

Drug & Alcohol Management Plan (DAMP)

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Version Control

The Sydney Airport Drug and Alcohol Management Plan (DAMP) is subject to change from time to time. The DAMP will be made available to persons covered by the policy via the company's intranet and internet sites. As information is updated, the Document Version Number of the document will be amended accordingly and stakeholders advised.

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SYDNEY AIRPORT DAMP POLICY

Sydney Airport is committed to providing a safe, healthy and productive workplace. Alcohol and drugs can have a negative effect on performance and safety.

This Policy facilitates the health, safety and welfare of all Sydney Airport workers by:

- (a) promoting personal responsibility in relation to the consumption of alcohol which may at any time effect their health or the performance of "safety sensitive aviation activities";
- (b) prohibiting the use of illicit drugs by all workers; and
- (c) promoting responsible and lawful use of prescribed and over the counter medication.

In accordance with Part 99 of the Civil Aviation Safety Regulations (1998) Sydney Airport is required to implement a Drug and Alcohol Management Plan (DAMP) for workers undertaking prescribed "safety sensitive aviation activities" (SSAA's) as listed in the Regulations. Sydney Airport employs a large number of workers engaged in such activities. This includes contractors and sub-contractors to Sydney Airport.

Pursuant to the Regulations, workers engaged in SSAA's are subject to random drug and alcohol testing by CASA as well as other testing by Sydney Airport.

It is Sydney Airport Policy that:

- illicit drugs will not be tolerated in any Sydney Airport Workplace;
- working while under the influence of drugs or alcohol will not be tolerated in any Sydney Airport Workplace;
- workers will be supported should they need to take prescription medication. Where prescribed
 medications have the potential to impair performance, the worker must inform their supervisor or
 manager. In such instances, workers will not be required to stop taking their prescribed
 medication, however may be required to temporarily cease performing or being available to
 perform SSAA's. Sydney Airport will seek advice from a Medical Review Officer (MRO) as to the
 individual's ability to continue performing SSAA's;
- workers feeling affected by prescription drugs must stop work immediately where performing SSAA's and inform their supervisor or manager;
- alcohol will not be consumed during work hours at any Sydney Airport Workplace except where
 alcohol is available at functions approved in writing by management and then still strictly
 according to this DAMP;
- workers whose performance is affected by alcohol or drugs will be subject to Sydney Airport's Drug and Alcohol Policy.

Sydney Airport will apply its DAMP to all persons engaged in airside activities. The DAMP will be made available to every current Sydney Airport worker, and on the engagement of any new worker, and all relevant external contractors/sub-contractors engaged in SSAA's.

Any questions or concerns as to this Policy may be directed to the DAMP Contact Officer or a DAMP Supervisor, as set out in this DAMP.

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Geoff Culbert Chief Executive Officer Sydney Airport

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1. THE POLICY DETAILS

1.1 Code of Behaviour

All Sydney Airport Workers are expected to present and remain operationally fit and free from impairment by alcohol and any other form of drug.

A Worker must not perform any SSAAs, remain at work or in any way be available to or undertake any SSAA if impaired by alcohol or drugs (whether those drugs are prescribed, over-the-counter or illicit).

1.2 Application of the DAMP

The purpose of this Plan is to detail Sydney Airport's processes for the management of drugs and alcohol consistent with Part 99 of the Civil Aviation Safety Regulations (1998) (CASR). The Plan outlines the process for drug and alcohol testing by Sydney Airport, random testing by CASA, procedures for dealing with positive results, provision of drug and alcohol awareness training, and drug and alcohol support and rehabilitation programs.

The requirements outlined in this Plan shall apply to those persons performing or available to perform SSAAs including:

- all Sydney Airport Workers working within the Aerodrome Testing Area;
- Sydney Airport engaged in-house contractors and consultants working within the Aerodrome Testing Area;
- Sydney Airport contractors and sub-contractors and their employees performing any work within the Aerodrome Testing Area under (written or oral) contracts with Sydney Airport.
- All activities undertaken by personnel employed by Sydney Airport's security services provider whilst undertaking their duties as an airport security guard or screening officer on behalf of Sydney Airport.

1.3 Definitions

Accident: an occurrence that arises out of a person performing or being available to perform an applicable SSAA if:

- a) the occurrence results in the death of, or serious harm to, a person;
- b) the occurrence results in serious damage to an aircraft or property.

Aerodrome Testing Area: includes any surface over which an aircraft is able to be moved while in contact with the ground, including any aircraft parking areas, and any other area which does not have a building on it, from which access to that area may be had and any part of an aircraft, aerobridge or other moveable structure. It also includes certain buildings on the aerodrome used by third parties for maintenance of aircraft or aeronautical products, for manufacture of aircraft or aeronautical products, by air traffic service providers or by the holders of an AOC for flying training.

Note: Sydney Airport expects employees and contractors will not have access on a regular basis to buildings on the aerodrome used by third parties for:

- maintenance of aircraft or aeronautical products;
- manufacture of aircraft or aeronautical products
- air traffic control service providers
- holders of an AOC for flying training.

Airside: any part of an aerodrome up to and including its perimeter whether or not it is fenced, but excluding any part of the aerodrome that may be lawfully accessed by a member of the public without a specific authorisation by or on behalf of the aerodrome operator.

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Authorised Person: a CASA Approved Tester or a person authorised by Sydney Airport who may conduct drug and alcohol testing.

BAC: blood alcohol content.

CASA: Civil Aviation Safety Authority of Australia.

CASA Approved Tester: a person who is authorised by CASA to:

- a) take body samples for drug and alcohol tests; and
- b) conduct initial drug or alcohol tests.

Comprehensive Assessment: in relation to a person's drug or alcohol use, means an expert examination of the person's physiological and psychosocial indicators.

DAMP: Drug and Alcohol Management Plan.

DAMP Contact Officer: the person appointed by Sydney Airport to liaise with CASA in relation to Sydney Airport's responsibilities under Part 99 CASR.

DAMP Supervisor: The person(s) appointed by Sydney Airport and who has had relevant training to form an opinion as to whether a person may be adversely affected by a testable drug or under the influence of alcohol.

First Join Test: A 'First Join Test' is conducted prior to the first day which an SSAA Employee is initially available to perform SSAA's. It must be conducted within 90 days prior to commencing employment where SSAA's will be conducted or on transfer of duties, prior to an employee's first availability to perform SSAA's.

Illicit Drugs: include cocaine, cannabis, opioids, and amphetamines.

MRO: Medical Review Officer appointed by Sydney Airport for the purposes of its DAMP.

Regular SSAA employee: any SSAA employee who is reasonably likely to perform an applicable SSAA at least two or more times every 90 days. (This may be construed as a rolling 90 day period, so it may cover a wide variety of staff).

