

St. Andrew's College

# Substance Management Policy

Approved by the Board of Regents  
November 2021

**ST. ANDREW'S COLLEGE**

**SUBSTANCE MANAGEMENT POLICY**

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**Theological Statement and Statement of Commitment**

We believe that all humans are equal before God and in creation, and that Jesus emphasized mutuality and respect in relationships.

St. Andrew's College is committed to provide a safe working environment to all our employees, students, residents, contractors, temporary workers, volunteers and visitors. This policy should be read with other policies on employment and student conduct and is intended to complement these other policies. If there is a conflict between this policy and other College policies, this policy will govern.

Employees, contractors, temporary workers and volunteers (hereinafter referred to as "Worker(s)") under the influence of impairment-causing substances on the job can pose serious safety and health risks to themselves, their co-workers and the public. The St Andrew's College Substance Management Policy provides guidance to students, Workers, supervisors and managers on the College's regulations surrounding the use of various drugs and alcohol in the College and offsite, while students and Workers are performing College-related functions.

**Confidentiality**

Confidentiality will be maintained, unless limited disclosure is necessary in relation to a Worker not being fit for work. Only information limited to the level of functionality (e.g. being fit for work) may be shared as required to determine whether a Worker is fit for work, appropriate work accommodations, and/or work re-entry initiatives.

**Expectations and Requirements**

1. Workers may not work while impaired by any substance.
2. Students and Workers experiencing substance abuse challenges must disclose these challenges to the Chief Administrative Officer immediately to allow the College to initiate the accommodation analysis process.
3. To help preserve a safe and healthy workplace, St. Andrew's College prohibits certain substances from being brought onto College property or being consumed on College property. Unless otherwise permitted in this policy, the following items are prohibited from being present on College property: impairment-causing non-prescription (or non-medically-authorized) drugs or medication, including but not limited to cannabis, and alcohol.

The consumption of legal, impairment-causing substances (such as alcohol) may be permitted, occasionally, at sanctioned work events or as specifically approved by a Worker's direct supervisor. Residents may consume legal, impairment-causing substances (such as alcohol) in their personal residence, however, not if it involves smoking, as smoking is not permitted within the College, including the Residence; smoking also includes vaping. Cannabis plants are not permitted to be grown, transported or stored within or around student residences.

Students and Workers are expected to exercise reasonable judgement when consuming impairment-causing substances at all College-related events. Students and Workers must abide by all policies when performing College-related functions onsite or off-site. St. Andrew's College prohibits the use of impairment-causing non-

prescription (or non-medically-authorized) drugs at the College. Workers are prohibited from working while impaired by any substance.

St. Andrew's College is equally committed to accommodating, up to the point of undue hardship, and assisting any of its students and Workers required to use prescription drugs or medications as well as any employee with a substance abuse issue, to seek treatment. For those Workers covered by College health insurance policies, external counselling is available under the employee family assistance program (EFAP).

St. Andrew's College acknowledges that drug and alcohol dependencies are protected and recognized as a disability under human rights legislation, and therefore considered to be prohibited grounds of discrimination.

Workers must report any safety risks in the workplace; including their own impairment.

Both medical and recreational cannabis are covered by this policy, under different substance classifications. To comment on impairment and or risk, cannabis products will be identified with one of the four descriptors:

- 1) medical cannabis (THC),
  - a. medically-authorized cannabis products containing significant amounts of THC
- 2) medical cannabis (CBD),
  - a. medically-authorized CBD-based cannabis products that do not impair the student or Worker
- 3) recreational cannabis (THC) and;
  - a. legally acquired, recreational cannabis products containing significant amounts of THC
- 4) recreational cannabis (CBD).
  - a. legally acquired CBD-based cannabis products that do not impair the student or Worker

If a student or Worker wishes to discuss this policy further, or if any additional information is required, please contact the Chief Administrative Officer via email, by phone or in-person.

<b>Policy Details</b>
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### 1) Accommodation

In this Accommodation section, "Worker(s)" does not include volunteers.

- a. The College will accommodate, up to the point of undue hardship, students and Workers who experience drug or alcohol dependency issues or students and Workers taking prescription drugs or medically-authorized substances (including medical cannabis).
  - i. Students and Workers are encouraged to disclose a substance dependency or substance abuse issue to the College immediately.
  - ii. Students and Workers do not have to disclose the use of any impairment-causing substance used for medical purposes.
- b. For those who initially disclose a drug or alcohol dependency issue, the College will work with the employee, the employee's treating physician or medical advisor to devise an individualized treatment and accommodation plan and an individual risk assessment that enables the employee to continue working. An employee's failure to participate in such a plan may cause discipline including termination.
- c. If a student or Worker discloses a drug or alcohol dependency issue only after they have violated a College policy, acted so it constitutes misconduct or gross misconduct, or acted so it is negligent, they will be subject to disciplinary action, including termination of employment or enrolment, for the behavior

or misconduct alone, not the dependency issue.

- d. Accommodating individuals is a shared obligation of the College and the student or employee:
  - i. It is the responsibility of a student or employee requiring accommodation to make the accommodation request to the Chief Administrative Officer, via email or in writing.
  - ii. The College will initiate the consultative accommodation analysis process promptly after receiving the student or employee's request.
- e. To request accommodation or disclose a substance abuse or dependency issue, please notify the Chief Administrative Officer via email or in writing.

