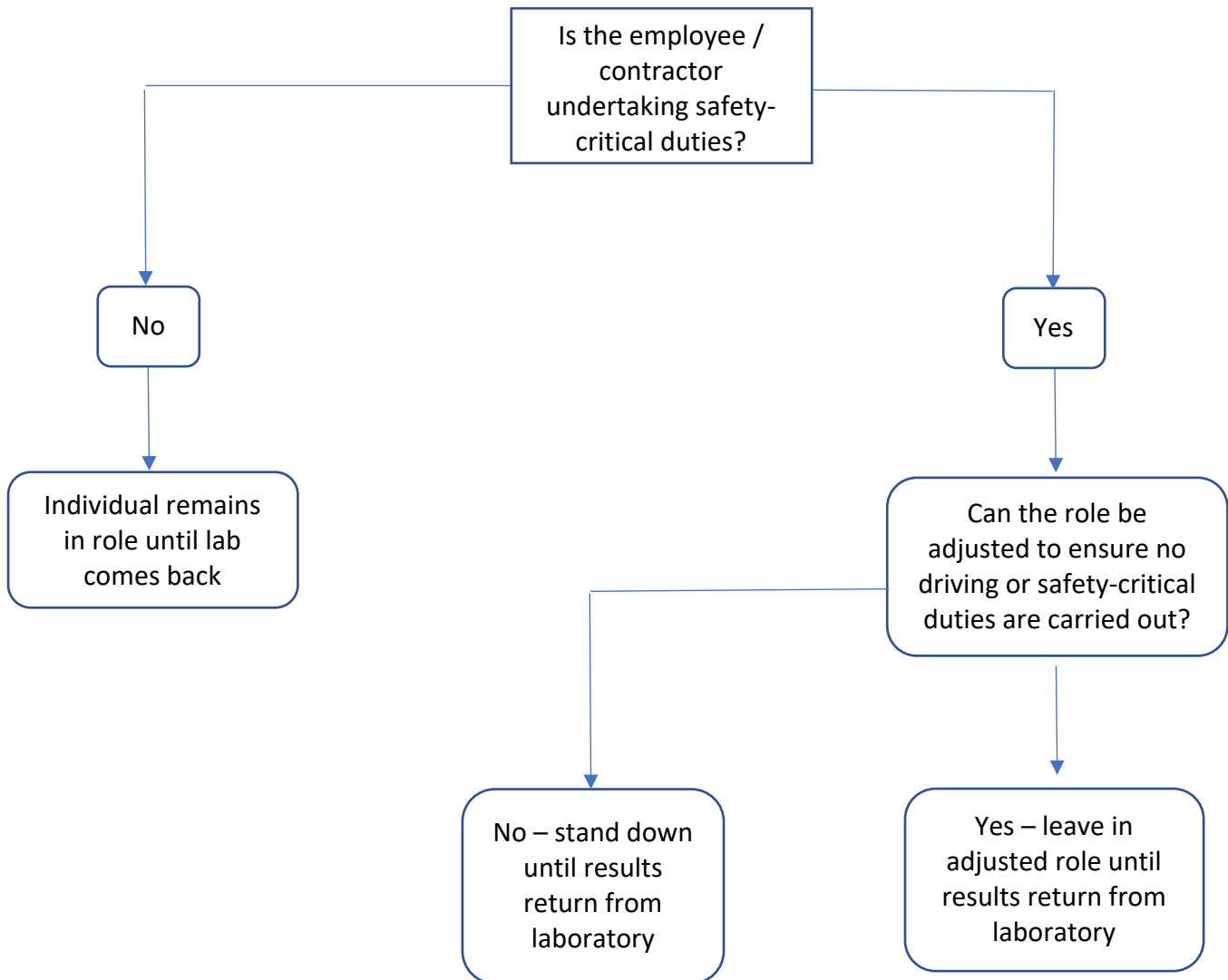


<sup>20</sup> Norse Atlantic Airways will use Norges Flymedisinske Senter (NFMS) for lifestyle testing in Norway and DrugTest.London for lifestyle testing in the UK.



**Unannounced Random Testing Procedure**

**With Reasonable Cause Testing Procedure**

**Managing Positive / Non-Negative Results**

## Appendix E

### **Procedure for monitoring an individual whilst waiting for a Testing Associate.**

When an employee or contractor has been identified as requiring a drugs and/or alcohol test, it is important that measures are taken to monitor this person until the collection officer arrives and can take control.

The employee/contractor should be taken to a room/environment where they can physically be seen/supervised by a member of staff in a senior position. The donor should be accompanied at all times.

The intake of liquids and/or food should be controlled whilst the donor awaits for the Testing Associate to arrive on site. If the individual insists that they must have a drink of water or something to eat, the following restrictions apply and all information must be recorded:

- The donor may be offered a reasonable amount of liquid to drink (a maximum of 250mls in 1 hour and should not exceed a maximum of 0.5 litres)
- This must be witnessed by a responsible manager and recorded
- Food can be given to the donor from a reliable source

Appendix F must be completed in full if the employee/contractor drinks any liquids and/or eats any food whilst awaiting the arrival of a Testing Associate for a drugs and/or alcohol test.



