Staffing Committee

Dorset County Council



Date of Meeting	13 September 2017		
Officer	Head of Organisational Development		
Subject of Report	Alcohol and Substance Misuse Policy		
Executive Summary	At its meeting in January 2017, Staffing Committee agreed to introduce alcohol and substance misuse testing subject to completing Trade Union (TU) consultation and the receipt of professional advice. These actions have now been completed. The purpose of this paper is therefore to:- * update Staffing Committee on advice and consultations * present the revised policy for formal approval		
Impact Assessment:	Equalities Impact Assessment: An EqIA has been completed and is attached as part of the January report, at Appendix 2.		
	Use of Evidence: The policy has been updated based on a range of evidence including TU consultation, professional advice from Synlab, Chartered Institute of Personnel and Development (CIPD), Trade Union Congress (TUC) and Health and Safety colleagues. Budget: Estimated costs of testing were presented to the Staffing Committee in January. The costs will be met by the relevant Directorate.		

	Risk Assessment: Having considered the risks associated with this decision using the County Council's approved risk management methodology, the level of risk has been identified as: Current Risk: LOW Residual Risk LOW
	Other Implications:
	None.
Recommendation	It is recommend that the Staffing Committee approves the revised policy to take effect from 1 November 2017.
Reason for Recommendation	The Staffing Committee oversee matters relating to staff terms and conditions and people management policies.
Appendices	Appendix 1 – Revised Alcohol and Substance Misuse Policy Appendix 2 – January 2017 report to the Staffing Committee
Background Papers	None
Officer Contact	Name: Paul Loach, HR & OD Business Partner Tel: 01305 225189 Email: paul.loach@dorsetcc.gov.uk

1. Introduction

- 1.1 At its meeting in January 2017, Staffing Committee approved the testing for alcohol and substance misuse in specific roles and situations in DCC. This authority was subject to DCC completing TU consultation and following professional advice. The consultation process has taken several months and is now complete.
- 1.2 The January Staffing Committee report outlining the rationale for introducing testing is attached at Appendix 2.
- 1.3 A revised alcohol and substance misuse policy is attached for your consideration and approval at Appendix 1. The revised policy takes account of work that has been undertaken since January including:
 - Consultation with the TU and managers of staff in safety critical roles
 - Appointment of an accredited testing laboratory, Synlab, to undertake the testing in accordance with their established procedures
 - Initial training for managers of those in safety critical roles as well as TU representatives (provided by Synlab).
- 1.4 The revised policy provides clarification on:
 - Expectations of employees
 - The emphasis on encouraging employees with a problem to seek help
 - The council's aim to support employees who are dependent on alcohol and/or other substances as far as is practicable
 - The council's legal responsibilities, particularly in relation to health and safety
 - The difference between 'random testing' and when testing may take place based on 'due cause'

2. Trade Union Views

- 2.1 DCC has scheduled monthly meetings with TUs at our Green Book and Soulbury Group meetings. The Alcohol and Substance Misuse Policy has been discussed with unions as a specific agenda item on seven separate occasions from September 16 to August 2017).
- 2.2 A summary of the TU's concerns and DCC responses are provided below:-
 - TUs requested that any testing company is accredited to UK standards. DCC confirmed that Synlab is an accredited and leading UK laboratory and testing company.
 - TUs requested DCC provides support and advice to any employee who may have a drug or alcohol dependency. DCC confirmed it can offer advice and support, both within DCC and externally. More specifically, internally via Occupational Health, HR & Wellbeing and Live Well Dorset. Externally via two local organisations, EDP and CADAS.
 - TUs requested that DCC's policy and practice complies with the TUC advice on drug and alcohol testing in the workplace. DCC agreed to this request. This covers areas such as objective selection for testing and the right to have

another accredited laboratory independently analyse a sample. In addition, the provision of assistance to individuals to help them overcome any addiction issues.

- DCC will continue will take the opportunity to review the implementation of testing after a year of operation. We will invite discussions with unions and will subsequently update staffing committee.
- Anonymised testing data will be shared with unions to allow a shared knowledge of situations involving positive tests
- The process will be carried out in a spirit of consultation and shared learning, with the shared aim of promoting health, safety and wellbeing.

