



# Royal Flying Doctor Service of Australia Central Operations

## **DRUG & ALCOHOL MANAGEMENT POLICY**

Issue No. 01, Version No. 06, Revision date: 03/03/2020

# Drug and Alcohol Management Plan

Issue No: 01, Revision No: 06, Revision Date: 03/03/2020

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# 1. Drug and Alcohol Management Plan/Policy

Issue No: 01, Revision No: 06, Revision Date: 03/03/2020

## 1.1 Introduction

This document is the RFDS CO Drug and Alcohol Management Plan (DAMP). RFDS CO is required by Part 99 of the Civil Aviation Safety Regulations 1998 (CASRs) to develop and implement a DAMP, covering persons who perform, or are available to perform, a safety-sensitive aviation activity (SSAA).

The requirement for various organisations, including RFDS CO, to develop and implement a program has been introduced into the CASRs in order to enhance safety benefits and other outcomes for the aviation sector.

The RFDS is committed to safety and in addition to meeting its statutory workplace and aviation requirements, this program seeks to control the risks associated with the consumption of alcohol and those associated with drugs and some medications.

RFDS CO is obliged to develop, implement and maintain a program meeting the requirements of the CASRs from 23 March 2009.

This is an important document that all personnel should read carefully and familiarise themselves with.

## 1.2 Scope

This policy applies to all RFDS CO staff at all locations including volunteers, contractors and their subcontractors. RFDS CO considers that all operational and non-operational staff contributes significantly to the safety, efficiency and quality of the RFDS CO service and as such only small distinctions are made between Safety Sensitive Aviation Activity staff and other staff as defined herewith. The scope of the policy extends to the holistic management of drugs and alcohol in the workplace and is not confined to drug testing alone.

## 1.3 Policy

It is a condition of employment that RFDS CO staff do not, by the consumption of alcohol, or the taking of drugs or certain medications, place themselves or others at risk, breach any applicable law or bring RFDS CO into disrepute in the course of their duties.

RFDS CO takes the issue of drugs and alcohol in the workplace very seriously particularly in light of the safety critical nature of the service

This policy serves to strike a balance between supporting and assisting staff who may have drug and alcohol dependency issues and taking a strong stance against harmful drug and alcohol use. Failure to comply with any aspect of the RFDS CO DAMP may result in disciplinary action.

Staff who have an RFDS CO requirement to maintain work licences for the operation of equipment, craft or vehicles in the course of their duties (e.g. for flying, driving or other activities) and have the licence revoked by a regulatory body will also face disciplinary action.

This may occur where the staff member is unable to fulfil the requirements of their employment contract. (i.e. undertake all tasks, duties and responsibilities associated with their role) or in the case of a company provided vehicle in the event that an employee's license is suspended, this may result in the return of the vehicle for the period of the suspension and /or disciplinary action.

## 1.4 References

- Work Health and Safety Act SA / NT 2012 (WHS Act 2012)
- Civil Aviation Act 1988 (CAA 88)
- Civil Aviation Safety Act 1988 (CASA 88)
- Civil Aviation Safety Regulations 1998(CASR 98) CAR 99
- South Australian Road Traffic Act 1961(SARTA 61)
- Northern Territory Traffic Act 1979 (NTTA 79)
- RFDS CO Guidelines for Expected Behaviour
- AS/NZS 4308 Procedures for specimen collection and detection and quantification of drugs of abuse in urine.

## 1.5 Definitions/Abbreviations

Accident means:	<p>An occurrence that arises out of a person performing or being available to perform an applicable SSAA or an occurrence that arises out of the use of an RFDS provided vehicle if either or both of the following applies;</p> <ul style="list-style-type: none"><li>• the occurrence gives rise to danger of death or serious harm to a person; or</li><li>• the occurrence gives rise to danger of serious damage to an aircraft or property.</li></ul>
Aerodrome testing area means:	<ul style="list-style-type: none"><li>a. any surface in a certified aerodrome or registered aerodrome over which an aircraft is able to be moved while in contact with the surface of the aerodrome, including any parking areas; and</li><li>b. any part of the surface of a certified aerodrome or registered aerodrome:<ul style="list-style-type: none"><li>◦ that is not covered by paragraph (a); and</li><li>◦ that does not have a building on it; and</li><li>◦ from which access to a surface mentioned in paragraph (a) may be had; and</li></ul></li><li>c. a building located on a certified aerodrome or registered aerodrome that is used:<ul style="list-style-type: none"><li>◦ for maintenance of an aircraft or an aeronautical</li></ul></li></ul>

	<p>product; or</p> <ul style="list-style-type: none"> <li>◦ for the manufacture of aircraft or aeronautical products; or</li> <li>◦ by an air traffic service provider to control air traffic; or</li> <li>◦ by the holder of an AOC for flying training; and</li> </ul> <p>d. any part of an aircraft, aerobridge or other moveable structure in a certified aerodrome or a registered aerodrome.</p> <p>Appropriately qualified alcohol and other drug professional means a person who:</p> <ul style="list-style-type: none"> <li>a. materially works as a provider of clinical drug and alcohol treatment services; and</li> <li>b. holds a bachelor degree, or postgraduate degree, in at least 1 of the following fields: <ul style="list-style-type: none"> <li>i. health sciences;</li> <li>ii. medical science;</li> <li>iii. social sciences;</li> <li>iv. behavioural sciences.</li> </ul> </li> </ul>
Comprehensive assessment means an examination of the person's physiological and psychosocial indicators carried out:	<p>by a psychiatrist; or</p> <p>by a medical practitioner who is a Fellow of the Australasian Chapter of Addiction Medicine; or</p> <p>jointly by:</p> <ul style="list-style-type: none"> <li>i. a person entitled to practise as a medical practitioner under a law of a State or Territory; and</li> <li>i. an appropriately qualified drug and alcohol professional.</li> </ul>
DAMP:	Drug and Alcohol Management Plan/Policy
DAMP Contact Officer:	The Principal Advisor Aviation Safety, Quality and Compliance who liaises with CASA, and any other authorities in relation to the DAMP
DAMP Supervisor	DAMP Supervisor: Trained Senior Staff, Supervisors and Managers of SSAA staff has received training on aspects of prevention and management of problematic AOD use, under the organisational DAMP. It is the DAMP Supervisor to whom employees report their concerns about medications they are taking. Additionally, the DAMP Supervisor has access to the Medical Review Officer (MRO) for advice and clarification as required.
MRO:	<p>Medical Review Officer is a person who meets the following criteria:</p> <ul style="list-style-type: none"> <li>• a registered medical practitioner</li> </ul>