## Appendix F

### Employee/Contractor Declaration

I declare that I have drank the following liquids and/or eaten food provided to me by the company representative as outlined.

Brand of water: \_\_\_\_\_ Amount: \_\_\_\_\_

Brand/type of food: \_\_\_\_\_ Amount: \_\_\_\_\_

To be signed in the presence of a witness:

#### Employee

Name: \_\_\_\_\_

Date: \_\_\_ / \_\_\_ / \_\_\_

Signed: \_\_\_\_\_

#### Company Representative

Name: \_\_\_\_\_

Date: \_\_\_ / \_\_\_ / \_\_\_

Signed: \_\_\_\_\_

#### Witness (as required)

Name: \_\_\_\_\_

Date: \_\_\_ / \_\_\_ / \_\_\_

Signed: \_\_\_\_\_

## Frequently Asked Questions

1) *How are people selected for unannounced random testing?*

A list of all personnel on site on the day of testing will be generated prior to the Testing Associate arriving on site. This list will be provided to the Testing Associate from the Testing Agency who will randomly select the appropriate number of individuals.

2) *Is the employee required to give permission for a drugs and/or alcohol test?*

Yes, they will be asked by the Testing Associate if they agree to be tested. The Donor must provide written consent. The employee should be made aware that a refusal to be tested will be regarded as an unreasonable response and treated as a positive test result which may lead to disciplinary action up to and including dismissal.

3) *Why is it necessary to randomly screen employees and contractors when there are no obvious grounds to suspect the use of drugs or an alcohol dependency?*

There is robust statistical evidence to suggest that workers attend work under the influence of alcohol and drugs. Norse Atlantic is committed to maintaining a safe working environment for all. Unannounced random drugs and alcohol testing is one of many ways to meet this objective.

4) *What should I do if I am taking prescribed medication but wish to attend work?*

Most medications are safe to take but any medication either prescribed or over the counter medication has the potential to cause side effects which could affect yours and others safety in the workplace. You should advise your GP/Pharmacist of your job role and/or operating plant and equipment or operating in a potentially dangerous environment. The GP/Pharmacist can then decide whether it is appropriate for you to work normally or recommend alternative arrangements. If you are experiencing side effects such as drowsiness, fatigue or adverse effects to your balance and you work in a safety-critical role or drive for business you should let your line manager know. They may take advice from Occupational Health or AME to ensure it is safe for you to continue to undertake your current duties or find out if a temporary amendment to duties is required.

5) *If I am receiving support after declaring that I have an alcohol or drugs related problem, will I be subjected to on-going screenings?*

Yes. Any support will be conditional upon you accepting professional help and adhering to an agreed support programme. Recovering from a substance abuse issue can be a lifelong journey and you should have no problem with being tested regularly. Attending work whilst under the influence of either drugs or alcohol is not acceptable and will be considered as gross misconduct and may lead to disciplinary action up to and including dismissal.

6) *If I consume a few drinks the night before an early shift, is there a risk that I may be over the limit when arriving at work?*



Yes. Alcohol can stay in your system for a significant period. Alcohol metabolises at different rates and is dependent upon various factors including an individual's build, health and any other medications they may be taking. It is your responsibility to report for work unimpaired by alcohol or drugs or their effects.

- 7) *If an individual takes recreational drugs, such as cannabis, whilst on vacation, is there a possibility that the substance could be detected several days later when he or she returns to work?*

Many factors determine how long drugs remain present in the body. Some drugs, including cannabis, can be detected weeks after consumption and therefore unannounced, random screening may lead to a positive result. It should be noted that many recreational drugs are illegal and there is a significant risk of prosecution if such substances are consumed whilst at work.

- 8) *If I am taking prescribed, or over the counter medication, and I am selected for a random screening, is it possible that I will provide a non-negative screening result?*

Yes. You will be asked about any medications you are taking if the test leads to a non-negative result. All non-negative results will require further laboratory analysis. The Testing Associate will ensure that all information about your medication is noted with the sample. Taking more than the prescribed amount can affect performance and may be regarded as misuse or abuse.

If you take the medication responsibly, and have discussed it with your line manager if in any doubt, then a non-negative test should not be a concern for those medications. Modern testing equipment can detect low levels of drugs, and the laboratory process is part of separating out what is acceptable intake of medication and what is not.

- 9) *Will I be able to continue working whilst the business is waiting for the laboratory results to be returned?*

This depends on whether your role or activities are classified as safety critical. The decision process can be found in Appendix D.

- 10) *What will happen if the result of the laboratory test is positive?*

In these circumstances, it will be regarded as gross misconduct and you will be suspended from duty immediately and liable to disciplinary action up to and including dismissal.

- 11) *How will I know that my sample that is sent for analysis is not compromised?*

A process known as 'chain of custody' applies. This ensures that two samples (Sample A and Sample B) are clearly labelled and sealed in tamper-proof tubes and envelopes in front of the Donor. It provides an audit trail for the sample sent for analysis to safeguard its identity and integrity from collection through to reporting of the test results. The process is auditable to ensure compliance and that a defensible report is produced. Sample A will be tested to verify positive/negative result from the on-site testing. The laboratory will hold your sample B for up to four months in case of dispute or if you wish to organise an independent analysis of your sample at your own cost.