


R&M POLICY · HEALTH AND SAFETY

# Drugs and Alcohol Policy

R&M Property Group Ltd

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## 1. Director's Statement

R&M Property Group Ltd is committed to providing a safe, healthy, and productive working environment for everyone who works on or visits our projects. The misuse of drugs and alcohol is incompatible with safe working in the construction industry and poses a serious risk to the individual concerned, to their colleagues, and to members of the public.

Construction work involves operating heavy plant and machinery, working at height, working in and around excavations, working with hazardous substances, and performing physically demanding tasks that require concentration, coordination, and clear judgment. The presence of any individual on site who is under the influence of drugs or alcohol, or whose ability to work safely is impaired by the after-effects of drugs or alcohol consumption, creates an unacceptable risk that R&M will not tolerate.

This policy sets out R&M's approach to drugs and alcohol in the workplace. It is designed to protect the safety of our workforce and the public, to comply with our legal obligations, and to provide a framework for supporting individuals who may have a drug or alcohol problem. R&M recognises that substance dependency is a health condition and that individuals who seek help voluntarily will be supported - but safety is the absolute priority, and anyone who attends an R&M site unfit for work due to drugs or alcohol will be removed immediately.

**Thom McKenna**, Director, R&M Property Group Ltd

## 2. Legal Framework

This policy is informed by and ensures compliance with the following legislation:

- **Health and Safety at Work etc. Act 1974:** Section 2 places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare at work of their employees. Section 7 places a duty on employees to take reasonable care for the health and safety of themselves and others who may be affected by their acts or omissions. An employee who attends work under the influence of drugs or alcohol is in breach of this duty.
- **Management of Health and Safety at Work Regulations 1999:** Require employers to carry out suitable and sufficient risk assessments. The risk of impairment due to drugs or alcohol must be considered as part of the overall risk assessment for construction activities.
- **Construction (Design and Management) Regulations 2015:** Require that construction work is carried out by competent persons under conditions that are, so far as reasonably practicable, safe and without risk to health. A worker who is impaired by drugs or alcohol is not competent to carry out construction work safely.
- **Misuse of Drugs Act 1971:** Makes it a criminal offence to produce, supply, or possess controlled drugs. It is also an offence for an occupier of premises to knowingly permit the production, supply, or use of controlled drugs on those premises. R&M, as the occupier of its construction sites and offices, has a legal obligation to prevent the use of controlled drugs on its premises.
- **Road Traffic Act 1988:** Makes it an offence to drive or attempt to drive a motor vehicle while unfit through drink or drugs, or with alcohol above the prescribed limit, or with a specified controlled drug above the specified limit. Many R&M employees and operatives drive to and from site and may drive company vehicles or plant on site.

- **Transport and Works Act 1992:** Makes it an offence to carry out certain safety-critical work while unfit through drink or drugs.
- **Corporate Manslaughter and Corporate Homicide Act 2007:** An organisation can be guilty of corporate manslaughter if the way in which its activities are managed or organised causes a person's death and amounts to a gross breach of a relevant duty of care. Failing to address known drug or alcohol misuse on a construction site could be relevant to such a charge if a death resulted.

R&M also has a duty of care under common law to its employees and to anyone affected by its activities. Failure to manage drugs and alcohol in the workplace could result in civil claims, criminal prosecution, HSE enforcement action, and exclusion from public sector frameworks.

## 3. Scope

This policy applies to:

- All directors, employees, and workers of R&M Property Group Ltd
- All agency workers and labour-only subcontractor operatives on R&M projects
- All subcontractors and their operatives while on R&M sites or premises
- All consultants, professional advisors, and visitors to R&M sites or offices

The policy applies at all times when an individual is at work, on an R&M site or premises, travelling on company business, or attending a work-related event. It also applies where an individual's ability to work safely is impaired by drugs or alcohol consumed outside of working hours, including the residual effects of consumption the previous evening or at the weekend.

## 4. Policy Rules

### 4.1 Alcohol

The following rules apply to alcohol:

- No individual may consume alcohol while at work, on an R&M construction site, in an R&M office during working hours, or while travelling on company business
- No individual may attend work or present themselves on an R&M site while under the influence of alcohol or while their ability to work safely is impaired by the residual effects of alcohol consumption
- No alcohol may be brought onto or stored on any R&M construction site
- R&M operates a zero-tolerance approach to alcohol on construction sites. There is no acceptable blood alcohol level for anyone working on a construction site - even a level below the drink-drive limit can impair judgment, coordination, and reaction times in a construction environment

On limited occasions, the Director may authorise the moderate consumption of alcohol at a specific work-related social event held away from any construction site (such as a team meal, awards event, or client function). In these circumstances, individuals must behave responsibly, must not consume alcohol to excess, and must not drive if they are over the legal limit. Any individual who is due to work on a construction site the following day must ensure that they are fully fit for work.

