

KOMFO ANOKYE TEACHING HOSPITAL



DRUG/ALCOHOL-FREE WORKPLACE POLICY

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1.0 INTRODUCTION

1.1 Mandate of Komfo Anokye Teaching Hospital

The mandate of the Komfo Anokye Teaching Hospital (KATH) as provided by the Ghana Health Service and Teaching Hospitals' Act 525, 1996 is in the following areas:

- Advanced clinical care
- Training of undergraduate and post-graduate medical professionals
- Research

1.2 Vision Statement

To become a centre of excellence in the provision of specialist healthcare.

1.3 Mission Statement

To provide quality health service to meet the needs and expectations of all clients. This will be achieved through well-motivated and committed staff applying best practices and innovation.

2.0 POLICY STATEMENT

Komfo Anokye Teaching Hospital is committed to providing a hospital environment free of the abuse of alcohol and the illegal use of alcohol and other drugs. It is, therefore, a violation of the hospital policy for any worker to possess, trade, or offer for sale illegal drugs or otherwise engage in the use of illegal drugs, intoxicants, or alcohol on the job **except as part of their job**.

The hospital shall adopt and implement programmes that seek to prevent the illicit use of drugs and the abuse of alcohol by staff.

3.0 PURPOSE

The purpose of this policy is to protect the safety, health, and well-being of staff, patients and other individuals who come into contact with the hospital. The Hospital shall strive to maintain a workforce free from the influences of illegal drugs and substance abuse, recognizing that alcohol abuse and drug use pose a significant threat to the achievement of our vision, mission and strategic goals.

To enforce this policy, the Hospital shall make all job offers contingent upon passing a drug test and this will form part of the post-offer medical examination. The Hospital shall carry out random test on staff especially if there is a reasonable suspicion that they are using, selling, possessing, transferring or under the influence of alcohol or illegal drug.

The Hospital strongly encourages staff who have alcohol and/or drug and substance dependency to voluntarily seek counseling or rehabilitation services.

4.0 COVERAGE

This drug-free workplace policy covers KATH-employed staff, individuals who provide services to the hospital (examples KNUST-SMS staff, suppliers, contract services workers), job applicants, volunteers, trainees/students on attachment interns, and patients/relatives.

5.0 APPLICABILITY

It applies whenever anyone is representing or conducting business for the Hospital. Therefore, this policy applies during all working hours, whenever conducting business or representing the hospital, while on call or overtime, while on hospital premises/property or other sites where staff may be assigned, and at hospital-sponsored events.

6.0 PRINCIPLES

The policy shall be guided by the following principles:

- a. Confidentiality of information on any worker of the hospital obtained through this policy shall be held in high esteem
- b. Staff suspecting a violation of this policy should contact their supervisor, their Director or Human Resources Unit as soon as possible.

7.0 PROHIBITED BEHAVIOUR

- a. It is a violation of our drug-free workplace policy to use, possess, trade, and/or distribute alcohol, illegal drugs, or intoxicants.
- b. The illegal or unauthorized use of prescription drugs is also prohibited. It is a violation of Komfo Anokye Teaching Hospital's drug-free workplace policy to intentionally misuse and/or abuse prescription medications.
- c. The use, sale, possession, distribution, dispensation, manufacture or transfer of controlled substances during non-working time to the extent such use impairs an staff's ability to perform his/her job or where such use, sale, possession, distribution, manufacture or transfer affects the reputation of the Hospital to the general public or threatens its integrity
- d. Prescription and over-the-counter drugs, when taken as prescribed, are not prohibited. Any worker taking prescribed or over-the-counter medications should consult with the prescribing healthcare provider and/or pharmacist to determine if the drug may interfere with safe performance on the job. If the use of a drug is determined to interfere with the ability to perform the essential functions of the job, or has an effect on the safety of the worker or workplace, it is the worker's responsibility to take the appropriate interventions

to avoid unsafe workplace practices. This includes taking appropriate work leave or seeking alternatives to the use of the prescribed drug.