Safety Sensitive Aviation Activities (SSAA): any activities that impact directly or indirectly on the safety of civil air operations in Australian territory or the operation of Australian aircraft outside Australian territory. In the case of Sydney Airport this applies to any activity undertaken by a person, other than as a passenger, in an Aerodrome Testing Area.

Serious Incident: an occurrence that arises out of a person performing or being available to perform an applicable SSAA if either or both of the following applies:

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

Testable Drugs: include alcohol, cocaine, cannabis, opioids, amphetamines and benzodiazepines.

Worker: a Sydney Airport employee or a Sydney Airport engaged in-house or external contractor or consultant and their subcontractors and employees.

Workplace: includes all buildings and grounds under the direct control of Sydney Airport Corporation Limited and also extends to worksites under Sydney Airport's control as well as Sydney Airport owned vehicles, whether or not they are on Sydney Airport property.

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2.0 **RESPONSIBILITIES**

2.1 Workers

Each Worker will:

- not possess or use illicit drugs on a Sydney Airport Workplace at any time;
- not undertake any work if he or she is adversely affected by alcohol or drugs;
- notify a supervisor and/or manager if he or she is taking prescription drugs that may affect safety or work performance;
- disclose to a supervisor or manager if he or she has consumed a level of alcohol, or is taking any drug, that may affect his or her ability to carry out an SSAA;
- notify a supervisor and/ or manager if he or she believes that the performance of another worker at a Sydney Airport Workplace is affected by drug or alcohol use;
- be responsible for his or her own alcohol intake at any management-approved function;
- if they have caused or were in any way involved in any Accident or Serious Incident within the Aerodrome Testing Area, immediately notify their supervisor, or manager of that fact and the identities of all other Sydney Airport Workers involved;
- be subject to drug and alcohol testing under this Plan while performing, or being available to perform, a SSAA;
- will be required to provide a body sample if they are to be tested for drugs or alcohol by Sydney Airport or CASA for the purposes of conducting such tests;
- cease performing or being available to perform SSAA if they:
 - o return a positive test 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 Sydney Airport drug and alcohol testing;
 - interfere with a body sample they provide for drug or alcohol testing by CASA or Sydney Airport.

If required to cease performing, or being available to perform a SSAA because of an Accident or Serious Incident, Workers must not again perform or be available to perform any SSAA duties until all mandatory pre-conditions have been met.

2.2 Supervisors and Managers:

- shall ensure Worker completes the Sydney Airport online Drug and Alcohol Education Program prior to performing or being available to perform any SSAA's to and maintains currency every 2 years;
- shall immediately notify any reports or suspicions of, or allegations of, drug or alcohol use or effect to their immediate Manager and the relevant Human Resources (HR) Business Partner;
- shall ensure any Accident or Serious Incident has been reported to their immediate Manager and relevant HR Business Partner;
- shall immediately direct relevant the Worker to cease duties and report to their immediate Manager or the HR Business Partner.
- Should and Accident or Serious Incident occur after normal business hours ensure any Sydney Airport SSAA Employees involved in the incident completes drug and alcohol testing.

Managers:

• upon being contacted by a Supervisor as above, the Manager or HR Business Partner will immediately contact a DAMP Supervisor to report the suspicion, Accident or Serious Incident;

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- a DAMP Supervisor will then as soon as practicable assess the Worker to determine if the Worker suspected may be adversely affected by a testable drug or alcohol and if so, ensure the Worker submits as soon as practicable to a drug and alcohol test, and immediately notify the HR Business Partner;
- in the event of an Accident or Serious Incident the immediately responsible Manager shall ensure any SSAA Worker involved submits as soon as practicable to a drug and alcohol test and ensure that the relevant HR Business Partner and the DAMP Contact Officer are also immediately notified. In the event of an Accident or Serious Incident after normal business hours notification to Human Resources and the CASA DAMP Officer may be via phone or email.;
- shall ensure adequate time is provided to an SSAA Worker to attend a drug or alcohol intervention program if required following an assessment by a suitably qualified MRO.

2.3 Sydney Airport's Duties

- make this DAMP available to all new Workers and to each SSAA Worker
- before that person begins to perform, or becomes available to perform an SSAA;
 - not permit a Worker to perform or be available to perform an SSAA in the following circumstances:
 - if a Supervisor, Manager or DAMP Supervisor suspects the Worker may be adversely effected due to the person being under the influence of a testable drug or alcohol;
 - o if an Accident or a Serious Incident has occurred which involved the Worker, either:
 - for the period that suitable test conditions exist for conducting drug or alcohol tests on the Worker and a test has not been conducted; or
 - if tests have been conducted but Sydney Airport has not been notified of the test results; or
 - if an SSAA Worker is returning to work after a period in which the Worker was not permitted to perform an SSAA because of testable drug use until all mandatory pre-conditions have been met.

2.4 Sydney Airport Contractors

Sydney Airport's DAMP will be made available to Sydney Airport contractors and sub-contractors who perform, or are available to perform a SSAA under a current contract with Sydney Airport.

Sydney Airport contractors who are themselves a DAMP organisation (eg. security screening authority) are not subject to the Sydney Airport DAMP.

Any contractor found to be in violation of Sydney Airport's DAMP will be refused entry into, or removed, and / or may be temporarily or permanently suspended from Sydney Airport's approved contractor list and / or visiting or providing services to Sydney Airport.

Sydney Airport contractors who fall within the definition of a DAMP organisation will be required to develop and implement their own DAMP and may be subject to auditing by Sydney Airport as to compliance with their DAMP and the Regulations.

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3.0 DRUG & ALCOHOL INDUCTION & EDUCATION PROGRAM

All Sydney Airport Workers will be provided with access to Sydney Airport's DAMP (available from the intranet) on commencement of their employment, including information on:

- Sydney Airport's Policy on drug & alcohol use;
- Sydney Airport's Drug and Alcohol Education Program;
- Sydney Airport and CASA drug and alcohol testing in the workplace;
- support and assistance services for people who engage in problematic use of drugs & alcohol; and
- the potential risks to aviation safety from the use of drugs & alcohol.

Sydney Airport engaged contractors and sub-contractors will be provided access to the DAMP via the company's corporate website.

Additionally DAMP Supervisor(s) will be provided with education and training to manage people who engage in problematic use of drugs and alcohol.

Sydney Airport's DAMP is also available via the intranet to all Workers whose employment pre-dates the commencement of the DAMP.

3.1 Drug & Alcohol Education Program:

The following training will be undertaken by all individuals undertaking SSAA's covered by the Sydney Airport DAMP:

• Induction Training

All new SSAA Workers and in-house contractors and consultants, including existing non-SSAA Workers whose role changes to an SSAA role, are required to complete the Sydney Airport online Drug and Alcohol Education Program on their first day of employment or prior to performing or being available to perform any SSAA's.

Contractor Induction Training

All Sydney Airport contractors and subcontractors who perform SSAA roles will be required to complete the Sydney Airport online Drug and Alcohol Education Program prior to commencing work at Sydney Airport.