3. Next Steps

- 3.1 The focus of the revised policy is to provide for employees who wish to come forward for help with a drug or alcohol problem. Subject to agreement of the policy amendments, a focused communications plan will follow for all staff, particularly those in safety critical roles who would be subject to random testing. Communications will include:
 - Targeted briefings to staff in safety critical roles; these are the employees whose roles will be subject to random testing.
 - Information on sources of help and advice
 - General communication to all staff via the all staff e-newsletter, the manager e-newsletter and a front page news item on Sharepoint
 - Managers will ensure that all staff are aware of the revised policy
 - The revised policy and a guidance on Sharepoint will be published in Sharepoint.
- 3.2 If approved, the revised policy will take effect from 1 November 2017 when random testing will commence for safety critical roles.

Jonathan Mair

Head of Organisational Development

13 September 2017

Alcohol and Substance Misuse Policy

1. Introduction

- 1.1. This policy aims to help raise awareness of the dangers of alcohol and substance misuse and encourage those with a problem to seek help.
- 1.2. The council recognises the importance of early identification and treatment and will aim to support employees who are dependent on alcohol and/or other substances as far as is practicable. The expectation being that every effort is being made by the employee to reduce their dependency.
- 1.3. The council also recognises that alcohol and substance misuse can have a detrimental effect on work performance and behaviour and is a health and safety consideration.
- 1.4. The council has a responsibility to ensure that employees' use of either alcohol or other substances will not impair its safe and efficient running or the health, safety and welfare of its workers, customers and visitors. This includes legal responsibilities under:
 - the Health and Safety at Work Act 1974 to provide a safe and healthy working environment
 - the Misuse of Drugs Act 1971, which makes it a criminal offence for illegal drugs to be knowingly used, kept or supplied on any of the organisation's premises and for any such activities to be ignored.
- 1.5. This policy should be read in conjunction with the council's Driving at Work Policy which requires drivers to comply with the Highway Code, including not driving under the influence of alcohol, drugs or any medication that may adversely impact on the ability to drive.

2. Scope

- 2.1. This policy and guidance applies to all council employees including DWP but excluding school based employees.
- 2.2. The council's testing procedure and protocol is intended to cover any persons who may undertake safety critical roles on council business including third party contractors, agency workers and volunteers.
- 2.3. While the scope of this policy does not extend to an individual's own time, employees are reminded that they need to be fully able to undertake the duties of their post without any limitations due to the use or after effects of alcohol or other substances. This may include, but is not limited to:
 - fitness to drive safely;
 - operation of machinery:
 - care of vulnerable individuals or
 - other roles which may have a significant impact on the safety of others.

Employees who undertake standby or out of hours duties need to be particularly mindful of this and ensure they are fully fit to work if required to do so at short notice.

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2.4. Where there is an impact on the safeguarding of children or vulnerable adults, the managing allegations guidance must be followed in conjunction with this policy.

2.5. This policy has been developed in consultation with the council's recognised Green Book and Soulbury trade unions.

3. Definitions

- 3.1. For the purposes of this policy, dependency is defined as a mental or physical reliance on alcohol and/or other substances and its withdrawal would result in distress for the individual. Dependency would need to be diagnosed by a Medical Practitioner.
- 3.2. Substance misuse for the purposes of this policy is defined as the taking of illegal drugs, the misuse of prescription and 'over the counter' medication or misuse of products with the express intention of causing an altered state of functioning, including psychoactive substances as defined in the Psychoactive Substances Act 2016 ("legal highs"), aerosols, solvents or lighter fuel.
- 3.3. For the purposes of this policy 'random testing' is defined as "the unscheduled, unannounced drug testing of randomly selected employees by a process designed to ensure that selections are made in a non-discriminatory manner."
- 3.4. For the purposes of this policy 'due cause' is defined as having reasonable belief that an employee is under the influence of alcohol or is misusing substances based on observation of patterns of behaviour that suggest such influence, or when the employee has been involved in an accident at work.

4. Key Principles

- 4.1. When an employee seeks help, the matter will be treated in a confidential manner. An employee may choose to contact DCC Occupational Health or Wellbeing for advice and support. Live Well Dorset are also able to offer alcohol reduction advice and can signpost individuals to external local services such as EDP Drug and Alcohol Services or CADAS (Community Alcohol and Drug Advisory Service).
- 4.2. When an employee acknowledges and is diagnosed with a dependency problem with either alcohol or substance misuse, the council will give them every reasonable support and encouragement to seek treatment.
- 4.3. When an employee's use of alcohol or substance misuse leads to conduct or capability concerns, including if a member of staff is unfit for work, an identified dependency problem will be taken into account when determining disciplinary or capability action.
- 4.4. The council's approach towards alcohol and substance misuse is one of prevention and supporting rehabilitation. There are however situations where formal disciplinary or capability proceedings may be taken in accordance with the Councils Disciplinary and Capability procedures. Examples of which may include, but are not limited to:-
 - Inability to fulfil working duties, including stand-by and call out, due to alcohol, drugs or substance misuse

