


Operations: HSE

Health and Industrial Hygiene

Drug and Alcohol Policy

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Rev	Date	Document Status	Custodian/Owner-Name	Authority-Name
8	07/31/2024	Revised	GoM Occupational Health Advisor	GoM Health Discipline Lead
7	07/13/2017	Renamed, consolidated other policies, and revised	Diana Haines	Valerie Murray
6	10/28/2015	Reviewed	Occupational Health Advisor	Health Manager
5	11/25/2014	Revised	Health Manager	GoM HSE Manager
4	09/27/2013	Revised	GoM Security Advisor	GoM Director of Security
3	09/21/2012	Revised	GoM Director of Security	VP S&OR
2	08/02/2010	Revised	GoM Director of Security	VP S&OR
1	06/01/2009	Revised	GoM Director of Security	VP S&OR
0	03/30/2009	Initial Issue	GoM Director of Security	VP S&OR

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AMENDMENT RECORD

Amendment Date	Revision Number	Amender Initials	Amendment Description
07/31/2024	8	VM, CH, RB	Updates made to Section 2 Key Responsibilities. Updates made to Section 3.1 List of prohibited substances. Removed non-DOT screening and cut-off tables in Section 3.2. Updated Section 3.2.2 Table 1 to include SAP requirements. Updated federally regulated testing requirements and consolidated serious marine incident testing requirements and protocols in Section 3.4. Clarified reasonable cause suspicion testing expectations and requirements in Section 4.1.4. Added Section 4.1.5 Return to Duty Testing. Updated Section 4.4 EAP. Section 6 disciplinary process was updated. Section 7 was updated to include training requirements for drug and alcohol testing collectors. Section 8 References/Documents was updated to include the US Drug Misuse Policy and Appendices, Notification Process following a non-negative POCT test and USCG, DOT, and SAMHSA links.
07/13/2017	7	VM, DH	Removed references to Contractors. Consolidated, reformatted, revised Post-Incident Drug and Alcohol Testing Policy (UPS-US-SW_GOM-HSE-DOC-00110-2) into the Regional Addendum to the US Substance Abuse Policy (UPS-US-SW_GOM-HSE-DOC-00200-2). Renamed the Regional Addendum to the US Substance Abuse Policy to GoM Region Drug and Alcohol Policy. Added SMI Testing, Added cut-offs for non-regulated urine, hair, oral. Revised post-accident and reasonable suspicion indication to match US Policy. Updated post-incident testing to align with 2017 OSHA Recordkeeping and Reporting Occupational Injuries and Illnesses regulation change. Updated Definitions. Added references.
10/28/2015	6		Document reviewed with no changes.
11/25/2014	5		Document reviewed with no changes.
09/27/2013	4		Updated Authority and Custodian.
09/21/2012	3		Update SPU to Region. Updated VP HSSE & Engineering to VP S&OR. Updated Security Manager to Director of Security

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Amendment Date	Revision Number	Amender Initials	Amendment Description
08/02/2010	2		Added non-bp employee statement –Purpose and Scope, Noted change or Post Accident Drug and Alcohol Testing Guideline to Policy. Removed definition of non-minor work-related accident/incident. Added link to GoM Region Contractor Substance Abuse Policy (10 Addendum)
06/01/2009	1		Reissued for use.
03/30/2009	0		Issued for use.

INFORMATION RECORD

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Custodian Title:	Occupational Health Advisor	
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1 Purpose / Scope

This bp Gulf of Mexico (GoM) Policy addresses drug and alcohol testing requirements for bp employees who travel offshore to work for bp GoM. This Policy supplements the bp *U.S. Drug and Alcohol Misuse Policy*.

2 Key Responsibilities

2.1 Employee

- A. Refrains from use of Prohibited Substances (refer to section 3.1)
- B. Completes employee drug and alcohol training in bp learning management system.
- C. Completes required drug and alcohol testing (e.g., pre-employment, random, reasonable suspicion, post-accident, follow-up, and unannounced site/location testing) as required by bp and GoM policies.
- D. Cooperates with Medical Review Officer (MRO) for non-negative laboratory results.
- E. Reports any fellow employee suspected of Prohibited Substance use and/or on-duty or offshore alcohol use to their Supervisor.
- F. Complies with all drug searches, including personal, belongings, bags, room, mail, and dog searches.
- G. Notifies Medic and Occupational Health Nurse (OHN) when they are taking any prescription or non-prescription medicine or any other substance that they believe, or regarding which they have been informed by a health professional, may impair their judgment, or otherwise adversely impact their ability to safely perform the essential functions of their job. This includes dangerous and restricted medications, chemicals, and dietary supplements per the *Medication Policy*.
- H. Provides a valid prescription and any requested pertinent information to the OHN when prescription medication is detected during their most recent drug test.