### 4.2 Illegal Drugs

The following rules apply to illegal drugs (controlled substances under the Misuse of Drugs Act 1971):

- The use, possession, supply, or distribution of illegal drugs on any R&M site or premises, or during working hours, is strictly prohibited and will be treated as gross misconduct
- No individual may attend work or present themselves on an R&M site while under the influence of illegal drugs or while their ability to work safely is impaired by the effects or after-effects of illegal drug use
- Any individual found to be in possession of, using, or supplying illegal drugs on an R&M site will be removed from site immediately. The matter will be reported to the police and will be treated as gross misconduct
- R&M will cooperate fully with any police investigation into drug offences connected with its sites or workforce

### 4.3 Prescription and Over-the-Counter Medication

R&M recognises that many individuals take prescription medication or over-the-counter remedies that are necessary for their health. Some of these medications can cause side effects that may impair the ability to work safely - including drowsiness, dizziness, impaired coordination, blurred vision, and reduced concentration. The following rules apply:

- Any individual who is taking medication that may affect their ability to work safely must inform their line manager or the site manager before commencing work. This information will be treated in confidence and used only to assess fitness for work
- The individual should check with their doctor or pharmacist whether the medication may impair their ability to carry out their work safely, particularly if they operate plant or machinery, work at height, or carry out other safety-critical tasks
- Where medication is likely to impair the ability to work safely, R&M will explore alternative duties or temporary adjustments. In some cases, the individual may need to be excluded from site work until the course of medication is complete or the side effects have subsided
- No one will be penalised for disclosing that they are taking medication. The purpose of disclosure is to protect the individual and their colleagues, not to create a barrier to work
- The misuse of prescription medication - including taking medication not prescribed to the individual, taking doses in excess of the prescribed amount, or using prescription drugs recreationally - is treated in the same way as illegal drug use under this policy

### 4.4 Novel Psychoactive Substances

Novel psychoactive substances (formerly known as 'legal highs') are substances that produce effects similar to illegal drugs but may not be controlled under the Misuse of Drugs Act 1971. The Psychoactive Substances Act 2016 makes it an offence to produce, supply, or offer to supply any psychoactive substance (other than exempted substances such as alcohol, tobacco, caffeine, and medicines). The use of novel psychoactive substances is prohibited on R&M sites and is treated in the same way as illegal drug use under this policy.

## 5. Drug and Alcohol Testing

R&M operates a drug and alcohol testing programme as part of its commitment to maintaining a safe working environment. Testing is carried out by a competent, independent testing provider

using validated testing methods and chain-of-custody procedures that ensure the integrity and confidentiality of the results.

### 5.1 Types of Testing

- **Pre-employment / pre-engagement testing:** R&M may require a drug and alcohol test as a condition of employment or engagement. All individuals will be informed of this requirement before the test is carried out.
- **Random testing:** R&M operates a programme of unannounced random drug and alcohol testing across its sites. Random testing is carried out without prior notice and individuals are selected on a genuinely random basis. All individuals on site - including R&M employees, agency workers, subcontractor operatives, and visitors - may be selected for random testing. By entering an R&M site, all individuals consent to random testing as a condition of site access.
- **For-cause testing:** A drug and alcohol test may be required where there is reasonable cause to suspect that an individual is under the influence of drugs or alcohol, or where their behaviour, appearance, or performance gives rise to concern about impairment. Indicators may include the smell of alcohol, slurred speech, unsteady gait, erratic behaviour, poor coordination, bloodshot eyes, or unusual drowsiness.
- **Post-incident testing:** A drug and alcohol test may be required following any accident, near-miss, or dangerous occurrence on site where drugs or alcohol may have been a contributing factor. Post-incident testing is carried out as soon as practicable after the incident and applies to all individuals directly involved.

### 5.2 Testing Methods

Testing may be carried out by oral fluid (saliva) screening, urine analysis, or breath testing for alcohol. Oral fluid screening provides rapid on-site results and is the most common method for initial testing. Where a screening test produces a non-negative result, a confirmatory laboratory analysis will be carried out before any disciplinary action is taken. The confirmatory test uses a more sensitive and specific analytical method (typically immunoassay followed by mass spectrometry) and provides a definitive result.