	<ul style="list-style-type: none"> <li>• has competence in the field of interpreting drug and alcohol test results</li> <li>• has knowledge of substance use disorders</li> <li>• has knowledge of the relevant provisions of the CASRs</li> </ul>
Positive Result	<p>Positive result means the following: In relation to a drug or alcohol test of a body sample the test results reveals:</p> <ol style="list-style-type: none"> <li>a. for an initial drug test - a test result above the permitted level.</li> <li>b. for a confirmatory drug test - a test result above the permitted level and verified by a Medical Review Officer (MRO) as a verified positive result</li> <li>c. for an initial alcohol test - a test result above the permitted level</li> <li>d. for a confirmatory alcohol test - a test result above the permitted level</li> </ol>
Regular SSAA Employees	<p>Regular SSAA Employees means SSAA staff who are reasonably likely to perform an applicable SSAA at least 2 or more times every 90 days.</p>
SSAA	<p>Safety Sensitive Aviation Activity is:</p> <ul style="list-style-type: none"> <li>• any actions undertaken by a person in an aerodrome testing area (including the persons presence in the area) other than as a passenger</li> <li>• any of the following activities, wherever they occur: <ul style="list-style-type: none"> <li>◦ calculation of the position of freight, baggage, passengers and fuel on aircraft</li> <li>◦ the maintenance, certification of maintenance or manufacture of aircraft, aeronautical products, ground based navigation aids or radar</li> <li>◦ the fuelling and maintenance of vehicles that will be used to fuel aircraft on aerodrome testing areas</li> <li>◦ activities undertaken by an airport security guard or screening person in the course of their duties as a guard or person</li> <li>◦ activities undertaken by a member of the operating crew of an aircraft in the course of that persons duties as a crew member</li> <li>◦ the loading and unloading of trolleys containing baggage for loading onto aircraft or unloading from aircraft and the driving of such trolleys</li> <li>◦ activities undertaken by an air traffic controller in the course of the controller's duties as a controller, or the supervisor of such a person</li> <li>◦ the provision of aviation fire fighting services; and</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>activities undertaken by a member of the OCC team.</li> <li>providing flight information and search and rescue alert services:</li> <li>to a pilot or operator of an aircraft immediately before the flight of the aircraft,</li> <li>to a pilot or operator of an aircraft, during the flight of the aircraft;</li> <li>as an intermediary for communications between a pilot or operator of the aircraft and an air traffic controller</li> </ul> <p>RFDS CO also classify any activities undertaken by a member of staff to deliver Health Services as SSAA even through those activities may not be directly related to aviation activities.</p>
Serious Incident	An incident involving circumstances indicating that an accident nearly occurred.
SSAA Employees:	Staff undertaking SSAA who hold ASIC passes for the RFDS CO. Category 1 contractors undertaking SSAA work for the RFDS are considered SSAA Employees for the purpose of this DAMP.
SSE:	Safety Sensitive Employees. Staff who undertake Safety Sensitive Aviation Activity (SSAA) and RFDS CO direct managers of SSAA.

## 1.6 Content

The drug and alcohol management plan has three key components:

1. Drug and alcohol education program
2. Drug and alcohol testing program
3. Drug and alcohol response program

## 1.7 Responsibilities

### 1.7.1 Responsibilities of RFDS CO

RFDS CO is legally required to, and will, comply strictly with its obligations under this program.

RFDS CO expects that all employees will similarly comply with their obligations under this program. Employees need to be aware that failure to do so may result in:

- Them committing an offence against the CASRs, for which prosecution or infringement action may be taken by the Civil Aviation Safety Authority or the Commonwealth Director of Public Prosecutions; and/or
- RFDS CO taking disciplinary action against its employees or contractual action against contractors or sub-contractors



RFDS CO will:

- For new SSAA employees, make this program available to each SSAA employee before that person begins to perform, or become available to perform, a SSAA;
- For current SSAA employees, make this program available to each SSAA employee by the end of the working day on which the employee next performs or is available to perform a SSAA;
- Not permit a SSAA employee to perform or be available to perform a SSAA in the following circumstances:
  - if a DAMP Supervisor suspects the employee's faculties may be impaired due to the person being under the influence of a testable drug or of alcohol;
  - if an accident or serious incident has occurred which involved the employee while he or she is performing or available to perform a SSAA and either:
- for the period that suitable test conditions exist for conducting drug or alcohol tests on the employee - a test has not been conducted; or if tests have been conducted - RFDS CO has not been notified of the test results;
  - if a SSAA employee has been required to cease performing, or being available to perform, SSAA duty because of an incident related to alcohol or drugs, not permit that SSAA employee to again perform or be available to perform SSAA duty until all mandatory pre-conditions have been met; and
  - provide periodic reports to the Civil Aviation Safety Authority about its administration of this DAMP or its dealings with its SSAA employees who have been subject to alcohol or drug testing by CASA.

As this policy directly affects the health and safety of staff and those that are within our area of operation, they will be provided with all necessary information regarding rights and responsibilities under the DAMP.

### 1.7.2 Responsibilities of all RFDS CO Staff / Employees

All staff have the responsibility to abide by this policy and to:

- Report any drug and alcohol related incidents which may or do impact on safety to a DAMP Supervisor or the DAMP Contact Officer (all reports will be treated in strict confidence)
- Report any drug and alcohol issues which may impact on their own ability to work safely (all information will be treated in the strictest confidence)
- Comply with any approved external, internal, random or targeted drug and alcohol testing request where required by statute or by this RFDS CO Policy
- Attend any drug and alcohol training required under this DAMP
- Attend a nominated drug and alcohol intervention program at the request or recommendation of an MRO
- Liaise with their medical practitioner if they believe a therapeutic drug, medical treatment, procedure or medical investigation may impact on their work safety
- Not interfere with any body sample they provide for drug and alcohol testing
- Not commence work if affected by drugs or alcohol until deemed as safe by confirmatory testing and medical opinion

Failure to comply with this policy may result in disciplinary action and/or prosecution or infringement action by CASA and/or other statutory bodies.

### 1.7.3 Responsibilities of RFDS CO DAMP Contact Officer

RFDS CO has appointed the following persons as its DAMP contact officer, and their role is to liaise with the Civil Aviation Safety Authority in relation to RFDS CO responsibilities in connection with this program:

Janet Inman

Principle Advisor Aviation Safety, Quality and Compliance

Mobile: 0477 700 119

The secondary contacts are:

Damien Heath Head of Flying Operations Mobile: 0428 832 747	Vikki Denny Nursing Director Mobile: 0400 998 902
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#### Note

While the secondary contacts have interchangeable qualifications in this role, it is preferred that when possible the contact will be related to the discipline involved in the scenario.

### 1.7.4 Responsibilities of RFDS CO DAMP Supervisors

RFDS CO has appointed key personnel as DAMP Supervisors.

DAMP Supervisors have been trained how to form an opinion as to whether a person may be adversely affected by a testable drug or under the influence of alcohol, and are authorised by RFDS CO to form such an opinion in appropriate cases.

Where a DAMP Supervisor forms that opinion, they must require a SSAA employee to cease performing or being available to perform a SSAA.

Where required to do so by a DAMP Supervisor, SSAA employees of RFDS CO must cease performing or being available to perform a SSAA.