2.2 Medic

- A. Receives notification from an employee regarding prescription and over-the-counter medications, chemicals, and dietary supplements. Notifies OHN and Physician Topsides Medical Control regarding the reported safety-sensitive medications / substances. Follows the *Medication Policy*.
- B. Completes drug and alcohol testing on the facility when required, including random, reasonable suspicion post-accident, follow-up, unscheduled, unannounced testing, and serious marine incident (SMI).
- C. Receives training in both U.S. Department of Transportation (DOT)/non-DOT drug screening collection and DOT/non-DOT alcohol testing (i.e., saliva and evidentiary breath testing). Receives training, initially and annually, and becomes competent in hands-on point-of-care testing (POCT). Maintains training and/or certification according to applicable regulatory requirements.
- D. Understands how to use and maintain the alcohol breathalyzer devices and drug testing kits.
- E. Verifies drug and alcohol testing equipment is calibrated and maintained according to manufacturer specifications.
- F. Monitors the expiration date on drug testing kits to confirm usability.
- G. Notifies the OHN and drug and alcohol testing vendor regarding requested and/or required drug and alcohol testing.
- H. Stores and maintains documentation of drug screening collection and alcohol testing.

2.3 bp GoM Supervisor

- A. Completes supervisor drug and alcohol training in bp learning management system.

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- B. Consults with GoM regional P&C, Security, and OHN prior to conducting a drug and alcohol test.
- C. Notifies Medic or OHN following an event subject to post-accident or SMI testing or a concern for reasonable suspicion. For non-DOT drug screening or alcohol testing, collect as soon as safely possible.
- D. Works with P&C and Offshore Installation Manager (OIM) to remove employees from duty following positive test results.
- E. Acts as the decision maker regarding disciplinary action for employees with positive test results.
- F. Notifies OHN when an employee discloses use of a potentially impairing medication.
- G. Notifies Director of Security of any drug and alcohol issues that impact security.
- H. Submits CG-2692 & CG-2692B form to U.S. Coast Guard (USCG) for any SMI testing.

2.4 bp GoM Director of Security

- A. Serves as bp GoM Designated Employer Representative (DER).
- B. Provides guidance to Supervisors and employees regarding this Policy.
- C. Consults with OHN on any requests to conduct post-accident, SMI, reasonable suspicion, or unannounced site/location testing.
- D. Follows bp *Notification Process for Non-Negative and Positive Drug and Alcohol Tests*.
- E. Assists with developing training content for bp learning management system.
- F. Assists with determining the appropriate drugs to be included in drug testing panel.
- G. When informed of an employee’s non-negative and positive test results, adds the employee to the *Unavailable to Work for bp List*.
- H. Manages all searches related to drugs and alcohol.
- I. Assists with performance meetings for drug and alcohol testing vendors.

2.5 bp GoM Occupational Health Nurse (OHN)

- A. Serves as the custodian for this Policy.
- B. Serves as bp GoM DER.
- C. Maintains employee and supervisor drug and alcohol training content for bp learning management system.
- D. Assists with coordinating Medic training related to drug and alcohol testing.
- E. Assists with determining the appropriate drugs to be included in drug testing panel and the drug cut-off level (i.e., the level at which a test is considered positive) and aligns these determinations with the DOT, where possible.
- F. Receives information from drug and alcohol testing vendor and/or Director of Security regarding non-negative and positive test results for employees.
- G. Follows bp *Notification Process for Non-Negative and Positive Drug and Alcohol Tests*.
- H. For employees receiving counseling assistance, works with P&C and Counselor regarding employee’s treatment with a substance abuse professional (SAP). Following treatment, oversees unscheduled and unannounced testing to ensure employee completes follow-up testing.
- I.
- J. Provides guidance to Supervisors, employees, and Medics regarding this Policy.
- K. Assists with performance meetings for drug and alcohol testing vendors.

2.6 Medical Review Officer (MRO)

Note: The MRO is not a bp employee, is independent of any laboratory, and must be a Medical Doctor/Doctor of Osteopathy (MD/DO) certified by the Medical Review Officer Certification Council (MROCC) and the American Association of Medical Review Officers (AAMRO).

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- A. Will not be affiliated with any laboratory, is not a bp employee, must be an MD/DO and certified MRO [MROCC, AAMRO].
- B. Contacts employee regarding interview for a non-negative laboratory test.
- C. Reviews chain of custody and laboratory report, then issues drug test results that are either positive, negative, adulterated, substituted, or invalid, or if there was a failure to test.
- D. Reports to OHN regarding any prescription medications that may interfere with safety-sensitive duties.