• Recurrent Training

The following recurrency requirements exist surrounding the Sydney Airport Drug and Alcohol Induction & Education Program:

- all Sydney Airport SSAA Workers and in-house contractors and consultants shall be required to re-complete the online Alcohol & Drug Education program every 2 years from the date that they last completed the course.
- all Sydney Airport contractors and subcontractors will be required to re-complete the online Alcohol & Drug Education program every 2 years from the date that they last completed the course in line with Sydney Airport contractor induction requirements.

• DAMP Supervisor Training

All Sydney Airport DAMP Supervisors shall be required to undertake the CASA DAMP Supervisors course available from the CASA website. DAMP Supervisors shall be required to re-complete the CASA DAMP Supervisors course every 2.5 years from the date that they last completed the course.

Completion of the above training is compulsory. Procedures for the enrolment and ongoing management of SSAA employee Drug and Alcohol Awareness education requirements are outlined in **Appendix 6**.

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4.0 SYDNEY AIRPORT DRUG & ALCOHOL TESTING

4.1 Random Testing by CASA

All SSAA Workers are subject to random alcohol and drug testing procedures by CASA. Random testing may be conducted at any Sydney Airport Workplace, on any day, and at any hour.

Only a CASA Approved Tester will be authorised to conduct random testing of individuals.

Sydney Airport does not intent to undertake random alcohol and drug testing of its staff but will review this on a regular basis and may choose to do so in the future.

4.2 Sydney Airport Testing

Sydney Airport will test for the following substances:

- Alcohol
- Opiates
- Cannabinoids
- Cocaine
- Amphetamines
- Benzodiazepines

CASA may test for other substances.

4.3 When will testing will be conducted by Sydney Airport?

Drug and alcohol testing of all SSAA Workers will be conducted in the following circumstances:

4.3.1 Prior to commencement of SSAAs

A person will be tested for testable drugs and alcohol before commencing SSAA duties with Sydney Airport, or in the case of an in-house contractor or an in-house consultant, before the contract for services including SSAAs commences with Sydney Airport. This test previously referred to as a 'Pre-Deployment Test', is now referred to as a 'First Join Test'.

Type of test: Alcohol – breath

Drugs - urine/oral fluid

Persons will be advised of the above during the recruitment process and this will also be highlighted in letters of appointment and upon transfer of duties to SSAA.

All Sydney Airport contractors will be required to produce evidence of negative testing from an accredited testing organisation prior to performing SSAA duties.

The arrangement and payment for such testing will be the responsibility of the contractor.

4.3.2 Post Accident or Serious Incident

A Worker will be tested for testable drugs and alcohol after any involvement in an Accident or a Serious Incident provided that suitable test conditions exist.

Suitable test conditions exist where, after an Accident or Serious Incident, testing can where practicable be conducted:

- within 32 hours of the accident or incident for drug testing; and
- within 8 hours of the accident or incident for alcohol testing.

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In the event testing is unable to be facilitated within acceptable test conditions post-Accident or Serious Incident, the SSAA Worker must not be permitted to perform or be available to perform any SSAAs until the period of acceptable testing has concluded.

Type of test:

Alcohol – breath

Drugs – urine/oral fluid

Note: In the event a worker requires medical attention resulting from the Accident or Serious Incident, medical needs will be treated as the priority. Drug and alcohol testing will be undertaken post medical attention. The worker will not be permitted to return to SSAAs until a drug and alcohol test has been conducted.

4.3.3 On reasonable suspicion

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

Type of test:

Alcohol – breath

Drugs - urine/oral fluid

The grounds for reasonable suspicion of a person being impaired by drugs or alcohol will depend upon the circumstances in each case. In all cases, an objective assessment of the suspicion will be established based on facts or other relevant information.

Reasonable suspicion can sometimes exist without specific information. For example, evidence of consumption or apparent impairment from witnesses or as a result of a primary test of a Worker could be sufficient to establish grounds for reasonable suspicion.

DAMP Supervisor assessments for reasonable suspicion must be recorded by completing the 'SMS-FO-E6-1-001 DAMP Reasonable Suspicion Assessment Form'. On completion, the form must be sent to Human Resources for record keeping. Where a Sydney Airport DAMP Supervisor conducts an assessment of an engaged contractor, the form will be provided to the contractors management through the Sydney Airport project or contract manager. DAMP Supervisors employed by Sydney Airport engaged contractors should also use this form when completing a Reasonable Suspicion Assessment and retain within company records.

Guidance on the DAMP Supervisor Reasonable Suspicion process is provided in a flow chart outlined in Appendix 8.

4.3.4 On return to SSAA duties

A Worker will be tested for testable drugs or alcohol when returning to work after a period during which the Worker was not permitted to perform or be available to perform an SSAA.

A Worker will only be permitted to return to SSAA work upon providing a negative test result.

Type of test:

Alcohol - breath

Drugs - urine/oral fluid

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4.4 Refusal to Submit to Testing on Medical Grounds

Should an SSAA Worker refuse to submit to drug or alcohol testing on medical grounds, the Sydney Airport Medical Review Officer (MRO) shall be required to assess the Worker's claim of refusal. In the event testing is required following an Accident or Serious Incident and testing cannot be undertaken based on medical grounds, the SSAA Worker shall not be permitted to perform or be available to perform SSAAs until the period of acceptable testing conditions has concluded.

Any such refusal shall be reported to the relevant Business Partner, Human Resources and a DAMP Contact Officer.

4.5 Approved Testing Provider

An Authorised Person will undertake drug and alcohol testing on behalf of Sydney Airport. The Authorised Person will be provided either by:

Sydney Airport Medical Centre

- Location: Level 3, Terminal 1,
- Phone: (02) 9667 4355.
- (Monday to Friday 0800-1700Hrs only)

AusHealth

- Location: Terminal 1, Terminal 2 or Lauriston Park (as required)
- Phone: (08) 8132 7416
- (After hours testing Monday to Friday 1700-0800Hrs and Saturday & Sunday 24Hrs)

4.6 Alcohol testing

Any Worker requested to submit to an alcohol test in accordance with this DAMP must comply with all reasonable directions given to them by the Authorised Person until he or she is satisfied that a valid breath test reading has been obtained. The test will be undertaken using a breathalyser which complies with the relevant standard AS3457.

If testing reveals an initial positive test result, the Authorised Person will direct the Worker to:

- cease undertaking any safety sensitive aviation activities;
- advise the Worker's Manager and a DAMP Supervisor of the initial positive test result and that the Worker has been directed to cease safety sensitive aviation activities;
- undertake an additional breathalyser test alcohol approximately 20 minutes after the initial test to verify the first result.

The Authorised person will report the test results in writing to the relevant Business Partner, Human Resources.

4.7 Drug testing

Any Worker undertaking safety sensitive aviation activities may be required to provide a sample of his or her urine for the purpose of testing for the presence of any testable drug as directed by an Authorised Person.

