

Substance Use Policy

Questions regarding this policy should be directed to the Policy Administrator.

Effective Date:	10/17/2018	Cross Reference:	Respectful Workplace Policy Code of Conduct Policy Progressive Discipline Policy CUPE Local 2157 Collective Agreement KCFA Collective Agreement
Policy Owner:	Human Resources	Appendices:	Appendix A – Substance Use Procedure
Policy Administrator:	Executive HR Director		
Approver:	Executive Committee		
Review Schedule:	Every 4 Years		

1. Policy Statement

- 1.1. Keyano College acknowledges its obligation to take all reasonable steps to ensure the health and safety of its workers, its students, and its visitors. The inappropriate use of alcohol and drugs can have adverse effects on job performance, the ability to learn, the health of employees and the safety of the individual and others.

2. Background

- 2.1. The misuse of any drug (legal or illegal), alcohol, cannabis (including medicinal) and medications jeopardize job safety and performance, learning, the wellbeing of the Keyano College community, the environment and the College's reputation.

3. Policy Objective

- 3.1. The objectives of this policy to provide a framework for managing substance use in the work and learning environment including disclosure, accommodation and workplace testing where appropriate. This policy supports Keyano College's obligations under the Occupational Health and Safety Act to provide a safe work environment and employee fitness for duty.

4. Scope

- 4.1. This This policy applies to all members of the College community including employees, members of the Board of Governors, Board of Directors, contractors, industry partners, volunteers and students of Keyano College.

5. Definitions

- 5.1. “Accommodation” making of adjustments or alternative arrangements in the workplace to eliminate a discriminatory effect upon an employee or student with a documented disability.
- 5.2. “Fit for Duty” employees must be able to safely perform assigned duties and responsibilities without any impairment due to the influence of, or after effects, of any substance as defined in the policy, that may hinder performance or compromise the safety of the employee, learners or others within the context of the job duties or participation in Keyano College sponsored learning programs or events.
- 5.3. “Fit for Learning” students must be able to meaningfully and safely participate in scheduled educational activities, without any impairment due to the influence, or after effects, of any substance as defined in the policy, that may hinder or compromise the safety or educational experience of the student or others.
- 5.4. “Reasonable cause: includes but is not limited to the following:
 - a) observed use of a substance as defined in this policy;
 - b) smell of alcohol;
 - c) smell of cannabis;
 - d) slurred speech pattern;
 - e) tremors or unsteadiness in walking/standing;
 - f) repeated errors or other unexplained changes in job performance and/or behaviours (eg absenteeism, lateness);
 - g) disoriented behaviour or drowsiness;
 - h) erratic or unusual behaviour;
 - i) unsafe or careless conduct; and
 - j) possession of alcohol or drugs on college premises.
- 5.5. “Safety sensitive” roles or activities: roles or activities which require the employee or learner to be alert, to be physically coordinated, and to exercise good judgement, and where impairment could adversely affect job performance, the activity, the health, safety or security of the Keyano College Community, property or the environment.
- 5.6. “Substance” for the purpose of this policy a substance means any drug (legal or illegal), alcohol, cannabis (including medicinal) and medications.
- 5.7. “Testing” a process for determining potential impairment where there is reasonable cause.

6. Guiding Principles

- 6.1. Employees must be fit for duty during the time they are at work.
- 6.2. Students must be fit for learning during scheduled educational activities.

- 6.3. Keyano College strives to eliminate or minimize health and safety risks associated with its business activities.
- 6.4. As appropriate measures are necessary to ensure safe and sustainable conduct, the misuse of any drug (legal or illegal), alcohol, cannabis (including medicinal) and medications in the work and learning environment is strictly prohibited and subject to disciplinary action, up to and including dismissal for cause or appropriate student sanctions.
- 6.5. Consistent with legislation legalizing cannabis products it is a priority for the College to protect members of the public and students who are under the age of 18. Therefore, the recreational consumption and use of cannabis on College property is prohibited.
- 6.6. Keyano College recognizes that education, deterrence and early intervention may help prevent problems and dependencies in employees or assist them with rehabilitation.
- 6.7. Employees are encouraged to seek assistance from Human Resources or Health Services in respect to any substance related problem or dependency.
- 6.8. Employee Fit for Duty Expectations:
- a) Employees are expected to arrive fit for duty and able to perform their duties safely and to standard; employees must remain fit for duty for the duration of their shift.
 - b) Employees must perform their work duties without limitation due to the use of or after effects of substances. If it is determined an accommodation is necessary due to disability the employee will participate in the accommodation plan.
 - c) Employees in safety sensitive positions are required to disclose how a medication or prescription being taken will affect their ability to safely perform their job duties, to their supervisor or Health Services.
- 6.9. In addition, the following are strictly prohibited
- a) to use alcohol, illegal or other drugs (including cannabis) or misuse medication while on duty;
 - b) to report for work or be found, while on duty to have a detectable impact of drugs or alcohol;
 - c) to possess, distribute or offer for sale alcohol, illegal or other drugs, or drug paraphernalia, or to illegally possess, distribute or offer for sale medications on College premises including student residence, in College fleet vehicles, or on premises where College work is being performed; and,
 - d) to fail to submit to tests required pursuant to this policy.
- 6.10. Students in safety sensitive scheduled educational activities are required to disclose how medication or prescription being taken that will affect their ability to safely participate in the educational activity to their instructor.