## **2) Driving while impaired by drugs / medication (prescription or non-prescription) and/or alcohol**

- a. It is illegal to operate a motor vehicle (for work or non-work purposes) while impaired by medication, drugs (prescription or non-prescription) or alcohol.
- b. The College will take all possible steps to prevent impaired driving, including assisting students and Workers getting home.
- c. Please notify your immediate supervisor or the Chief Administrative Officer if you require any assistance in arranging safe transportation after any College-related activity.

## **3) Prescription drug / medication use (including medical cannabis)**

- a. Students and Workers do not have to disclose prescription drug or medication use to the College (including medical cannabis) provided those individuals remain free from any impairment while at the College or any College-related event.
- b. If a student or Worker feels that their use of prescription drugs (including medical cannabis) could affect performance, prevent them from completing their job functions, prevent them from complying with College policies, or create a safety hazard in the workplace, they must disclose their prescription drug use to the Chief Administrative Officer to allow the College to conduct an accommodation analysis or determine if the work can be conducted.

## **4) Substance abuse issues and addiction**

In this Substance abuse issues and addiction section, "Worker(s)" does not include volunteers.

- a. Any student or Worker struggling with substance abuse/addiction challenges will be supported and accommodated by the College.
- b. Students and Workers struggling with substance abuse or have a dependency must notify the Chief Administrative Officer promptly to allow the College to prevent risk, conduct an accommodation analysis and coordinate support for the individual.
  - i. The College will accommodate addiction and substance abuse challenges of students and employees up to the point of undue hardship.
  - ii. If a student or Worker discloses a drug or alcohol dependency issue only after they have violated a College policy, acted so it constitutes misconduct or gross misconduct, or acts so it is negligent, they will be subject to disciplinary action for the behavior or misconduct alone, not the dependency issue.

## 5) Drug testing

In this Drug testing section, "Worker(s)" does not include volunteers.

- a. The College may require drug or alcohol testing on an employee under these conditions:
  - i. When the College has grounds to reasonably suspect that an employee is impaired by drugs or alcohol.
  - ii. After a "near miss" safety incident.
  - iii. After a safety incident.
  - iv. As part of an employee's rehabilitation program.
- b. Any drug or alcohol testing performed under this Policy will be conducted by an outside service provider or other medical professional with specific training related to workplace drug or alcohol testing.

## 6) Zero tolerance

- a. The College will not tolerate any unsafe behavior or negligence at the College or College-related events, including impairment.

## 7) Consequences and Discipline

- a. Students and Workers who violate this policy or who engage in illegal activities such as distributing or selling drugs and/or alcohol while on College premises will be subject to disciplinary action including the termination of their employment with cause or their enrolment.

If any clarification or additional information is required, please contact the Chief Administrative Officer. Please see the attached chart to provide further direction on policy compliance. This chart is a guide and is non-exhaustive.

<b>Substance classification</b>	<b>Permitted on College property</b>	<b>Accommodation guidelines</b>	<b>Permitted use while working</b>	<b>Disclosure requirements</b>
<p>legal, non-medical substances that cause impairment</p> <p>EX: alcohol, recreational cannabis (THC)</p>	<p>Only permitted at College-sanctioned social/work events, with authorization from direct supervisor.</p>	<p>Student or Worker is required to request accommodation if required.</p> <p>Accommodation, up to the point of undue hardship, will be provided by the College.</p>	<p>No Worker can be impaired while working.</p> <p>Only permitted at College-sanctioned social events, with authorization from direct supervisor.</p>	<p>All students and Workers are required to disclose dependency issues, to allow for a support plan to be created and to allow for accommodation analysis to occur.</p>
<p>illegal, non-medical substances that cause impairment</p> <p>EX: cocaine</p>	<p>No</p>	<p>Student or Worker is required to request accommodation if required.</p> <p>Accommodation, up to the point of undue hardship, will be provided by the College.</p>	<p>No.</p> <p>No Worker can be impaired while working.</p>	<p>All students and Workers are required to disclose dependency issues, to allow for a support plan to be created and to allow for accommodation analysis to occur.</p>
<p>Medically-authorized substances that cause impairment</p> <p>EX: medical cannabis (THC), codeine</p>	<p>Yes.</p>	<p>Student or Worker is required to request accommodation if required.</p> <p>Accommodation, up to the point of undue hardship, will be provided by the College.</p>	<p>No.</p> <p>No Worker can be impaired while working.</p>	<p>Students and Workers are not required to disclose out-of-College use, provided they are not impaired at the College.</p> <p>All students and Workers are required to disclose dependency issues, to allow for a support plan to be created and to allow for accommodation analysis to occur.</p>
<p>prescription substances that cause impairment used illegally</p> <p>EX: Percocet</p>	<p>No</p>	<p>Employee is required to request accommodation if required.</p> <p>Accommodation, up to the point of undue hardship, will be provided by the College.</p>	<p>No.</p> <p>No Worker can be impaired while working.</p>	<p>All students and Workers are required to disclose dependency issues, to allow for a support plan to be created and to allow for accommodation analysis to occur.</p>

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