

# Drugs & Alcohol Policy



## 1. Introduction and scope

This policy is non-contractual and will be kept under review. It may be amended from time to time as considered appropriate. It applies to:

- 1.1 All seafarers while serving on board (including Guest Entertainers and Concessionaire staff with seafarer status).
- 1.2 Any person employed by a Carnival group company who visits or travels on board a ship for business purposes\*
- 1.3 Any persons contracted to a Carnival group company whose job entails visiting or travelling on board a ship \*
- 1.4 Any other person contracted with a third party for the purposes of working on board any ship.

*\*Random testing does not apply to these individuals. In all other respects this policy applies. Any breach will be treated seriously and will be reported to the individual's employer for disciplinary action.*

## 2. Definitions

The following definitions apply:

- 2.1 'An individual' is anyone who is subject to this Policy as defined in paragraph 1.1 above.
- 2.2 'Prohibited drugs' mean any drug or drugs prohibited by the Company and includes but is not limited to :
  - 2.2.1 Any controlled drug categorised as Class A, Class B or Class C as defined by the UK Misuse of Drugs Act 1971.
  - 2.2.2 Any New Psychoactive Substances (NPS), also known as 'legal highs', which contain chemical substances which can produce similar effects to the drugs controlled under the Misuse of Drugs Act. These were outlawed by the Psychoactive Substances Act 2016.
- 2.3 A 'Positive test result' means:
  - 2.3.1 A drug test result indicating the presence of any prohibited drugs/substances;
  - 2.3.2 An alcohol breath test showing an alcohol level of 0.25 microgrammes in 100 millilitres of breath (0.25mg/l) or higher, a blood test resulting in an alcohol level of 50 milligrammes in 100 millilitres (0.05%) or higher, or a urine test resulting in an alcohol level of 67 milligrammes in 100 milliliters or higher.
  - 2.3.3 These limits apply unless a lower level is prescribed by national or local legislation, or regulations of the ship's Flag State, or Port State or location.
  - 2.3.4 The limits prescribed by national or local legislation or regulations which will be applied for the purposes of this Policy, are in all cases and for all individuals those specifically prescribed for crew members on duty or at any time on board where they might be required to undertake emergency duties.

Some current levels which are considered particularly relevant for the purposes of this Policy are:

|  | <b>Blood</b> |
|--|--------------|
| United States Waters – for all crew within 3 miles of the United States of America | 0.04%        |
| Danish Waters – for on duty Deck and Technical Personnel                           | 0.05%        |
| German Waters – for on duty Deck and Technical Personnel                           | 0.00%        |
| UK Flagged vessels and ships operating in UK waters                                | 0.05%        |

It is recognised that some prescribed medications and medications obtained 'over the counter' can have side effects that even when taken appropriately, can prevent somebody from being fit to do their duty. It is your responsibility to inform the medical centre onboard of any medication you have, or have recently been taking when you join the ship, by completing an accurate health declaration. Please refer to T&C.6.3 - Monitoring of Statutory Certification – Health Declaration

### 3. Policy Details

The Company's over-riding priority is the safety of you, our guests, our ships, those who may be impacted by our operations and the marine environment. The use of prohibited drugs and excessive consumption of alcohol seriously undermines safety and poses serious risk. Therefore:

- 3.1 The use, sale, possession/ trafficking or distribution of prohibited drugs is absolutely forbidden.
- 3.2 The consumption of alcohol is prohibited if it would result in a test result higher than those limits stated in paragraph 2 or otherwise render you unfit for work and safety duties.
- 3.3 Members of the ship's company involved in watch keeping must not consume alcohol for a period of four hours prior to reporting for duty during their pre-determined routines. It is an offence for a professional seafarer to be impaired by alcohol or drugs whilst on duty on board a ship, or at any time on board a vessel where they might be required to undertake emergency duties to protect the safety of guests.
- 3.4 Where applicable watch keepers must anticipate changes to pre-determined routines as required by "stand-by" arrangements for arrivals, departures and other occasions when the normal watch keeping manning must be supplemented by additional personnel.

All persons on board have a duty of care towards each other, the safety of the ship and our guests, those who may be impacted by our operations, and the marine environment. Therefore, should you become aware of a breach of this policy you must report it in accordance with the reporting procedure at Annex A.