6.11. The work or activity supervisor or instructor has the authorization to remove a person from the activity if they have reasonable grounds to believe that a person appears not to be able to participate in the activity safely.

6.12. Failure to comply with this policy may result in disciplinary action up to and including dismissal for cause or appropriate student sanctions.

7. Roles and Responsibilities

STAKEHOLDER	RESPONSIBILITIES
Executive Committee	<ul style="list-style-type: none"> • Approve and formally support this policy • Provide a safe environment for members of the College community
Human Resources Staff	<ul style="list-style-type: none"> • Develop, maintain, and oversee the implementation of this policy • Provide guidance on and administer the policy and procedures
Immediate Supervisor/ Management	<ul style="list-style-type: none"> • Understanding the Substance Use policy and ensure the policy is effectively communicated to employees • Apply this policy in a consistent manner • Guide employees who seek assistance to the appropriate resource while maintaining confidentiality
Employees	<ul style="list-style-type: none"> • Ensure their own health and safety and the safety of others • Ensure they understand and comply with this policy as part of their obligation to perform work activities in a safe manner • Use medications responsibly and are aware of their potential side effects • Encourage their peers and co-workers to seek help when there is a breach of this policy • Report any violations of this policy to their supervisor • Co-operate with any investigations into violations of this policy • Seek advice and follow appropriate measures for treatment as required • Report to their supervisor any impaired driving charge conviction or suspension of operator's license, if operating a vehicle is or could be part of the employee's job duties

10. Policy Management

Policy Title:	Substance Use Policy
Approval Date:	10/17/2018
Effective Date:	10/17/2018
Historical Review Dates:	
Next Review Date:	10/17/2022
Related Legislation:	Bill C-45 Cannabis Act, Alberta Cannabis Framework, RMWB Smoking and Vaping Bylaw
Supersedes Policies:	3.31 Use, Sale or Possession of a Controlled Substance, Drugs or Narcotics
Monitoring/Frequency:	Every 4 Years
Policy Owner:	President & CEO
Policy Administrator:	Executive Director Human Resources
Policy Coordinator:	Executive Assistant, President & CEO and Board of Governors

Appendix A

Substance Use Procedure

This procedure provides direction on Keyano College's process for substance use disclosure and accommodation, suspicion of impairment and employee testing.

1. Disclosure for safety sensitive positions and scheduled educational activities.

Step	Action	Responsibility
1.	Report use of prescription or over the counter medication to supervisor or instructor.	Employee/Student
2.	Complete Substance Disclosure Form (Attachment A or B) and submit to Health Services.	Employee/student
3.	Conduct an initial risk assessment to determine immediate need for temporary accommodation.	Health Services Supervisor/Instructor
5.	Determine if additional medical information is required to determine accommodation.	Health Services Supervisor/Instructor
6.	Develop risk mitigation and/or reasonable accommodation.	Health Services Supervisor/Instructor

2. Suspicion of employee impairment.

Step	Action	Responsibility
1.	Enact if there is <i>reasonable cause</i> that an employee is impaired at work.	Supervisor
2.	Seek another opinion to confirm initial observations about employee's status.	Supervisor/Dean/Director (as appropriate) and Human Resources
3.	Consult privately with the employee to determine cause of observation.	Supervisor/Dean/Director (as appropriate)
4.	If employee is considered allegedly impaired and deemed "unfit for work" transportation will be provided for the employee to their home address.	Supervisor/Dean/Director in consultation Human Resources (as appropriate)
5.	Schedule meeting as soon as reasonable to review the incident and determine a course of action.	Supervisor/Dean/Director in consultation Human Resources (as appropriate)

3. Accommodation of medicinal cannabis.

Step	Action	Responsibility
1.	Declare use of medicinal cannabis and request accommodation.	Employee or student.
2.	Provide medical practitioner documentation.	Employee or student.
3.	Discuss suitable accommodation.	Employee/Student and HR/ Health Services.
4.	Provide additional supporting medical documentation to assist with accommodation discussions if required.	Employee or student.

4. Additional Information.

Attachment A – Employee Substance Disclosure form

Attachment B – Student Substance Disclosure form