

Lucas UK Group Ltd

Drugs and Alcohol Policy

Incorporating

Lucas Finishing Specialists Ltd

&

Lucas Fit Out Ltd

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Part 1 General Information

1.1 Introduction

Drugs and alcohol – are substances that alter the way in which the body or mind works. Drugs can be defined as those controlled under the Misuse of Drugs Act 1971, prescribed drugs, over the counter medications, "legal highs" and alcohol.

Inappropriate use of drugs and alcohol can result in serious consequences for both individuals and businesses. Therefore, in taking proactive measures to address the issues of drugs and alcohol in the workplace Lucas UK Group Ltd has developed an effective Drugs and Alcohol Policy in order to help clarify the organisation's rules and procedures for dealing with the issue in a fair, consistent and supportive manner.

1.2 General compliance date

This Policy comes into force and shall be complied with from 1st January 2019.

Screening will commence from 1st April 2019.

1.3 Health and safety responsibilities

General responsibility for the implementation and maintenance of this policy rests with the Operations Manager, Lucas UK Group Ltd.

In issuing this Policy, Lucas UK Group Ltd makes no warranties, technical or implied, that compliance with all or any documents published by the company is enough on its own to ensure safe systems of work or operation.

Sub-contractors are reminded of their own responsibilities to ensure health and safety at work and their individual duties under health and safety legislation.

1.4 **Technical content**

The technical content of this Policy has been approved by the HSQE & Operations Director.

Enquiries should be directed to the HSQE & Operations Director.

1.5 Supply

Controlled and uncontrolled copies of this Policy may be obtained from the HSQE & Operations Director

1.6 **Communicating the Policy**

Employees: This policy was sent to all staff prior to our launch date and is now held within our suite of Policies and Procedures. New staff will be made aware of this policy at induction and will be sent a copy with their contract of employment, it will also form part of an annual policy reminder programme.

Self Employed Contractors: All Self-Employed Contractors will be made aware of this policy at induction and will be provided with an abridged version of this document, a copy of which can be found at Appendix 1

Sub-Contractors: A copy of this policy will be sent out to all Sub-Contractors. It will be their responsibility to communicate the contents to their employees. Any new sub-contractor's employees entering the site will be made aware of this policy at the induction.

Visitors: Information will be posted around the site and office complex. A copy of the policy will be placed on the office and workshop notice board, and visitors entering site will be made aware of this policy during a visitor's induction.

Part 2 Application of this document

2.1 Purpose

This Policy contains mandatory controls designed to prevent accidents and incidents occurring on Lucas UK Group Ltd premises and its Customers' property or on a public highway as a result of impaired performance due to the consumption of alcohol or drugs.

2.2 To whom these requirements apply

This Policy contains requirements that are applicable to Lucas UK Group Ltd, and all parties bound to hold a duty of care under The Management of Health and Safety at Work Regulations, 1999.

2.3 Application

Scope – Lucas UK Group Ltd

The requirements of this document apply to all PAYE employees and self-employed contractors, (for the purposes of this document, these are to be referred to as employees from this point forward unless otherwise specifically mentioned as separate entities) and, those involved in activities undertaken by relevant individuals, as defined in clause 2.5.

Exclusions from scope

There are no exclusions from the scope specified in clause 2.3. or Lucas UK Group Ltd

Exceptions to general compliance date

There are no exceptions to the general compliance date specified in 1.2 above.

Scope - Sub-contractors

The requirements of this document apply to all activities undertaken by relevant individuals, as defined in clause 2.5.

Exclusions from scope

There are no exclusions from the scope specified for sub-contractors.

Exceptions to general compliance date

There are no exceptions to the general compliance date specified for sub-contractors.

2.4 **Document management**

The following document is used to prescribe the process that Lucas UK Group Ltd uses to deliver this policy: LUKG D&A Procedures, issue one – Drugs and Alcohol Testing.

2.5 **Definitions**

Accident

Unplanned, uncontrolled event giving rise to death, ill health, injury, damage or other loss.

Blind analysis testing

A process that is undertaken to test a laboratory's ability to detect and identify those substances that are being tested for in such a way that is unknown to the people carrying out the tests.

Chain of custody

A process used to maintain and document the chronological history of a drugs and alcohol sample in order to guarantee the identity and integrity of the sample from collection through to reporting of the test results and leads to the production of a legally defensible report.

