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1. **OBJECTIVE**

To define the requirements that apply to the testing and management of Employees, Contractors, Port Users and Visitors in the Port Hedland Port Authority (PHPA) secured port areas including the Administration Offices.

This is to ensure fitness for duty of all people entering the Port and minimise the risk of workplace accidents or incidents.

2. **SCOPE**

This policy applies to PHPA employees, contractors, contractor’s employees and all others who enter the secured port area or Administration Offices.

3. **DEFINITIONS**

**Adulteration** – The addition of a substance in-vivo or in-vitro, excluding those integral to the on-site collection and or testing process, which may compromise the integrity of the specimen.

**Alcohol** – Ethyl Alcohol, Ethanol

**Amphetamine-type stimulants** – Amphetamine-type stimulants (ATS) may include, but are not limited to, the following: amphetamine, methylamphetamine, methylenedioxymethylamphetamine (MDMA), methylenedioxyamphetamine (MDA).

**BAC** – Blood Alcohol Concentration or its equivalent Breath Alcohol Concentration. The units used for expression of Blood Alcohol Concentration in this policy being percent (%) with the equivalent breath concentration being expressed as grams to 210 litres of expired breath.

**Cannabis** – The Standard refers to Δ⁹-tetrahydrocannabinol (THC) as the target substance.

**Chain-of-custody** – A series of procedures to account for the integrity of each urine or oral fluid specimen by tracking its handling and storage from point of collection to final disposal of the specimen.

**Chain-of-custody form** – A form to be used from time of collection of the specimen to its receipt by the laboratory, as well as dispatch between laboratories.
Collection device – A device that consists of one or more components to collect oral fluid or urine and incorporates an adequacy indicator.

Collection site – A place at which the specimen collection occurs and where initial testing procedures may be conducted.

Collector – A person who has successfully completed a course of instruction in compliance with the Standard for specimen collection, storage, handling and dispatch and received a statement of attainment in accordance with the Australian Quality Training Framework.

Confirmatory test – An analytical procedure that uses mass spectrometry to identify and quantify unequivocally a specific drug or metabolite.

Confirmed negative – A result at or below the target concentration following confirmatory testing.

Confirmed positive – A result above the target concentration following confirmatory testing.

Contractor – An organisation (including persons employed by the organisation) undertaking work in the Port area, but not including Port Hedland Port Authority and employees of the Port Hedland Port Authority.

Drug – Any substance, article, preparation or mixture (with the exception of alcohol) whether gaseous, liquid, solid or in any form which, when consumed or used by any person, deprives him or her either temporarily or permanently of any of his or her normal metal or physical faculties.

Employees – Persons employed by the Port Hedland Port Authority

Fitness for Duty – Describes the physical or mental condition of a person whereby the person can be reasonably expected to undertake a task without incurring unacceptable risks to the health and safety of themselves or any other person.

Heavy Mobile Equipment – Vehicle or other machine that requires human operation and weighs more than 200kg.

Incident – this defined as “An incident is any accident or event that is caused in the course of which involves:

- occupational illnesses;
- uncontrolled fire and explosions;
- any injuries;
- equipment plant or property damage;
- dangerous occurrences which could have, but did not injure any person;
- exposures to hazardous substances or circumstances;
- loss of environmental value;
- any other occurrence that could put employees or plant at risk.
Laboratory – A laboratory which has been accredited by NATA to carry out chemical analysis in conformity to the requirements of AS/NZS 4308:2008 Procedures for the collection, detection and quantitation of drugs of abuse in urine and AS 4760:2006 Procedures for specimen collection and the detection and quantitation of drugs in oral fluid.

Metabolite – A substance formed in the human body by a biochemical reaction. For the purposes of this policy its meaning shall be restricted to metabolites formed from drugs and as such the confirmed presence of a metabolite acts as a marker of drug use.

NATA – National Association of Testing Authorities

NIDT – Non Instrument Drug Testing Device

Non-prescribed drug – any drug legally obtained but not prescribed by a medical practitioner including, but not limited to “over the counter” medication.