Accordingly, they have the responsibility to:

- Attend DAMP Supervisor training
- Monitor staff work presentation and performance
- Assess whether an employee may be adversely affected by drugs or alcohol
- Approach and counsel staff where in their assessment of the employee there is reasonable reason to suspect that they may be affected by drugs and alcohol as it impacts on their work
- Assess whether an employee affected by a banned drug or alcohol must cease a work activity (including a SSAA)

- Take any reasonable immediate steps to prevent harm due to any potential or actual risk created by drug and/or alcohol consumption
- Impose disciplinary measures where required
- Refer any at-risk employee to the RFDS CO Employee Assistance Program
- Recognise that where a positively tested staff member is subsequently cleared by a MRO, the employee is deemed as having no longer tested positive for drugs and/or alcohol
- Maintain strict confidentiality with all information pertaining to an employee's drug and/or alcohol issue, at all times
- Identify an employee that requires 'Post accident and serious incident' Testing as per 4.2.2 and ensure that the RFDS CO DAMP Contact Officer or secondary DAMP Contact Officer is notified.

Contact details for all DAMP Supervisors are on the Telephone Listing located on the CEO & Administration web page.

It is a serious breach of RFDS CO policy for any DAMP Supervisor to ignore any responsibilities referred above and /or exercise their function and powers for an improper purpose.

### 1.7.5 Responsibilities of SSAA Staff / Employees of RFDS CO

Must disclose to RFDS if they have consumed a level of alcohol, or are taking any drug, that may affect his or her ability to carry out a SSAA;

Must not perform, or be available to perform, a SSAA if aware that they are adversely affected by a testable drug or by alcohol, until he or she is no longer adversely affected;

Give consideration to CASA's recommended periods for no-flying/no controlling when scheduling certain medical treatment, procedures and investigations;

Are subject to drug and alcohol testing under this program while performing, or being available to perform, a SSAA for RFDS CO;

Will be required to provide a body sample if they are to be tested for drugs and alcohol by RFDS CO for the purposes of conducting such tests;

Must cease performing or being available to perform SSAA if they:

- return a positive result for a drug or alcohol test
- fail to comply with a request by an approved tester to provide a body sample for CASA drug and alcohol testing;
- fail to comply with a request to provide a body sample for RFDS CO drug and alcohol testing under this program;
- interfere with a body sample they provide for drug or alcohol testing by CASA or RFDS CO;

If required to cease performing, or being available to perform, SSAA duty because of an incident related to alcohol or drugs, must not again perform or be available to perform SSAA duty until all mandatory pre-conditions have been met.

Category	Explanation	Specific staff
Safety Sensitive Staff / Employees	Staff who undertake Safety Sensitive Aviation Activity (SSAA) and direct RFDS CO managers of SSAA	Pilots Flight Crew Aviation Engineers Operations Communications Coordinators ASIC holders undertaking airside work Medical Officers Healthy Living Program Staff Mental Health Clinicians Other Allied Health Services staff employed Direct RFDS CO Managers of SSAA
Non Safety Sensitive Staff / Employees	All staff that are not SSAA or direct RFDS CO managers of SSAA	Non-operational staff* RFDS CO Managers of Non SSAA staff

\*CASA reserves the right to deem any staff member a SSAA staff.

#### 1.7.6 Managers and Supervisors of non SSAA staff / Employees

Senior staff, Supervisors and Managers must report to the RFDS CO DAMP Contact officer for assistance on managing DAMP within their teams.

#### 1.7.7 Volunteers

Volunteers have the same rights and responsibilities with respect to this program as non-safety sensitive activity staff.

#### 1.7.8 Medical Review Officer (MRO)

The MRO is an external, independent, non-RFDS CO Medical Practitioner appointed by RFDS CO with competence in the field of interpreting drug and alcohol test results, knowledge of substance disorders and a knowledge of drug and alcohol statutory requirements. The MRO is responsible for:

- Reviewing any positive, confirmatory alcohol or other banned drug test result to determine whether the positive result was as a result of a therapeutic drug or some other source
- Reviewing medical information concerning an individual's failure to give a body sample because of a claimed medical condition

Determining in consultation with the treating clinician, an individual's ability to return to a SSAA or other role.

The nominated MRO for RFDS CO is:

Dr Tschirn - WorkAir Management Group Pty Ltd

Phone: (08) 8355 9400 | Mobile: 0452 217 441 | Fax: (08) 8234 3383

### 1.7.9 Staff Driving for Work Purposes

A motor vehicle used for discharging work duties and /or purposes is, by definition, a workplace meaning that drug and alcohol provisions in the respective State and Territory workplace safety legislation apply whilst driving for work reasons. State and Territory road traffic legislation imposes stringent requirements on motorists, including those driving for work purposes.

The SA Road Traffic Act 1961 imposes blood alcohol concentration limits on alcohol intake and total prohibition of illegal drugs.

In the Northern Territory, it is an offence under the Traffic Act 1987 when a person is under the influence of intoxicating liquor, drug or psychotropic substance to such an extent as to be incapable of having proper control of the motor vehicle.

The RFDS CO Motor Vehicle Policy should be read in conjunction with these provisions.

### 1.7.10 Staff Attending Social Functions and Events

RFDS CO expects that all staff will act in a mature, responsible and law abiding manner at functions and events where they represent RFDS CO as required by the Guidelines for Expected Behaviour. Where practicable and where RFDS CO has some control over such functions or events, RFDS CO management will take reasonable steps to minimise the risk of harm such as:

- Reminding staff of the above policy before the event
- Encouraging staff to make safe transport arrangements for themselves, partners and co-workers

It is an RFDS CO expectation that all staff will exercise due care and take personal responsibility for their actions.

## 1.8 Contractors and Sub-Contractors and their requirements regarding DAMP policy

The RFDS CO DAMP applies to and will be made available to contractors, their employees and subcontractors undertaking SSAA work on RFDS premises.

All contractors, their employees and subcontractors will be made aware of the DAMP Policy and may be randomly tested when on RFDS CO premises.

Throughout this section Contractors, their employees and Sub Contractors will be referred to as Contractors.

Contractors the RFDS use fall into three groups:

### **Examples of each of these Categories:**

1. Contractors retained to carry out SSAA on RFDS premises– e.g. Contract Engineering support.
2. Contractors retained to provide a SSAA service on the premises of the contractor using a SSAA employee working under the control and direction of the contractor. – e.g. Off Site Propeller Overhaul
3. Contractors retained to carry out non SSAA (any actions undertaken by a person in an aerodrome testing area is classified as SSAA) – e.g. Office IT.

### **Category 1 - The RFDS CO consider these individuals part of the RFDS CO for the purpose of DAMP.**

All category 1 contractors will be required to undergo the RFDS Contactor DAEP and will be subject to the requirements of the Contractor Management policy.

Should the contractor employee undertake regular SSAA they will be required to undertake a pre employment Drug and Alcohol test with a RFDS CO approved testing provider as detailed under Section 3.

