



Drug and Alcohol Abuse Policy

This Policy and its guidelines on the misuse of alcohol and non-medicinal drugs have been designed to ensure that the workplace is safe and productive for all Employees. This Policy has also been designed to encourage Employees with drug and alcohol abuse problems to seek help.

Northwards will fully investigate all incidents and allegations of the misuse of drugs and alcohol, concerning its Employees.

Northwards recognises that drug and alcohol misuse may be illnesses and will try, where possible, to offer support to any affected Employees. However, in some cases the misuse of drugs and alcohol will lead to performance and misconduct issues which may lead to Disciplinary action.

Definitions:

The following definitions are supplied for information purposes only and are not meant to be all-inclusive:

Alcohol – Includes alcoholic beverages such as beer, wine, liquor, etc.

Drugs - Applies to substances specified under the Misuse of Drugs Act 1971 and includes all forms of drugs and chemicals such as stimulants, narcotics, depressants, hallucinogens and other substances prohibited or restricted by law. Drugs also include any prescription drugs or chemicals not used for the purpose prescribed (medically prescribed drugs used in the prescribed manner do not fall under the definition of drugs).

Prohibited Activities:

The following are activities which are prohibited on Northwards premises or whilst representing Northwards outside the office or at social functions:

1. consuming alcohol on work premises without the consent of your Manager other than during an organised function. Under no circumstances should an intoxicated person be whilst present on the work premises and/or during working time. Similarly, employees should not be intoxicated when representing Northwards at meetings and/or functions which are not held on Northwards premises.
2. possession of any alcohol that is not in the original manufacturer's container or that has been opened (except for Northwards' sponsored events sponsored).

3. the possession, use, sale, purchase, transportation or distribution of drugs/substances for non-medicinal purposes on work's premises or whilst engaged on business away from the office.
4. the consumption of alcohol, use of drugs/substances or being under the influence of such to the extent that they interfere with your performance, thereby rendering the employee unfit to perform assigned duties or causing employees to be a potential safety risk to themselves or others or Northwards' property.
5. using alcohol or drugs/substances whether inside or outside of the work offices, the influence of which causes employees to act in such a manner that Northwards' name is brought into disrepute.

Treatment and Assistance

The early identification and treatment of alcohol and drug abuse problems is crucial and Northwards will support employees should they need to seek professional help and treatment under a rehabilitation programme for these problems. This is not a promise of financial support. Northwards will, however, treat any time off to seek professional help and treatment in the same way as treatment for other illnesses, as detailed in the Sickness Absence Policy and the Occupational Health Service.

During such treatment employees may continue to attend work but only with the agreement of their Manager. If this is not forthcoming, they will be placed on 'special leave' which may be paid or unpaid depending on the circumstances of their case. Managers will make the final decision.

Employees' jobs will not be jeopardised for seeking help for alcohol and drug/substance abuse problems. However, such participation by itself does not protect employees from appropriate disciplinary action should there be a breach of the conditions of employment, a violation of the prohibited activities listed above or should job performance fall below an acceptable level.

If at any time employees, having sought help, withdraw from a rehabilitation programme, and/or suffer a relapse during or following treatment Northwards reserves the right to withdraw support and to proceed to deal with the matter under the terms of the Disciplinary Procedure.

Disciplinary Action and Possible Consequences

If Northwards has any reason for suspecting that there has been a breach of this Policy or work performance or conduct has been impaired through alcohol or drug/substance abuse, the Company reserves the right to invoke disciplinary action in accordance with the Disciplinary Procedure. A full investigation will take place before any Disciplinary action is taken.

This investigation may insist that employees are medically examined by an independent medical adviser appointed by Northwards. Refusal to attend a medical examination may lead to the Disciplinary Procedure being invoked or decisions about employment being made without the benefit of medical advice.

If a medical examination verifies that employees have been tested positive for an illegal substance or, in the medical adviser's opinion, they have an addiction to alcohol, drugs or an illegal substance, normally they will be suspended from duty

whilst a member of Human Resources and their manager reviews their case. Depending on the outcome of their review and the severity of the case, disciplinary action may be taken and, in certain circumstances, treatment and rehabilitation may be offered.

Northwards also reserves the right to suspend employees if they engage in any of the prohibited activities described above and/or which result in, or cause, actually or potentially adverse publicity affecting the Northwards', effectiveness, reputation or its ability to service its Clients.

Serious instances of alcohol or drug/substance abuse could result in dismissal for gross misconduct in accordance with the Disciplinary Procedure. Again a full investigation, will take place before any action is taken.

Reporting Procedures

In most cases it is the behaviour associated with substance abuse that will be evident to Managers and work colleagues. For example, patterns of depression or fatigue, erratic performance, inappropriate behaviour, absenteeism and deterioration in relationships. The following guidelines are intended to be a framework for dealing with substance abuse problems:

1. If employees have a reasonable suspicion of, or observe, prohibited drug or alcohol abuse actions by a fellow Employee they are expected to report the matter to Human Resources or Manager. In no event should these matters be discussed with any other Employee.
2. Any suspicion or confirmation of drug or alcohol abuse is a sensitive matter and is to be handled in a confidential, reasonable and professional manner by the parties concerned and as this information is sensitive personal data, it falls under the Data Protection Act. Any Employee who violates the confidential nature of such information by discussing these matters with anyone other than the individuals outlined above may themselves be subject to disciplinary action, which may include dismissal.

Northwards reserves the right to inform the Police of any suspicions it may have with regard to the use of alcohol and/or drugs by its Employees on its premises or whilst representing Northwards at a social function.