Subject: Drug and Substance Abuse Management Plan (DASAMP)

Date: 14 March 2017

1. APPLICABILITY: This Guidance material is applicable to SACAA approved AMOs and Technical personnel involved in aircraft maintenance.

2. REGULATION REFERENCE CODES

Part 145 of the Civil Aviation Regulations of 2011, as amended (CARs)

3. PURPOSE:

The purpose of this proposed TGM is to address the requirements of CAR 145.02.01 (proposed regulation) requirements which relates to prevention, reduction and control of drugs and substance abuse problems in the workplace.

4. FOCUS:

Accessing technical guidance material through the references provided assures that both inspectors and AMOs use current documents with effective dates.

5. DISCUSSION AND CONTENTS:

5.1 Requirements:

From an airline operations perspective, aircraft maintenance is not a revenue-producing activity. Anytime an aircraft is on the ground, it is not producing revenue. Therefore, there tends to be a significant amount of pressure (either implicit or explicit) on the maintenance personnel—whether within the airline organization or at a third-party repair station—to minimize the ground time and release the aircraft back in revenue service. This may result in Maintenance personnel cutting corners

Public, flight crews, and their families put their trust in the people who maintain commercial aircraft. This confidence in the abilities of aircraft maintainers has a solid basis in fact, experience, and statistically safe performance. Inherent in that trust, is the idea that the people who maintain aircraft and those who manage and regulate those maintainers will always do the “right” thing when it comes to
ensuring the airworthiness of the aircraft on which they fly. For the overwhelming majority of maintenance decisions made each day, the people responsible for aircraft safety do the right thing—even at the cost of delays, lost revenue, and job security.

Doing the right thing implies that the thousands of decisions made each day are based on a solid moral and ethical foundation. However, in addition to being a professional vocation, aviation maintenance is also a business that is conducted and managed by people. As such, it is subject to the same personal, political, and financial pressures.

6. SUBSTANCE ABUSE IN THE WORKPLACE

Substance abuse in the workplace can also affect an employee's performance at work resulting in absenteeism, accidents, illness and mortality – all of which could add to the employer's costs.

Substance abuse has been linked to negative occurrences in the maintenance workplace such as stress, monotonous work, shift work, complacency, accidents and incidences, failure to follow maintenance recommendations, work requiring relocation and the frequent changes in co-workers and supervisors. The aim of this guideline is to outline how substance abuse affects the workplace and what measures Aviation employers and employee representatives could implement in order to eliminate the problem.

7. CFARP PURPOSE

The Revised Cross Functional Accident Reduction Plan (CFARP) 2016/17 to 2018/19 document was derived from the Revised Cross Functional Accident Reduction Plan (CFARP) 2016/17 to 2018/19 approved by the DCA. This Document serves to provide guidance to the Airworthiness Technical personnel who are responsible for safety oversight functions within the Aviation Industry. The plan development process revolves around the following strategic themes:

- Man
- Machine
- Environment
- Information gathering and awareness

The following is a brief description of the themes as outlined by the approved revised CFARP Management plan

- Human performance can be degraded by physical factors (lack of strength), physiological factors (fatigue, illness), psychological factors (stress, depression) and psychosocial factors (conflict at work). The Man theme considers the currency of Aircraft Maintenance Engineers (AMEs) and deal with other related challenges such
as curbing overtime hours, testing for substance abuse as these may have undetected safety implications. Any introduced measures will have to be supported by a solid business case and appropriately consulted with industry. This function resides with PEL and the Airworthiness Departments plays a role in terms of carrying oversight and verifying compliance to requirements.

- The Machine Theme addresses inherent weaknesses of the Mandatory Periodic Inspection (MPI). The SACAA usually requires documentation only when an aircraft reaches the MPI or is due for renewal of C of A, however various aircraft still require maintenance before this landmark is reached. Current evidence points towards a lack-luster approach towards pre-MPI maintenance. In this regard, the plan calls for interventions to ensure that these periodic maintenance milestones are adhered to and audited including out of phase maintenance or inspections.

- The Environment theme covers reductions of air-infringements based on in-depth analyses of near misses. It may include problems such as violation of systems operating limits, unsuitable weather conditions or unsuitable ambient environment

- The fourth strategic theme revolves around obtaining quality safety data and sharing it with affected users to reduce accidents. The Accident and Incident Investigation Division (AIID) plays a critical role in gathering accident statistics

The four elements mentioned above (if not managed properly) may contribute to a large reduction in safety margins and physical distress which could lead to fatigue which in turn could lead to injury, death or damage to equipment.

8. AIRCRAFT MAINTENANCE ORGANISATION’S RESPONSIBILITY

Duties of holder of approval

The holder of an approval shall ensure that compile a Drug and Substance Abuse Management Plan (DASAMP) is developed and implemented to address drug and alcohol issues in relation to their potential effect on aviation safety. The management plan shall include the following elements

(a) Drug and Alcohol Policy - A policy conveying the organisational values, guidelines, standards and regulatory requirements. This document should not just include the what, but the how, when and who is accountable.

(b) Drug and Alcohol Education Program – the details and documentation of education program for the employees.

(c) Drug and Alcohol Testing Program - The details and documentation of the how and when individuals may be tested.
(d) Drug and Alcohol Response Program – The details and documentation of what happens if someone has a positive test result and how, or even will they be permitted to return to their safety duties.