Any Worker requested to submit to a drug test in accordance with this Policy must comply with all reasonable directions given to them by the Authorised Person, until the Authorised Person is satisfied that a valid sample and analysis reading has been obtained and all relevant procedures completed.

If an initial test for any of the testable drugs, other than alcohol, indicates a positive result, then a confirmatory test will be undertaken in accordance with the relevant Standard to verify the presence of testable drugs above the permitted levels.

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Drug testing shall be conducted in accordance with either of the following relevant standards:

- AS /NZS 4308 Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine; and
- AS 4760 Procedures for specimen collection and the detection and quantitation of drugs in oral fluid.

4.8 Testable limits

The limits for Testable Drugs will be as follows:

- for cocaine, cannabis, opioids, amphetamines ("Illicit Drugs") and benzodiazepines the relevant "confirmatory target concentrations" set out in AS / NZS 4308 for urine testing and AS 4760 for oral testing; and
- for alcohol a BAC of less than 0.02%.

Individuals must return a negative drug test result for CASA testable drugs at all times while in the Aerodrome Testing Area or performing safety sensitive aviation activities.

4.9 Medication

Prescribed or over the counter medicines may alter a person's coordination, response, performance and judgment. It is recommended that advice is sought from a pharmacist or medical practitioner on any side effects of any such medication/s.

If there are side effects which impair normal functions and the ability to perform normal duties then the Worker should stop work immediately. A medical certificate should be sought and presented to the Supervisor or Manager at the next commencement of work.

Sydney Airport will not endorse a worker choosing to cease taking medication which is required on medical grounds because it impairs normal functions and the ability to perform normal duties. Such decisions must be made in consultation with a medical practitioner.

However, Workers must not perform SSAAs if adversely affected by prescription or over the counter drugs.

4.10 Drug test results

If a confirmatory drug test conducted under this DAMP returns a positive result, Sydney Airport will consult the DAMP Medical Review Officer to determine if the presence and level of testable drug detected by the test could be the result of a legitimate therapeutic treatment or some innocuous source.

The Worker will not be permitted to perform or be available for safety sensitive aviation activities in any of the following circumstances:

- if a positive test result for an initial drug and / or alcohol test has been returned;
- if a confirmatory drug test or alcohol test returns a positive result;
- if an MRO has not determined that the result recorded could be a result of a legitimate therapeutic treatment or some other harmless source;
- if the Worker refused to undertake drug or alcohol testing;
- if the Worker interfered with the integrity of the test;
- if the DAMP Supervisor suspects the Worker is under the influence of drugs or alcohol;
- if an Accident or Serious Incident has occurred involving the Worker while performing or being available to perform SSAAs.

Note: In the event a contractor returns a confirmed positive drug or alcohol test, the contracting company must immediately inform their Sydney Airport Contract Manager or Project Manager and

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confirm that the worker has been stood down from performing or being available to perform SSAAs. The Contract Manager or Project Manager must advise the DAMP Contact Officer or their nominated alternate contact in such cases.

4.11 Organising Testing

- 4.11.1 First Join Testing prior to employment the Human Resources Business Partner will verify if the role to be filled constitutes an SSAA. On awarding of the position the Human Resources Business Partner will arrange an appointment for the new Worker to submit to a First Join test no more than 90 days prior to their first day of employment or transfer to regular SSAA duties.
- 4.11.2 Reasonable Suspicion Testing should the Sydney Airport DAMP Supervisor have reasonable grounds to believe that an SSAA Worker may be adversely affected by alcohol or testable drugs, the DAMP Supervisor will require the SSAA Worker to cease performing or being available to perform SSAA's and contact the Human Resources Business Partner to arrange for a 'Reasonable Suspicion' drug and alcohol test to be conducted. Should testing be required outside of normal business hours, the DAMP Supervisor will contact Sydney Airport's after- hours testing provider and arrange a suitable location for testing to be conducted.
- 4.11.3 Post-Accident or Serious Incident Testing should an SSAA employee be involved in an Accident or Serious Incident whilst performing or available to perform SSAAs, the Worker's immediate Manager or Supervisor shall require them to cease performing or being available to perform SSAAs and contact the Human Resources Business Partner to arrange for a 'Post-Accident or Serious Incident' drug and alcohol test to be conducted. Should testing be required outside of normal business hours, the DAMP Supervisor or responsible line supervisor will contact Sydney Airport's after- hours testing provider and arrange a suitable location for testing to be conducted.
- 4.11.4 Sydney Airport Drug & Alcohol Testing Provider Monday to Friday 0800hrs 1700 hrs: Sydney Airport Medical Centre Level 3, Terminal 1 Phone: (02) 9667 4355
- 4.11.5 After Hours Drug and Alcohol Testing Provider Monday to Friday 1700hrs 0800hrs and 24hrs Saturday to Sunday: AusHealth Ph: (08) 8132 7416

Note:

- 1. AusHealth will dispatch a testing officer to conduct a test.
- 2. For incidents occurring at Terminal 1, Terminal 2 or Terminal 3, AusHealth will contact the Duty Manager on arrival.
- 3. For incidents concerning the Airfield, AusHealth will contact the Airfield Operations Coordinator (CAR 2) on arrival at Lauriston Park.
- 4. Ensure a suitable, private location is provided, such as an office is provided for the drug and alcohol testing to be conducted.

5.0 DRUG AND ALCOHOL RESPONSE PROGRAM

5.1 SSAA Workers ceasing SSAA's

Sydney Airport will not permit an SSAA Worker to perform, or be available to perform, an SSAA in any of the following circumstances:

- 5.1.1 Where Sydney Airport is aware that a positive result for an initial drug test has been recorded and, subject to paragraph 5.1.3, the Worker has not, following that test result, recorded a test result for a confirmatory drug test that is not a positive result;
- 5.1.2 Where Sydney Airport is aware that a positive result for an initial alcohol test has been recorded and, subject to paragraph 5.1.4, the Worker has not, following that test result, recorded a test result for a confirmatory alcohol test that is not a positive result;
- 5.1.3 Where Sydney Airport is aware that a positive result for a confirmatory drug test has been recorded for the Worker unless:
 - a. the MRO has determined the result recorded is because of legitimate therapeutic treatment or some other innocuous source; or
 - b. mandatory preconditions for return to work have been met (see paragraph 5.3 below);
- 5.1.4 Where Sydney Airport is aware that a positive result for a confirmatory alcohol test has been recorded for the Worker unless:
 - a) the MRO has determined that the result recorded is as a result of legitimate therapeutic treatment or some other innocuous source; or
 - b) mandatory preconditions for return to work have been met (see paragraph 5.2 below);
- 5.1.5 Where Sydney Airport is aware that a SSAA Worker who has been required to take a drug or alcohol test has:
 - a. refused to take the test; or
 - b. interfered with the integrity of the test.
- 5.1.6 If a DAMP Supervisor suspects the Worker's faculties may be impaired due to the person being under the influence of a testable drug or of alcohol;
- 5.1.7 If an Accident or Serious Incident has occurred involving the worker while he or she is performing or available to perform an SSAA and either:
 - a. for the period that suitable test conditions exist for conducting drug or alcohol tests on the Worker a test has not been conducted; or
 - b. if tests have been conducted under suitable test conditions Sydney Airport has not been notified of the test results.