2.7 Drug and Alcohol Testing Vendor

- A. Delivers hands-on POCT drug and alcohol testing training to the Medic, initially and annually.
- B. Provides required drug and alcohol testing supplies and documentation forms.
- C. Completes drug and alcohol testing at requested locations, onshore and offshore.
- D. Maintains required records and documentation related to drug and alcohol testing according to applicable regulatory requirements.
- E. Disposes of illegal drugs according to applicable regulatory requirements.
- F. Follows bp *Notification Process for Non-Negative and Positive Drug and Alcohol Tests*.
- G. Communicates all non-zero alcohol results to OHN.
- H. Sends positive drug and alcohol test results to OHN.
- I. Liaises with MRO and OHN concerning test results.
- J. Coordinates all searches with bp GoM Security Director related to drugs and alcohol, as requested.
- K. Provides monthly, quarterly, and annual drug and alcohol testing reports.

2.8 Health Discipline Lead

- A. Serves as the authority for this Policy.
- B. Serves as bp GoM DER.
- C. Assists with performance meetings for drug and alcohol testing vendors.
- D. Reviews and agrees random testing percentage and drug testing panel with GoM BLT.

2.9 People & Culture (P&C)

- A. Conducts consequence management discussions with employees.

2.10 GoM Occupational Health Physician

- A. Makes recommendations regarding work activity restrictions for employees, based on type of medication used.
- B. Assists with determining the appropriate drugs to be included in the drug testing panel and the drug cut-off level, and aligns these with the DOT, where possible.
- C. Receives information from the OHN regarding employees who tested positive.
- D. Supports the OHN, P&C, and Supervisor regarding non-negative testing or a refusal to test.
- E. For employees receiving counseling assistance, works with the OHN and P&C regarding an employee's treatment.
- F. Provides guidance to Supervisors, employees, and Medics regarding this Policy.
- G. Advises regarding additional drug(s) to test for when there is reasonable suspicion that abuse will not be detected by the current drug testing panel. For example, if a specific illegal substance is found in belongings or bags.

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3 General Requirements

3.1 Prohibited Drugs, Chemicals, and Medications

The use, selling, purchasing, transferring, concealment, manufacturing, transportation, possession, or being under the influence of a Prohibited Substance while on bp property, in any bp vehicle, or on bp time is strictly prohibited.

Prohibited Substances include:

- alcohol;
- any substance listed in Schedule I of the Controlled Substances Act (CSA) (21 U.S.C. 812), specifically including marijuana, cannabinoids (CBD) (both synthetic forms and substances derived from the cannabis plant), heroin, opiates, opioids, amphetamines, and phencyclidine (PCP) and their synthetic equivalents;
- any substance that an individual may not manufacture, distribute, dispense, possess, or use under U.S. law and/or the laws of the state in which the individual is employed or is working;
- any otherwise legal but illicitly used substances, such as prescription drugs obtained or used without proper medical authorization (this would include prescription drugs prescribed to someone other than the employee e.g., friends and family members), drugs or supplements with mind-altering properties (e.g., Kratom, Salvia, Kava, Khat, Mescaline, Ayahuasca, and Betel Nut), testosterone-like substances, and other substances not being used for their intended purposes or not for human consumption; and
- DEA Drugs of Concern and other substances not being used for their intended purposes and those not Food and Drug Administration (FDA) approved for human consumption; CBD products not included in Schedule I of the CSA (unless FDA approved). (Note that CBD products may contain THC even if they claim otherwise.)

There are several states that allow for the use of marijuana and cannabinoids for medical and/or recreational purposes. None of these states currently require an employer to allow an employee’s use or possession of marijuana, cannabinoids, or THC-containing substances in the workplace or while performing work duties. bp reserves the right to take disciplinary action up to and including termination based on possession, impairment, or positive drug test results to the fullest extent permitted by law.

Unless otherwise prohibited by law, **INDIVIDUALS ARE PLACED ON NOTICE THAT EVEN IF THE INDIVIDUAL POSSESSES A PRESCRIPTION OR RESIDES IN A JURISDICTION WHERE MEDICAL OR RECREATIONAL USE OF MARIJUANA, CANNABINOIDS (CBD), OR ANY THC-CONTAINING SUBSTANCE IS LEGAL, A POSITIVE TEST MAY BE DEEMED A VIOLATION OF THIS POLICY AND MAY BE GROUNDS FOR WITHDRAWAL OF AN OFFER OF EMPLOYMENT AND FOR DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION OF EMPLOYMENT.**

Individuals are warned that the use of CBD products and substances, or medications purchased in a foreign country, may result in a positive drug test.