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- A failure to inform the DVLA where required to do so, about any substances or medication, including prescription or 'over the counter' medication
- For safety critical roles, a failure to inform the relevant manager when taking any medication, including prescription or 'over the counter' medication, which could affect the safe or effective operation of duties
- A refusal to provide a sample for testing
- Failure to cooperate in an initial or ongoing referral or treatment, where there
 are conduct or capability concerns arising from an identified dependency
 problem
- Being in possession of illegal drugs or substances on council premises
- Where there is a positive test result for alcohol, drugs or substance misuse in relation to an individual. (A positive test result is not the same as a nonnegative test result, which is one that requires further investigation and analysis)

An investigation will determine whether or not formal disciplinary or capability action is required. If formal action is required, the Council may decide to apply any sanction which could range from informal action, through to summary dismissal (and all stages in between).

- 4.5. It is the employee or contractor's responsibility to ensure their medication and dosage does not result in a health or safety risk. Advice can be sought from Occupational Health or General Practitioner (GP) or Pharmacist if unsure.
- 4.6. People managers are responsible for ensuring that this policy is clearly communicated. They are expected to deal promptly and sensitively with matters relating to alcohol or substance misuse and to provide details of sources of help.
- 4.7. The council will undertake random alcohol or drug testing for certain safety critical roles. These roles are as identified by Directors on the basis of risk assessment in order to support the council's compliance with relevant health and safety legislation. Employees will be made aware if their role is identified as safety critical. Testing will only take place in accordance with the council's testing procedure and protocol. Specific testing may also be carried out where there is due cause.
- 4.8. No samples will be taken without the informed consent of the person and never under duress.
- 4.9. Anyone who tests positive has the right of appeal. The Council will also encourage TU representation at any appeal.
- 4.10. The policy and the testing procedure and protocol will at all times be applied in accordance with the council's diversity policy, which states:

"The county council is committed to diversity and equality of opportunity so that no employee or potential employee will be subject to unlawful or unfair discrimination because of gender, age, marital or civil partnership status, colour, race, nationality, or other ethnic or national origin, religion or belief, disability, sexual orientation, gender reassignment, pregnancy or maternity, criminal background, membership or non-membership of a trades union or political beliefs".

4.11. The Council encourages any employee who may have a dependency on drugs, alcohol, prescription medication or other substances to seek advice and support at the earliest opportunity. Should the individual be working in a safety critical role, this disclosure must be made to Wellbeing, HR or Occupational Health without delay. The individual will then not be able to continue any safety critical aspect of their role and a discussion will take place to explore alternative duties.

5. Testing

5.1. Testing for alcohol or other substances will be carried out in accordance with the council's testing procedure and protocol. All drug tests will be carried out by a laboratory accredited by the UK accreditation service.

6. Policy Review

6.1. This policy will be subject to review on a periodic basis.

Staffing Committee

Dorset County Council



Date of Meeting	30 January 2017		
Officer	Head of Human Resources and Organisational Development		
Subject of Report	Revision to Alcohol, Drugs and Substance Misuse Policy		
Executive Summary	The original alcohol and substance misuse policy was introduced in 2003. Since that time there's been a marked shift in the types of drugs and substances available coupled with a change in legislation. The development of improved drug testing technology preceded an increase in the number of drug driving offences recorded in the UK. DCC employs a small but significant number of people in safety critical roles, including winter gritter drivers, HGV drivers, road workers and arboriculturalists (tree surgeons who use chainsaws). We have a legal duty of care both to employees and the public to ensure that we operate our services safely. The Glasgow bin lorry incident reminds us of the devastating impact that can occur when attention isn't given to driver's health and wellbeing. DCC wishes to introduce alcohol, drugs and substance misuse testing in a proportionate, fair and supportive way. The aim being to prevent injury and assist individuals to make healthier life choices, rather than the primary focus being punitive. This stated our first priority will always be the protection of employees and public. DCC are working with industry experts in the implementation of the policy, including Occupational Health, Public Health, Trade Unions, Health and Safety, an Accredited external testing company as well as advice from other councils who have implemented a testing process. We wish to seek Staffing Committee approval for DCC to introduce testing for alcohol, drugs or misuse of substances in specific circumstances. If agreed, we will continue to consult with unions on the plans for implementation.		
Impact Assessment:	Equalities Impact Assessment: An EQIA is included as Appendix 1, pending approval by the Directorate Equality Group		