- e. A worker reporting to work visibly impaired will be deemed unable to properly perform the essential duties of the job and will not be allowed to work until further evaluated. If, in the opinion of the supervisor, the worker is considered impaired, the worker should be sent home or to a medical facility.
- f. An impaired worker should not be allowed to drive.
- g. It is however, not a violation of this policy to engage in the responsible and legal provision and consumption of alcohol at hospital-sponsored functions, to the extent that such provision and consumption is otherwise permitted at the event.

8.0 SEARCHES

Entering the Hospital's property constitutes consent to searches and inspections.

If an individual is suspected of violating the drug-free workplace policy, he or she may be asked to submit to a search or inspection at any time. Searches can be conducted of pockets and clothing, lockers, desks and work stations, and vehicles and equipment.

9.0 DRUG/ALCOHOL TESTING

- a. To ensure the accuracy and fairness of the hospital's testing programme, all testing will include a screening test, a confirmation test, review by a medical doctor, including the opportunity for workers who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result.
- b. All drug-testing information will be maintained in separate confidential records.
- c. Testing will take place in the following situations: pre-placement, random, post-accident, reasonable suspicion, fitness-for-duty, and follow-up testing.
 - I. **Post offer Testing:** Pre-employment testing is required for all applicants who have received a conditional offer of employment. After completing the Hospital's form on which the job applicant acknowledges that he or she has seen this policy, each applicant will be required to undergo a urine drug test, administered by Psychiatry Unit or Occupational Health as part of the post-offer screening. An applicant may refuse to submit to testing, but if he or she does so, the job offer shall be withdrawn.
 - II. **Random:** Workers may be selected for drug testing through a verifiable and tamper-proof method without prior notification and for no particular reason. A staff may

refuse to submit to the random testing, but if he or she does so, will be subject to disciplinary action.

- III. **Post-accident:** Workers who have caused, contributed to, or are involved in an on-the-job incident or accident involving injury, illness, or property damage will be tested.
- IV. **Reasonable Suspicion Testing:** Drug tests will be conducted following any observed behavior creating "reasonable suspicion", such as:
 - Direct observation of the use of drugs or alcohol or the behaviour consistent with being under the influence of a drug, substance, or alcohol.
 - Abnormal behavior while at work or a significant deterioration in performance.
 - A report of drug use, provided by a reliable and credible source.
 - Evidence that an individual has tampered with a drug test.
 - Evidence that a staff has used, possessed, sold, or solicited drugs while working or while on hospital premises or in a hospital vehicle.

A staff who is reasonably suspected of being under the influence of drugs or alcohol will not be allowed to work, and after furnishing blood and urine specimens or refusing the test, will be sent home on a non-disciplinary suspension (the duration of which will not extend beyond three (3) working days after receipt of the test results) pending results of the drug and alcohol test. The staff will be reinstated if the outcome of the test is negative.

When a staff is sent home due to reasonable suspicion of violating this policy, the Supervisor will take reasonable precaution to ensure the staff's safe return from the workplace to the staff's home.

- V. **Fitness-For-Duty:** Testing may be conducted during annual evaluations for fitness-for-duty.
- VI. **Follow-up Testing:** Random, unannounced testing will be required for workers who have participated in a substance abuse rehabilitation programme after completion of the programme.

10.0 SUBSTANCES TO BE TESTED

The substances that will be tested for include but not limited to the following:

- Psychomimetics
- Narcotics

- Cannabis
- Stimulants
- Hallucinogens
- Performance Enhancers
- Alcohol

Testing for the presence of alcohol will be conducted by analysis of breath. Testing for the presence of the metabolites of drugs will be conducted by the analysis of urine.

Any worker who tests positive shall be immediately removed from duty and referred to a substance abuse professional for assessment and recommendations.

