

TRAD GROUP POLICY

DRUGS & ALCOHOL POLICY

08	05-Mar-21	General revision
07	10-Oct-20	General revision and change of logo and company titles, including details of the TRAD Group ¹
06	07-Apr-20	General revision and new directors cited.
05	04-Jun-19	General revision and change of directorship
04	27-Feb-19	General revision
03	23-Feb-18	General revision and removal of MTD name (as this company was purchased by TRAD Scaffolding Contractors)
02	26-Jul-17	General revision (including no smoking/vaping policy on TRAD premises)
01	22-May-16	Inclusion of ALTRAD MTD Limited into the TRAD Group
00	01-Apr-16	First issue (amalgamation of TRAD Sister Companies' existing Policies into a Group Policy)
REV	DATE	STATUS / DESCRIPTION OF CHANGES

DOCUMENT NO.	TRAD-POL- 004
---------------------	----------------------

¹ Please note that the TRAD Group consists of TRAD Scaffolding Contractors and TRAD UK. TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited; TRAD UK is a brand name for Trad Hire & Sales Ltd.

STATEMENT

The TRAD Group is committed to a workplace free of substance misuse and the Policy details the requirements to protect operations, clients and their employees, our employees and the general public from the risks and adverse effect of Drug & Alcohol abuse. In particular employees will not be permitted to undertake their duties if thought to be in an unfit state due to the effects of alcohol or drugs and such cases may be treated as gross misconduct, the penalty of which is likely to be termination of employment.

This Policy has been assembled to comply with legislation² and for reasons of:

- health and safety, efficiency and effectiveness; and
- because of the responsibilities towards clients and the need for client confidence.

Note: this TRAD Group Policy (underpinned by ALTRAD group policies, including the ALTRAD Code of Conduct, also available on our website) is applicable to every company within the TRAD Group – comprising of **TRAD Scaffolding Contractors** and **TRAD UK** – and all TRAD companies will ensure full compliance.³

The word “company” is used in this Policy as each one of the TRAD companies has slightly different procedures and processes, which nonetheless will adhere to this Group Policy (e.g. TRAD Scaffolding Contractors is a member of its trade body the *National Access & Scaffolding Confederation* (NASC) and will comply with the NASC Safety Guidance: *SG15 Substance Abuse; Guidance for Employers and Employees*).

Employees and workers also have a duty to co-operate fully, abstain from D&A abuse as detailed in this Policy, and they must immediately report anyone at work under the influence of Alcohol and Drugs who may jeopardise the health and safety of himself/herself, fellow workers and others.

Note: D&A requirements also applies to TRAD office and contracts staff. There is a prohibition on consuming drink etc during the day (including at lunchtime) and anyone found to have done so will be suspended and a disciplinary process put in place.

Where TRAD employees are asked to attend an evening event (e.g. for an award ceremony) then directors/managers should assess the risks and brief employees beforehand and ensure the risks to H&S are managed appropriately. Where alcohol consumption is an expectation, TRAD employees do not have to drink (and may abstain if they wish). Where employees wish to drink superficially or moderately, this is acceptable but they must act appropriately at all times, use taxis to get home (or public transport if appropriate) and ensure they, their colleagues and others are safe at all times. Where the event is on a weekday (e.g. a Thursday) and employees are expected to work the following day, managers must stress to employees that they must be completely alcohol free before travelling to work the following day (and where there is a risk, they must stay at home).

² Including for instance all applicable legislation including: Health and Safety at Work etc Act 1974, Section 2; Management of Health and Safety at Work Regulations 1999, Misuse of Drugs Act 1971, Road Traffic Act 1988, and Transport and Works Act 1992; Psychoactive Substances Act 2016.

³ Please note that TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited; TRAD UK is a brand name for Trad Hire & Sales Ltd.

The TRAD Group has a formal drug-testing programme, but please note that the adoption of such an approach does not imply any doubts about the high ethical standards and integrity of employees; instead, it is a step required to affirm the Group's status as a safe, conscientious and credible Group.

The TRAD Group operates a zero tolerance on D&A abuse (and where applicable each company shall abide by any client requirements relating to Drugs and Alcohol). This Policy aims to support affected employees rather than punish them, but anyone found in possession or dealing in drugs at work will be immediately reported to the police.