	Use of Evidence: Sources: Automobile Association, Edmund King OBE, AA President CIPD report "managing drug and alcohol use at work" Freedom of information request, BBC, 2016 THINK! Department of Transport. Legislation: Psychoactive Substances Act 2016
	Budget: Estimated cost for Environment and Economy is between £2k and £4k per annum. Estimated cost for DWP is £3 to £5k per annum. The costs will be met by the relevant Directorate. The final costs will depend on the type and number of tests undertaken.
	Risk Assessment:
	Current Risk: LOW Residual Risk LOW / VERY LOW (i.e. reflecting the recommendations in this report and mitigating actions proposed)
	Other Implications: Not applicable.
Recommendation	It is recommended that Staffing Committee:
	i) notes the legislative and societal reasons for introducing testing
	ii) agrees to introduce alcohol, drugs and substance misuse testing subject to completing Trade Union consultation and following professional advice
	iii) requests a revised alcohol and substance misuse policy is brought to Staffing Committee for approval
	iv) requests a review paper is brought to Staffing Committee 12 months post implementation.
Reason for Recommendation	To promote a healthy and safe working environment and to protect the public from harm
Appendices	Appendix 1: Equality Impact Assessment
Background Papers	None
Report Originator and Contact	Name: Paul Loach, HR Business Partner Tel: 01305 225189 Email: paul.loach@dorsettcc.gov.uk

Sheralyn Huntingford

Head of Human Resources and Organisational Development

January 2017

1. Introduction

- 1.1 The original drugs and substance misuse policy was approved by Staffing Committee in 2003. A revised policy is being prepared to reflect societal and legislative changes in relation to drugs and substance abuse
- 1.2 The revised policy wishes to introduce the option of drug and alcohol testing in certain circumstances, subject to agreed procedures and protocols.

2. Reasons for review of the existing policy

2.1 **Drug driving in the UK**

- 2.1.1 There were almost 8,000 arrests last year for drug driving in England and Wales. The statistics from 35 of the 43 police forces showed that 7,796 people were arrested between March 2015 and April 2016.
- 2.1.2 The Automobile Association reports there are around 200 drug-related deaths on our roads each year but believe the figure is much higher as victims aren't always routinely checked for drugs after crashes.
- 2.1.3 Research conducted by THINK! has revealed that more than half of those who admitted to driving under the influence of illegal drugs said they felt safe behind the wheel.
- 2.1.4 In 2015 new legislation was introduced to allow police officers to test drivers for traces of drugs for the first time. Officers no longer have to prove a driver was too impaired to drive, only that they had an illegal level of drugs in their system.

2.2 **Drink Driving in the UK**

2.2.1 In the last 50 years road casualties caused by drink driving have fallen dramatically, but in 2014, there were still 240 deaths due to drink driving, accounting for 14% of all road fatalities.

3. Proposed changes to DCC's Alcohol and Substance Abuse Policy

- 3.1 The purpose of the policy is to improve health and wellbeing amongst our staff and protect people from harm. The main policy revision is to enable DCC to test for alcohol or drug misuse in specific circumstances. We propose that employees will be eligible to random or specific testing where:
 - they are employed in a safety critical role or
 - there is suspicion or reports of alcohol and drugs misuse or
 - there has been an accident or near miss

4. Types of Testing

- 4.1 **Random Testing**. Applies to safety critical roles. The locations and number of employees are randomly selected for drug and/or alcohol testing periodically.
- 4.2 **Specific Testing.** Applies where an individual is suspected of being under the influence of drugs or alcohol, or in a post-incident situation. HR advice will be sought before any specific testing is agreed.

5. Other organisations approaches to testing

- 5.1 The CIPD report "managing Drug and Alcohol Use at work" states that the majority of "safety critical" organisations carry out testing for drug and alcohol misuse, but testing is much less prevalent in non-safety critical organisations.
- 5.2 A number of local authorities have already, or are in the process of introducing drug and alcohol testing in the workplace including Barnsley BC, Calderdale BC, Wrexham Council, East Riding of Yorkshire Council.
- 5.3 Our Occupational Health lead has been in contact with Calderdale Council who has shared their experience and learnings in the implementation of their testing process.