3.2 Screening and Confirmation for Drugs and Alcohol

3.2.1 Drug Testing

- A. Employees are tested for drugs on site using urinalysis (POCT), oral fluid testing, and/or hair testing.
- B. Drug tests will be analyzed at a Substance Abuse and Mental Health Services Administration (SAMSHA) certified laboratory.
- C. Oral fluid tests, hair tests, and non-negative urinalysis POCT will be analyzed at a SAMSHA certified laboratory.

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D. Laboratory non-negative results will undergo an MRO review.

3.2.2 Alcohol Testing

- A. Alcohol testing may include use of either a breath or saliva test.
- B. In certain circumstances, a blood test may be used for alcohol testing.
- C. Positive alcohol test results will be confirmed using an evidentiary breath alcohol testing device. An MRO review is not required for positive alcohol test results, unless otherwise required by an applicable local, state, or federal law.
- D. Table 1 lists confirmation test levels for alcohol and required actions.

Table 1. Alcohol Testing Confirmation

Confirmation Test Level	Actions
If the event is less than 0.02% breath alcohol concentration (BAC)	<ul style="list-style-type: none"> • Deemed a negative test result. • OHN will refer employee to P&C. • May report to active duty
If the First event is equal to or greater than 0.02% BAC and less than 0.04% BAC	<ul style="list-style-type: none"> • Remove employee from active duty and suspend. • Deemed a positive test result and employee is subject to disciplinary action. • Employee is denied access to any bp facility and must be referred (mandatory) to an SAP. • Employee may not return to work until SAP recommendations are completed and a negative test result is obtained. • When follow-up testing is appropriate, the number and frequency of such follow-up testing shall be determined by a SAP
If the Second event is equal to or greater than 0.02% BAC	<ul style="list-style-type: none"> • Remove employee from active duty • Deemed a positive test result and employment will be terminated.
If the First event is equal to or greater than 0.04% BAC	<ul style="list-style-type: none"> • Remove employee from active duty. • Deemed a positive test result and employment will be terminated.

3.3 Searches and Inspections

- A. bp reserves the right at all times on its premises to conduct unannounced substance screening/testing, searches, and inspections of employees, including their personal belongings, lockers, baggage, desks, toolboxes, clothing, mail, and vehicles located on bp property or worksites, as a means of enforcing this Policy.
- B. Any Prohibited Substance or item prohibited by this Policy, or any materials that are illegal to possess, will be retained by bp and may be destroyed, tested, or turned over to the appropriate law enforcement agency.

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- C. The refusal of any person to submit to a search or inspection will result in the revocation of the person's access privileges.

3.4 DOT Federally Regulated Tests

Based on USCG guidance (issued in 2022) regarding floating offshore facilities (FOF), Thunder Horse, Atlantis, Mad Dog, Na Kika, and Argos are no longer considered by USCG to be “vessels.” Therefore, each of the five (5) bp platforms are not subject to the manning and marine licensing regulations found in 46 CFR Subchapter B, Parts 10-16, including mandatory chemical testing requirements. Based on the non-applicability of the foregoing regulations, bp is not required to employ licensed mariners on FOFs and, therefore, not required to complete DOT chemical testing.

4 Process

4.1 bp GoM Employee Testing

4.1.1 Pre-Placement

Employees are required to submit to and successfully complete a pre-placement drug test 60 days prior to their start date. These drug tests may include hair, urine, or oral testing.

4.1.2 Random

- A. Random drug testing may be completed on an unannounced/unscheduled basis for the Westlake Office. GoM employees must immediately report to the collection site following notification from their Supervisor.
- B. For offshore travelers, random drug and alcohol testing is completed at the heliport. Testing may also be completed offshore, shorebase, and flotels on an unannounced/unscheduled basis.
- C. Employees working at the Preservation Maintenance Facility (PMF), Houma Operations Learning Center (HOLC), and any other bp onshore-operated facility may be randomly tested for drugs on an unannounced/unscheduled basis.

4.1.3 Post-accident

- A. Non-federally regulated testing:
 - 1) Following a work-related incident, the employee will be medically stabilized first and then may be required to submit to drug and alcohol testing.
 - 2) bp Supervisors must assure that, when an employee’s conduct either contributed to the incident or cannot be eliminated as a contributing factor to the incident, that employee is tested for drugs and alcohol.
 - 3) Documented explanation shall be required if drug and alcohol testing does not occur within 2 hours following the incident. The worker is required to remain available for alcohol testing within the 8-hour period after the incident. Drug testing should occur within 32 hours. Use the *Supervisor Written Record* from the bp *U.S. Drug and Alcohol Misuse Policy* in Section 8 as guidance.
- B. Serious Marine Incident (SMI) Testing: If a SMI occurs, a “marine employer” is required to conduct and document drug and alcohol testing in accordance with the following procedures. NOTE: incidents that occur on bp-operated facilities Thunderhorse, Atlantis, Na Kika, Mad Dog, and Argos are not SMIs, because those facilities are not “vessels.” (See Section 3.4 above) Nevertheless, bp may elect to conduct drug and alcohol testing in accordance with one or more of the following SMI procedures.

