

 BRANDON UNIVERSITY	Responsible Substance Use and Harm Reduction	Approved by: President's Administrative Council Administered by: Vice-President (Administration & Finance)
Administrative Policy	First Approved: September 12, 2018	Updated:

Brandon University is committed to providing a safe, healthy and productive working and learning environment. The use of substances can have serious implications in the workplace. As an employer, Brandon University will take appropriate measures to provide education and awareness as well as to address substance-related issues in the workplace.

1.0 Scope

This policy applies to:

- a) All Brandon University employees and students, and
- b) Members of the greater community including:
 - Persons acting on behalf of or engaging with the University, including volunteers, consultants, contractors and their employees; and
 - Assiniboine Community College students living in residence.

2.0 Policy

The purpose of this policy is to establish Brandon University's commitment to the health, safety and wellness of its employees, students and members of the community by providing a safe environment through clear expectations and consistent guidelines regarding the use of substances in the workplace.

This policy is intended to reduce the adverse consequences of drug use by ensuring responsible use of such substances by implementing a harm reduction approach.

Brandon University recognizes that substance usage, abuse, and/or dependency problems can detrimentally affect work performance, behaviour and safety. The University and its employees, students and members of the community share a responsibility to maintain a safe and productive working and learning environment and, as such, are expected to:

- a) Arrive fit for duty;
- b) Not demonstrate impairment or exhibit signs of impairment (see Appendix A);
- c) Conduct themselves in a safe and lawful manner while working and learning or on University premises, including by not selling drug-related paraphernalia; and
- d) Self-disclose substance usage and/or dependency in order to access supports and/or accommodations.

Failure to follow these requirements will result in the University taking disciplinary action to correct the behaviour and maintain a healthy, safe, and productive environment.

3.0 Definitions

- 3.1 **Substance** - drugs which can negatively impact or compromise an individual's cognitive, physical or mental abilities in the workplace including, but not limited to: alcohol, drugs, prescription or over-the-counter medications, solvents, or inhalants
- 3.2 **Substance abuse** - for the purposes of this policy, indiscriminate use of a substance which is not considered dependency
- 3.3 **Substance dependency** - the persistent use of substances despite problems related to their usage
- 3.4 **Medication** - a drug obtained legally either over the counter or through a physician's prescription
- 3.5 **Fit for duty** - the ability to safely perform assigned duties without any limitations as a result of using substances, or otherwise under the influence of the same
- 3.6 **Safety-sensitive** - a situation, task or job in which there can exist a risk of harm to those doing the job, their coworkers or the public
- 3.7 **Impairment** - when an employee is unable to react clearly or is not fit for duty for any number of reasons, including because of the effects of alcohol, illegal drugs or legal prescription drugs
- 3.8 **Harm reduction** - According to the Canadian Centre on Substance Abuse, "harm reduction refers to any program, policy or intervention that seeks to reduce or minimize the adverse health and social consequences associated with drug use."¹
- 3.9 **Responsible use** - According to the World Health Organization, "responsible use of medicines reflects a continuum of access along with appropriate selection and use, and involves all key stakeholders."²

4.0 Accountability

The Vice-President (Administration & Finance), through the Chief Human Resources Officer for employees and Dean of Students for students, is responsible for the communication, administration and interpretation of this policy.

The Vice-President (Administration & Finance) is responsible for advising the President and Vice-Chancellor that a formal review of this policy and secondary documents is required. The Chief Human Resources Officer is a point of contact for reference and advice.

5.0 Responsibilities

Managers and Supervisors are those who, by virtue of their position at Brandon University, are responsible for overseeing others in the workplace. Managers and supervisors should be aware of signs of impairment and take action to assess individual situations. Managers and supervisors must ensure that their employees are aware of this policy and related procedures and that they are provided opportunities to participate in education and training related to substance use and prevention of substance abuse.

Staff and faculty are responsible for being aware of signs of impairment and to report such situations to a manager or supervisor. Staff and faculty are expected to participate in education and training opportunities related to recognizing the signs of impairment, substance use and substance abuse.

The University recognizes that health or safety emergencies may arise related to the over-consumption or abuse of drugs and alcohol. It is important that immediate assistance be provided to any persons experiencing a health or safety emergency, either themselves or as a

bystander. In all such matters, the health and safety of the person at risk is the University's top priority. Persons seeking emergency support, including the person experiencing the health or safety emergency, are protected from charges or discipline when seeking or providing that support, whether or not they remain at the scene, under the Canadian Good Samaritan Drug Overdose Act.

6.0 Review

This policy will be reviewed one year after its inception and every three years thereafter with the next scheduled review date September 2019. In the interim, this policy may be revised or rescinded if the President deems necessary or if there are changes within legislation which require such.

7.0 Previous Policies

This policy supersedes:

- 7.1 All previous Board/Senate policies on the subject matter herein; and
- 7.2 All previous administration policies on the subject matter contained herein.

