

Document Details			
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Version history				
Version	Date	Author	Reason for new version	Sections affected
1.1	30/9/2025	HR Director (VW)	New Policy	All
1.2	2/12/2025	HR Director (VW)	New Clause	Clause 7

SRL Traffic Systems Ltd is committed to providing a safe and healthy working environment for all employees and those affected by our activities. SRL Traffic Systems Ltd operations will be carried out so as to ensure, so far as is reasonably practicable, that the Health, Safety or Conditions of any person or property will not be adversely affected. The misuse of drugs or alcohol by individuals can lead to an increased risk of accidents or incidents; the SRL Traffic Systems Ltd aim is to reduce these risks by means of the Policy, Procedures and Guidance set out in this document.

It is imperative that Colleagues make their Line Manager or Human Resources aware of any concerns over a dependency on substances as soon as possible and not only as a result of being selected for testing.

1. Purpose

Ensure that SRL Traffic Systems Ltd complies with relevant legislation relating to substance abuse at work (including without limitation The Health and Safety at Work etc. Act 1974, the Transport and Works Act 1992, the Misuse of Drugs Act 1971).

To take a proactive approach to ensure that our workplace is a drug and alcohol-free environment as part of our commitment to ensuring a safe and productive workplace, by ensuring that all relevant individuals are aware of this Policy and that anyone who declares (pre-testing) a drug, alcohol or substance related addiction or habit is given the necessary support.

Undertake measures to prevent persons attending work under the influence of illegal drugs, misused prescribed or over-the-counter medication or alcohol, using a testing regime; and provide information, instruction and awareness training to all Relevant Individuals on the health effects of alcohol and illegal drug

use, the principles of this Policy and the repercussions of a breach of it (including disciplinary procedures and dismissal).

2. Scope

This Policy is applicable to SRL Traffic Systems Ltd and trading divisions all officers and employees of the SRL Traffic Systems Ltd & trading divisions and all, consultants, contractors, and subcontractors or other third parties employed or engaged by or on behalf of SRL Traffic Systems Ltd.

This Policy will be communicated to all relevant individuals and reviewed on a regular basis. All amendments or updates will be communicated.

3. Definitions

Substances - Includes but is not limited to alcohol, drugs and solvents.

Alcohol - Includes, but is not limited to distilled spirits, liquor, beer, wine, malt liquor, or any other intoxicants used for beverage purposes.

Drugs - Any psychoactive substance (those drugs that affect mood, thought process or perception), available both legally and illegally.

Illegal Drugs - All those drugs covered by the Misuse of Drugs Act (1971) and amendments and the drug driving laws.

Dependency - Where the user has adapted physically and/or psychologically to the presence of alcohol, drugs or substances and would suffer if they were withdrawn abruptly.

Company Premises - To include all premises the Company has responsibility for and includes all Company vehicles. This policy also applies to all occasions where SRL Traffic Systems Colleagues and persons working for SRL Traffic Systems are on Company business, unless excluded with the agreement of an Executive.

Vehicle – any vehicle used for operational business purposes.

Impaired (Alcohol) - In terms of this policy any person who has Breath Alcohol Concentration that exceeds 35 mcg/100 ml in England, Wales and Northern Ireland and exceeds 22 mcg/100ml of breath in Scotland is deemed to be impaired due to alcohol and therefore in contravention of this policy.

Impaired (Drugs) - In terms of this policy, any person found to have consumed illegal drugs or used drugs in an unsanctioned or unreported way (to be confirmed by an agreed test method) is deemed to

be impaired due to the use of drugs and therefore in contravention of this policy. This policy is compatible with the Drug Driving laws.

Misuse - This applies to using substances in an unsanctioned way. For example, any illegal drug use, or using drugs for non-medical purposes without proper direction to do so from an appropriately qualified person such as a medical doctor or pharmacist. It also applies to using substances in a way that are harmful / hazardous to the individual or to others and which are likely to distort perception and response when at work.

Chain of custody - is the secure process that ensures the sample provided by an individual for drug testing is labelled, tracked, analysed and reported so that on completion of the laboratory analysis the result is specific to the original sample provided by the individual.

Colleague – This means any person who carries out work for SRL Traffic Systems both on and off SRL Traffic Systems premises, and includes but is not limited to directly employed Colleagues, agency staff and 3rd party workers, including Service partners, couriers, contractors and sub-contractors.