Any breaches of this policy are an act of gross misconduct and will be managed through the disciplinary process. Breaches relating to prohibited drug use are also illegal and may lead to prosecution.

If you are tested for any reason and record a negative test, you will be allowed to continue with your duties unless there are grounds to suspect you are unfit for duty.

If you record a positive test or are otherwise deemed unfit for duty, you will be suspended pending the outcome of a disciplinary process.

In circumstances where testing is not possible, disciplinary action may still be taken if it is considered that you are under the influence of alcohol and/or drugs. In such circumstances the question of whether you are under the influence may be assessed from surrounding circumstances, such as (but not limited to) your physical state, behavior and/or demeanor.

#### **4. Employee Assistance Programme**

We have an Employee Assistance Programme in place which can be accessed by anyone as a supportive measure.

#### **5. Drugs and Alcohol Screening**

To ensure compliance with this policy the Company operates a Drug and Alcohol Screening Programme, both for cause and at random. Blood alcohol tests may be requested by the US Coast Guard or other authorised government agencies. Any refusal to take or frustrate the operation of a drugs or alcohol test is also an act of gross misconduct.

#### **6. For Cause screening**

Screening will be undertaken in accordance with EMR-1104 - Drug and Alcohol Testing After Marine Incident.

In addition, where an officer has a reasonable suspicion an individual is in violation of this policy at any time they may require them; with the authorisation of the relevant SMT Member to undertake a drug and/or alcohol screening test. Where any other person has a reasonable suspicion an individual is in violation of this policy, they must report it to an officer as soon as possible.

#### **7. For Cause searches**

Where the Master has cause to suspect you are involved in the use, sale, possession or distribution of drugs they will authorise an immediate search of your living quarters, your personal possessions and any other relevant areas such as your work space. This would always take place where there is a positive test result for unlawful drugs.

The search will normally be conducted by the Security Officer and members of the Security Team. Where possible, you should be present during a search of your living quarters or personal possessions. If for any reason this not possible, a Senior Officer at operations team level or above should be present to act as an independent witness.

Any attempt to frustrate or delay the search will be regarded as an act of gross misconduct.

## **8. Random screening**

The Company reserves the right to undertake unannounced drug and alcohol screening of a random selection, for at least 5 individuals per ship each month. The procedure for testing those individuals is set out at Annex C.

## **9. Random searches**

From time to time the Company will conduct random searches of ships. These may involve the use of dogs trained to detect drugs or detection equipment. No areas of the ship are exempt from these searches, including your living quarters and personal possessions. Refusal to agree to such a search, or any attempt to frustrate or delay it, will be regarded as an act of gross misconduct.

Any substance found during the course of a search which is suspected of being a prohibited drug will be seized and secured by the Security Officer or an officer authorised by the Master. These substances will be surrendered to law enforcement officers or destroyed, as considered appropriate

## **10. Support for individuals with drug or alcohol problems**

The Company will assist with the rehabilitation of individuals who voluntarily seek help for drug and/or alcohol problems. Assistance must be sought at the earliest opportunity. Discovery or a disclosure prompted by an incident, search or screening, or an impending search or screening, will not provide immunity from disciplinary action. Help can be sought through the onboard medical team. Further details are at Annex B to this policy.

## **11. Promotion and Awareness of the Drugs and Alcohol Policy**

The following steps will be taken to raise awareness of this policy:

- 11.1 Masters must ensure that this policy is covered during induction events.
- 11.2 Line Managers must ensure that they are alert at all times to the signs of potential drug or alcohol misuses and act promptly on any suspicions.
- 11.3 Medical staff must facilitate appropriate medical support for any individual who voluntarily seeks help for drug and alcohol problems.
- 11.4 Staff serving alcohol will be supported to enforce the Responsible Service of Alcohol policy (found at HOT 1103 – Responsible Service of Alcohol)

## **Annex A**

### **Reporting Procedure**

Should you become aware of a breach of the Drugs and Alcohol policy you must report it, in person or by phone, without unreasonable delay to either your line manager, the Security Officer or alternatively to any Officer on duty.