Drug

For the purpose of this document, a drug means a 'controlled drug' as defined in the Misuse of Drugs Act, 1971 and its subsequent modification orders, or other substances (including "legal highs") that could affect an employee's ability to carry out their duties safely. This includes medication either prescribed by a medical practitioner or purchased over the counter.

Drugs and alcohol testing

For the purpose of this document, this means testing to identify whether drugs or alcohol are present in a relevant person as defined in below (see also definition of 'For cause' drugs and alcohol testing).

Duty holder

Any individual or group having responsibilities under Health and Safety Legislation.

'For cause' drugs and alcohol testing

Drugs and alcohol testing to identify whether drugs and/or alcohol are present in an employee where there are reasonable grounds to suspect that the fitness of that person:

- has contributed to, or is likely to have contributed to, the cause of an incident or accident.
- is likely to compromise the safety of the employee or others.

Incident

Unplanned, uncontrolled event or near miss, which could have resulted, but did not result in death, ill health, injury, damage or other loss.

Non-negative result

For the purpose of this document, this means that testing for drugs or alcohol shows and defines "under the influence" as:

- The presence of drugs for which there is no legitimate medical need for either their use or the quantity of their use.
- More than 80 milligrams of alcohol in 100 milliliters of blood, or
- More than 35 micrograms of alcohol in 100 milliliters of breath, or
- More than 107 milligrams of alcohol in 100 milliliters of urine

Sub-contractor

For the purpose of this document, "Sub-contractor" means a company that is employed by Lucas UK Group Ltd to carry out services as necessary.

Relevant individual

For the purpose of this document this means a person carrying out work, tasks or activities that have the potential to import risk into the Company:

- Under a contract of employment, or
- Under a contract with another organisation (agency or sub-contractor), or
- As a self-employed person, or
- As a visitor to a site or office

Part 3 Requirements

3.1 Determining who is covered by the drugs and alcohol policy

Lucas UK Group Ltd ensures that all relevant individuals are subject to this drugs and alcohol policy.

3.2 Determining what drugs to test for and how to test

Lucas UK Group Ltd has a process in place to determine which drugs to test for and how to test. In determining which drugs to test for and how to test for these drugs, the Company takes into consideration, but is not limited by, the following factors:

- Whether a test exists
- Likelihood of a drug being taken, and
- The ability of a drug to affect performance detrimentally.

3.3 Establishing the drugs and alcohol policy

Lucas UK Group Ltd has a documented drugs and alcohol policy statement in place that sets out their position for employees and sub-contractors regarding the:

- Use of drugs,
- Use or abuse of any prescribed or over the counter medication or other substances that could detrimentally affect work performance,
- Consumption of alcohol.
- Lucas UK Group Ltd gives information to employees and sub-contractors on the following:
- The effects of drugs and alcohol on performance,
- Factors that lead to dependency on drugs or alcohol,
- Information that can prevent them from inadvertently breaching the drugs and alcohol policy.
- his information is incorporated into the induction programme for employees and subcontractors, or otherwise brought to their attention.

3.4 Implementation and review of the Company Drugs and Alcohol Policy

Lucas UK Group Ltd ensures through training and education that supervisors and managers can:

- Understand their responsibilities under their organisation's drugs and alcohol policy,
- Recognise impaired workplace performance or behaviour likely to be caused by the abuse of drugs or alcohol,
- Understand the process for identifying the effects of medication on the ability of employees and sub-contractors to undertake work that could affect the safety of themselves or others,
- Encourage employees and sub-contractors to ask for advice and help in respect of problems arising from drugs or alcohol.
- Lucas UK Group Ltd communicates the drugs and alcohol policy to all employees and sub-contractors when first implemented and when subsequently reviewed.
- Lucas UK Group Ltd reviews this drugs and alcohol policy as part of the review of the safety management system, at no greater intervals than every 2 years.

3.5 Pre-appointment / Pre-employment testing

Lucas UK Group Ltd ensures that a process is in place to inform potential new recruits who could become employees, and who are likely to be offered employment, of the details set out in this drugs and alcohol policy.

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Lucas UK Group Ltd reserves the right to test ensures that all persons who are likely to become employees (on appointment or promotion) are tested before they undertake all tasks.