6. Safeguards and sensitivities

6.1 **Approach**

- 6.1.1 Occupational Health will continue to assist any employee who has notified us of a dependency on drugs, alcohol or other substance misuse. Occupational Health will signpost individuals to professional help and support groups with the aim of assisting them in their recovery. An employee in a safety critical role will not be permitted to carry out any safety critical tasks until advised by Occupational Health that they are fit to do so.
- 6.1.2 DCC will seek to find alternative duties or redeploy during a period of treatment where practicable. This stated, a high quality of service needs to be maintained and any temporary changes to duties will be subject to review by the Manager, Occupational Health and HR & OD. In situations where an employee in a safety critical role has tested positive for drugs, alcohol or substance misuse, the organisation will signpost the individual to professional support but will also consider the matter under the disciplinary procedure.

6.2 Training and Awareness

- 6.2.1 Prior to the introduction of testing, an awareness programme will be carried out to inform managers and employees of the risk of drug and alcohol abuse and promote health and wellbeing.
- 6.2.2 Any employee whose role is designated as "safety critical" will be informed that their role will be subject to random testing. A communications campaign will inform all employees of the possibility of the organisation requesting specific testing only in situations outlined in paragraph 4.

6.3 Fairness and Dignity

6.3.1 Fairness in the allocation of random tests is key to the credibility of the exercise. The method of allocating random tests and practicalities of carrying out the tests will be reviewed by Trade Union colleagues. One option is for the drug testing company to schedule the tests based on DCC's list of safety critical roles without the council's involvement, thereby maintaining objectivity. In applying the testing process, DCC will always seek to protect the privacy and dignity of all involved.

6.4 DCC Safety Critical Roles

6.4.1 The organisation is carrying out an audit to determine which of its roles are deemed "safety critical". The audit is subject to discussion with Trade Unions, but roles will include drivers of winter gritter lorries, HGV drivers, users of heavy machinery (e.g. chain saws). We propose to introduce random drugs and alcohol testing for these roles to ensure our employees are safe from harm to themselves, colleagues and the public. We foresee the majority of safety critical roles will fall within the Environment and Economy Directorate and Dorset Waste Partnership, but the definite list will be subject to union consultation.

6.5 A Learning Approach

6.5.1 A learning from other organisations who have recently implemented drug and alcohol testing is that adjustments will be required after implementation. As our understanding develops, new questions will arise about consistency of testing between roles throughout the organisation. For these reasons the programme will be subject to regular discussion with Directorates and Trade Unions and a post-implementation review paper will be brought to Staffing Committee.

7. Consultation

7.1 The organisation has placed great importance on seeking the views and expertise of others prior to embarking on this exercise. Of particular importance is the role of Trade Unions in developing our policy and approach. The unions have helpfully provided DCC with the TUC guidance on drug and alcohol policy which has guided our approach.

7.2 Further consultation on the detailed testing procedure and implementation plan is planned.

8. Specialist Advice

8.1 We are grateful to colleagues in Occupational Health, Public Health and Health and Safety who are advising us on the development and implementation of the initiative. Calderdale Council have been very helpful in sharing their learning and experiences in introducing testing with us.

9. Testing Provider: External Company or DCC Resource?

- 9.1 After seeking advice from other organisations, it is clear that the introduction of a drug and alcohol testing requires considerable specialist expertise, especially in relation to testing arrangements and equipment. The protocols on how the testing is carried out, the reliability of the tests and the calibration of the testing equipment means that at external provider is the best option. The random testing of safety critical roles affects a relatively small number of roles within DCC, so there isn't the economy of scale to manage the initiative in-house.
- 9.2 DCC will use a testing laboratory who are accredited by The United Kingdom Accreditation Service (UKAS) to the International Standard ISO 17025 for Drugs of Abuse Testing.

10. Timescale:

10.1 Subject to Staffing Committee approving the option of testing, we will continue in consultation with Trade Unions and commence a pre-implementation employee awareness programme. Our aim is to commence testing in Summer 2017.

11. Recommendation

- 11.1 Notes the legislative and societal reasons for introducing testing
- 11.2 Agrees to introduce alcohol, drugs and substance misuse testing subject to completing Trade Union consultation and following professional advice
- 11.3 Requests a revised alcohol and substance misuse policy is brought to Staffing Committee for approval
- 11.4 Requests a review paper is brought to Staffing Committee 12 months post implementation.