4. Guidelines and Rules

SRL Traffic System's policy is that the working environment should be free from the influence of substances. This policy will help to ensure that the health and safety of our Colleagues, and others with whom they come into contact, to maintain the efficient and effective operation of the business, and to ensure our customers receive the quality service they require.

Unless permitted otherwise in this Statement you must not be in possession of or consume:-

- alcohol; or,
- unless properly prescribed to you or purchased over the counter for a legitimate medical reason, any drugs;

whilst working on our sites or premises; working off-site; attending a Company event, other than at work related social events, or otherwise representing the Company.

You must not under any circumstances be under the influence of drug or alcoholic substances whilst on our sites or premises or working off-site.

Colleagues must remember that they are acting as ambassadors of SRL Traffic Systems and ensure their behaviour is appropriate, lawful and does not offend, harass or irritate others present, nor does it in any way, bring SRL Traffic Systems into disrepute or undermine our service.

Contravention of these rules is a very serious matter, and the Company reserves the right to take disciplinary action in the event of an infringement under the Company's disciplinary procedures, which may include dismissal.

5. Responsibilities

Employer Responsibilities

Within this policy, there are specific responsibilities to be undertaken by all managers. Action needs to be taken in the event of a suspected contravention of this policy, incident/accident or an individual showing signs of impairment due to substances. All managers have a responsibility to ensure that the procedures of this policy are properly enforced and followed.

- Ensure that this policy is implemented throughout SRL Traffic Systems
- To notify Colleagues, contractors and any associated Company of this Drug & Alcohol Policy and supporting procedures
- To monitor the effectiveness of the policy on an ongoing basis
- To ensure that the health and safety of those individuals under their management or supervision is not endangered through the misuse of substances in the workplace
- To take the appropriate action against those individuals whose job capability is impaired due to substances
- To take the appropriate action regarding those individuals who are in contravention of the Company's Drug & Alcohol Policy
- To refer to HR those individuals who volunteer that they may have a substance dependency or where they have a concern regarding an individual's possible dependency

Employee Responsibilities

Under the Health & Safety at Work Act 1974 (Section 7a), all Colleagues have a duty of care not only for their own health and safety, but the health and safety of others who may be affected by their acts or omissions.

Colleagues should familiarise themselves with the policy and the implications arising from a contravention of this policy.

It should be recognised that prescribed and over-the-counter medicines may cause impairment to an individual's performance at work. It is therefore the Colleague's responsibility to seek advice from their GP or pharmacist on any medicines they are taking. They should inform their line manager or HR, of any possible side effects of their medication. Any medical information will be treated in strictest confidence. Colleagues may be referred to the Company's Occupational Health Provider for advice.

Colleagues with genuine concerns about any Colleague in relation to substance misuse or dependency should be made aware of their responsibility for taking those concerns to their Line Manager or HR, with the relevant supporting evidence. Such concerns will be taken seriously and mechanisms for dealing with them are in place. Any Colleague should feel able to raise genuine concerns appropriately without fear of victimisation; however, this must be done with proper regard to principles of veracity and confidentiality.

It is imperative that Colleagues make their Line Manager or Human Resources aware of any concerns over a dependency on substances as soon as possible and not only as a result of being selected for testing. If an individual fails to declare a drug or alcohol dependency and a for-cause test becomes necessary, if that individual fails the for-cause test, the Company's Disciplinary Policy may be applied.

6. Procedures

All tests will be performed by an impartial collection agency specialising in drug and alcohol testing.

Induction Testing

The Company reserves the right to test any new employee during their induction. The test will be performed by an impartial collection agency specialising in alcohol and drug testing and will consist of an FDA (Food and Drug Administration) approved swab test to acquire oral fluid. Any evidence of illicit drug use will be deemed as a positive result and SRL Traffic Systems will not continue the employment process with the applicant.

Random Testing – Drugs / Alcohol

The test will be unannounced and will be completed on a reasonable and proportional basis of employees at each depot / office.

The test will be carried out by an impartial collection agency specialising in alcohol and drug testing. The procedure for the administration of this test is as follows:

- The Colleague will be removed from their duties and asked to wait in a private area where the nature of the test will be explained and the implications of a positive test result or a refusal to consent or provide a sample for testing
- Upon the arrival of the approved collection agency representative, (or by the nominated Company representative), the Colleague will be asked to complete
 - and sign a consent form to enable the test to take place. Failure or refusal to complete this will be viewed as a positive test result and the appropriate disciplinary proceeding will be implemented
- The approved collection agency representative will collect the oral fluid via a swab test
- The oral fluid sample will be split into two samples (A and B) and both will be delivered to an approved laboratory following strict chain-of-custody procedures, where it will undergo initial analysis and if required confirmation analysis to ascertain the exact identity of the substance(s) found

The Colleague will return to work pending the outcome of the laboratory result.