3.6 Unannounced random drugs and alcohol testing

Lucas UK Group Ltd implements a policy of unannounced drugs and/or alcohol testing of a random selection of employees not less than 10% (Ten Percent) of the workforce per annum.

Lucas UK Group Ltd ensures that the number of employees and sub-contractors selected and the frequency at which testing is undertaken are enough to meet the requirement in the sentence above.

Lucas UK Group Ltd also ensures that a suitable selection method is used to prevent an employee from permanently avoiding such testing. The preferred method of selection is via the All Health Matters Random Selection software.

Lucas UK Group Ltd may permit employees or sub-contractors that are subject to unannounced random testing to continue their duties whilst awaiting the results of such testing unless there are reasonable grounds to suspect that they are unfit for duty at the time of testing

3.7 **'For cause' testing – behaviour**

Lucas UK Group Ltd has a process in place to test any employee or sub-contractors whose behaviour gives cause to suspect that they are unfit for work because of drugs or alcohol. Such employees or sub-contractors shall not be allowed to resume work or tasks until the result of the drugs and alcohol test are known.

Lucas UK Group Ltd undertakes 'for cause' drugs and alcohol testing of any employee or subcontractors where there are reasonable grounds to suspect that person is under the influence of drugs or alcohol, and that safety is at risk.

3.8 'For cause' testing – accidents and incidents

Lucas UK Group Ltd 'for cause' drugs and alcohol testing when they have reasonable grounds to suspect that safety has been compromised through the consumption of drugs and/or alcohol. When the criteria requiring an accident or incident to be investigated by means of a formal inquiry are met, then it shall always be considered that reasonable grounds exist, although reasonable grounds may still exist if the criteria for a formal inquiry are not met.

An employee or sub-contractor tested for drugs and/or alcohol under these circumstances shall not be allowed to resume work or tasks unless:

- A negative result is obtained, or
- It can be demonstrated that the person concerned did not contribute, either through their actions or by their omission, to the accident or incident.
- In the case of an employee or sub-contractor who would normally be tested in compliance with this policy, but has been admitted as a hospital patient, the permission of the doctor in charge of the case shall be obtained before undertaking drugs and alcohol testing
- When an employee is tested by a police officer and returns a non-negative or negative test result for alcohol, then Lucas UK Group Ltd may choose not to undertake any further testing.

This is because the requirements contained in this document may not be equivalent to those set out in The Road Traffic Act, 1988 that specifies the legal threshold for alcohol detection during police roadside testing.

Once the results of drugs and alcohol testing are known, Lucas UK Group Ltd shall inform the person identified as responsible for investigating the cause of the accident or incident.

3.9 'Employee Compliance' testing

Where an employee declares a drug or alcohol problem (excluding immediately prior to a test or once selected for testing) and/or seeks help prior to being tested, support will be given and treated as with any other illness.

Lucas UK Group Ltd will support the individual and assist in finding specialist assistance to aid in the return to work as soon as possible. An agreement will be drawn up between Lucas UK Group Ltd and the employee, the details of which will be considered on a case-by-case basis.

The agreement shall include that the individual shall submit to and pass a test for drugs and alcohol before resuming work and that they are subject to an individually tailored regime of unannounced testing, for which they must pass each time, for a period to be determined by Lucas UK Group Ltd on a case-by-case basis. If the individual provides a non-negative for result for drugs and/or alcohol, then this will be considered as being in breach of the agreement made.

If the individual refuses assistance or is found in breach of any part of the agreement, then this will be viewed as an act of gross misconduct and may render the employee liable to summary dismissal under the disciplinary procedure.

3.10 Arrangements for sample collection and analysis

Lucas UK Group Ltd ensures that persons who collect the samples and undertake the analysis for drugs and alcohol are trained and competent for the tasks that they are to undertake, and that collection of samples is undertaken using a documented Chain Of Custody for drugs and alcohol sample collection. Where a third party is chosen, then they must hold accreditation and be trained for the collection of samples via a legally defensible chain of custody as recommended by the European Guidelines for Legally Defensible Workplace Drug and Alcohol Testing. The minimum quality accreditation is ISO9001/2015.