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- 1) Employees involved in the SMI will be medically stabilized first and then may be required to submit to drug and alcohol testing.
- 2) SMI drug and alcohol testing must be conducted and reported to the USCG. USCG forms CG-2692 and CG-2692B must be submitted to the USCG Chief of Investigations, Marine Safety Unit, Morgan City, LA, following any SMI by the OIM. The facility's Medic will maintain copies of CG-2692 for the facility.
- 3) Supervisors must verify that each employee who was directly involved is tested for drugs and alcohol. A "directly involved" individual is one whose order, action, or failure to act is determined to be, or cannot be ruled out as, a causative factor in the events leading up to or causing an SMI.
- 4) Documentation shall be completed by the Supervisor if alcohol testing does not occur within 2 hours following the incident. The worker is required to remain available for alcohol testing within the 8-hour period after the incident.
- 5) Drug testing will occur within 8 hours, and no later than 32 hours, following a SMI. If circumstances preclude testing within the 32-hour period, delayed testing may be considered for drugs only. Non-DOT drug testing will be performed if testing occurs after 32 hours, after consultation with P&C and OHN. SMI drug testing will be conducted by the facility Medic as directed by the OIM or their designate.
- 6) A Serious Marine Incident (SMI) is defined as:
 - a) One or more deaths
 - b) An injury to a crew member, passenger, or other person that requires professional medical treatment beyond first aid, and, in the case of a person employed on board a vessel in commercial service, which renders the individual unfit to perform routine vessel duties
 - c) Damage to property in excess of \$100,000
 - d) Actual or constructive loss of any vessel subject to inspection under 46 USC 3301
 - e) Actual or constructive total loss of any self-propelled vessel, not subject to inspection under 46 USC 3301, of 100 gross tons or more
 - f) Discharge of oil of 10,000 gallons or more into the navigable waters of the United States, as defined in 33 USC 1321
 - g) A discharge of reportable quantity of hazardous substances into the navigable waters of the United States
 - h) A release of a reportable quantity of hazardous substances into the environment.

4.1.4 Reasonable Suspicion

- A. The decision to conduct reasonable suspicion testing shall be based on specific and contemporaneous physical, behavioral, or performance indicators of impairment.
- B. bp OHN shall be consulted for guidance prior to testing and regarding testing timeframes. P&C should also be notified by the OHN or Supervisor.
- C. Supervisors should refer to Section 8 and use the bp *U.S. Drug and Alcohol Misuse Policy* Appendix F: *Reasonable Suspicion Observation Checklist* to help identify when reasonable suspicion testing should be conducted.
- D. Reasonable suspicion testing for drugs and alcohol should occur within 2 hours of the reasonable suspicion determination when possible. Delayed testing beyond this timeframe may be considered if circumstances did not allow for testing within 2 hours but should not exceed 8 hours for alcohol or 32 hours for drugs. Tests beyond 32 hours is acceptable for non-DOT drug testing. If testing does not occur, documentation should be completed using Section 8, Appendix F: *Supervisor Written Record* in the bp *U.S. Drug and Alcohol Misuse Policy*.
- E. At a minimum, employees will be removed from safety-sensitive or critical duties as defined by the business until the test results are complete.

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- F. The following steps should be used to guide the Supervisor when addressing a reasonable suspicion situation:
1. Either the OHN, DER, or Supervisor must contact P&C.
 2. Privately inform the employee that they are being sent for a reasonable suspicion test because there is a reasonable basis to believe the employee’s performance and/or behavior is or has been affected by some substance.
 3. Privately inform the employee that they are expected to accompany the appropriate bp Supervisor or designate to the specimen collection site (i.e., sickbay) to provide a specimen.
 4. In Section 8, use Appendix F: *Reasonable Suspicion Observation Checklist of the US Drug and Alcohol Misuse Policy* to document the event. Send the completed checklist to the OHN or DER.
 5. The employee should be instructed not to drive any motor vehicle due to the reasonable suspicion belief that they may be impaired.