Persons – Employees, contractors and visitors.

Port Area - The areas of the port under the control of the PHPA (land area within the security regulated port boundary including Wharf No.1, 2, 3 and Utah Point, and the harbour up to the fender line of BHP/FMG berths.

PHPA – Port Hedland Port Authority

POC – Point of Collection or Point of Care Device

Prescribed Drug – any substance prescribed by a medical practitioner that has restriction or specific instructions associated with its use.

Shall/Will – indicates that a statement is mandatory.

Should – indicates a recommendation.

Synthetic Products – refers to manmade products designed to mimic another product

Transportation – Any form of transportation controlled by a person for which a licence is required and other forms of transport capable of being used on public roads as such, but not limited to bicycles and animals.

4. REFERENCES

- AS 4760:2006 Procedures for specimen collection and the detection and quantitation of drugs in oral fluid
5. **ACCOUNTABILITIES**

See Appendix 1

6. **DUTY OF CARE**

The PHPA and all other employers have a “duty of care” under the *Occupational Safety and Health Act 1984* and *Mines Safety and Inspection Act 1994* to provide safe work places, safe systems of work and to eliminate safety hazards in the workplace. This duty of care includes taking reasonable precautions to ensure all individuals are in a fit state to work.

Employees also have a “duty of care” under Section 20 of the *Occupational Safety and Health Act 1984* and Section 10 of the *Mines Safety and Inspection Act 1994* to ensure a safe workplace exists for themselves and others.

7. **POLICY**

The PHPA maintains a Drug and Alcohol Policy which is endorsed by the CEO and Chairperson.
8. CONTRACTORS AND PORT USERS

8.1 Contractors and Port Users working at the Port are required to participate in this Fitness for Duty Procedure – Alcohol and Drug Module as well as the procedures which apply in the event of a confirmed positive test for alcohol or other drugs. There is an exemption for personnel that are covered by government legislation.

8.2 All organisations are required to have their own suitable testing, breach and support regimes for the personnel they are managing and/or providing. When working at the Port, the level of such regimes cannot be lower than the Port’s own regime. By conducting activities within the port this requirement will be deemed as accepted.

8.3 Personnel who refuse to undergo alcohol and other drug testing where required by this procedure shall be advised of the consequences. If they continue to refuse after being advised of the consequences they will not be permitted on any PHPA work site at any time in the future.

8.4 To demonstrate compliance with section 7.3 all companies accessing the Port will provide their procedure and data related to dates and times of testing as well as numbers tested upon request.

8.5 Contractors and Port Users will be able to self-test for alcohol at all times. A self-testing BAC unit will be made available at the security gates of both Utah and Eastern Harbour for those who wish to test for alcohol prior to entering the Port’s boundaries.

8.6 Contractors and Port Users requiring drug self-testing are to make contact with their direct line manager to facilitate self-testing prior to entering the Port’s Boundaries.

9. PERMITS

Functions on PHPA land involving the consumption of alcohol may be permitted, in writing by the Chief Executive Officer outlining the required conditions.

Off-duty Seafarers either returning to or departing from a ship at the PHPA berth will be exempted by permission of the Chief Executive Office unless there is any potential to cause harm to them, the PHPA facilities and/or other Port Users.
10. PRE-EMPLOYMENT TESTING

10.1 The PHPA requires employees to undertake an alcohol and drug test as a prerequisite to establishing the employment contract with the PHPA.

10.2 The results of such testing can be grounds to withdrawing an offer of employment.

11. ALCOHOL AND OTHER DRUGS

11.1 Emergency access to site
In the event of call back for an emergency, where a staff member has consumed alcohol and may have a BAC above 0.000, they must make their line manager aware that this is the case. The Manager in question is able to assess the situation and perform a risk assessment taking into account the following elements.