Lucas UK Group Ltd also ensures sample collection is conducted in a manner such that:

- The safety, health and dignity of those people carrying out the sample collection and of the employees whose sample is being collected are protected,
- Samples are collected at a time when the safety duties of the employee being tested are not affected,
- Employees being tested are given the opportunity to disclose any medication they have taken.
- Lucas UK Group Ltd only uses laboratories for drugs and alcohol analysis that are UKAS (or European equivalent) accredited to ISO17025 and are subject to blind analysis testing under an external quality assurance scheme. Lucas UK Group Ltd.'s preferred Drugs and Alcohol Service Provider is:

All Health Matters Orchard Close Mews Orchard Street Canterbury Kent CT2 8AP

Tel: 01227 451233 Fax: 01227 762246

Email: admin@allhealthmatters.co.uk

- Lucas UK Group Ltd ensures that the results of drugs and/or alcohol testing are made known to persons being tested as soon as possible.
- The result of such testing, if non-negative, shall be set out in such a way as to enable identification of a non-negative result as defined in this document.

3.11 Non-negative results of drugs and alcohol testing

A refusal by an employee of a reasonable request to be tested for drugs and alcohol when required by this document is the same as if that employee had tested non-negative for drugs or alcohol. The same applies where a donor has deliberately contaminated, diluted or substituted a sample in such a way as to attempt to corrupt the integrity of the testing system.

Medication disclosed by an employee shall not be considered as a non-negative drug result providing it was disclosed before the drugs and alcohol sample was collected. Prescribed or Over the Counter (OTC) medication" may throw up non-negatives. These must be declared at the time of signing the Consent form (the Collector will ask). Such 'non-negatives' will need to go to the lab who will ascertain the facts. The MRO (Medical Review Officer who has toxicology training) would make a final determination if there was any question as to whether the individual was fit to work while taking legitimate medication.

Lucas UK Group Ltd shall not consider for work or tasks those people who return a non-negative result after pre-appointment drugs testing. Those people who return a non-negative result are permitted to re-take the test later in accordance with 3.11.5 the details below.

Lucas UK Group Ltd ensures that an employee who returns a non-negative result after drugs and alcohol testing does not undertake any work activity unless the requirements of clauses below are met in full.

It is permissible for employees or sub-contractors who have previously returned a non-negative result for drugs or alcohol testing to be re-employed provided:

- A period of 6 months has elapsed during which time they have not undertaken work as a relevant individual, and
- They submit to and pass a test for drugs and alcohol before resuming work, and
- They are subject to an individually tailored regime of unannounced testing for a period to be determined by Lucas UK Group Ltd on a case-by-case basis.

All non-negative "B" samples will remain unopened and stored at the laboratory for a minimum of 12 months. An employee or subcontractor has the right to challenge any non-negative result personally applicable to them. Where the sample donor wishes to challenge the non-negative result, they must do this through the H.R. Department as part of the disciplinary process. The H.R. Department will then instruct Lucas UK Group Ltd, preferred D&A service provider, to invoke their specific "Sample B Challenge" Procedure (full details of which can be made available on request).

3.11.1 Suspension and its Effect on Pay while awaiting Laboratory Tests of a non-Negative Test

- 3.11.1.1 PAYE Staff will be suspended on full pay while awaiting the results
- 3.11.1.2 **Self Employed Contractors** will be suspended without pay while awaiting the results

3.12 Records: evaluation, monitoring and review

Lucas UK Group Ltd keeps records of all testing for drugs and alcohol for a period of not less than three years from the date the testing was carried out.

Lucas UK Group Ltd monitors the results of drugs and alcohol testing to identify trends, patterns and changes in the levels of drugs and alcohol detection.

Lucas UK Group Ltd periodically audits and reviews the effectiveness of this drugs and alcohol policy and makes changes to prevent or eliminate increases in risk resulting from the deficiencies identified by the monitoring detailed above.

3.13 Use of medication

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Lucas UK Group Ltd has a process in place that enables employees or sub-contractors to report the use of prescribed and over-the-counter medicines to their supervisor or line manager.

Lucas UK Group Ltd ensures that a supervisor or line manager receiving such a report from an employee or sub-contractor is able to refer to advice provided by a competent authority to identify the likely effects on the ability of the employee to carry out his or her duties.

An employee or sub-contractor shall not be allowed to carry out all work or tasks if the medical authority referred to in this section advises that such a course of action is necessary. In these cases, it is permitted to either:

- Request that the employee or sub-contractor visit their own General Practitioner and obtain alternative medication that will not affect their performance, if available, or
- Instigate special measures to permit the employee or sub-contractor to carry out their normal duties safely, or
- Instigate control measures to permit the employee or sub-contractor to undertake other than their normal duties.