If the concern relates to your line manager you should report it to a more senior Officer or to the Security Officer.

If your concern relates to the Security Officer you should report it to another Officer.

Additionally, there is a confidential reporting line available on-board by dialling 4444 from any of the ships telephones.

An Officer receiving such a report must pass it on in person or by phone without unreasonable delay to the Head of Department who should in turn, pass it on to the Security Officer, or if the case involves the Security Officer to the Master. The Security Officer or Master will then deal with the issue as per the 'For Cause' screening procedure set out in this policy.

Deliberately failing to report a breach may be regarded as an act of gross misconduct.

## **Annex B**

### **Support for individuals with drug or alcohol problems**

If you voluntarily seek help for drug and alcohol problems, you will be treated in the same way as you would for any other medical issue. Confidentiality and discretion will be applied as for any other condition.

If you request participation in a rehabilitation program, or are considered by the onboard doctor to require rehabilitation, you will be disembarked from the ship in order to access this treatment in your home location.

You will be considered for sickness-related benefits in line with the Maritime Labour Convention or your Seafarer's Employment Agreement. This assumes you have not breached any other policy that would ordinarily result in your sickness-related benefits being withheld.

Rehabilitation must be facilitated through a recognised inpatient or outpatient programme ashore and will only be offered following approval from the Medical Department. There is no contractual right to rehabilitation support and it is offered at the Company's discretion.

You cannot request rehabilitation as an alternative to being managed through the relevant Code of Conduct after a breach of conduct has occurred. If you wish to seek support, you are also reminded that discovery or a disclosure prompted by an incident, search, or impending search or screening will not provide immunity from disciplinary action and in such cases rehabilitation will not be offered.

If you participate in a rehabilitation programme you will be required to be passed as fit for service prior to returning onboard. This will include but may not necessarily be limited to, being required to obtain a new Seafarer Medical Examination Certificate in accordance with the ILO Guidelines on the Medical Examinations of Seafarers.

Any failure to follow medical advice or the professional advice of those involved in rehabilitation treatments may result in the programme being withdrawn. Access to any rehabilitation programme will only be offered once. In the event of a relapse, it will not be repeated.

## Annex C

### Random Drug & Alcohol Testing Procedure

The names of randomly selected individuals will be provided to the Master and the Ships Security Officer by the Company's Southampton Office. Results of the tests should be sent to HRServices Fleet for reporting purposes.

#### Drug Testing Procedure:

Collection and testing must be completed under the supervision of the ship's Security Officer. The collection of samples requires attention to detail and the documented procedure must be precisely followed to ensure results are legally binding.

- Before collection, all individuals must wash their hands thoroughly.
  - Appropriate PPE equipment must be used during collection and testing.
- If you are being tested, you must be advised not to eat, drink or smoke in the 10 minutes prior to testing.
- You must complete the attached record of consumption form.
- Collection and testing must be completed in accordance with the attached manufacturer's instructions.
- In the event of a positive screening test:
  - You must be directed to select a new 'Back to Lab' testing kit.
  - Two samples must be collected in accordance with the manufacturer's instructions.
  - Chain of custody documentation must be completed in accordance with the manufacturer's instructions.
  - The samples must be labeled and sealed in the presence of you as the one being tested.
  - Both the person conducting the test and you as the individual being tested, must sign the chain of custody form.
  - Samples must be stored in a secure (locked) location until they can be released to a recognized courier service.

Samples for confirmatory testing must be sent to a CUK recognized Testing Services Laboratory.

Scanned copies of the chain of custody forms must be retained onboard along with a shipping number/tracking number annotated. Results of confirmatory testing can be expected in 5 -7 days.



## **Alcohol Testing Procedure**

Breath alcohol testing must be completed in accordance with the device manufacturers operational guidelines.

Collection and testing must be completed under the supervision of the ships Security Officer or an officer authorised by the Master.

The first test taken is a 'screen' test, to establish whether a 'second confirmation test' will be required.

If the screen test result exceeds the applicable limit, a second confirmation test must be taken after 15 minutes.

If the screen test result is below the applicable limit, no further test is required.

If the second confirmation test is above the applicable limit, you will be managed through the disciplinary process.