Category 1 SSAA contractors may be exempt from the pre-employment Drug and Alcohol test requirement if there is a written contract between RFDS CO and the contracting organisation, and that organisation has a DAMP-like program in place which is applicable to the employee. The RFDS must agree in writing that the DAMP-like program that covers the contracting employee is to apply instead of the RFDS DAMP in relation to the employee's performance of, or availability to perform, the applicable SSAA for RFDS CO.

The category 1 contractor is also subject to Drug and Alcohol testing.

The outcome of any test must be provided to the RFDS CO with the expectation that the result is clear and shows no evidence of either drug or alcohol use. It is noted that some over-the-counter and prescription therapeutic drugs may produce positive test results.

Category 1 contractors testing positively will be reported to their employer and will not be permitted to provide services for RFDS CO until medically cleared and they have meet the requirements of Returning to Safety Sensitive Aviation Activities of the DAMP.

Category 2 – Contractors undertaking SSAA work/activities on behalf of the RFDS are required to have their own DAMP in place. Should a Category 2 SSAA employee test positive for alcohol or prescribed drugs, and the SSAA employee had recently been performing tasks directly related to RFDS operations, the Category 2 contractor is to notify the RFDS Damp Contact immediately. The RFDS CO Head of Engineering will then be notified immediately. The Head of Engineering will review the tasks that the SSAA employee or contractor has performed during the period in which the drugs or alcohol may have impaired the person's performance and will make a determination, using a risk based approach, to the impact that may have been caused by any potential impairment on the safety of operations. Where there is a potential risk a mitigation plan will be implemented.

Should at any stage the SSAA contractor be required to attend a RFDS premises to undertake SSAA, they will become a Category 1 contractor for the duration they are on RFDS premises.

**Category 3 – Category 3 contractors are subject to the requirements of the Independent Contractor Management policy.**

There is no requirement to have these contractors undertake the DAEP or be DAMP tested; however they may be subject to random testing. Should any of these contractors undertake regular SSAA on RFDS premises (any actions undertaken by a person in an aerodrome testing area is classified as SSAA) they will become category 1 contractors.

## 2. Drug and Alcohol Education Program (DAEP)

### 2.1 Pre-Employment

At interview all potential employees are advised of their requirements to participate in DAMP.

The successful SSAA applicant is advised of the need for a pre-employment Drug and Alcohol test. The Drug and Alcohol testing is undertaken by Medvet or other approved organisation.

Job applicants will not be employed in the event of a confirmatory positive test which cannot be attributed to a therapeutic drug or an agent.

### 2.2 Induction

All new SSAA employees are provided with a welcome pack prior to commencement which details the RFDS DAMP. Upon commencement SSAA employees are required to attend a company induction/orientation.

At the induction/orientation the policy is discussed in detail with a focus on following:

- Employees are encouraged to speak with their supervisor/manager (or DAMP Supervisor) if they believe they are at risk of a positive result.
- RFDS CO policy on drug and alcohol use
- Drug and alcohol testing in RFDS CO including employees are required to participate in CASA and RFDS Random Drug and Alcohol Testing program.
- Support and assistance services for people engaging in problematic use of drugs and alcohol
- Information about the potential risks to aviation safety from problematic use of drugs and alcohol
- Raising awareness to CASA's recommended periods of no-flying/no-controlling following certain medical treatments, procedures and medical investigations.

On completion of induction/orientation employees are required to acknowledge and sign the RFDS policy compliance declaration form indicating that they are required to abide by all RFDS policies and procedures at all times.

SSAA employees shall not commence SSAA until the successful completion of the RFDS induction/orientation.

New DAMP Supervisors are required to complete the CASA DAMP Supervisor training as part of their induction/orientation. DAMP Supervisors shall not commence DAMP Supervisor duties until the successful completion certificate has been provided to the Principal SQR Advisor or QSA. DAMP Supervisors will be entered onto the DAMP Supervisors list by the Principal SQR Advisor or the QSA.

New DAMP Supervisors are required to undertake both the RFDS CO DAEP and CASA DAMP Supervisor training.



A designated representative from RFDS CO's People and Culture shall ensure that completion dates for all SSAA induction/orientation DAMP staff training and DAMP Supervisor training is entered into Air Maestro Recency for ongoing training requirements.

## 2.3 Ongoing

RFDS CO will provide refresher education to all SSAA Staff at an interval of no longer than 30 months. All SSAA employees of RFDS CO are required to attend a drug and alcohol education program. All SSAA employees are to complete the required associated RFDS CO DAMP education program test with a pass outcome. Completion of the training shall be recorded by RFDS CO People and Culture.

DAMP Supervisors are to complete the required CASA online training and the associated test with a pass outcome. On successful completion of the training a Certificate of Completion shall be lodged with the People & Culture department for recording.

DAMP Supervisors are required to complete both the RFDS CO DAEP and CASA DAMP Supervisor training.

RFDS CO will ensure that all staff, including, SSAA staff and DAMP Supervisors have access to a drug and alcohol education program:

- for SSAA staff and DAMP Supervisors employed prior to 23 March 2009; or for personnel who are to become SSAA staff and DAMP Supervisors after 23 March 2009 at induction and prior to the employee performing or being available to perform a SSAA.

A designated representative of RFDS CO People and Culture department shall ensure that completion dates for all SSAA staff training and DAMP Supervisor training into Air Maestro Recency. Air Maestro will alert staff when DAMP Supervisor or Refresher Training is due. The Principal Advisor Aviation, Safety, Quality and Compliance will ensure that training is in accordance with the CASR 99 regulation and be spaced at not greater than 30 month intervals.

Any staff member required to complete the DAMP Supervisor training from the CASA website is deemed to have satisfactorily completed the RFDS CO internal training.

The RFDS CO DAEP is summarised in the table below:

Education	Audience	Frequency	Method	Provider
Orientation of new SSAA staff	All SSAA staff commencing after March 2009	Once off	Face to Face	RFDS CO delivered by People & Culture
RFDS CO Drug and alcohol awareness training for all employees	All SSAA Staff	Every 30 months thereafter	Intranet	RFDS CO Intranet
DAMP Supervisor Training covering managing people engaging in problematic drug and alcohol use.	DAMP Supervisors	At commencement & every 30 months thereafter	On-line	CASA Online Training

The RFDS CO Intranet DAEP can be found on the SQR Webpage

The RFDS CO drug and alcohol education program contains the following components:

For Safety Sensitive Staff — awareness of:

- a. RFDS CO policy on drug and alcohol use
- b. drug and alcohol testing in RFDS CO
- c. Support and assistance services for people engaging in problematic use of drugs and alcohol
- d. Information about the potential risks to aviation safety that may result from the taking of drugs, alcohol and potentially some medical treatments, procedures and medical investigations.

Additionally for DAMP Supervisors, education and training to manage people who engage in problematic use of drugs or alcohol.