3.14 **Disciplinary Action**

Breaches of this Policy will be dealt with under the Lucas UK Group Ltd disciplinary procedure. Where it is found that the employee has a drug or alcohol related addiction or dependency, the disciplinary procedure may be suspended while the employee is referred to an appropriate agency. The decision to suspend the disciplinary procedure will depend on:

- The nature of the breach, and proof that a health problem exists.
- Where an employee declares a drug or alcohol problem (excluding immediately prior
 to a test or once selected for testing) and seeks help prior to being tested, support
 will be given and treated as with any other illness. However, where the employee
 refuses to undergo drug or alcohol testing or refuses to undergo treatment, the
 disciplinary procedure will be invoked.
- Where an employee is guilty of gross misconduct whilst under the influence of drugs or alcohol the disciplinary procedure will not be suspended. The use, possession or distribution of illegal drugs on company property, reporting for work or trying to report for work when under the influence of drugs or alcohol will be viewed as an act of gross misconduct and will render the employee liable to summary dismissal under the disciplinary procedure, irrespective of whether support may be appropriate for an underlying drug or alcohol problem.

3.15 Counselling, Support and Confidentiality

Lucas UK Group Ltd Employees:

Should any employee have a drug or alcohol problem, they should contact the H.R. Department (Tel: 01622 880 126). Assessments will be made, and the employee will be put in contact with the appropriate organisation for rehabilitation.

During treatment the employee will be removed from any work deemed to be safety critical and will not be liable for dismissal during the term of the treatment. At the end of treatment or if the treatment is ceased the employee will again be subject to the disciplinary process if a test is failed.

Sub-Contractors:

Self-employed contractors and sub-contractors will be responsible for producing their own guidance for supporting their operatives who have a drug or alcohol problem.

Confidentiality

Lucas UK Group Ltd aims to ensure that the confidentiality of all employees, self-employed contractors and sub-contractors and visitors experiencing alcohol or drug problems is

maintained. Information regarding individual cases will not be divulged to third parties unless the safety of the person concerned, or others would be compromised by not doing so.

3.16 **D&A Employee Letter**

Our D&A Employee letter is at Appendix 2

References

The Misuse of Drugs Act, 1971

The Health and Safety at Work Act, 1974

The Road Traffic Act, 1988

The Data Protection Act, 1998

The EU General Data Protection Regulation (GDPR) 2018

The Workplace (Health, Safety and Welfare) Regulations, 1992

The Management of Health and Safety at Work Regulations, 1999

DRUG MISUSE AT WORK - HSE guide for employers, ISBN 0717624021

BS EN ISO/IEC 17025:2005 General Requirements for the Competence of Testing and Calibration Laboratories

Appendices

Appendix 1 – An Abridged Version for our Self-Employed Contractors of the Lucas UK Group Ltd, Drugs and Alcohol Policy

Appendix 2 – D&A Employee Letter

Appendix 1

An Abridged Version for our Self-Employed Contractors of the Lucas UK Group Ltd, Drugs and Alcohol Policy

Drugs and alcohol – are substances that alter the way in which the body or mind works. Drugs can be defined as those controlled under the Misuse of Drugs Act 1971, prescribed drugs, over the counter medications, "legal highs" and alcohol.

Inappropriate use of drugs and alcohol can result in serious consequences for both individuals and businesses. Therefore, in taking proactive measures to address the issues of drugs and alcohol in the workplace Lucas UK Group Ltd has developed an effective Drugs and Alcohol Policy in order to help clarify the organisation's rules and procedures for dealing with the issue in a fair, consistent and supportive manner.

Full content of the Lucas UK Group Ltd, Drugs and Alcohol Policy is available for your reference, should you wish to be provided with a copy please request this via your Site Manager, the document number is LUKG 5.1.3

As a Self-Employed Contractor working for Lucas, you are subject to Drug & Alcohol testing, be these random checks, for cause checks after an accident or incident, as part of the right to operate safety critical equipment, or as part of a Principal Contractor whole or random site check

A refusal by an any Self-Employed Contractor of a reasonable request to be tested for drugs and alcohol when required by this document is the same as if that employee had tested non-negative for drugs or alcohol. The same applies where a donor has deliberately contaminated, diluted or substituted a sample in such a way as to attempt to corrupt the integrity of the testing system.