- The BAC reading of the person
- The likely consequences if this person does not enter the site
- Other available expertise or contingency plans that could be put into operation
- The tasks required to be completed by the worker

11.2 Alcohol and other drug testing

11.2.1 Taking part in random alcohol and other drug testing is a condition of entry to any PHPA site.

11.2.2 An employee will also be requested to provide a saliva or breath sample to a representative of PHPA or a testing agency designated by the CEO:

- Where there is reasonable suspicion or cause that the employee may be under the influence of alcohol or other drugs.
- When an employee has been involved in an incident. (as defined above)
- If the employee has previously returned a positive drug or alcohol result in the last 12 months.
- If the employee displays behaviours as outlined in Appendix 3 of this Procedure.
- If the employee commits any act of neglect or carelessness or breach of safety requirements.
- If a material decline in work performance or work attendance or any other irrational behaviour is apparent.
- Where they have contravened the PHPA Drug and alcohol policy statement and procedures in terms of alcohol or other drug use.

11.3 Breath analysis testing (positive result) – Disciplinary action
11.3.1 Where an employee returns a positive reading to a breath analysis during that person’s working hours the following shall apply;

11.3.2 Blood alcohol content (BAC) readings between 0.00 and 0.020:

- The employee will be relocated to an amenities room or the location of the evidentiary unit and will not undertake any tasks.
- The candidate will be retested after 20 minutes. If the blood alcohol content reading has fallen to 0.000 the candidate can resume their normal duties.
- If the blood alcohol content remains greater than 0.000% the person will be denied entry and this day will be taken as leave without pay or they may apply for an annual leave day.
- The employee will be offered alcohol counselling through the Employee Assistance Scheme
- For any second breach within 12 months of the first breach, a final warning will be issued and the employee will undertake compulsory alcohol counselling.
- If the employee refuses counselling, the employee may be dismissed.
- For any subsequent blood alcohol content reading within 12 months of the final warning an employee may be terminated

11.4 Breath alcohol content readings of 0.020 and above

- The employee will be relocated to an amenities room or the location of the evidentiary unit and will not undertake any tasks.
- The candidate will be retested after 20 minutes. If the blood alcohol content reading has fallen to 0.000 the candidate can resume their normal duties.
- The Confirmatory Breath Test form shall have a positive result recorded if the result remains above 0.000. They will have this reading ratified by having an evidential reading completed.
- The completed form will be retained on the personnel file.
  - If the reading is below 0.020% the employee can decide whether to drive home if they believe it is safe to do so.
  - If the reading is above 0.020% the employee is to make arrangements to be transported home. In the event that the employee is unable to do so, the PHPA (or the person’s employer where they are not a PHPA employee) can be requested to make the necessary arrangements.
  - The day will be taken as leave without pay or they may apply for an annual leave day.
- A final warning letter will be issued.
- Alcohol counselling will be offered to employees. If it is refused it will be noted on their file.
• For any blood alcohol content readings within 12 months of the final warning letter an employee may be terminated.

11.4.1 Disputing a Breath Test

Where a person wishes to dispute the results of a Blood Alcohol Breath tests they must do so immediately, they are then required to have an evidential reading completed.

A person declining to submit to this resolution process is deemed to have accepted the BAC Breath test result.

11.5 Calibration of Testing Equipment

11.5.1 Equipment used for alcohol breath testing must be calibrated in accordance with Australian Standard as/NZS 3547.

11.5.2 The HHI Alcolizer units currently used by the PHPA for alcohol breath testing must be calibrated every six (6) months or 300 tests, whichever comes first. A calibration certificate is issued when Alcolizer units are recalibrated. Calibration certificates are kept with the individual Alcolizer units.

11.5.3 Draeger Alco test 9510 evidential unit’s will be used to ensure that the reading gained on the HH1 is accurate. These units will reside at Eastern harbour and at Utah BHF. They will be calibrated on a rotation to ensure we have calibrated units for testing.

11.6 Saliva & Urine Testing

Shall occur for the following classes of drugs;

• Amphetamines
• Methamphetamines
• Opiates
• Cannabis (THC)
• Cocaine
• Benzodiazepines
• Synthetic Products

11.6.1 The PHPA will conduct a saliva test as the method of screening for the presence of prescribed or non-prescribed drugs, to the guidelines provided by the supplier / manufacturer of the testing equipment and to the relevant Australian Standard.