- i. The individual will be required to successfully complete recommended rehabilitation including continuing care, and will be required to pass a **Return-to-Duty test** and sign a **Return-to-Work Agreement**, and be subject to random, unannounced drug tests at the management's discretion.
- ii. Any individual, if tested positive a second time or violates the Return-to-Work Agreement, will be subjected to disciplinary action.
- iii. A worker will be terminated immediately if he/she refuses the screening or the test, adulterates or dilutes the specimen, substitutes the specimen with that from another person or sends an imposter, will not sign the required forms or refuses to cooperate in the testing process in such a way that prevents completion of the test.

11.0 POST-TESTING PROCEDURE

- i. Alcohol and Drug tests are reported by the testing laboratory directly to the medical doctor who will in turn inform Human Resource Unit. If the results are negative, Human Resource will subsequently notify the staff or applicant in writing. If it is positive, the doctor shall directly contact the staff or applicant to give him or her the opportunity to discuss the test result. If the staff or applicant declines to discuss the results or ignores a repeated attempt by the doctor to contact him or her, the doctor may confirm a test as positive without having communicated directly with him or her about the test results
- ii. Within three (3) working days after receipt of a test report from the medical doctor, the Human Resource Unit shall inform the staff in writing of a negative test result on an initial screening test or a negative or positive test result on a confirmatory test, and of his/her right to request and receive a copy of the test result.

- iii. In the case of a positive test result on a confirmatory test, the staff may also submit, within three (3) working days, additional information (such as any over-the-counter or prescription medications that he/she is currently taking or has recently taken) which could explain the test result, and may request a confirmatory retest of the original sample. In order to obtain a confirmatory retest the staff must, within five (5) working days after notice of the confirmatory test result, notify Human Resource in writing of his or her intention to obtain a confirmatory retest. Human Resource will then take appropriate steps to arrange for the retest. If the confirmatory retest does not confirm the original positive test result, no adverse personnel action based on the original confirmatory test will be taken against the staff.

If the original test, the confirmatory test and, if requested, the confirmatory retest are all positive, the Applicant's job offer will be withdrawn and a staff will be referred to the Psychiatry Unit or Occupational Health for care and/or treatment.

- iv. Any adverse action taken against a staff based upon a positive result of a test and a confirmatory test will be in accordance with the hospital Disciplinary Code. Action taken, depending on the individual circumstances, may be a warning, suspension, termination or summary dismissal. Any such adverse action will be based upon the employee's detrimental behaviour and not on the condition of chemical impairment. However, a staff will not be terminated for whom a positive test result on a confirmatory test was the first such result for the staff on the hospital's drug or alcohol test unless the employee was given an opportunity to participate in a drug or alcohol counseling or rehabilitation program, and that staff either refused to participate or failed to successfully complete such a programme.
- v. Any staff who has completed a drug or alcohol rehabilitation programme must be cleared by the Psychiatry Unit or Occupational Health before returning to work. Proper documentation must be submitted to validate successful completion of such a programme.

After successful completion of a drug or alcohol rehabilitation programme, the staff will continue to be subject to random drug and/or alcohol screens for a period of time not to exceed two (2) years. Length of time in this random pool will be determined by the Psychiatry Unit or Occupational Health.

12.0 CONSEQUENCES

If a worker violates the conditions of this policy, the hospital shall take the appropriate disciplinary action which may include termination from employment depending on the severity of the violation.

In the case of potential employee during the recruitment stage, if he or she violates the drug-free workplace policy, the offer of employment shall be withdrawn.

13.0 ASSISTANCE

- The Hospital recognizes that alcohol and drug abuse and addiction are treatable illnesses and that early intervention and support improve the success of rehabilitation. The Hospital therefore offers staff the opportunity to seek assistance with alcohol and drug problems.

14.0 CONFIDENTIALITY

All information received by the organization through the drug-free workplace program is confidential communication. Access to this information is limited to those who have a legitimate need to know in compliance with relevant laws and management policies.

