

Workplace drug and alcohol testing: from policy to practice



A step-by-step guide to development and implementation

Before developing a suitable drug and alcohol (D&A) testing policy, there are a number of factors for a business to consider which will drive the most appropriate course of action, specific to its own requirements. Developing a policy is the first step, but the program must also be easily implemented, providing a sound and actionable foundation from which to ensure worker safety.

A thorough program of development will involve a number of steps:

1. An assessment of workplace risk and hazards
2. Development of a clear and actionable testing policy and program
3. Determining the most appropriate testing methodology – who, when and how to test
4. Ascertaining who will carry out the testing – achieving in-house certification or outsourcing
5. Identifying action and outcomes from a positive test result

Step 1: Risk assessment

Step one is to conduct a risk assessment in order to ascertain existing workplace hazards and the strategies required to address those risks. The risk assessment forms the basis for any D&A policy and should be a consultative process which includes management, workers and relevant representatives including unions and other industry bodies.

The degree of risk is driven by obvious factors, such as a requirement for workers to operate heavy machinery or handle hazardous materials, but equal consideration should be given to cultural factors including the nature of the work or workplace practices.

Step 2: Developing the policy

The policy itself will be largely determined by the identified risks and appropriate methods for dealing with those risks. As the D&A policy forms a part of a business' overall workplace health and safety program, it must be clearly communicated and made freely available to all affected parties.

It should plainly outline aims and objectives and indicate that it is equally applicable to everyone across the business including management, workers, visitors and contractors. If it is determined that identified risks and hazards within the business warrant a program of testing, then this must be clearly stated.

In addition to the testing itself, employees must be made aware of the processes and procedures that will be carried out in the event of a positive test result, as well as any counselling, assistance or education measures that will be offered and disciplinary action that may follow.

Step 3: Testing – who, when and how

A major part of the process is to determine the most appropriate testing methodology, which itself is derived from a number of considerations. To simplify the administration, there are many 'sample' D&A policy documents available online from WH&S websites, which will form a useful starting point for your own policy. Additionally, suppliers of testing devices (or other testing service providers) can guide the development of a suitable policy.

Some industries and occupations including aviation and other transport forms, are subject to specific legislative requirements due to the intrinsic relationship with public safety. In other industries, where the risk of harm resulting from D&A use is determined to be significant enough to warrant testing, businesses must ascertain who will be tested and what the trigger for that testing will be.

This will vary from industry to industry and business to business. For instance, in workplaces that implement a program of zero tolerance (and that policy has been clearly communicated) it is not uncommon to conduct random testing, ensuring that workers are adhering to the conditions of their employment.

In other cases, D&A testing is only conducted in the instance of reasonable cause, whereby the employer suspects that an employee is affected by drugs or alcohol and subsequently represents a risk to themselves and others, or in the event of an incident, such as a safety breach or accident involving a particular individual.

In the case of testing explicitly for drug use, the screening technique needs to be determined. There are two available methods; saliva testing and urine testing. Saliva testing is preferred when the objective is to assess an employee's fitness for work, so it most commonly used in the reasonable cause and incident-related scenarios. This is because it provides a result on recent drug use only, indicating an individual's current ability (or inability) to perform duties as required.

If the objective is to provide a lifestyle assessment or establish a long-term pattern of drug use, then urine testing may be more appropriate as it provides a longer detection window.

There are practical benefits to implementing a saliva testing regime, as it is a faster and less intrusive collection method with no requirement for privacy, it requires less fluid handling and delivers results quickly and precisely – between three and eight minutes to provide a result with greater than 95% accuracy.

Regardless of the methodology, testing must comply with the relevant Australian standards which govern the collection, detection and quantitation of drugs. The D&A testing policy must incorporate written procedures which outline the methods of testing to be used and ensure that there are appropriate safeguards.

These safeguards include a clear definition of what actions will be taken with a positive result, privacy and confidentiality issues such as who may access and interpret the results, how they will be stored and for how long, as well as what to do in the event of a test refusal or a challenge to a specific test outcome.

Step 4: In-house or outsource?

Another major decision in the development of a suitable testing policy and regimen is whether to carry out the process in-house, or to utilise the services of an outsourced firm.

Administering the process in-house offers many benefits over outsourcing including savings in both outlay and labour downtime, as testing can be conducted at the most convenient time without involving a third party.

In the case of incident-related or reasonable cause testing, having capacity within the business to respond immediately is invaluable. If there is a requirement for random testing, in-house capability means this can be conducted flexibly and responsively and can be scaled up or down as required.

Workplace drug and alcohol screening can be a sensitive issue, so moving the process in-house and providing a degree of continuity can also improve worker acceptance, as staff are familiar with both the team conducting the testing and the process itself.

The advent of fast and accurate saliva testing technology means that reliable results are delivered quickly, providing the highest level of assurance in the outcome.

Establishing in-house competencies will require accreditation in order to comply with the relevant Australian Standard, as determined by the substance to be detected and the proposed sample collection method. The current standards are: AS 3547-1997 - Breath alcohol testing devices for personal use; AS 4760-2006 - Procedures for specimen collection and the detection and quantitation of drugs in oral fluid and; AS/NZ 4308 - Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine.

Accreditation can be achieved through a number of registered training organisations who provide specific instruction on the collection, management and storage of screening samples, as well as the required administrative elements including record keeping and reporting.

Step 5: Confirmation of screening results

A D&A policy must clearly outline the required action and outcomes resulting from a test result. In the event that an employee tests positive for a prohibited substance, they should be immediately stood down from duty and (where practical) removed from the workplace or encouraged to remain in a safe location until such time as they are able to safely travel home.

Confirmatory testing will need to be carried out to verify test results. This testing is generally carried out in one of two ways; a) at an external facility such as a general medical practice or; b) via a second on-site sample which is sent to an external accredited laboratory.

The chosen re-testing method should be outlined in the D&A policy and employees must be fully aware of any disciplinary action that may result, as well as any assistance or counselling programs they may access – be they provided internally or from an external source.

Communication is the key

Developing and implementing a policy and program for workplace drug and alcohol testing needn't be a difficult task. For any workplace where obvious potential risk exists; where there is requirement for operating machinery, handling of hazardous materials, working at height or in enclosed spaces, or simply driving a vehicle, a D&A policy is a logical inclusion in the existing workplace health and safety system.

The key to development of a successful program is the inclusion of input from all members of a business to ensure that the intent, scope and expected outcomes are clear and that everyone benefits from a safer work environment.