5.2 Stand down from SSAA's

Sydney Airport will implement the following process following return of a non- negative drug or alcohol test result:

- 5.2.1 Where an SSAA employee returns an initial positive drug or alcohol test result, the Sydney Airport Medical Centre will immediately notify Human Resources. Following this notification, the Sydney Airport Medical Centre will automatically be authorised to conduct a confirmatory test to confirm the non-negative result;
- 5.2.2 Upon notification of an initial positive test result, Human Resources, in conjunction with the SSAA employee's manager, shall <u>immediately</u> stand down the SSAA employee from performing or being available to perform SSAA's. The SSAA employee must not be permitted to return to SSAA's until the confirmatory test returns a negative test result. Notification will also be provided by Human Resources to the DAMP Contact officer or a DAMP Supervisor, who will provide assistance as required in managing required follow-up.
- 5.2.3 Following advice from the Sydney Airport Medical Centre of a confirmed positive result, Human Resources, in conjunction with the SSAA employee's manager must advise the SSAA employee that they will remain stood down from performing SSAA's. The SSAA employee must not be returned to performing SSAA unless the SSAA employee has met the provisions outlined under Section 5.1.3.

5.3 Returning to Safety Sensitive Aviation Activities

- 5.3.1 Where Sydney Airport has not permitted a SSAA Worker to perform, or be available to perform, an SSAA as a result of a drug or alcohol testing related suspension event, Sydney Airport will only permit the Worker to again perform or be available to perform an SSAA in the following circumstances:
 - 5.3.1.1 the Worker has undergone a Comprehensive Assessment for drug or alcohol use;
 - 5.3.1.2 if the Comprehensive Assessment recommended the Worker commence a drug or alcohol intervention program the Worker has begun participating in a nominated drug or alcohol intervention program; and
 - 5.3.1.3 the Worker is considered fit to resume performing, or being available to perform, an SSAA by:
 - a. the MRO; and
 - b. the Worker's treating clinician, if any;
 - 5.3.1.4 if the suspension event related to a drug test at the time the Worker was considered fit to resume performing SSAA duties, the Worker receives a confirmatory drug test and records, for the test, a result that:
 - a. was not a positive result; and
 - b. the MRO is satisfied it indicates the absence of testable drug use;
- 5.3.2 Sydney Airport will permit a SSAA Worker time to attend a nominated drug or alcohol intervention program, if:
 - a. the MRO has advised Sydney Airport that the Worker should attend the program; and
 - b. the Worker is returning to work after a period during which the worker was not permitted to perform or be available to perform an SSAA because of a positive test

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result for testable drug use or alcohol use.

5.4 Self-Referral

An aim of this policy and the educational material available is to encourage Sydney Airport Workers to recognise problematic use of substances and to obtain the assistance they need.

Any Worker who seeks assistance from their Manager, Supervisor, HR or from the Sydney Airport Worker Assistance Program (EAP) will be afforded all necessary assistance. The matter will be treated with strictest confidence.

Sydney Airport employees seeking assistance from Sydney Airport management will be offered assistance, by way of counselling or other treatment or rehabilitation program. They may be provided with flexible leave arrangements in order to complete any treatment or rehabilitation program. Any Worker who wishes to seek assistance should contact the Worker Assistance Program.

5.5 Drug and Alcohol Response Program Documentation

The Sydney Airport HR Business Partner shall be responsible for maintaining documented records of the measures outlined above in response to an SSAA Worker's positive drug or alcohol test.

6.0 ROLE OF THE DAMP MEDICAL REVIEW OFFICER

Sydney Airport will appoint and consult a DAMP Medical Review Officer (MRO) as part of its responsibilities under this program and the CASR's.

6.1 Who is the MRO?

An MRO is a medical practitioner that has:

- competence in the field of interpreting drug and alcohol test results; and
- knowledge of substance use disorders; and
- knowledge of the contents of relevant standards and regulations;
- responsibility for maintaining direct contact with the individual who is the subject of the testing during the testing process;
- responsibility for ensuring the timely flow of information between the parties; and
- responsibility for maintaining the confidentiality of all related information.

Sydney Airport's MRO:

- Dr Somnuk Phonesouk, Dr Gerald Yuen
- Sydney Airport Medical Centre Level 3, Terminal 1
- Phone 9667 4355

6.2 What is the role of an MRO?

Sydney Airport will consult its MRO in the following circumstances:

 if a drug test conducted under the program returns a confirmatory drug test result for a SSAA Worker of Sydney Airport 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; and

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- 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;
- to determine, in consultation with the Worker's treating clinician (if any) if the Worker is fit to resume performing or being available to perform a SSAA after being required to cease performing or being available to perform a SSAA for a drug or alcohol testing related incident.

The MRO will also:

- provide the HR Business Partner and DAMP Contact Officer with results from drug and alcohol testing.
- make initial contact with the Worker's nominated treating clinician if a Worker requires further treatment after returning a positive test result.
- provide the HR Business Partner with the treating clinician's details so they can liaise with them.
- provide statistical information, as required under the CASR's to the DAMP Supervisor.

7.0 REPORTING TO CASA

Sydney Airport is covered under an industry wide CASA Exemption EX143/17 that removes the requirement for regular DAMP reporting to be provided to CASA. Sydney Airport is however required to continue to maintain records relating to drug and alcohol testing and education activities.

8.0 EMPLOYEE ASSISTANCE PROGRAM

There is a wide range of professional support programs available for individuals experiencing dependency problems.

Sydney Airport is committed to providing all reasonable rehabilitation support through these channels for its Workers.

8.1 Employee Assistance Program (EAP)

Sydney Airport employees and in-house contractors and consultants can telephone our Worker Assistance Program provider AccessEAP on 1800 818 728 during business hours for:

- confidential assistance, including guidance on appropriate professional referral; and
- crisis assistance; and
- in relation to supervisors or managers, information about how to manage a perceived issue.

Access is also available from a link on the Health & Wellbeing page on Airportal.

8.2 Drug & Alcohol Intervention Program

It will be compulsory for Workers to attend a drug or alcohol intervention program when:

- an MRO has recommended a Worker attend such a program following a positive test result;
- a Worker did not stop performing or stop being available to perform SSAAs following a
 positive test result; or
- the Worker did not remain in the CASA Approved Tester's presence whilst a drug or alcohol test was completed.