4.1.5 Return-to-Duty Testing

An employee who has a positive alcohol test (and who is not terminated), shall not be allowed to return to duty until the employee has complied with the Substance Abuse Professional’s (“SAP”) recommended provisions, and obtained a negative alcohol test. Refusal to cooperate with the SAP’s recommendations is a violation of this Policy and the employee may be subject to disciplinary action up to and including termination of employment. The employee should be required to sign a return to duty plan as established by bp outlining the follow-up testing and any other return to duty requirements. Failure to comply with this return to duty plan may result in disciplinary action up to and including termination of employment.

4.1.6 Positive Tests

The following will be considered a positive test and employment will be terminated:

- A. MRO verified positive drug test where drug is identified above cut-off level without medical explanation.
- B. Confirmation test above alcohol limit. Refer to Table 1. Alcohol Testing Confirmation.
- C. Refusal to test, failure to cooperate with any portion of the testing process, or failure to complete test, unless due to a medical condition verified through bp Occupational Health
- D. Submission of a specimen that the MRO verifies as adulterated or substituted, or where there is evidence of an attempt to interfere with a drug or alcohol test.

4.1.7 Refusal to Test

The refusal of an employee to submit to any testing required by this Policy is considered equivalent to a positive test, except there will be no opportunity for rehabilitation and future retesting. A refusal to test shall include a failure to cooperate with any part of the testing process, including:

- A. Failing to remain and cooperate until the process is completed.
- B. Failing to provide a sufficient or adequate specimen (without medical explanation).
- C. Failing to appear for testing, including failing to appear within a reasonable time after being notified of testing.
- D. Failing to submit to a re-collection or retesting when required.
- E. Submitting a specimen that the MRO verifies as adulterated, substituted, or invalid due to test tampering.

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4.2 Statement of Confidentiality

It is the policy of bp that medical information, whether in verbal, written or electronic form, is considered strictly confidential. All such medical information will be maintained in a confidential file separate from any other employee information. This information will only be disclosed to those with a legitimate “need to know.” Employees who disclose confidential medical information without proper authorization will be subject to disciplinary action up to and including dismissal from bp.

4.3 Disciplinary Implications

The bp *U.S. Drug and Alcohol Misuse Policy* allows for an opportunity for rehabilitation following a first positive test result. It also allows for termination following a first positive test or a refusal to test. Given the safety-sensitive nature of many jobs, particularly offshore, GoM will more vigorously scrutinize this decision. Any violation of this Policy by an employee will result in their immediate removal from the workplace, including placement on the *Unavailable to work for bp List*.

All violations will be reviewed by appropriate GoM Management, GoM Medical, Legal, Business Integrity and P&C as they pertain to Employee Assistance Program referral, disciplinary action, and access reinstatement.

4.4 Employee Assistance Program

As part of your benefits package, bp employees and family members living in the same household, including coverage for children over certain ages 2, can access free, confidential and independent advice and practical support to help you manage issues that are worrying you at work or at home – through the Employee Assistance Program (EAP).

- **You can use EAP to discuss everyday challenges or significant life events** such as bereavement or divorce. You don’t have to be at crisis point to contact EAP, it can be used at any time you need guidance, coaching or issue resolution.
- **Your use of EAP is completely confidential.** The service is provided by an independent vendor. No one at bp will know you have contacted EAP and you can choose to remain anonymous.
- **EAP can help managers** with advice on how to support employees in their teams who may be facing issues - or how to deal with challenges of their own as line managers and team leaders.
- **EAP offers you unlimited advice for as many problems or enquiries that you have.** For issues where it is deemed appropriate, a **six-session model of face-to-face or structured telephone counselling may be advised. This is short-term solution based counselling.**

EAP is available 24/7, 365 days of the year. Employees can call anytime, whatever the reason.

- Telephone: 1 800 409 3687
- In the US the EAP benefit is offered through the BP Medical Plan. You can get more information about this benefit at bp.com/benefitsatbp and you can contact the EAP at www.EAPhelplink.com (company code bp)

5 Recordkeeping

bp, through its third-party administrators and vendors, will maintain records related to substance tests conducted under this Policy, subject to bp record retention and destruction practices.

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6 Training

Computer-based education and training components are available in the bp learning management system for GoM employees and supervisors. This education and training platform provides information concerning employee and supervisory obligations as defined in the bp *U.S. Drug and Alcohol Misuse Policy* and other federal requirements.

All drug and/or alcohol collectors shall have appropriate and up-to-date training.