Equality Impact Assessment – Screening Form

Service:	ervice: DCC excluding schools, including DWP			
Title of S	trategy, policy, project or service:	Revised Drugs and Alcohol Policy		
Type of S	Strategy (select as appropriate)			
E	xisting:			
Ne	ew/proposed:	X		
Cl	nanging/Update/revision			
Ot	ther	☐ please list below		

Officers Involved in the Screening:

Paul Loach, HR Business Partner

1. What is the aim of your strategy, policy, project or service?

To protect the public and employees from harm, and promote health and wellbeing by introducing a revised drug and alcohol policy.

The policy will allow the testing for drugs and alcohol of employees, contractors and workers in specific circumstances under agreed protocols.

The impact of the testing will be mainly limited to roles which are deemed "safety critical" (e.g. hgv drivers, heavy machinery users). The list of safety critical roles in being finalised, but we envisage the majority of roles will be in DWP or Environment and Economy.

The specific types of testing will be:-

Random Testing Policy: These are only for safety critical roles. This means that sites and a number of employees are randomly selected for drug and/or alcohol testing periodically.

Specific Testing (safety critical role). This is directed at an individual who is under suspicion of drugs or alcohol misuse, or in post-incident situation.

Specific Testing (non safety critical role). Specific testing of an individual in a non-safety critical role will only be initiated by a manager where an employee repeatedly gives cause for concern and the manager believes this is due to drug or alcohol misuse. In addition the employee's manager should observe the employee for indications of misuse and seek HR advice before any specific testing is agreed.

Occupational Health will continue to assist any employee who has notified us of a dependency on drugs, alcohol or substance misuse. We signpost individuals to professional help and support groups and assist them in their recovery. If any such employee is in a safety critical role, they will not be permitted to carry out such tasks, and we will allocate other duties.

Prior to the introduction of testing, an awareness programme will be carried out to inform managers and employees of the risk of drug and alcohol abuse, and to encourage health and wellbeing. Employees will be encouraged to seek assistance via Occupational Health, or any alcohol or drug related concern prior to the commencement of testing.

Any employee whose role is designated as safety critical will be informed that their role will be subject to random testing.

Fairness in the allocation of random tests for an employee is key for the credibility of the exercise. The method of allocating random tests will be agreed and reviewed by Trade union colleagues. The practicalities of carrying out the tests will also be subject to Trade Union consultation, and we will protect the privacy and dignity of all involved in the testing process.

DCC will use a testing laboratory who are accredited by The United Kingdom Accreditation Service (UKAS) to the International Standard ISO 17025 for Drugs of Abuse Testing.

2. Who will it impact upon (For example, service users, visitors, staff members)

This will protect all users of Dorset roads, service users, visitors and staff. The health and wellbeing aspect will impact mainly on safety critical roles, but we are hoping to have a wider impact as a result of the awareness programme.

a). Does or could the service, strategy, policy, project or change have an impact upon the following:

Protected characteristic	Positive impact	Negative impact	Neutral impact	Unclear
Age	Х			
Disability	Х			
Gender Identity	х			
Pregnancy and Maternity	Х			
Race and Ethnicity	Х			
Religion or Belief	Х			
Sex	Х			
Sexual Orientation	х			
Other socially excluded groups (Carers, rural isolation, low income, armed forces personnel))	Х			

3. Does this have any impact on the $\underline{\text{workforce}}$ in relation to the following:

Protected characteristic	Positive impact	Negative impact	Neutral impact	Unclear
Age	Х			
Disability	Х			
Gender Identity	х			
Pregnancy and Maternity	Х			
Race	Х			
Religion or Belief	Х			
Sex	х			

Appendix 2

Sexual Orientation	х		
Other socially excluded groups (Carers, rural isolation, low income, armed forces personnel)	х		

4. If your answers to Q3 and 4 are mostly 'negative 'or 'unclear', you need to consider a full EqIA. If you do not intend to carry out one, please explain why:

The impact of the exercise is to promote positive health and wellbeing throughout DCC. Similar to other parts of society DCC has employees who struggle with drug and alcohol dependency, and we expect that more employees will come to Occupational Health for advice and support as a result of the initiative.

The majority of safety critical roles in EE and DWP are held by men and this group will therefore be more likely to be tested than women. There is also a possibility that some employees may hide their dependency and then be subject to disciplinary action upon a confirmed positive test, but our intention is prevention not punitive.