If the laboratory confirmation analysis result is positive then the Colleague shall be informed accordingly and suspended from work on full pay (if applicable) pending the implementation of disciplinary investigations.

If the laboratory result is negative, the Colleague will be informed accordingly.

For Cause Testing – Drugs / Alcohol

The test will be performed by an impartial collection agency specialising in alcohol and drug testing.

The test will comprise of a breath sample collection using a calibrated digital Alcolmeter, similar to those employed by the police.

The approved collection agency representative will collect the oral fluid sample in accordance with strict chain of custody procedures.

7. Prescription Medication Disclosure and Verification

Where an employee declares the use of prescription medication during random or for-cause drug and alcohol testing, the following process will apply:

- The employee will be placed on special leave pending verification of the prescription.
- The employee must provide written proof of prescription issued by a certified General Practitioner (GP) or hospital within 48 hours.
- Failure to provide satisfactory proof of prescription may result in the matter being treated as a breach of this Policy and subject to disciplinary action.
- Once proof of prescription is verified, the Company will assess whether the medication impacts the employee's ability to safely perform their duties and determine appropriate next steps, which may include a return to work, modified duties, or continued leave

8. Help and Support

SRL Traffic Systems endeavour to ensure that advice and specialist help are made available to any Colleague who feels they have or are developing a dependency relating to any substance and seeks help from the Company.

Any Colleague who seeks the assistance of the Company in obtaining help and support for an alcohol, drug or other substance problem is assured of their confidentiality being respected.

Early identification and treatment are essential for any Colleague dependency and therefore any problems for the Colleague and the Company are avoided. Colleagues should come forward and seek assistance at the earliest possible opportunity. Colleagues should contact their line manager or HR

who may arrange for the appropriate course of treatment or rehabilitation programme to be made available.

During any period of absence from work for agreed treatment, the Company's normal sick pay arrangements will apply (where applicable) and absence for treatment will be treated as normal sickness.

If an agreed or recommended course of treatment is not followed by a Colleague or is ineffective and occurs concurrently with lapses in the Colleague's performance, conduct or attendance, then they will be dealt with in accordance with the Company's normal disciplinary or sickness absence procedures as appropriate. This includes any matter arising prior to the disciplinary procedure being suspended.

Testing may be carried out to ensure compliance with the treatment and recovery programme. This option will be agreed with the Colleague before the commencement of the treatment and recovery programme.

The aim of treatment and rehabilitation is to ensure optimum recovery and return to work.

Any Colleague with a substance dependency who only declares they have a dependency when a serious misconduct issue has arisen, before a test takes place, or where they are proven to be in contravention of this policy, will be subject to the same disciplinary procedures as any other Colleague who contravenes this policy.

9. Drugs / Alcohol Appeal Procedure

A Colleague may appeal against the positive result of an alcohol or drugs test at the appeals stage of any disciplinary procedure. The Colleague may only appeal against a positive result on the grounds either that:

- They believe the alcohol test result is inaccurate in which case they will be responsible for all costs for the checking of the calibration of the instrument; or
- They believe the drug test result to be incorrect; in which case they will be responsible for all costs for testing the B sample.

If a Colleague wants to instigate the appeals procedure against a positive test result, they must request in writing to HR their intention to appeal. This must include their reasons for the appeal with any information that they believe could have affected the test result, and any supporting evidence they intend to use as part of the appeal.

HR must receive the letter or e-mail within 3 days of the initial test date or result. Any information contained in the appeal letter, the Company shall ensure that it remains compliant with the scope of all Data Protection and to the Colleagues sequential rights to confidentiality. Where a Colleague's application to appeal is over the 3 days allowed, the appeal will be deemed null and void.

Alcohol – A written request can be made to SRL Traffic Systems, and the provider will supply a copy of the report to show calibration of the Alcolmeter to ensure the result was valid and correct.

Drugs – At the Colleague's expense, the Colleague must select the laboratory for testing the B Sample within 2 days of informing the Company of their decision to appeal. If the colleague fails to follow the above timeline they will forfeit their right to testing the B Sample.

Colleagues may appeal against disciplinary action taken against them following contraventions of this policy through the normal disciplinary process.

This Policy Statement is reviewed annually.

Dated: 2nd December 2025