

## Appendix 2

<b>Policy Comments for:</b>
<b>Alcohol and Drugs Policy</b>
<ol style="list-style-type: none"><li>1. A zero ban on alcohol consumption is not sensible and it should be at manager's discretion. The CEx Christmas nibbles have wine and this would be a clear contradiction of this policy.</li><li>2. The policy doesn't seem to say what a positive test for alcohol would be. Is it above the drink drive limit or any detection of alcohol at all. If it's the latter, I consider this unreasonable e.g. a shandy, or pint, at lunch or a glass of wine at CEx xmas nibbles would contravene this policy.</li><li>3. What do Managers / HR do about people in non-safety critical roles if they appear drunk or under the influence of drugs? Can they at least ask them to go home? Guidance / instruction needs to be given in the policy.</li><li>4. What about employee leaving dos? Does this mean we cannot go out and have a glass of wine / pint? I appreciate we should not drink excessively. Is it zero tolerance for all regardless of safety critical status?</li><li>5. The definition of safety critical roles in section 1.6 undermines the specific nature of genuine safety critical roles. The last two bullet points (managing cash and public facing) seem like a catch all for everyone! Reputation critical or safety critical?</li><li>6. Policy seems to assume that any unusual behaviour is due to alcohol or drugs and goes straight in to the council's right to test if it has reasonable suspicion. Why not check the obvious first and then check if there is an underlying problem? Overly stressed or sleep deprived employees could find themselves unnecessarily subject to intrusive drug and alcohol tests.</li><li>7. Also what will happen if people are tested unnecessarily as a result of incorrect accusations and grudges?</li><li>8. Section 3.8 says that if the DVLA removes an employee's licence they will be 'unable to carry out their role fully.' Not necessarily. This would only apply to jobs where it is essential to drive.</li><li>9. Don't jump to conclusions. Unusual behaviour could be the result of prescription drugs and not alcohol or illegal drug use. .</li><li>10. Zero ban on alcohol? Surely 'within the legal limits' should be allowed for non-safety critical posts.</li><li>11. Section 2.2: Bullet point 5 is superfluous as it is covered in the other bullet points.</li></ol>

12. Section 4.3: Is 'sent home' the same as suspension? What is the position regarding pay and is there a mechanism for ending the suspension ASAP if deemed appropriate? Is there a comparable measure in say the disciplinary policy that could be used?
13. Can / should managers detain people before HR arrives / getting their input?
14. Section 6.3: Why notify the police unless they are breaking the law e.g. driving or using threatening behaviour. Other than that why would it be a police matter?
15. Section 6.4: Side effects and warnings about driving and using machinery are usually printed on the packets of prescribed drugs and / or stated by the doctor or pharmacist. Would it be better to say 'when in doubt' advise Occupational Health?
16. Random testing has advised by our Occupational Health Provider so this is why it is now in the policy as an option.