A properly compiled (DASAMP) plan will influence attitudes, beliefs, knowledge and behaviour relating to Substance abuse and Other Drug use and minimise harm in the aviation sector, further to this, the plan will assist in building and supporting organisational culture that encourages employees to avoid being affected by drugs and alcohol at work.

Once an organisation becomes operational SACAA’s on-going surveillance program will review that the appropriate implementation and enforcement of a DASAMP is undertaken by an organisation. This surveillance will include the examination of the processes that underpin the organisation’s systems and the objective of the surveillance audit will be to verify the organisation’s systems effectiveness.

(9) SUBSTANCE ABUSE IN THE AVIATION MAINTENANCE ENVIRONMENT

Below are elements that should be included in an AMOs policy regarding Drug and Substance Abuse Management

DEVELOPMENT OF AN ALCOHOL AND DRUG POLICY FOR THE WORKPLACE

Maintenance Organisations, together with employee representatives, are continuously encouraged to develop, in writing, a policy on alcohol and drug abuse. If possible, the policy should be formulated with the help of medical personnel and other experts who have specialised knowledge regarding alcohol and drug related problems. The policy should include information and procedures on:

• Measures to control "substance abuse" in the workplace through good employment practices

The policy should advise that where it is shown that certain job situations may contribute to substance abuse the employer together with the employee representatives should identify and take appropriate preventative or remedial action. Workers and their representatives should also not formally or informally support behaviour, which incites, encourages or otherwise facilitates the harmful use of alcohol or the abuse of drugs on the premises. When an employee voluntarily discloses a previous history of substance abuse, the employer should take steps to ensure that the employee is not exposed to a working situation which might, in the past, have resulted in the employee’s problem.

• Restriction on alcohol, legal and illegal drugs in the workplace

The employer together with consulting parties should consider restricting or prohibiting the possession, or consumption and the selling of alcohol in the workplace. The
employer should, after consultation with employee representatives, consider withdrawing alcohol as an item for expense account reimbursement or restrict it to specific situations. Employers should also be prevented from paying any wages in the form of alcohol or drugs. The above should apply to both management and workers. In those instances were medication might result in significant impairment, the employee should consult a health professional and inform his/her senior in accordance to normal procedures for absence for health reasons.

• **Prevention through information, education and training programmes**

   The policy should advocate that employers should promote safety and health in the workplace through information, education and training programmes on the physical and psychological effects of alcohol and drug use. These programmes should be directed at all employees. The information, education and training programmes should also include the following information:

   - General and specific to the workplace laws and regulations on alcohol and drugs,
   - Suggested steps to prevent such problems from occurring, and
   - Services available to assist the employees both within and outside the workplace.

   This will include information on assessment and referral services, counselling, treatment and rehabilitation.

   It is recommended that managerial staff should be provided with additional training in order to assist them in identifying changes in the individual's performance and behaviour. The training will also equip managers with the necessary skills to respond to questions regarding the company policy on alcohol and drugs. After the training, they will also be able to support a recovering worker's needs and monitor that individual's performance when he/she returns to work.

   Additional training should also be provided to employee representatives. In order to enable them to assist employees who require help and to identify working methods or conditions that need to be changed or improved to prevent, reduce or better the management of alcohol and drug related problems. Training would further assist them in explaining and responding to questions related to company policies regarding alcohol and drugs.

• **Identification**

   Identification of employees with problems could be conducted at different levels, including, self-assessment, and informal identification through a friend, family member or fellow employee and formal identification. Formal identification may include testing and should be done in accordance to the applicable laws and practices.
• Assistance, treatment and rehabilitation programmes

The policy should also recommend that employees with alcohol or drug related problems should be treated in the same manner as workers with other health problems. Therefore, workers who seek rehabilitation should not be discriminated against and should enjoy the normal benefits that are offered by an employer including the opportunity for transfer and promotion. The exceptions are in those cases where it has been identified that the employee is no longer fit to do their work. In such instances, the employer should assist the employee to obtain access to counselling, treatment and rehabilitation.

Assistance to employees with problems could vary according to the size of the company. Small companies could assist by providing employees with the names of identified professionals and services that specialise in counselling, treatment and the rehabilitation of employees, for example, self help groups such as Alcoholic Anonymous (AA). Big companies, on the other hand, might consider the establishment of an Employee Assistance Programmes (EAP). In other instances, employees might consider establishing their own programme.

• Intervention and disciplinary procedure

The policy should additionally recommend that employers should be aware that an employee who suffers from an alcohol and/or drug problem might also be suffering from a health problem and should consider offering counselling, treatment or rehabilitation as an alternative before deciding to discipline the employee. Disciplinary rules regarding substance abuse should be communicated to employees so that they are clear in terms of what is prohibited and the type of sanctions for the violation of such rules

(6) AMO SURVEILLANCE

The AMO shall be subjected to continuous surveillance to verify the effectiveness of the Drug and Substance Abuse Management Plan (DASAMP). Once an organisation becomes operational SACAA’s on-going surveillance program will review that the appropriate implementation and enforcement of a Management Plan is undertaken by an organisation. This surveillance will include the examination of the processes that underpin the organisation’s systems and the objective of the surveillance audit will be to verify the organisation’s systems effectiveness.

(10) For further reading, please see an article on Drug and substance abuse in the Aviation Environment which is available on the SACAA webpage: Airworthiness

(11) For any queries and comments please an send e-mail to: airworthiness@caa.co.za

**ISSUED BY:**
Aircraft Maintenance Organisation Section :Airworthiness Department