11.6.2 Should an employee return a positive result from a saliva test, the employee will be required to provide a urine sample to an accredited testing agency for confirmation testing immediately. Testing after an incident should be undertaken as soon as possible but within three hours.

If a positive reading is recorded and is consistent with declared medication eg codeine recorded and has taken Nurofen plus then a risk assessment will
need to be completed by the person and their line manager to ensure they are not at risk of incident due to possible impairment from the medication. If unsure then security personnel is to contact Senior Security Advisor.

11.6.3 The employee may nominate another person to attend and witness the urine sampling procedure provided that the witness undertakes to comply, and does comply, with all directions given by the representative of the testing agency.

11.6.4 The witnessing by a work colleague and/or the testing person shall be conducted on a basis of privacy, and with a suitable testing room that does not require the actual witnessing of the person urinating.

11.6.5 The employee must be provided with a duplicate copy of the laboratory’s test results.

11.6.6 The employee is to make arrangements to be transported home. In the event that the employee is unable to do so, the PHPA (or the person’s employer where they are not a PHPA direct employee) can be requested to make the necessary arrangements.

11.6.7 If the confirmation is positive for an illegal drug, the employee will be required to attend counselling for drug & dependency issues. A final warning will be issued and the employee will be subject to at least two (2) drug screens and confirmations, separate from random testing, over the following twelve months.

11.6.8 If the employee refuses dependency counselling, the employee at the discretion of the CEO may have their PHPA access withdrawn.

11.6.9 If a further positive test is taken within 12 months of the final warning, the employee will be terminated.

11.7 Tampering

11.7.1 Any employee, contractor or port user, who provides a substituted specimen or interferes with an oral fluid or urine specimen so as to prevent detection of a drug or metabolite, shall be dealt with under the PHPA disciplinary process. The person will be denied entry to PHPA sites.

11.7.2 Any visitor, who is suspected of substituting or adulterating an oral fluid or urine specimen, shall be removed from the workplace. No subsequent laboratory analysis of an oral fluid or urine specimen provided by a visitor or the provision of a further specimen from the visitor is required. In the event that the tampering is proven the person will be denied entry to PHPA sites.

11.8 Laboratory Testing of Urine

11.8.1 The only recognised standard that currently exists for the collection and analysis of human fluid samples for toxicological purposes in a laboratory setting is AS/NZS 4308:2008 Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine. However, while this standard is recommended and laboratories may state they conform to this standard, compliance is voluntary. Moreover, whilst there is a system of laboratory accreditation by the National Association of Testing Authorities (NATA), accreditation by NATA does not automatically mean that laboratories are accredited to comply with the Australian Standard.
11.8.2 PHPA will only use NATA laboratories that are accredited to Class 10.61.16 Drugs for Toxicological Purposes. This standard is important as it guarantees the technical quality and integrity of the tests.

11.8.3 Testing must follow a rigorous set procedure and shall be consistent with the requirements of AS/NZS 4308:2008. This standard includes but is not limited to the following:

- Oral Fluid samples - the subject of the test must receive a sample which they can have independently tested.
- Chain of custody - the time, place and each person who handles samples must be documented.
- Confidentiality.

Table 1 – On-site Initial Test target Concentrations

<table>
<thead>
<tr>
<th>Class of drug</th>
<th>Target concentration ng/mL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Opiates</td>
<td>50</td>
</tr>
<tr>
<td>Amphetamine-type stimulants</td>
<td>50</td>
</tr>
<tr>
<td>$\Delta^9$-tetrahydrocannabinol (THC)</td>
<td>25</td>
</tr>
<tr>
<td>Synthetic Products</td>
<td>Lab Test Only</td>
</tr>
<tr>
<td>Cocaine and metabolites</td>
<td>50</td>
</tr>
</tbody>
</table>