### 5.3 Substances Tested

The standard testing panel includes, but is not limited to:

- Cannabis (THC)
- Cocaine and its metabolites
- Opiates (including heroin, morphine, and codeine)
- Amphetamines (including methamphetamine and MDMA/ecstasy)
- Benzodiazepines
- Methadone
- Ketamine
- Alcohol (via breath test or oral fluid)

The testing panel may be updated from time to time to reflect changes in substance misuse patterns or testing technology.

### 5.4 Refusal to Test

Any individual who refuses to submit to a drug or alcohol test, or who attempts to tamper with, adulterate, or substitute a sample, will be treated as having produced a positive result. Refusal to test will result in immediate removal from site and will be treated as gross misconduct for

R&M employees. Subcontractor operatives and agency workers who refuse to test will be permanently denied access to all R&M sites.

### 5.5 Positive Results

Where a confirmed positive test result is obtained:

- **R&M employees:** The individual is removed from site immediately and suspended pending investigation. A positive test result is treated as a potential act of gross misconduct. The individual will be invited to a disciplinary hearing at which they may present any mitigating circumstances, including evidence of prescription medication or a medical condition. The outcome may range from a final written warning with mandatory referral to an occupational health professional, through to summary dismissal, depending on the circumstances.
- **Subcontractor operatives:** The individual is removed from site immediately and permanently barred from all R&M sites. The subcontractor employer is notified and required to take appropriate action. The costs of the test are charged to the subcontractor.
- **Agency workers:** The individual is removed from site immediately and permanently barred from all R&M sites. The employment agency is notified. Repeated positive results from a single agency's workers may result in the agency being removed from R&M's approved supplier list.

## 6. Support and Rehabilitation

R&M recognises that drug and alcohol dependency is a health condition and that individuals who are struggling with substance misuse deserve support as well as accountability. R&M's approach balances the absolute priority of site safety with a genuine commitment to helping individuals who seek help.

### 6.1 Voluntary Disclosure

Any individual who comes forward voluntarily to disclose a drug or alcohol problem before it is identified through testing, an incident, or observed impairment will be treated sympathetically. Voluntary disclosure will not, in itself, result in disciplinary action. R&M will:

- Refer the individual to an occupational health professional or the company's Employee Assistance Programme (EAP) for confidential assessment and support
- Explore whether temporary adjustments to duties or working arrangements can be made to keep the individual in work safely while they receive treatment
- Agree a return-to-work plan with clear expectations, including agreement to ongoing monitoring and testing
- Treat all information disclosed in confidence, sharing it only with those who need to know to manage the situation safely

However, voluntary disclosure does not excuse an individual from the requirements of this policy. If an individual discloses a problem but continues to attend work while impaired, or if they fail to engage with the support offered, the matter will be dealt with under the disciplinary procedure.

### 6.2 Employee Assistance Programme

R&M's Employee Assistance Programme provides confidential support for employees dealing with a range of personal and health issues, including drug and alcohol misuse. The EAP offers telephone counselling, face-to-face counselling, and referral to specialist treatment services.

All contact with the EAP is confidential and is not reported to R&M unless the individual consents.

### 6.3 Return to Work After Treatment

Where an individual has undergone treatment for drug or alcohol dependency and is assessed as fit to return to work, R&M will support their return through a structured plan agreed between the individual, their manager, and the occupational health professional. The plan may include a phased return, temporary adjustments to duties, regular check-ins, and a programme of follow-up testing over a specified period (typically twelve months). The purpose is to support a successful and sustained return to safe working.

## 7. Construction Site Standards

The following standards apply on all R&M construction sites:

- No alcohol or illegal drugs are to be brought onto, stored on, or consumed on any R&M construction site at any time
- Any alcohol, illegal drugs, or drug paraphernalia found on site will be confiscated and, in the case of illegal drugs, handed to the police
- Site welfare facilities must be kept free of alcohol containers, drug paraphernalia, and any evidence of substance use
- The drugs and alcohol policy is communicated to all workers at site induction. Every individual attending a site induction is required to acknowledge that they have read and understood the policy and that they consent to random drug and alcohol testing as a condition of site access
- Posters summarising the key rules of this policy and the support available are displayed in site welfare facilities
- Site managers conduct regular welfare facility inspections and are alert to any signs of drug or alcohol use on site
- Any individual who appears to be under the influence of drugs or alcohol, or who is believed to be unfit for work due to the after-effects of substance use, is not permitted to commence or continue work. The site manager will arrange for the individual to leave site safely and will initiate the for-cause testing process

