

Circle Program Substance-Free Workplace Policy

Commitment to a Drug and Alcohol-Free Workplace

Circle Program is committed to providing a safe, healthy, and productive work environment. Consistent with this commitment, this policy establishes Circle Program's intent to maintain a drug and alcohol-free workplace. Being under the influence of alcohol or illegal drugs (as classified under federal, state, or local laws), including marijuana, while on the job poses serious health and safety risks to staff, mentor, and Circle Program participants, which is not tolerated.

Circle Program's premises is defined to include:

1. the main office in Plymouth, NH,
2. the camp facility in Groton, NH,
3. any Circle Program sponsored gathering with mentors and participants present,
4. anytime in the presence of a program participant, or
5. all owned, rented, or leased vehicles belonging to Circle Program staff, mentors, board members transporting participants to and from a Circle Program sponsored gathering.

Prohibited Conduct

Circle Program expressly prohibits the following activities at any time that staff are either (1) on duty or conducting Circle Program business (either on or away from Circle Program's premises), or (2) on Circle Program's premises (whether or not the employee is working):

- The use, abuse, or being under the influence of alcohol, illegal drugs, or other impairing substances.
- The possession, sale, purchase, transfer, or transit of any illegal or unauthorized drug, including prescription medication that is not prescribed to the employee or drug-related paraphernalia.
- The illegal use or abuse of prescription drugs.

While the use of marijuana has been legalized under state law for medicinal uses, it remains an illegal drug under federal law and its use as it impacts the workplace is prohibited by Circle Program's policy. Circle Program does not discriminate against staff solely on the basis of their off-duty use of medical marijuana in compliance with New Hampshire's medical marijuana law. However, staff may not consume or be under the influence of marijuana while on duty or at work, even if the staff member has a valid prescription for medical marijuana.

Nothing in this policy is meant to prohibit the appropriate use of over-the-counter medication or other medication that can legally be prescribed under both federal and state law, to the extent that it does not impair a staff member's job performance or safety or the safety of others. Staff who take over-the-counter medication or other medication that can legally be prescribed under both federal and state law to treat a disability should inform the Executive Director if they believe the medication will impair their job performance, safety, or the safety of others or if they believe they need a reasonable accommodation *before* reporting to work while under the influence of that medication.

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A violation of any of the above is subject to disciplinary action, up to and including immediate termination of employment.

Circle Program Sponsored Events

From time to time, the Executive Director and/or Board President may sponsor or approve social or business-related events at which alcohol is served and Circle Program participants are present. This policy does not prohibit the use or consumption of alcohol at such events. However, if staff, mentors or Board Members choose to consume alcohol at such events, they must do so lawfully and responsibly, and must maintain their obligation to conduct themselves properly and professionally at all times.

Workplace Searches and Inspections

In order to achieve the goals of this policy and maintain a safe, healthy, and productive work environment, Circle Program reserves the right at all times to inspect staff, as well as their surroundings and possessions, for substances or materials in violation of this policy. This right extends to the search or inspection of clothing, desks, lockers, bags, briefcases, containers, packages, boxes, tools and toolboxes, lunch boxes, and Circle Program-owned or leased vehicles and any vehicles on camp property where prohibited items may be concealed. Staff should have no expectation of privacy while on Circle Program premises.

Employee Assistance Program

Circle Program provides an employee assistance program (EAP) for all employees. The EAP is designed to help individuals manage personal problems that can impact their well-being and work performance. Treatment is confidential (unless an EAP counselor is required by law to disclose information such as child abuse) and will not become a part of a staff member's personnel records. For more information about the EAP, contact the Executive Director.

Administration of this Policy

Circle Program expressly reserves the right to change, modify, or delete the provisions of this Policy without notice. If you have any questions regarding this policy or if you have questions about drug testing in the workplace that are not addressed in this policy, please contact the Executive Director.