Further information for DAMP Supervisors can be found via the CASA/OAD website.

All records relating to the RFDS CO DAEP will be maintained by the DAMP Contact Officer and recorded on the RFDS CO Staff Training Register / Staff Recency via Air Maestro.

## 3. Drug and Alcohol Testing Program

In addition to the drug and alcohol testing conducted by or on behalf of RFDS CO under this program, SSAA employees (including all persons who perform duties in an aerodrome testing area) may also be subject to random drug and alcohol testing by CASA under Part 99.C of the CASRs and other regulatory bodies (e.g. the police).

RFDS CO will test for the following alcohol and drug categories:

1. Alcohol
2. Opiates (Heroin, Morphine, Codeine)
3. Cocaine
4. Amphetamine type substances
5. Cannabinoids (Marijuana/THC)
6. Benzodiazepines

Drug and alcohol testing requirements are outlined below and the nature of testing is contingent on the staff category.

To organise any testing in this section contact the The Principal Advisor, Aviation Safety Quality and Compliance or the secondary Contact officers.

Current provider of these services (AusHealth) provides testing services that conforms to AS 4308 and AS 4760.

### 3.1 How Testing will be conducted

The RFDS CO internal drug and alcohol testing program is administered by an external/independent third party.

RFDS CO staff must comply with any request made by either:

- a representative of the testing provider
- a DAMP Supervisor of RFDS CO

to provide a body sample that is in accordance with the specified method of AOD testing under the relevant standard. RFDS CO personnel must provide the representative of the testing provider with their name on request.

Any drug and alcohol testing done under this program will be conducted as follows:

- for breath testing for alcohol — using a device that meets either:
  - AS 3547, Breath alcohol testing devices for personal use; or
  - NMI R 126, Pattern Approval Specifications for Evidential Breath Analysers;
- for oral fluid testing for drugs — in accordance with AS 4760, Procedures for specimen collection and the detection and quantitation of drugs in oral fluid;
- for urine testing for drugs — in accordance with AS/NZS 4308, Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine.

Any devices used in drug or alcohol testing under this DAMP must be used in a way that is not inconsistent with the instructions of the manufacturer of those devices.

Please contact the DAMP Contact Officer for details on the devices used for alcohol testing and the standard with which the device complies and a statement of the third parties drug testing accreditation against the relevant standard.

### 3.2 When Testing will be conducted

Drug and alcohol testing of all staff under this program will be conducted in the following circumstances:

#### **Prior to commencement in a role performing SSAA**

A person will be tested for alcohol and testable drugs when they first join RFDS CO, if the person will be working as a regular SSAA staff, or when the role of an existing staff member is to change to that of a regular SSAA staff.

RFDS CO will accept the results of a drug and alcohol test if conducted less than 90 days before the person is required to begin performing or being available to perform a SSAA only when the test results were not positive results and the test was arranged by the RFDS CO and our agreed providers as per Section 3 of the DAMP.

#### **Post accident or serious incident**

A person will be tested for alcohol and testable drugs after an accident or serious incident involving a SSAA employee that occurs whilst he or she is performing, or available to perform, a SSAA, provided that suitable test conditions exist.

- Suitable test conditions exist where, after an accident or serious incident, testing can be conducted:
  - within 32 hours of the accident or incident for drug testing
  - within 8 hours of the accident or incident for alcohol testing; and it is practicable to conduct a test

It is the responsibility of the DAMP Supervisors to assist with the identification of accidents or incidents that fall under the definition of a post accident or serious incident.

The following employees have the ability to determine that an employee requires post accident or serious incident testing:

- Damp Contact Officer
- Secondary DAMP Contact Officers
- CEO
- OOGM (On Call Operations Group Manager, Chief Pilot, Engineering Manager)

Upon an employee being identified that they require post accident or serious incident testing shall be removed from performing or be available to perform SSAA until the test has been carried out as per the requirements of this DAMP.

A **post accident or serious Incident** is an occurrence that arises out of a person performing or being available to perform an applicable SSAA or an occurrence that arises out of the use of an RFDS provided vehicle if either or both of the following applies:

- the occurrence gives rise to danger of death or serious harm to a person; or
- the occurrence gives rise to danger of serious damage to an aircraft or property.

### On reasonable suspicion

A person will be tested if a DAMP Supervisor has reasonable grounds to believe that SSAA staff may be adversely affected by an alcohol or testable drugs while performing, or available to perform, a SSAA.

If on enquiry it is apparent that the behaviour is not drug or alcohol related the staff member's immediate supervisor will be contacted for assessment of fitness to conduct further duties

### On return to SSAA work

A person will be tested for alcohol and testable drugs if SSAA staff is returning to work after a period during which the staff was not permitted under the CASRs to perform or be available to perform a SSAA because of alcohol or testable drug use or a related incident.

### Random Testing

An employee, group of employees or Category 1 contractor, may at any time and without notice be requested to provide a sample for the purpose of alcohol and drug testing. Random testing will be performed on the basis that the sites / dates for testing will be selected at RFDS CO discretion (without prior advice to the site).

Personnel to be tested at any time will be selected by a random draw method, which will be devised and administered by the independent drug and alcohol testing agent.

Any staff member drawn randomly for testing is required to make themselves available for drug and alcohol testing. Staff who are engaged in a high priority or time critical aeromedical or similar task at the time of the testing will not be tested but may be tested during the next testing cycle. Any staff member rostered to work (but not yet tasked) and randomly drawn for testing will be required to attend a test at the workplace.

The method of testing will be by body sample, an external MRO will be consulted if any tests are positive.

A positive test is defined as a test result exceeding the limit set by statutory bodies. The table below defines the testing type and Permitted Level.

## 3.3 Permitted level

Alcohol - a concentration of less than 0.02 grams of alcohol in 210 litres of breath.

A testable drug - a concentration of the testable drug that is specified in a legislative instrument made by CASA for the purposes of Part 99.010 of the CASR

The permitted levels in oral fluid for each testable drug	
Testable Drug	Level- ng/mL
Morphine	25
Codeine	25
6-Acetyl morphine	10

The permitted levels in oral fluid for each testable drug	
Amphetamine	25
Methylamphetamine	25
Methylenedioxymethylamphetamine	25
Methylenedioxyamphetamine	25
$\Delta$ 9-tetrahydrocannabinol 10	10
Benzoyllecgonine	25
Ecgonine methyl ester	25

The permitted levels in urine for each testable drug	
Testable Drug	Level- ng/mL
Morphine	300
Codeine	300
6-Acetyl morphine	10
Amphetamine	150
Methylamphetamine	150
Methylenedioxymethylamphetamine	150
Methylenedioxyamphetamine	150
$\Delta$ 9-tetrahydrocannabinol 10	15
Benzoyllecgonine	150
Ecgonine methyl ester	150

Note: These levels ensure that the results are administratively reliable and are set at a sufficient level to detect recent alcohol or drug use by the donor.