Table 2 - Confirmatory Target Concentrations

<table>
<thead>
<tr>
<th>Compound</th>
<th>Target concentration ng/mL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Morphine</td>
<td>25</td>
</tr>
<tr>
<td>Codeine</td>
<td>25</td>
</tr>
<tr>
<td>6-Acetyl morphine</td>
<td>10</td>
</tr>
<tr>
<td>Amphetamine</td>
<td>25</td>
</tr>
<tr>
<td>Methylamphetamine</td>
<td>25</td>
</tr>
<tr>
<td>Methylenedioxymethylamphetamine</td>
<td>25</td>
</tr>
<tr>
<td>Methylenedioxyamphetamine</td>
<td>25</td>
</tr>
<tr>
<td>$\Delta^9$-tetrahydrocannabinol (THC)</td>
<td>25</td>
</tr>
<tr>
<td>Synthetic Product</td>
<td>150</td>
</tr>
</tbody>
</table>
11.9 Payment

PHPA will pay the cost of one (1) re-test only for employees returning to work and contractors will directly incur all costs or re-testing following an initial positive result.

11.10 Refusing a Test

Where an employee fails to undergo testing, attend for assessment or participate in a rehabilitation program as requested, the disciplinary consequences shall be explained to the employee, and the request repeated. Further, failure to undergo testing shall be deemed as a failed screening result and the employee concerned shall have the disciplinary and counselling process applied.

12. PRESCRIPTION MEDICATION

All employees shall notify their supervisor or manager as soon as practicable of any medication they are taking which may affect their work performance (prescribed or over-the-counter).

Refer Appendix 2 for further information
13. DRUG SCREENING CUT-OFF LEVELS

13.1 These standards may vary as Australian Standards are amended.

13.2 The categories of drugs and substances prohibited by PHPA are listed below as per AS/NZS 4308:2008 for drugs of abuse.

13.3 Alcohol - [An employee with a blood alcohol content of more than 0.00%].

13.4 Opiates - [Morphine, codeine and monoacetyl morphine.]

13.5 Sympathomimetic amines - [Amphetamines, methylamphetamine, methylenedioxy methamphetamine (MDMA), phentermine, including ephedrine and pseudoephedrine.]

13.6 Cannabis metabolites - [Tetrahydrocannabinol-9-carboxylic acid (THC).]

13.7 Synthetic Products – advised by State Testing Laboratory

13.8 Cocaine metabolites - [Benzoyl ecgonine and ecgonine methyl ester.]

13.9 Benzodiazepines – [Oxazepam, temazepam, flunitrazepam, diazepam, nitrazepam, clonazepam or their metabolites.]

13.10 The Confirmatory Test Cut-off level (ug/L)\(^1\) for positive test results for each category in AS/NZS 4308:2008 is set out below:

- Morphine\(^2\) 300
- Codeine 300
- Amphetamine 300
- Methylamphetamine 300
- Methylenedioxymethamphetamine 300
- Phentermine 500
- Ephedrine 500
- Pseudoephedrine 500
- Tetrahydrocannabinol-9-carboxylic acid 35 100 (immuno-assay cut off for THCs)
- Benzoylecgonine 150
- Ecgonine methyl ester 150

\(^1\) All cut-off levels are expressed as total concentration of drug or metabolite after hydrolysis.

\(^2\) 6-acetylmorphine should be reported when detected at a cut off level of 10 ug/L.
14. Privacy

14.1 Confidentiality

14.1.1 The practices to be followed to ensure the highest levels of confidentiality are:

- Conversations relating to work performance or the misuse of alcohol or other drugs must be conducted in private;
- All documentation relating to the implementation of this procedure must be kept confidential;
- It is the responsibility of the Port to ensure that all counsellors providing services to their employees are aware of the confidentiality requirements relating to client information.

