

EQUALITY IMPACT ASSESSMENT

Department	HR
Policy	Alcohol and Substance Misuse at Work Policy

1. Description of Policy

The Alcohol and Substance Misuse at Work Policy sets out the Academy's approach to managing alcohol or drug misuse in the workplace. The policy states that the Academy has a duty to take care of the health and safety of all staff and other individuals affected by its activities. The policy advises that it is important to ensure that staff conduct themselves in an appropriate, professional and responsible manner at work and that alcohol or drug misuse does not create a health or safety risk. The scope of the policy includes the misuse of alcohol and drugs in the workplace, fitness for work, misconduct, disciplinary processes and support and referral pathways.

This Equality Impact Assessment aims to ensure that the Alcohol and Substance Misuse at Work Policy promotes equality, avoids discrimination, and complies with the Equality Act 2010. The assessment considers potential impacts on protected characteristics and, where necessary, identifies mitigating actions.

The policy is published on the Academy's Intranet at:

[Human Resources - Documents - Policies and Procedures - All Documents](#)

2. Could the policy have an adverse impact on equality? Please consider this in relation to the following protected characteristics as defined by the Equality Act 2010:

- Age
- Disability
- Gender re-assignment
- Marriage or civil partnerships
- Pregnancy and maternity

- Race
- Religion or belief
- Sex
- Sexual orientation

No, the Alcohol and Substance Misuse at Work Policy is compliant with, and upholds, the principles of the Equality Act 2010 and will not have a direct adverse impact on equality.

3. Does this policy provide opportunities to make a positive impact on equality?

Yes, the Alcohol and Substance Misuse at Work Policy provides an opportunity to make a positive impact on equality by supporting employees with the protected characteristic of disability as defined by the Equality Act 2010. It advises of the Academy's commitment to the health and wellbeing of staff and it recognises that alcohol or drug dependency may lead to a medical, including mental health, condition. The policy states that where an employee discloses, or the where the Academy suspects, alcohol or drug dependency a non-judgmental and supportive approach will be adopted. It encourages employees who are aware that they may be suffering from drug or alcohol dependency to contact the Human Resources department, the counselling team or another appropriate source of specialist help. The policy states that all enquiries relating to drug or alcohol issues will be treated with the strictest confidentiality and with appropriate sensitivity. This is particularly important to ensure that individuals are treated fairly and with dignity. The policy also states that where a member of staff is diagnosed as suffering from illness arising from drug or alcohol misuse, time off for treatment and rehabilitation will be treated in the same way as absence for other longer-term medical conditions and will qualify for entitlement under the sick pay scheme.

However, the policy could be improved by consideration of the following recommendations:

- Review the wording of the policy from the perspective of person-centred language aimed at reducing stigma and supporting people to access help.
- Provide definition and clear distinction between the terms 'use', 'misuse' and 'dependence' with particular reference to medical, including mental health, conditions.
- Provide definition and clear distinction between legal and illegal substances.
- Re-word policy item A5 as follows: ' Whilst drug and alcohol dependency are not, in themselves, defined as disabilities under the Equality Act 2010, it

is important to note that the Act may cover conditions arising from, or associated with, the misuse or dependency on drugs or alcohol, such as chronic liver disease or mental health conditions. Although dependency itself is excluded, conditions such as those above may be protected if they independently meet the disability definition of the Act, particularly if these conditions have a substantial and long-term effect on day-to-day activities’.

- Note that advocacy groups advise not to use the term ‘suffering from’ in relation to medical conditions, and instead recommend that neutral terms such as ‘experiencing’ or ‘has a diagnosis of’ be used.
- Consider the potential risk of indirect disability discrimination if health-related needs related to dependency on drugs and alcohol are not distinguished from misuse and misconduct. Risk can be mitigated by careful case-by-case assessment, occupational health support and reasonable adjustments where applicable. This may require an investment in the management and training of line managers and support staff.
- Consider how the policy balances disclosure of dependency and exemption from immediate disciplinary action with the potential risk to others, including students.
- Consider how the policy relates to, and cross references with, the Academy’s Harassment and Sexual Misconduct Policy, Intimate Personal Relationships Policy, Health and Safety Policy and the Equality Diversity and Inclusion Policy in relation to the protection of students and staff.
- Refer to the following resources when revising the policy:
 - I. UK Drug Policy Commission - Getting Serious about Stigma: the problem with stigmatising drug users
 - II. National Institute on Drug Abuse (NIDA) - Words Matter: Terms to Use and Avoid When Talking About Addiction
 - III. [CIPD Trust](#) - Drug and alcohol use at work: Guidance for people professionals
 - IV. Gov.Uk - Disability: Equality Act 2010; Guidance on matters to be taken into account in determining questions relating to the definition of disability
 - V. Health and Safety Executive - Managing drug and alcohol misuse at work.

4. What evidence has been considered? What consultation has been undertaken?

The policy was updated in consultation with the following staff groups, departments and external advisory agencies:

- The Policy Review Group, which includes the Registrar and Director of Student Operations, Director of Finance and Director of HR
- The HR team
- The EIA sub-committee
- Brightmine (formerly Xpert HR)
- CIPD website
- UK Drug Policy Commission
- Health and Safety Executive

5. What actions have been agreed as a result of this EIA?

This Equality Impact Assessment concludes that the Alcohol and Drugs at Work Policy supports equality and inclusion, promotes health, safety and wellbeing and includes appropriate safeguards to mitigate equality risks. The policy applies consistently to all employees and related workers and does not directly discriminate against any protected group. Overall, the assessment concludes that the policy is lawful, proportionate and fair, and that appropriate safeguards are in place to manage equality risks effectively. The policy may proceed as drafted, subject to the above recommendations and ongoing monitoring, manager training and periodic review.

Progress on the actions detailed below will be reported to the Belonging Committee.

Action	Who	Timescale
Revision of the policy as recommended by this EIA prior to publication on the Academy's Intranet.	HR	February 2026

Provide line manager training to help identify and support staff with drug and alcohol dependency	HR	tbc
Collect feedback from employees and line managers on their experience of policy in practice	Line managers	Ongoing
Revise the policy, based on data collection and consultation, as necessary	HR	At the point of next policy review, September 2029

Date of Belonging Committee Approval: 10/3/2026.