15.0 COMMUNICATION

Communicating our drug-free workplace policy to both supervisors and staff is critical to our success. To ensure all workers are aware of their role in supporting our drug-free workplace program:

- a. Staff shall be educated on the policy and the dangers of alcohol and drug use and the availability of help and copies made available to them
- b. New staff shall be educated on the policy during orientation
- c. Posters shall be available at all locations
- d. Supervisors shall receive training to help them recognize and manage workers with alcohol and drug problems.

16.0 RESPONSIBILITIES

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both management and staff have roles to play:

a. Top Management

- Foster a culture in which every staff of the hospital abstains from drug or alcohol addiction whether on or off duty.
- Provide appropriate resources to assist staff in achieving a drug free work environment.
- Determine appropriate consequences arising from violation of this policy

b. Human Resource Unit

- Ensure that the provisions of this drug-free workplace policy of the Hospital are clearly communicated to potential employees at the recruitment stage and to commit them to sign the drug free agreement form (appendix...).

- Ensure that records on any staff with alcohol or drug problems are confidentially maintained
- Monitor adherence to the policy and procedures
- Implement appropriate consequences arising from the violation of the provisions of the this policy

c. Supervisors

- Inform staff of the drug-free workplace policy and ensure adherence to it
- Observe staff performance, document negative changes and problems in performance and Counsel staff as to expected performance improvement
- Refer staff with alcohol or drug problems for assistance

d. Employees

- Be concerned about working in a safe environment
- Adhere to the drug-free policy
- Support fellow workers in seeking help
- Seek assistance for alcohol or drug problems
- Report dangerous behaviour to their supervisor.

17.0 MONITORING

Directorates and units are responsible for ensuring adherence to this policy. HR shall periodically conduct audits of compliance with the policy and actions taken.

This Drug Free Workplace policy shall be reviewed to reflect service changes at the Hospital or any changes required by law.

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CHIEF EXECUTIVE
DR. OHENEBA OWUSU-DANSO

Effective Date: 1st March, 2018

CERTIFICATE OF AGREEMENT
KATH DRUG FREE WORKPLACE POLICY

I(name) do hereby certify that I have received and read Komfo Anokye Teaching Hospital Drug-Free Workplace Policy regarding substance abuse and substance abuse testing, have had the entire policy explained to me, and have had the opportunity to ask questions.

I understand that if conditions as specified in the policy indicate it is necessary, I will submit to substance abuse testing.

I also understand that failure to comply with a request or a positive result may lead to disciplinary action.

.....
Signature

.....
Employee's Name

Date

(To be a permanent part of worker's personnel file)

SAMPLE LETTER TO WORKERS

Dear Worker:

We have come to recognize that substance abuse is a problem in the workplace, as well as a social problem. We believe abuse of illegal drugs, alcohol or other substances may endanger the health and safety of the workplace.

Komfo Anokye Teaching Hospital is committed to creating and maintaining a drug-free workplace. Our policy will not jeopardize valued but troubled workers' job security, provided they are prepared to help us help them.

Our policy now formally states it is a condition of employment to refrain from substance abuse on or off the job. This prohibition includes the possession, use, distribution or sale of illegal drugs.

Workers who are found to be under the influence of illegal drugs or alcohol or who violate this policy in other ways are subject to disciplinary action which may include termination. Because of the serious nature of these violations, each individual case will be thoroughly investigated to determine the appropriate course of action.

It is important that we all work together to deal with substance abuse and other personal problems to make Komfo Anokye Teaching Hospital a safer and more rewarding place to work.

A copy of the complete Drug Free Workplace policy is attached for your use along with a certificate of agreement.

Sign and return the certificate to the Deputy Director, Human Resource Management.

The policy is effective 1st March, 2018.

Sincerely,

CHIEF EXECUTIVE
DR.OHENEBA OWUSU-DANSO