14.1.2 PHPA will respect the rights of employees to privacy in matters relating to the use of employee assistance or other counselling services, and communicate those rights to employees. The practices to be implemented are:

- Information relating to counselling must be treated as confidential.
- Psychologists are bound by their code of conduct to respect the confidentiality of information obtained in the course of their work. They may disclose such information to others only with the consent of the client or the client’s legal representative except in those cases where failure to disclose information would result in a clear danger to the individual or another person.
- Counsellors who are not psychologists are not required to be registered with a professional association and therefore may not be bound by a code of conduct. It is the responsibility of PHPA to ensure that all counsellors providing services to their employees are aware of the confidentiality requirements relating to client information.
- Employees may wish to have their manager liaise with their counsellor. In this case, the employee must give written permission for the information to be disclosed. The information that can be disclosed in such circumstances shall only be work-related, in order
to support the most effective management of a performance-related problem and the reintegration of the employee into the workforce.

- Where counselling is a compulsory requirement, the PHPA will need to be provided with a report as to, whether counselling is progressing satisfactorily, whether adjustments are needed to the employee’s work and whether the counselling is likely to lead to no further breaches occurring. A counsellor without divulging information of a personal nature can provide this information.

- See appendix 4 Workplace Assistance and Rehabilitation

14.2 Record Keeping

14.2.1 The privacy of any records relating to work performance and counselling, treatment or rehabilitation must be protected.

14.2.2 Records should only focus on the drug and/or alcohol issues as they relate to work readiness and performance.

15. APPENDIX 1 – Accountabilities

Management

Alcohol cannot be consumed within the Operational Port areas under any conditions due to the operations undertaken at both sites.

Alcohol may only be consumed in other PHPA areas if approved by the Chief Executive Officer, outlining the area to be used, date, time period and any conditions associated with the arrangement.

Managers and supervisors are responsible for taking prompt and appropriate action whenever there is a report or they have reasonable cause to suspect that, an individual may be impaired.

Managers and supervisors will maintain strict confidentiality in relation to:

any employee failing the impairment assessment;

any employee self-identifying; and

any employee being referred to rehabilitation and counselling.

Managers and supervisors will be provided with an appropriate level of education and training in relation to alcohol and other drugs in the workplace and how to effectively communicate any disciplinary procedures for failure to adhere to the PHPA procedure.

The PHPA will implement, monitor and review the Fitness for Duty Procedure – Alcohol and Drug Module in consultation with PHPA employee workplace representatives and the PHPA Health, Safety and Environment Committee.
Managers and supervisors will make reasonable workplace adjustments to support the rehabilitation of PHPA employees.

Managers and supervisors will encourage PHPA employees to use the Employee Assistance Program to support them and their families with issues of alcohol and other drug misuse.

Managers and supervisors will provide information about counselling, treatment and rehabilitation services where appropriate (outlined in Appendix 3).

Managers and supervisors are to liaise with the Human Resources or the Safety team for advice on application of this procedure including rehabilitation processes and disciplinary actions.

**Employee Responsibilities**

Employees must not commence work if they are not fit for work or if they are impaired by the influence of alcohol or other drugs that may affect their ability to safely perform their duties.

Alcohol cannot be consumed, possessed or stored within the Operational Port area under any conditions due to the operations undertaken at both sites.

Alcohol may only be consumed and stored in other PHPA areas if approved by the Chief Executive Officer, outlining the area to be used, date, time period and any conditions associated with the arrangement.

Employees must not consume, use or possess illegal drugs in the workplace.

In the case of prescription or pharmaceutical drugs, employees must discuss with their doctor or pharmacist whether their medication will impair them and adversely affect their ability to undertake their duties safely. If employees are unsure as to their fitness for work they must notify their supervisor or manager. Information can also be sought from the Health and Safety Advisor, or the Human Resources Manager.

Employees should report any suspected or known alcohol and other drug impairment to their manager or supervisor.

Employees are not to give prescription medication to others.

Employees should discuss with their manager, supervisor, Health and Safety Advisor, or OH&S representative if they are concerned about working with other employees because of a perceived safety risk due to suspected alcohol or other drug use.

16. **APPENDIX 2 – Prescribed medications**

**Prescribed or Over-The-Counter Medication Which May Cause Impairment**
PHPA Fitness for Duty Procedure  
Alcohol and Drugs Module: PR- HS 014

PHPA does not intend to test for prescribed medication; however the employee has an obligation under the *Occupational Safety and Health Act 1984* to inform the employer if they may be impaired by medication. There is an obligation to disclose any prescribed or over the counter medications when having a drug screen.