9.0 DAMP CONTACT OFFICER

A DAMP Contact Officer is appointed by Sydney Airport to liaise with CASA in relation to the DAMP (refer to the CASR 1998 Part 99).

9.1 The CASA DAMP Contact Officer is:

Sydney Airport Senior Manager, Organisational Safety Phone: 0481 909 046 Email: robert.cracknell@syd.com.au

9.2 The MRO Liaison is:

Sydney Airport Health & Wellbeing Specialist

10.0 DAMP SUPERVISOR

Sydney Airport has appointed key personnel as DAMP Supervisor(s).

DAMP Supervisors have been trained about 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 Sydney Airport to form such an opinion in appropriate cases. Sydney Airport DAMP Supervisors may also be called upon to conduct an assessment of an SSAA employee of contractors engaged by Sydney Airport.

This is known as a Reasonable Suspicion assessment. All Reasonable suspicion assessments will be recorded via the 'SMS-FO-E6-01-001 DAMP Reasonable Suspicion Assessment Form'. On completion of an assessment, the DAMP Supervisor will ensure the form is sent to HR.

Where a DAMP Supervisor forms that opinion, they must require an SSAA Worker to cease performing or being available to perform an SSAA and direct that person to immediately undertake a drugs and alcohol test.

Where required to do so by a DAMP Supervisor, SSAA Workers must cease performing or being available to perform an SSAA.

The Health & Wellbeing Specialist coordinates the rehabilitation process if a Worker returns a positive drug and / or alcohol test.

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10.1 DAMP Supervisor Contact Details

The Sydney Airport DAMP Supervisors contact details are as follows:

Name	Position	Phone	Mobile	Availability
Robert Cracknell	Senior Manager, Organisational Safety	N/A	0481 909 046	MON-FRI 0900-1700 Hrs
Anthony Conte	Head of Airfield Operations & Compliance	9667 6024	0419 236 083	MON-FRI 0900-1700 Hrs
Symon Reid	Ramp Safety Supervisor	9667 9751	0415 533 044	MON-FRI 0700-1500 Hrs
Chris King	AOL/ADC Supervisor	9667 6320	N/A	MON-FRI 0800- 1600Hrs
John Marciano James Dean Jade Kinchella Nigel Coghlan	Car 2 Airfield Operations Coordinator	9667 9824	Landline diverts to mobile	24/7
David Anderson Michael J Brown Gerard Kaudeer Robert Kracanoski Benn McGrath	Car 10 Senior Works Safety Officer	N/A	0407 949 218	24/7
Sonia Benedicic - Lombardo	Manager Service Standards	9667 9066	0466 854 951	MON-FRI 0700-1500 Hrs
Simon Mouawad Nicolas Morse Mark Rule Warren Burden-Hill George Fotiou	Airport Duty Managers	T1: 9693 3291 T2: 9693 3292	Landline diverts to mobile	0400- 2300hrs
Sandy Senadhira	Manager Operation Control	N/A	0401 689 205	MON-FRI 0700-1500 Hrs
Laurence Veness	IOC Duty Manager	9693 3290	Landline diverts to mobile	When on Duty

11.1 CASA ALCOHOL AND DRUG TESTING

CASA will randomly select individuals undertaking SSAAs and those who access the Aerodrome Testing Area as part of their normal duties for testing based on their own methods.

CASA random testing will involve:

- saliva and / or urine tests for testable drugs except for alcohol; and / or •
- breathalyser tests for alcohol. •

If random testing reveals an initial positive test result, the CASA Approved Tester will direct that person who has produced the positive test not to undertake any SSAAs. A confirmatory test will be undertaken as soon as practicable following the initial test.

The CASA Approved Tester will inform the DAMP Contact Officer or a DAMP Supervisor of the initial positive test result who shall confirm the Worker's obligation to stop undertaking SSAAs and not to return to work until all mandatory pre-conditions have been met in accordance with the DAMP.

On being tested, an SSAA Worker must immediately (or within 1 hour) produce appropriate identification to the CASA tester. This may be a drivers licence, an ASIC or passport. An offence against this requirement is an offence of strict liability.

It is a requirement that all SSAA Workers will at all times carry their ASICs when at the workplace.

12.0 OFFENCES UNDER THE LEGISLATION

Strict liability offences apply if a Worker does not comply with reasonable requests by a CASA Approved Tester to conduct drug and alcohol testing. These include:

- refusal to submit to a drug or alcohol test;
- refusal to submit to a drug or alcohol test of the type that the CASA Approved Tester requests • the person to undertake;
- refusal to stop and provide their name and address when requested; •
- providing a name and address which is false when asked to provide a name and address; •
- tampering with or substituting samples in the testing process; and / or •
- refusing to stand down from undertaking one or more SSAA.

13.0 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 by Sydney Airport or by CASA.

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

14.0 REVIEW & AUDIT

The DAMP must be reviewed every 5 years starting from the date on which the DAMP was developed or at any other time as CASA directs.

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15.0 DAMP RECORD-KEEPING

Sydney Airport will ensure records used to provide information to CASA are maintained for a period of 5 years from the date the information was provided to CASA. All records or parts of records relating to the results of drug or alcohol testing will be destroyed within 6 months after the end of the 5 year period.

The Sydney Airport HR Business Partner shall be responsible for maintaining the security of personal records relating to drug and alcohol testing results. Contractors engaged in SSAAs by Sydney Airport shall be responsible for retaining secure personnel records that will be made available for review by Sydney Airport or CASA on request.

16.0 FURTHER READING & REFERENCES

Part 99 CASR 1998;

CASA EX39/15;

Alcohol and other Drugs in the Workplace, SafeWork NSW;

AS/NZS 4308 Procedures for the collection, detection and quantitation of drugs of abuse in urine;

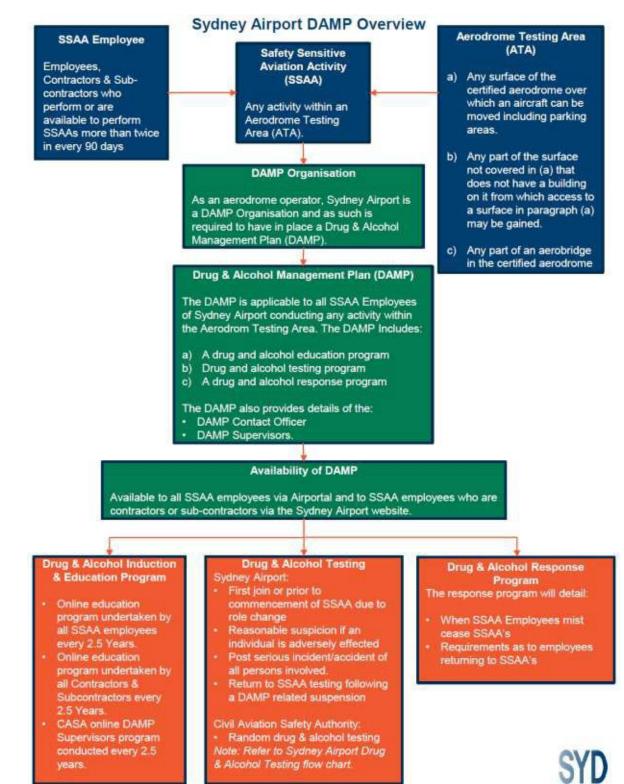
AS 3547 Breath alcohol testing for personal use;

Sydney Airport Drug and Alcohol Policy;

Sydney Airport Enterprise Agreement.