The TRAD Group also recognises the importance of balancing respect for individual privacy with the need to maintain a safe, secure, and productive working environment free of alcohol and drug misuse. The Group is aware that in some instances, drug and/or alcohol dependency is defined as an illness. TRAD actively encourages those employees who are experiencing difficulties with drugs, alcohol, or any other substance to seek help and where appropriate, will offer assistance in seeking relevant and evidence based treatment. In these cases normal sickness absence procedures will apply and confidentiality is assured at all times (with advice sought from the Group HR Director).

However, if an employee – e.g. following on from a D&A test – is deemed to be unfit for work due to either alcohol or drugs, then the employee will be safely removed from company premises and suspended on full pay pending investigation and possible disciplinary proceedings, which is highly likely to lead to termination of employment.

Note: all D&A issues must be dealt with by the Group HR Director.

Similarly, employees must comply with TRAD's Policy on No Smoking in Offices (including Electronic Cigarettes). Additionally, where the client stipulates "smoke free" zones these must be adhered to.

TRAD has placed signs prohibiting smoking/vaping on premises and employees (and visitors) must not smoke cigarettes and electronic cigarettes in the office. This includes company vehicles.

TRAD recognise that the use of electronic cigarettes – as detailed by Public Health England – is relatively low and these can also be a benefit for those striving to give up cigarettes.



However, used in the office they can be perceived as a nuisance with the odour and – as stated in the guidance – [“We don't yet know everything there is to know about e-cigarettes and their impact. For that reason, some commentators cite the 'precautionary principle' in support of prohibition until more evidence is available”](#) and for that reason TRAD prohibit electronic cigarettes in TRAD controlled offices.

This is of course subject to review as Public Health England gather more evidence and in the mean time TRAD recommend that, with managers' assistance, employees use electronic cigarettes in a safe place outside away from smokers, to further encourage their striving to give up nicotine.

Lastly, there is a risk of fire when using electronic cigarette chargers and employees must only purchase from reputable suppliers and seek permission from their Director, before charging electronic cigarettes on TRAD premises. These chargers should never be left unattended and should be removed at break times and before leaving the premises.

TRAD Group's D&A aims and objectives are to:

- identify any risks involved in D&A abuse and put in place any required preventative measures;
- where required, implement a D&A testing programme (including the Network Rail's testing regime for railway projects, which requires a minimum of 5% of sponsored personnel to be tested annually with the test being carried out by a RISQS approved supplier);
- ensure that none of our employees under our control access our projects or carry out safety critical tasks while under the influence of drugs or alcohol (including Network Rail Managed Infrastructure);
- inform employees of the risks of D&A abuse (including risks involved with medication etc);
- inform employees that it is a condition of employment that the following applies:
 - You are not allowed to perform ANY duty at work whilst under the influence of alcohol, illegal drugs or substances (or having consumed/used illegal drugs or substances);
 - You are not allowed to perform ANY duty if taking medication liable to impair your faculties;
 - You are not allowed to perform ANY duty at work if you have misused medication;
 - You are not allowed to misuse, possess, use or sell illicit drugs, substances, alcohol or medication on any Company or Client's site.

Note: Declared legitimate medication is permitted, subject to review by the Company or Client Medical Advisor prior to working on site/office.

- On any project or when working on TRAD Group premises, it is a contract condition and a condition of your employment that the following testing for D&A may be carried out:
 - Pre-appointment;
 - Pre-employment;
 - For cause; and
 - Random.
- If you refuse to co-operate with or fail such a test it will be treated as gross misconduct, the penalty for which is highly likely to be summary dismissal;
- The tests may be carried out on behalf of the Company or Client (including Network Rail).

Declaration

The TRAD Group is fully committed to ensuring compliance both with the letter and spirit of the principles of this Policy. For that reason, Mr. Moore has been appointed with the responsibility and authority to oversee and drive compliance. The Group, the Group CEO, Managing Directors, Directors and Managers are committed to continual improvement and this Policy will be reviewed annually and the Policy will be disseminated throughout the Group and supply chain as required.

For and on behalf of the TRAD Group: ⁴

Des Moore,
TRAD Group CEO



Dated: as front page

Peter McShane,
TRAD Scaffolding Contractors
Managing Director



Dated: as front page

Colin Dobson,
TRAD UK,
Managing Director



Dated: as front page

Jim Gorman,
TRAD UK,
Deputy Managing Director



Dated: as front page

⁴ Please note that the TRAD Group consists of TRAD Scaffolding Contractors and TRAD UK. TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited; TRAD UK is a brand name for Trad Hire & Sales Ltd.