8.0 References

8.1 Sources

- 8.1.1 University of Manitoba. University governance, governing documents, staff. Substance abuse and/or dependency. 2012.
http://www.umanitoba.ca/admin/governance/governing_documents/staff/1235.html
- 8.1.2 MacEwan University. Grant MacEwan University policy manual. Alcohol and drugs. 2012.
https://www.macewan.ca/contribute/groups/public/documents/policy/alcohol_drugs.pdf
- 8.1.3 OHS Canada. Canada's occupational health & safety magazine. 2012. www.ohscanada.com
- 8.1.4 Canadian Centre on Substance Abuse (CCSA)¹
<http://www.ccsa.ca/Resource%20Library/ccsa0115302008e.pdf>
- 8.1.5 World Health Organization, Essential Medicines and Health Products Information Portal: A World Health Organization resource². 2013-14.
<http://apps.who.int/medicinedocs/en/d/Js23184en/>
- 8.1.6 Good Samaritan Drug Overdose Act. 2017. <https://www.canada.ca/en/health-canada/services/substance-use/problematic-prescription-drug-use/opioids/about-good-samaritan-drug-overdose-act.html>

8.2 Related Documents

- 8.2.1 Appendix A, Concerning Behaviours
- 8.2.2 Appendix B, Frequently Asked Questions – Cannabis at Brandon University
- 8.2.3 Board of Governors, Use or Consumption of Tobacco, Cannabis and E-Materials
<https://www.brandonu.ca/governors/files/Use-or-Consumption-of-Tobacco-Cannabis-or-E-Materials-FINAL-September-2018.pdf>
- 8.2.4 Board of Governors, Workplace Accommodation Policy
<https://www.brandonu.ca/ama/files/Accommodation-Policy.pdf>
- 8.2.5 Board of Governors, Workplace Accommodation Procedure
<https://www.brandonu.ca/ama/files/Accommodation-Procedure-approved-1.pdf>
- 8.2.6 Board of Governors, Non-Academic Misconduct Policy (under development)
- 8.2.7 Senate, Academic Accommodation for Students with Disabilities Policy
<https://www.brandonu.ca/ama/files/SAS-Academic-Accommodation-Policy.pdf>

- 8.2.8 Senate, Academic Accommodation for Students with Disabilities Procedure
<https://www.brandonu.ca/ama/files/SAS-Academic-Accommodation-Procedure.pdf>
- 8.2.9 Human Resources Guide to Internal Investigations at Brandon University
<https://www.brandonu.ca/diversity/files/Guide-to-Internal-Investigations-at-BU.pdf>
- 8.2.10 2018-19 Brandon University Residence Handbook
<https://www.brandonu.ca/residence/files/2018/09/bu-residence-handbook.pdf>

Procedures

1. Disclosure

Should an employee disclose that a substance dependency exists, they will be directed to Human Resources where they will be informed of the Workplace Accommodation Policy and Procedures. Inquiries may be directed to the Chief Human Resources Officer or designate.

Should a student disclose that a substance dependency exists, they will be directed to the Student Accessibility Services office where they will be informed of the Student Academic Accommodation Policy and Procedures. Inquiries may be directed to the Dean, Student Services.

2. Suspicion or Complaint

For employees, the Chief Human Resources Officer will use the *Human Resources Guide to Internal Investigations at Brandon University* as a reference.

For students, the Dean of Students will follow the *Board of Governors, Non-Academic Misconduct Policy*.

All Administrative Policies and Procedures are available in PDF format at

<https://www.brandonu.ca/vp-finance/policies/>

Alternate formats are available upon request by contacting the Office of the Vice-President (Administration & Finance) at admin.finance@brandonu.ca or (204) 571-7850.

Concerning Behaviour

The following list of behaviours may indicate signs of an acute medical emergency or a chronic health condition including a substance related impairment. Someone displaying these behaviours may need your help so first look to assist the person directly or to contact a manager/supervisor if you do not feel comfortable doing so. Managers and/or supervisors should discuss any concerns or observations of atypical behaviour with employees to determine potential fit for duty and/or where accommodation may be warranted.

Physical Observations

Walking

- | | | |
|--------------------------------------------------------|-------------------------------------|-----------------------------------------|
| <input type="checkbox"/> Holding on | <input type="checkbox"/> Stumbling | <input type="checkbox"/> Unable to walk |
| <input type="checkbox"/> Unsteady | <input type="checkbox"/> Staggering | <input type="checkbox"/> Swaying |
| <input type="checkbox"/> Falling | | |
| <input type="checkbox"/> Other (please describe below) | | |

Standing

- | | | |
|--------------------------------------------------------|------------------------------------------|-------------------------------------------|
| <input type="checkbox"/> Swaying | <input type="checkbox"/> Feet Wide Apart | <input type="checkbox"/> Unable to stand |
| <input type="checkbox"/> Rigid | <input type="checkbox"/> Staggering | <input type="checkbox"/> Sagging at knees |
| <input type="checkbox"/> Dizziness | | |
| <input type="checkbox"/> Other (please describe below) | | |