7 Definitions/Acronyms

Table 2. Drug Testing

Terms	Description
Adulterated	substances were found in a testing sample which are added at the time of specimen collection, often to interfere with testing.
Chain of custody (COC)	the combination of procedures and documentation which provides a faithful and accurate written record of the custody of a biological specimen, from the time of initial collection of a specimen to final laboratory analysis.
Drug (substance) testing	the analysis of urine, saliva, hair, or breath for chemicals, drugs, and drug metabolites.
Invalid test	inability to complete laboratory testing due to interference of a substance (which may be a medication).
Laboratory non-negative test	laboratory confirmation using gas chromatography/mass spectrometry (GC/MS), prior to review by MRO.
Negative test	- a negative point-of-care Testing (POCT), or - laboratory conclusion that the presence of a substance was not detected in a specimen at or above the screening and confirmation levels used, or - MRO determination that a laboratory non-negative test had a legitimate explanation.
Non-negative test	the result of the on-site/rapid/screening drug test or laboratory immunoassay that was found to contain one or more substances present at or above the screening cut-off level, but has not yet undergone confirmation testing and review by the MRO.
Positive test	a result where a drug was detected and confirmed by the laboratory and reviewed by MRO without alternative medical explanation (refusals to test are also considered equivalent to a positive test).
Post-accident	drug/alcohol testing following injury or property damage or as required by DOT post-accident testing.

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Terms	Description
Serious marine incident testing	drug/alcohol testing following Serious Marine Incidents as defined by the USCG.
Substance abuse testing	drug and alcohol testing.
Substituted	the specimen was not consistent with human urine.

8 References/Documents

A. *bp U.S. Drug and Alcohol Misuse Policy*

[US-Drug-Alcohol-Policy.pdf \(exploreyourbenefits.com\)](#)

B. *bp U.S. Drug and Alcohol Misuse Policy Appendices*

[drugs-and-alcohol-misuse-policy-appendices-us-lm.pdf](#)

bp U.S. Drug and Alcohol Misuse Policy: Appendix E: Supervisor Written Record – Drug and Alcohol Testing



Appendix E
DRUG-ALCOHOL Su|

C. *bp U.S. Drug and Alcohol Misuse Policy: Appendix F: Reasonable Suspicion Observation Checklist*



Appendix F
REASONABLE SUSPIC

D. *Medication Policy (Offshore) UPS-US-SW-GOM-HSE-DOC-00109-2*

<https://bp-eb.bentley.com/CIS/Framework/Object.aspx?o=5616456&t=3>

E. *Notification Process for Non-Negative Drug & Alcohol Test*



Notification
process for D&A tes

F. *2692 Casualty Reporting Forms - United States Coast Guard – U.S. Department of Homeland Security*

- A. REPORT of MARINE CASUALTY, COMMERCIAL DIVING CASUALTY, or OCS-RELATED CASUALTY CG2692
- B. BARGE ADDENDUM CG2692A
- C. REPORT OF MANDATORY CHEMICAL TESTING FOLLOWING A SERIOUS MARINE INCIDENT INVOLVING VESSELS IN COMMERCIAL SERVICE CG2692B
- D. PERSONNEL CASUALTY ADDENDUM CG2692C
- E. INVOLVED PERSONS AND WITNESSES ADDENDUM CG2692D

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[2692 Reporting Forms & NVIC 01-15 \(uscg.mil\)](http://uscg.mil)