It is acknowledged that some over-the-counter and prescription therapeutic drugs may produce positive test results, particularly for opiates.

A list of such medications is provided on the RFDS CO Intranet SQR Page.

### 3.4 What happens if I test positive to testable drug

There are three stages to a final positive result.

Initial Positive – The external/ independent tester receives a positive result at the time of testing. At this time the SSAA employee will cease SSAA and their manager and the DAMP Contact Officer will be notified.

If the person is a job applicant, they will not be employed in the event of a confirmatory positive test which cannot be attributed to a therapeutic drug or an agent.

The employee's body samples are sent to a laboratory for a confirmatory test.

Confirmatory Positive – The laboratory confirms initial presence of the Drug(s) and provides the level the Drug was test at.

If a confirmatory drug test conducted under this program returns a positive result, RFDS CO will consult a DAMP medical review officer to determine if the presence and level of a testable drug detected by the test could be the result of legitimate therapeutic treatment or some other innocuous source.

MRO Positive – After the employee has recorded an initial positive and then a confirmatory positive, a designated person from RFDS CO People and Culture Department will notify the MRO who will under Section 5 of the DAMP determine a result and direction.

## 4. Drug and Alcohol Response Program

### 4.1 Ceasing SSAA

RFDS CO will not permit a SSAA employee to perform, or be available to perform, under certain circumstances SSAA. In all circumstances the Principle Advisor Aviation Safety, Quality and Compliance must be advised. Refer to section 13 for working checklist for removal from SSAA.

The above mentioned circumstances are as follows:

1. Where RFDS CO is aware that a positive result for an initial drug test has been recorded and the employee has not, in respect of that test result, recorded a test result for a confirmatory drug test that is not a positive result;
2. Where RFDS CO is aware that a positive result for an initial alcohol test has been recorded and the employee has not, in respect of that test result, recorded a test result for a confirmatory alcohol test that is not a positive result;
3. Where RFDS CO is aware that under this DAMP:
  1. a positive result for a confirmatory drug test has been recorded for the employee; and
  2. a DAMP medical review officer has not determined that the result recorded could be as because of legitimate therapeutic treatment or some other innocuous source; and
  3. mandatory preconditions for return to SSAA have not been met (see below);
4. Where RFDS CO is aware that under CASA random testing:
  1. a positive result for a confirmatory drug test has been recorded for the employee; and
  2. a CASA medical review officer has not determined that the result recorded could be as a result of legitimate therapeutic treatment or some other innocuous source; and
  3. mandatory preconditions for return to SSAA have not been met (see below);
5. Where RFDS CO is aware that a SSAA employee who has been required to take a drug or alcohol test has:
  1. refused to take the test; or
  2. interfered with the integrity of the test.
6. If a DAMP Supervisor suspects the employee's faculties may be impaired due to the person being under the influence of a testable drug or of alcohol;
7. If an accident or serious incident has occurred involving the employee while he or she is performing or available to perform a SSAA and either:
  1. for the period that suitable test conditions exist for conducting drug or alcohol tests on the employee — a test has not been conducted; or
  2. if tests have been conducted under suitable test conditions — RFDS CO has not been notified of the test results.



Non SSS will have their situation assessed by the DAMP Supervisor or the DAMP Contact Officer as to whether a step down from duty is required. The employee will be immediately offered support and counselling.

In the event that SSAA employee or contractor has a positive result for an initial drug or alcohol test, the Head of Flying Operations (HOFO) will be notified if the person is a flight crew member, the Head of Engineering (HoE) if the person is from the engineering department, and the Director of Nursing (DoN) for medical personnel. On notification the HoE / HOFO/ DoN, whomever is relevant, will review the tasks that the SSAA employee or contractor has performed during the period in which the drugs or alcohol may have impaired the person's performance and will make a determination, using a risk based approach, to the impact that may have been caused by any potential impairment on the safety of operations. Where there is a potential risk a mitigation plan will be implemented.

## 4.2 Disclosing the Potential of a Confirmatory Positive Sample - Actions Following a Confirmatory Positive Test

As part of the RFDS CO induction, staff members are made aware of their obligations regarding CASR 99 in relation to RFDS CO Drug and Alcohol Management Plan (DAMP). After induction the reference material can be reviewed at anytime via the RFDS intranet.

If an employee has taken a substance that they believe may result in a confirmatory positive test (if they were tested) they shall contact their supervisor and organise a leave of absence. The supervisor will then make a file note for the HR file and ensure a sick leave form is submitted.

In this situation Category 1 contractors must notify their company's representative and appropriate action taken. The Category 1 contractor must notify the RFDS DAMP Contact Officer of the event and the outcome of any MRO intervention/guidance.

If the supervisor or other management develop a concern that this is becoming a habitual situation then a suitable course of action needs to be taken. This may be in line with HR Performance Management principles. Consideration shall be given as to the appropriate type of support to help the employee with any remedial drug and alcohol therapies. The RFDS CO Employee Assistance Program (EAP) may be of benefit in these circumstances for RFDS employees..

The role of the MRO will vary significantly depending on the nature of the employee's problem. RFDS CO will be guided by the experience and knowledge of the MRO in all cases. In the case of employees who have developed a significant drug or alcohol dependence then the return to work process may be more complex and RFDS CO will work with the MRO on the return to work plan.

## 4.3 Returning to Safety Sensitive Aviation Activities

Where RFDS CO has not permitted a SSAA employee to perform, or be available to perform, a SSAA as a result of a drug or alcohol testing related suspension event RFDS CO will only permit the employee to again begin performing or being available to perform a SSAA in the following circumstances:

1. the employee has undergone a comprehensive assessment for drug or alcohol use;
2. if the comprehensive assessment recommended the employee commence a drug or alcohol intervention program — the employee has begun participating in a nominated drug or alcohol intervention program;
3. the employee is considered fit to resume performing, or being available to perform, a SSAA by:
  1. a Medical Review Officer; and
  2. the employee's treating clinician, if any;
4. if the suspension event related to a drug test — at the time the employee was considered fit to resume performing, the employee receives a confirmatory drug test and records, for the test, a result that:
5. was not a positive result; and a Medical Review Officer is satisfied indicates the absence of testable drug use.

RFDS CO will permit a RFDS SSAA employee time to attend a nominated drug or alcohol intervention program, if:

1. Medical Review Officer has advised RFDS CO that the employee should attend the program; and
2. the employee is returning to work after a period during which the employee was not permitted to perform or be available to perform a SSAA because of a positive test result for testable drug use or alcohol use.

In the case of Category 1 Contractors, the Contractor will liaise with the RFDS Damp Contact Officer to review return to work options for the contractor.

Drug or Alcohol Intervention Program may consist of any of the following:

- assessment
- treatment, including:
  - education
  - counselling
  - consultation with health care professionals
  - pharmacotherapy
  - residential or non residential treatment programs
- monitoring and follow up action

A return to work plan will be developed in consultation with the DAMP MRO, the employee's treating medical practitioner, and the employee's manager.