## 8. Supply Chain Obligations

R&M's drugs and alcohol policy applies to all individuals on R&M sites, regardless of their employer. R&M manages supply chain compliance through the following measures:

- All subcontractors are required to acknowledge and accept R&M's drugs and alcohol policy as part of the Pre-Qualification Questionnaire (PQQ) process. This is a condition of inclusion on R&M's approved supplier list
- Subcontract terms include a clause requiring the subcontractor and its operatives to comply with R&M's drugs and alcohol policy and to cooperate with testing when requested
- Employment agencies are required to confirm that they inform all supplied workers of R&M's drugs and alcohol policy before they attend site
- The costs of any drug or alcohol test arising from a for-cause or post-incident test of a subcontractor operative are borne by the subcontractor

- Any subcontractor operative who tests positive or refuses to test is permanently barred from all R&M sites. The subcontractor is required to provide a replacement operative and to take appropriate action in respect of the individual concerned

R&M encourages its supply chain partners to adopt their own drugs and alcohol policies and testing programmes. A robust approach to drugs and alcohol across the supply chain protects everyone on site and demonstrates the professional standards expected of R&M's approved suppliers.

## 9. Responsibilities

- **Thom McKenna (Director):** Overall responsibility for this policy. Approves the policy, ensures adequate resources for the testing programme, and reviews all serious incidents personally.
- **Phillip Hollingworth (H&S Adviser, Spectra Safety):** Responsible for managing the testing programme, appointing and liaising with the testing provider, receiving and reviewing test results, maintaining confidential records, advising managers on individual cases, and reviewing this policy annually.
- **Jon Scurr (Director of Operations):** Responsible for ensuring that site managers implement the policy consistently across all projects and that site inductions include the drugs and alcohol briefing.
- **Site Managers:** Responsible for communicating the policy at induction, maintaining site standards, being alert to signs of impairment, initiating for-cause testing where appropriate, ensuring individuals who are unfit for work are removed safely from site, and maintaining the confidentiality of any information disclosed.
- **Louis Howard (Procurement Manager, Enabl):** Responsible for ensuring that PQQ and subcontract terms include drugs and alcohol policy acknowledgement and testing cooperation requirements.
- **All Individuals:** Every person on an R&M site has a personal responsibility to comply with this policy, to attend work fit and unimpaired, to report any concerns about a colleague's fitness for work, and to cooperate with testing when requested. Under Section 7 of the Health and Safety at Work etc. Act 1974, employees have a legal duty to take reasonable care for their own safety and the safety of others.

## 10. Confidentiality and Data Protection

All information relating to drug and alcohol testing, results, disclosures, referrals, and treatment is treated as confidential and as special category personal data under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Access to this information is restricted to the Compliance Officer, the Director, and any occupational health professional involved in the individual's case. Information is only shared with other parties (such as a site manager or the individual's line manager) on a strict need-to-know basis and only to the extent necessary to manage site safety.

Drug and alcohol testing records are retained for the duration of the individual's engagement and for a minimum of two years after the engagement ends. Records of confirmed positive tests and any associated disciplinary proceedings are retained in accordance with R&M's data retention policy.

## 11. Related Policies

This policy operates alongside and should be read in conjunction with:

- R&M Health and Safety Policy
- R&M Mental Health and Wellbeing Policy
- R&M Disciplinary Procedure
- R&M Anti-Bullying and Harassment Policy
- R&M Pre-Qualification Questionnaire (PQQ) - Drugs and Alcohol Acknowledgement

## 12. Policy Review

This policy will be reviewed annually by the Compliance Officer and approved by the Director. The next scheduled review date is June 2027. The policy will also be reviewed following any drug or alcohol-related incident on site, any change in relevant legislation or industry guidance, any significant change in R&M's workforce or testing arrangements, or upon feedback from employees, Client Organisations, or the Framework Manager.

### Approved and Signed

**Name:** Thom McKenna

**Position:** Director, R&M Property Group Ltd

**Date:** 24 June 2026

This policy will be published on the R&M Property Group Ltd website and available to all employees, supply chain partners, and framework clients upon request.

Please print name, sign and date below your agreement to this policy -