Medication disclosed by an employee shall not be considered as a non-negative drug result providing it was disclosed before the drugs and alcohol sample was collected. Prescribed or Over the Counter (OTC) medication" may throw up non-negatives. These must be declared at the time of signing the Consent form (the Collector will ask). Such 'non-negatives' will need to go to the laboratory who will ascertain the facts.

Lucas UK Group Ltd shall not consider for work or tasks those people who return a non-negative result after pre-appointment drugs testing.

Lucas UK Group Ltd ensures that an employee or Self-Employed Contractor who returns a non-negative result after drugs and alcohol testing does not undertake any work activity, until their sample has been checked by a Laboratory and is found to be negative.

Self Employed Contractors will be suspended without pay, while awaiting Laboratory results their sample.

Those Self-Employed Contractors that are found to have;

- a. Positive test results will be subject to dismal.
- b. Negative test results will be permitted to return to work without prejudice.

Appendix 2

D&A Employee letter

20th July 2023

Dear Employee,

IMPORTANT NOTICE: SUBSTANCE ABUSE (DRUG AND ALCOHOL) POLICY

Lucas UK Group Ltd is committed to safeguarding the health, safety and welfare of its employees, sub-contractors and all other persons who may come into contact with our actions. We are therefore moving our forward our Policy on Substance Abuse (often known as a Drugs and Alcohol Policy) as a fundamental part of the Company's strategy and commitment to this.

Alcohol, drug (including prescribed and "over the counter" medicines), "legal highs" and other substance (solvents etc) consumption or abuse affects individual health and work performance in terms of safety, efficiency, productivity and attendance. In addition, it can have a detrimental and sometimes fatal effect on colleagues, dependants and, in certain cases, members of the public.

Reports have shown:

- 15% of drink drive convictions are 'morning after'.
- Alcohol is estimated to cause up to 5% of all absences from work.
- Up to 14 million working days lost each year through alcohol misuse alone.
- Drugs and Alcohol are estimated to be a contributory factor in 25% of all workplace accidents.
- Alcohol implicated in 60% of UK workplace fatalities.

As a responsible employer, in an industry where health and safety are of paramount importance, the Company recognises the need to take measures to address these issues.

Our Policy on Substance Abuse became active on 15th January 2019. An information pack with helpful information about this subject and where you can get further advice and help if required along with a copy of our D&A Policy is available from our HSQE Department.

One of the key aspects of the D&A Policy will be the introduction of a regular testing programme. We also reserve the right to conduct Pre-Employment testing. Random Testing will be included. For-Cause testing will take place at the company's discretion after accident or incident and/or where there is reason to believe an employee has presented themselves to work unfit according to the Policy. This testing programme commenced with effective of 15th April 2019.

Scope of the Policy

It should be noted that the Policy will cover all employees and contractors of Lucas UK Group Ltd.

Assistance Programme

In order to facilitate the testing programme it has been agreed that all direct employees will have the opportunity to seek help or assistance with any substance abuse issues they may have via their own channels. Employees seeking such help or further assistance are encouraged to make themselves known to their manager, or our HR

Manager. Any "Assistance Programme" will only apply where an employee has voluntarily come forward seeking help. It may not be considered appropriate where Substance Abuse is discovered via intended or after actual testing procedures. As an employee, it will be your responsibility to inform us of any medication you are currently taking.

Use of medication

Lucas UK Group Ltd has a process in place that enables employees or sub-contractors to report the use of prescribed and over-the-counter medicines to their supervisor or line manager.

Lucas UK Group Ltd ensures that a supervisor or line manager receiving such a report from an employee or sub-contractor is able to refer to advice provided by a competent authority to identify the likely effects on the ability of the employee to carry out his or her duties.

All staff when consulting a medical doctor or pharmacist must be advised to inform them of their work, in order to ensure any information on possible side effects or effects on safety at work, can be given where medication is involved. Any staff taking medication and are unsure as to their fitness to undertake work, should notify their line manager.

If you wish to discuss this topic further, please contact the HSQE & Operations Director. The Company needs commitment from all parties involved to ensure that it will meet its aims, to continually improve and provide safer working conditions and to raise its standards in Health and Safety.

Thank you.

Your Sincerely

D Lucas

CEO & Managing Director