An employee does not have to disclose to the employer the type of medication that has been prescribed by their doctor or over the counter unless it effects their ability to perform tasks safely.

Employees should outline the duties of their job to their doctor or pharmacist and seek advice as to whether their safe performance will be affected by taking the medication.

Employees must not commence duties if their doctor or pharmacist indicates that it would not be safe to do so.

Depending on individual circumstances, where operationally possible employees who are unable to perform normal duties due to medication should be taken off normal duties and found suitable alternative duties or access accrued sick leave.

17. **APPENDIX 3 – Behaviours**

**Alcohol and other Drug Abuse in the Workplace**

The misuse of alcohol or other drugs may result in an observable decline in work performance. While it is not the responsibility of supervisors or managers to diagnose personal or health problems, they should be aware of the common indicators that suggest an alcohol or other drug problem may exist. The indicators include but are not limited to:

- Habitual lateness or excessive absenteeism;
- Extended lunch breaks;
- Aggressive outbursts;
- Problems with coordination, forgetfulness or ‘near miss’ incidents;
- Possible time management issues;
- Clear intoxication at work or signs of drinking prior to commencement of work. Signs of this may include:

  - strong smell of alcohol on the breath
  - slurred or incoherent speech
  - unsteadiness on their feet
  - red, bloodshot or watery eyes
  - flushed or ruddy face
  - noticeably smaller or larger pupils
  - lack of (or poor) muscle coordination
  - person may be aggressive or argumentative
  - person may be overexcited or agitated
simple instructions may not be followed
- drowsiness or asleep on the job or on work breaks
- difficulty in concentrating on a task or a conversation
- poor balance and coordination
- loss of inhibitions.
- Managers must take into account the possibility that a decline in work performance could be the result of illness, disability, fatigue or other personal factors not related to alcohol or other drug use.

18. **APPENDIX 4 – Workplace Assistance and Rehabilitation**

**Workplace Assistance for Alcohol or other Drug Abuse Problem**

PHPA employees with a problem relating to alcohol or other drug abuse may approach any of the following people within Port Hedland Port Authority for confidential advice and assistance:

- Human Resources Manager
- Safety Manager
- Health and Safety Advisor
- Their immediate manager or supervisor
- Any senior manager
- An OS&H Workplace Representative
- A Union Representative.

The PHPA employee shall be referred to the Employee Assistance Program (EAP) in the first instance.

**Rehabilitation**

1. PHPA encourages any employee who is having ongoing difficulty controlling their use of alcohol or other drugs to enter into a recognised drug &/or alcohol rehabilitation program. If a person self identifies, PHPA will be supportive and assist any PHPA employee in returning to work within a reasonable period of time.

2. The employee shall then consult either their own doctor or use the Employee Assistance Program to consult a recognised drug &/or alcohol rehabilitation provider.

3. PHPA will require evidence from the provider that the employee has commenced treatment and will require monthly reports of compliance and attendance with the treatment/program.

4. PHPA will require that the program and the provider have:
   - a record of success in dealing with people with drug problems; and
   - the capacity to identify when an employee is ready to return to work and the level of responsibility to which the employee can return; and
   - the willingness to provide a reasonable estimate of the time required for the employee to be suitable for return to work and if not in the short term to make such a statement.
5. A return to work plan will be arranged through the senior manager and Human Resources Manager and agreed to along the lines of existing return to work programs and can be gradual or total (depending on the advice of the provider and the employee’s doctors).

When Approaching an Employee who is suspected of having a problem

If an employee of PHPA believes someone they are working with (Port user, contractor or PHPA personnel) maybe impaired then it is incumbent on them to make someone aware. They may approach their supervisor, line manager, safety advisor, human resources or security personnel with their concerns; they must be acted upon with discretion and respect to all parties.

19. RESPONSIBILITIES

This procedure is the responsibility of the Health and Safety Manager.

20. PROCESS OWNER

The General Manager Risk and Governance has overall responsibility for this procedure.