8.1 Substance Abuse and Mental Health Services Administration (SAMHSA)

Certified Laboratories Listing -

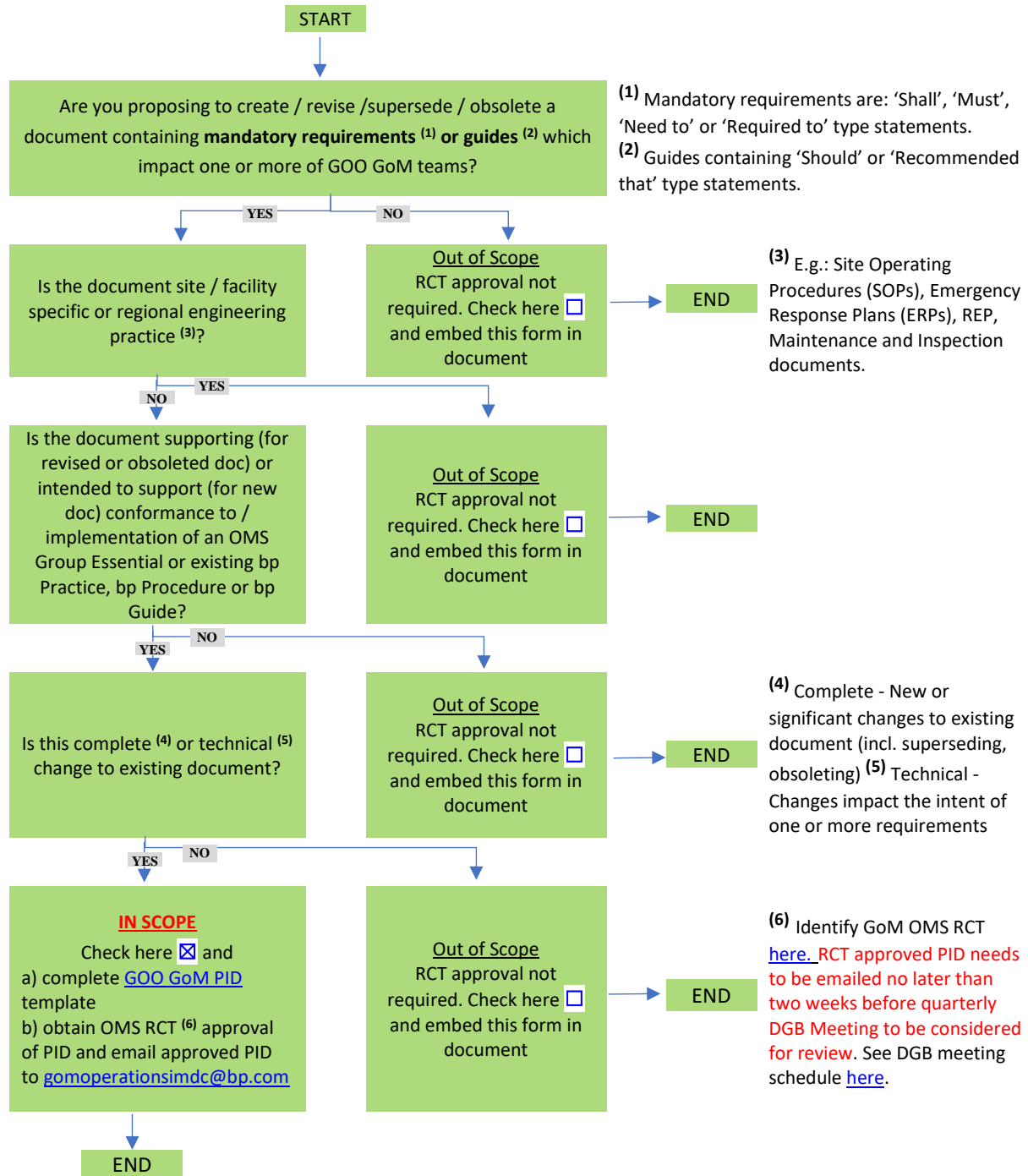
<http://www.samhsa.gov/workplace/resources/drug-testing/certified-lab-list>

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Document Title	Drug and Alcohol Policy		
Next Review Date	07/31/2027		
Document to be Added/Removed - OMS Navigator	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	OMS Sub-Element	3.4
Reason for Issue: (check applicable)	<input type="checkbox"/> New	<input checked="" type="checkbox"/> Revise	<input type="checkbox"/> Supersede <input type="checkbox"/> Obsolete

Document Sign Off

	Print Name & Title	Signature	Date
Reviewer(s) (if not applicable, put N/A in front of Name & Title, then sign and date)	Christina Hegman		
	Christine Curtis		
Training Completed (if not applicable, put N/A in front of Name & Title, then sign and date)	Christina Hegman		
Communication Completed (if not applicable, put N/A in front of Name & Title, then sign and date)	Valerie Murray		
Custodian – (Name & Title, then sign and date)	Christina Hegman		
Authority – (Name & Title, then sign and date)	Valerie Murray		
Document Posted – (Name & Title, then sign and date)	Carolina Cabrera , IMDC Document Controller		

Other Instructions & Comments
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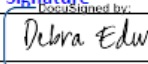
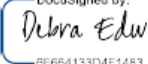
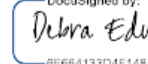



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Document Title	GoM Document Template		
Next Review Date	12/31/2021		
Reason for Issue: (check applicable)	<input type="checkbox"/> New <input checked="" type="checkbox"/> Revise <input type="checkbox"/> Supersede <input type="checkbox"/> Obsolete		

Document Sign Off			
	Print Name & Title	Signature	Date
Reviewer(s) (if not applicable, put N/A in front of Name & Title, then sign and date)	NA, Debe Edwards, IMDC Document Controller	DocuSigned by:  8F664133D4F1483	March 25, 2019
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Custodian – (Name & Title, then sign and date)	Debe Edwards, IMDC Document Controller	DocuSigned by:  8F664133D4F1483	March 25, 2019
Authority – (Name & Title, then sign and date)	Jay Cyfra, IMDC Team Lead	DocuSigned by:  8F664133D4F1483	March 21, 2019
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