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Appendix 1: Sydney Airport DAMP Overview Flow Chart

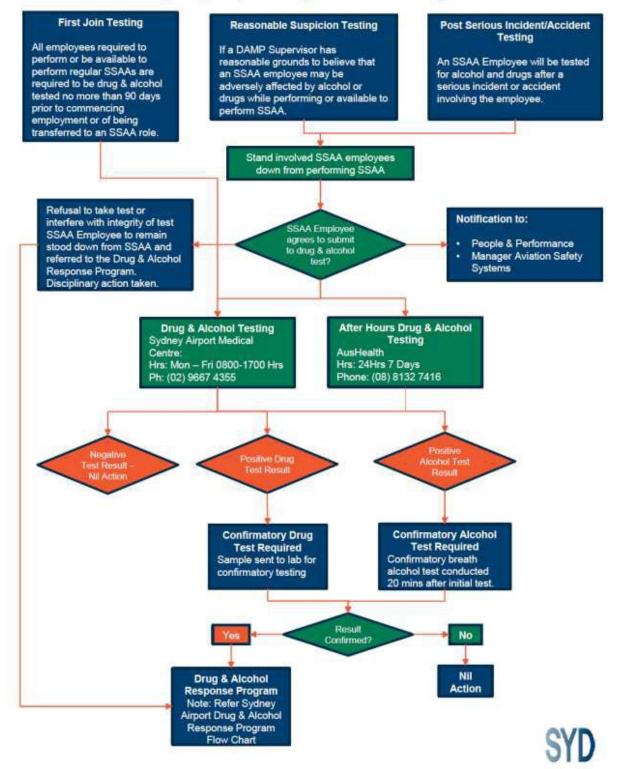


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Appendix 2: Sydney Airport Drug & Alcohol Testing Flow Chart

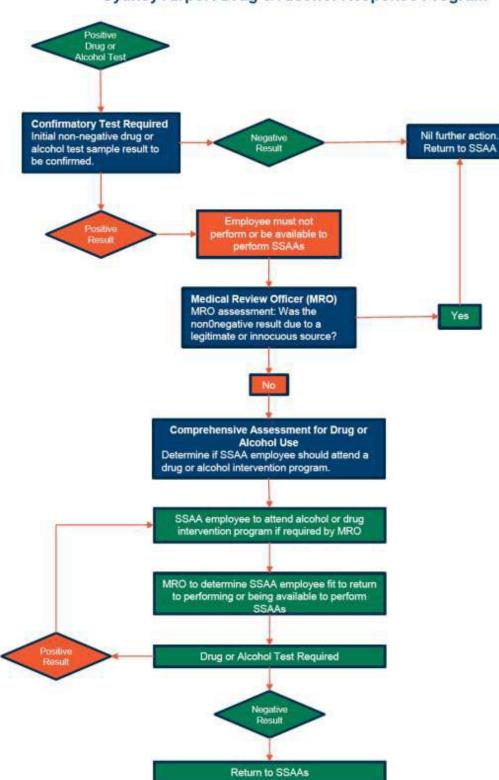
Sydney Airport Drug & Alcohol Testing



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Appendix 3: Sydney Airport Drug & Alcohol Response Program



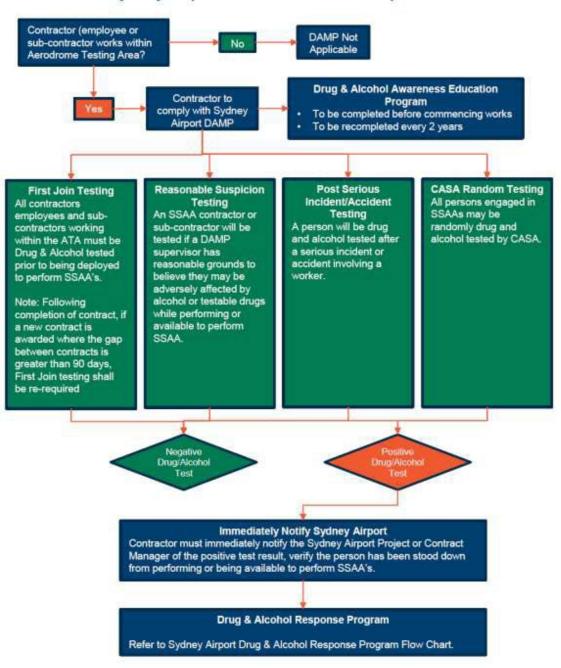
Sydney Airport Drug & Alcohol Response Program



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Appendix 4: Sydney Airport Contractor DAMP Requirements



Sydney Airport Contractor DAMP Requirements



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Appendix 5: DAMP Recruitment Procedures

The following provides an outline of procedures to be followed when recruiting personnel to ensure all individuals who will be performing SSAAs are identified for the purpose of complying with Sydney Airport's DAMP requirements.

1. Position Description Recruitment

The following procedure shall be followed during the recruitment process:

- Human Resources in conjunction with the relevant line manager shall determine if the role constitutes one which would be determined as an SSAA employee role and thus required to comply with the Sydney Airport DAMP requirements. When unsure, consult with the DAMP Contact Officer.
- Where a role is determined to be an SSAA role, Human Resources will ensure this is reflected within the relevant Position Description.

2. Interview Process

During the interview process any candidate applying for a position determined to be an SSAA Employee role will be advised by Human Resources that if successful in the position they will be required to comply with the requirements outlined within Sydney Airport's DAMP.

3. Commencing Safety Sensitive Aviation Activities (SSAA)

The following procedure shall be followed prior to the applicant offered the position being permitted to commence regular SSAAs:

- HR shall ensure the DAMP Contact Officer is advised of all new positions offered and their scheduled commencement date.
- The DAMP Contact Officer will ensure all new personnel are enrolled in Sydney Airport's online Drug and Alcohol Education Program as required.
- All new SSAA employees will be required to complete the Sydney Airport Drug and Alcohol Education prior to commencing any SSAA's.

4. **Pre-Deployment Drug and Alcohol Test Administration:**

Human Resources will liaise with new SSAA employees prior to commencement of SSAAs and the Sydney Airport Medical Centre to facilitate scheduling of the required 'First Join' Drug and Alcohol Test. 'First Join' testing must be completed no more than 90 days prior to the individual's commencement of SSAAs.