## 5.Role of the Medical Review Officer

RFDS CO will appoint and consult a Medical Review Officer as part of its responsibilities under this program and the CASR's.

### 5.1 What is the role of a Medical Review Officer?

RFDS CO will consult a Medical Review Officer (MRO) in the following circumstances:

1. if a drug test conducted under the program returns a confirmatory drug test result for a SSAA employee of RFDS CO that is a positive result — to determine if the presence and level of a testable drug detected by the test could be the result of legitimate therapeutic treatment or some other innocuous source;
2. to review medical information concerning a person's failure to give a body sample for drug or alcohol testing because of a claimed medical condition;
3. to determine if the employee is fit to resume performing or being available to perform a SSAA.

The Medical Review Officer may consult with the employee's treating clinician (if any).

The RFDS CO will assist the MRO to ensure they have the required information to make a determination under the above circumstances. Including the testable drug detected and the level recorded.

## 6. Disciplinary Action

The RFDS CO response to a confirmatory positive test will depend on the exact circumstances and advice provided by the MRO.

RFDS CO will ensure that the MRO is consulted as soon as possible after a confirmatory positive and will give high priority to acquiring the earliest practicable appointment. If the MRO is not available within 24 hours of the result an alternative Medical Practitioner will be sought but the employee may still be required to attend the next available MRO appointment.

Where confirmatory testing established that the employee (SSAA and Non SSAA) has alcohol or a prohibited drug in their system with no therapeutic or other acceptable explanation from the MRO, disciplinary action will commence - instant dismissal may be the disciplinary action taken. In the case of a dismissal RFDS CO will seek to recoup any work time lost from the employee's leave entitlements.

Employees failing to present for or comply with testing, assessment or treatment without good reason will also face disciplinary action and may be treated as having tested positively.

RFDS CO job applicants for SSAA roles will be advised at the time of application of the need for drug and alcohol testing as part of the pre-employment selection process. Job applicants will not be employed in the event of a confirmatory positive test which cannot be attributed to a therapeutic drug or an agent.

Disciplinary action undertaken under this DAMP will be governed by ADM02 Human Resources Manual, Disciplinary Action for Misconduct or Serious Misconduct.  
Disciplinary

## 7. Privacy

The Privacy Act 1988 may apply to information gathered under this program and information held in relation to the outcomes of drug and alcohol testing, whether conducted under the RFDS CO or by CASA.

The RFDS CO program is consistent with the requirements of the Privacy Act 1988 and RFDS CO will comply with any obligations it may have under that Act in the handling of personal information collected under the program.

### 7.1 Review, Audit and Compliance

RFDS CO will review this program at regular intervals of at least every 2 years, or as directed by CASA, in order to ensure its continued compliance with the requirements of the CASRs.

To ensure the appropriate development, implementation and enforcement of the RFDS CO program, CASA may audit RFDS CO and require it to provide relevant documentation.

## 8.Provision of Information and Record Keeping

### 8.1 Provision of Information

RFDS CO DAMP Contact Officer will ensure it records and maintains information in respect of:

- drug and alcohol education; and
- drug and alcohol testing; and
- drug and alcohol response; and
- the number of SSAA employees engaged; and
- details of the current DAMP contact officer.

RFDS CO will provide the above to CASA as required.

The information reported to CASA will not contain any additional detail, beyond that required by the CASRs, which might identify individuals employed by RFDS CO, its contractors or subcontractors.

### 8.2 Record Keeping

RFDS CO will keep all records pertaining to this DAMP that are used to provide information to CASA for a period of 5 years from the end of the year the records was obtained. Electronic documents will be kept on a secure company drive and hardcopies are kept in a lockable filing cabinet.

Within 6 months of the expiry of the 5 year record keeping period, RFDS CO will ensure such records are destroyed or deleted.

## 9. Variations

RFDS CO may at any time be required by CASA to make specific changes to this program, or to prepare a new program, to ensure ongoing compliance with the CASRs.

RFDS CO may implement variations or amendments to this program from time to time and, where relevant, will provide written notice to its employees setting out these changes.

RFDS CO may implement variations or amendments to this Program at any time. If these changes have not been directed by CASA, 3 month's written notice will be given to employees to that effect.

Unless otherwise determined, such variations or amendments shall have the same force and effect as if included in this Program, from the time at which the 3 months notice expires.

## 10. Review and Auditing

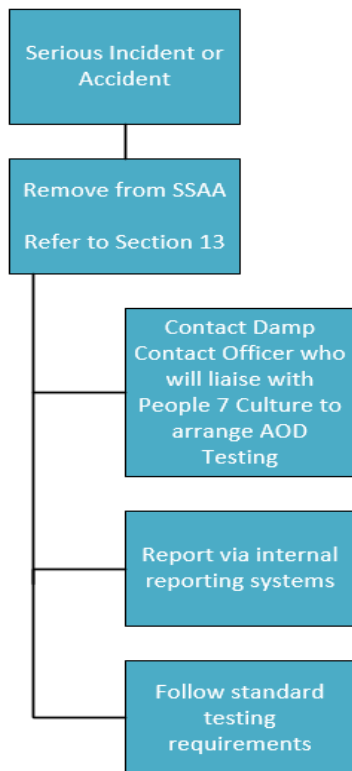
RFDS CO will every 2 years review the DAMP and its associated documents through the SQR Consultative Committee. The review will be placed on the agenda for the last meeting of the calendar year.

RFDS CO will yearly internally audit the DAMP. The DAMP internal audit will be placed on the internal audit schedule.