Requirements surrounding drug and alcohol testing and the application of Sydney Airport's DAMP will be advised during the recruitment process and will also be highlighted in letter of appointment and upon transfer of duties to SSAA.

HR shall ensure the completed date of the 'First Join' Drug and Alcohol Test is recorded on the new SSAA employees HR profile.

5. Changing Duties: Non-SSAA Employee to SSAA Employee

Sydney Airport personnel classified as non-SSAA employees who transition to an SSAA Employee role are required to comply with the requirements of Sydney Airport's DAMP. In such instances, personnel will be required to submit to pre-deployment drug and alcohol testing and complete the Sydney Airport online Drug and Alcohol Education program prior to commencing SSAAs.

Human Resources, must advise the DAMP Contact Officer of any personnel changing duties of which they are aware.

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Note: For directly engaged contractors or consultants engaged via a Consultancy Service Agreement (CSA), the Line Manager to whom the contractor or consultant reports is responsible for notifying the DAMP Contact Officer of any changes to the scope of works which would include SSAA duties.

The DAMP Contact Officer will ensure all personnel transitioning to SSAA applicable roles are enrolled in Sydney Airports online Drug and Alcohol Education Program as required.

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Appendix 6: Drug and Alcohol Education Program Management

Procedure A – In-house SSAA Employees

The following provides an outline of procedures for the management of Sydney Airport SSAA Employees in line with Section 3.0 of the Sydney Airport DAMP.

1. Initial Enrolment

The following procedure shall be followed during initial enrolment of new SSAA employees in the Drug and Alcohol Education Program:

- HR shall ensure the DAMP Contact Officer is advised of all new positions offered and their scheduled commencement date.
- The DAMP Contact Officer will ensure all new personnel are enrolled in Sydney Airports online Drug and Alcohol Education Program as required.
- On completion of the online Drug and Alcohol Education Program, the learning management system will automatically calculate the date which the SSAA Employee will be due for recurrency training.

2. Recurrency Training

The following procedure shall be followed to ensure Drug and Alcohol Education Program recurrency requirements are met:

- The Sydney Airport learning management system tracks training recurrency due dates.
- 30 days before the recurrency due date, an email notification is sent to the SSAA employee to recomplete the Drug & Alcohol Education Program.

Note: Sydney Airport may at any time require SSAA employees to recomplete the Drug and Alcohol Awareness prior to their recurrency due date where it is deemed necessary.

Any SSAA employee who fails to complete their Drug and Alcohol Awareness training prior to their recurrency due date may be prohibited from performing SSAA's until training requirements have been completed.

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Procedure B – SSAA Contractors

The following provides an outline of procedures for the management of Sydney Airport SSAA Contractors in line with Section 3.0 of the Sydney Airport DAMP.

1. Initial Contractor Enrolment

The following procedure shall be followed during initial enrolment of new SSAA contractors in the Drug and Alcohol Education Program:

• Prior to the commencement of works, all contractors engaged in Safety Sensitive Aviation Activities shall be required to register for the Drug and Alcohol Education Program as part of their contractor induction via AIRDAT Passport:

https://passport-syd.airdat.org/account/login?ReturnUrl=%2F

• On completion of the online Drug and Alcohol Education Program, the learning management system will automatically calculate the date which the SSAA contractor will be due for recurrency training.

2. Contractor Recurrency Training

The following procedure shall be followed to ensure Drug and Alcohol Education Program recurrency requirements are met:

- The AIRDAT learning management system tracks training recurrency due dates.
- 30 days before the recurrency due date, an email notification is sent to the SSAA employee to recomplete the Drug & Alcohol Education Program.
- Recurrency compliance is subject to audits by the DAMP Contact Officer and SSEQ Compliance team.

Note: Sydney Airport may at any time require SSAA employees to recomplete the Drug and Alcohol Awareness prior to their recurrency due date where it is deemed necessary.

Any SSAA contractor who fails to complete their Drug and Alcohol Awareness training prior to their recurrency due date may be prohibited from performing SSAA's until training requirements have been completed.

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Procedure C – DAMP Supervisor Training

The following provides an outline of procedures for the management of Sydney Airport DAMP Supervisors in line with Section 3.0 of the Sydney Airport DAMP.

1. Initial DAMP Supervisor Enrolment

The following procedure shall be followed for the initial enrolment of Sydney Airport DAMP Supervisors in the CASA DAMP Supervisor eLearning Course:

- Upon appointment the DAMP Supervisor will be required to register to complete the 'DAMP Supervisor Course' via the CASA Aviation Worx Learning Space:
 https://www.casa.gov.au/education/elearning-catalogue/aviationworx
- On completion of the DAMP Supervisor course, completion dates are recorded in the Sydney Airport learning management system. The system automatically calculates the date which DAMP Supervisor must recomplete their training.

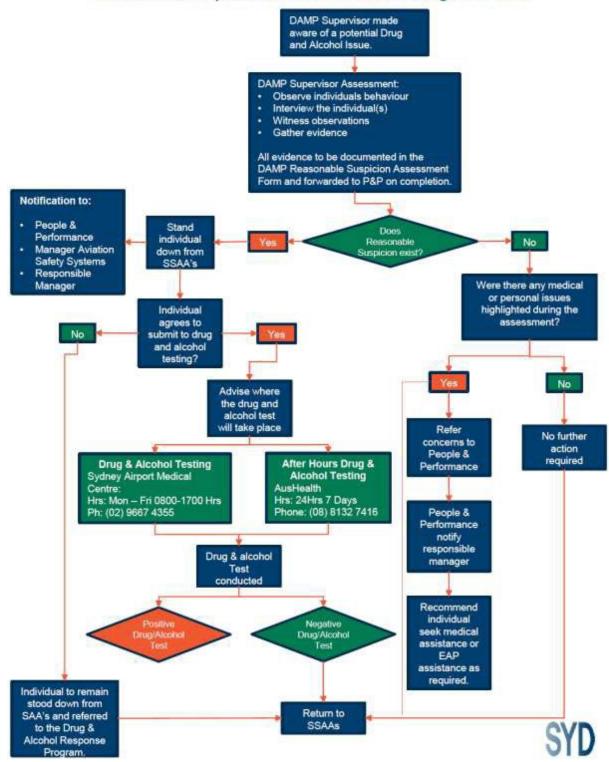
2. DAMP Supervisor Recurrency Training

The following procedure shall be followed to ensure DAMP Supervisor recurrency requirements are met:

- The Sydney Airport learning management system tracks training recurrency due dates.
- 30 days before the recurrency due date, an email notification is sent to the SSAA employee to recomplete the Drug & Alcohol Education Program.
- Any DAMP Supervisor who fails to complete their training prior to their recurrency due date may be prohibited from performing duties as a DAMP Supervisor until training requirements have been completed.

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Appendix 7: DAMP Supervisor Assessment Flow Chart



Reasonable Suspicion Assessment and Testing Flow Chart

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