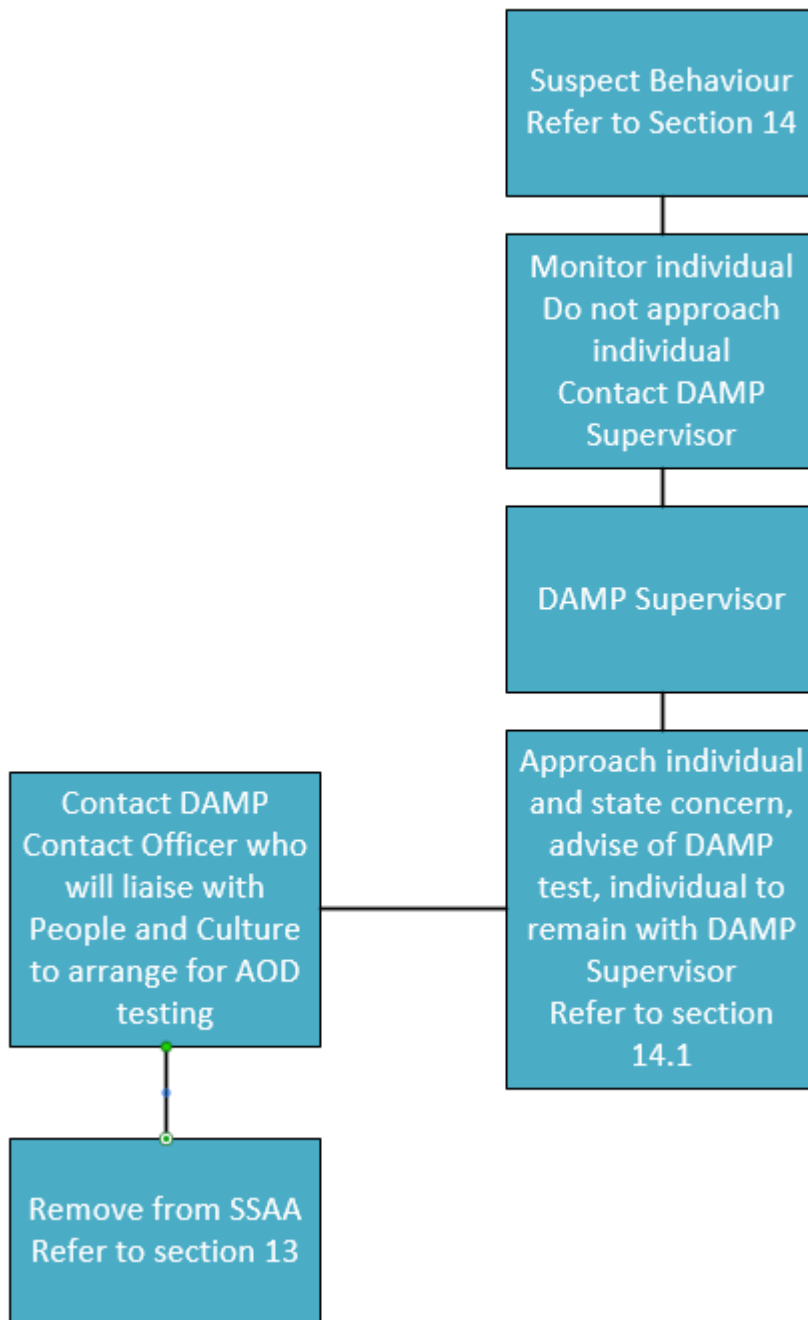
# 11.Serious incident or accident flow chart

## Serious Incident or Accident flow chart



## 12.Reasonable Grounds Testing flow chart

Reasonable Grounds Testing flow chart



## 13. Indicators for Reasonable Grounds Testing

Reasonable Grounds Testing can be considered on the observation of the following signs, displayed by a safety sensitive staff member, who is performing or available to perform SSAA.

Reasonable ground testing indicators can be:

- Inappropriate moods
- Overly confident
- Agitated
- Anxious / nervous
- Overly alert
- Saying inappropriate things
- Talkative
- Slurred speech
- Clumsy / uncoordinated
- Slow physical responses
- Sweating
- Nausea

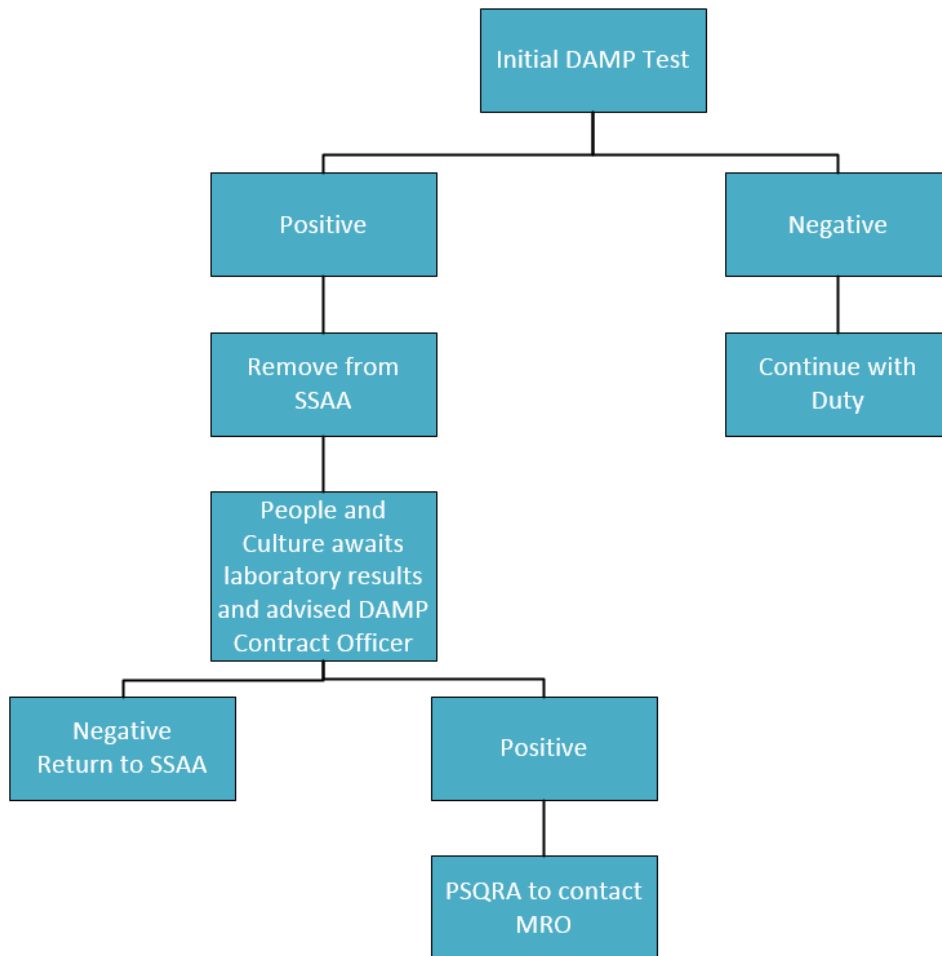
This list is not exhaustive.

### 13.1 Approaching an individual for reasonable grounds for testing

DON'T	DO
When approaching the employee don't use words/statements like "You're drunk" or "You're stoned" or "You're high"	Use statements like "I am concerned that you may not be able to perform your ..... safely or satisfactory." or "I have observed your behaviour and ...." (list the behaviours that have concerned you)
Argue or debate your concerns with the employee	Avoid confrontation, be brief, firm and remain calm
Accept the employee's claim that they have not used drugs or consumed alcohol	A "For Cause" or "Reasonable Suspicion" drug and alcohol test should be performed as part of the investigation into the employee's behaviour
Allow the employee to drive home	If an employee has acted in a way that has raised safety concerns the employee should not be able to drive home regardless of the results of the drug and alcohol test
Allow the employee to return to work the next day "no questions asked"	Arrange a follow up meeting with the employee and include the requirement of a negative drug and alcohol test result
Whilst supervisors are not qualified to make a medical diagnosis on an employees condition they are generally able to make a decision on whether an employee is in a fit state to be able to remain at work	

# 14. Drug and Alcohol Test Results

## Drug and Alcohol Test Results



## 15.MRO Review