Movements

- | | | |
|--------------------------------------------------------|--------------------------------------------------|--------------------------------------|
| <input type="checkbox"/> Fumbling | <input type="checkbox"/> Jerky | <input type="checkbox"/> Nervous |
| <input type="checkbox"/> Slow | <input type="checkbox"/> Normal | <input type="checkbox"/> Hyperactive |
| <input type="checkbox"/> Reduced reaction time | <input type="checkbox"/> Diminished coordination | <input type="checkbox"/> Tremors |
| <input type="checkbox"/> Not following tasks | | |
| <input type="checkbox"/> Other (please describe below) | | |

Eyes

- | | | |
|--------------------------------------------------------|---------------------------------|------------------------------------------------------|
| <input type="checkbox"/> Bloodshot | <input type="checkbox"/> Watery | <input type="checkbox"/> Droopy |
| <input type="checkbox"/> Glassy | <input type="checkbox"/> Closed | <input type="checkbox"/> Dilated/ constricted pupils |
| <input type="checkbox"/> Other (please describe below) | | |

Face

- | | | |
|--------------------------------------------------------|-------------------------------|---------------------------------|
| <input type="checkbox"/> Flushed | <input type="checkbox"/> Pale | <input type="checkbox"/> Sweaty |
| <input type="checkbox"/> Other (please describe below) | | |

Breath

- | | | |
|--------------------------------------------------------|-----------------------------------------|------------------------------------------------------|
| <input type="checkbox"/> Alcoholic odour | <input type="checkbox"/> Chemical odour | <input type="checkbox"/> Sweet/pungent tobacco odour |
| <input type="checkbox"/> Other (please describe below) | | |

Speech

- | | | |
|--------------------------------------------------------|-------------------------------------|-----------------------------------|
| <input type="checkbox"/> Whispering | <input type="checkbox"/> Slurred | <input type="checkbox"/> Shouting |
| <input type="checkbox"/> Incoherent | <input type="checkbox"/> Slobbering | <input type="checkbox"/> Silent |
| <input type="checkbox"/> Rambling | <input type="checkbox"/> Mute | <input type="checkbox"/> Slow |
| <input type="checkbox"/> Other (please describe below) | | |

Appearance

- | | | |
|----------------------------------------------------------|----------------------------------------------|-----------------------------------------------------------|
| <input type="checkbox"/> Unruly | <input type="checkbox"/> Messy | <input type="checkbox"/> Dirty |
| <input type="checkbox"/> Stains on clothing | <input type="checkbox"/> Dress is disheveled | <input type="checkbox"/> Visible puncture marks or tracks |
| <input type="checkbox"/> Excessive sweating in cool area | | |
| <input type="checkbox"/> Other (please describe below) | | |

Behavioural Observations**Demeanor**

- | | | |
|--------------------------------------------------------|---------------------------------------------|-------------------------------------------------|
| <input type="checkbox"/> Non-cooperative | <input type="checkbox"/> Calm | <input type="checkbox"/> Talkative/rapid speech |
| <input type="checkbox"/> Polite | <input type="checkbox"/> Sarcastic | <input type="checkbox"/> Sleepy |
| <input type="checkbox"/> Crying | <input type="checkbox"/> Sleeping on job | <input type="checkbox"/> Argumentative |
| <input type="checkbox"/> Excited | <input type="checkbox"/> Withdrawn | <input type="checkbox"/> Mood swings |
| <input type="checkbox"/> Overreacts to minor things | <input type="checkbox"/> Excessive Laughter | <input type="checkbox"/> Forgetful |
| <input type="checkbox"/> Other (please describe below) | | |

Actions

- | | | |
|--------------------------------------------------------|---------------------------------------------------------------------------------|--------------------------------------------------|
| <input type="checkbox"/> Hostile | <input type="checkbox"/> Fighting | <input type="checkbox"/> Profanity |
| <input type="checkbox"/> Drowsy | <input type="checkbox"/> Threatening | <input type="checkbox"/> Erratic |
| <input type="checkbox"/> Hyperactive | <input type="checkbox"/> Calm | <input type="checkbox"/> Resisting communication |
| <input type="checkbox"/> Signs of paranoia | <input type="checkbox"/> Possessing, using or distributing an illegal substance | <input type="checkbox"/> Baseless panic |
| <input type="checkbox"/> Other (please describe below) | | |

Frequently Asked Questions – Cannabis at Brandon University

What is the legal age to smoke cannabis in Manitoba?

The legal age is 19+ for the use, purchase and possession of cannabis.

What exactly is cannabis? How is it used?

Cannabis, commonly referred to as marijuana, is a plant. Two of the key components of it are THC and CBD. THC affects the brain and can result in mood swings, the ability to concentrate or depression. CBD may relieve chronic pain and inflammation.ⁱ Cannabis can cause some people to get tired while others may become aggressive. It can be smoked, consumed, or applied topically. Because cannabis can stay in a person's system for a few days or several weeks, there are varying degrees of impairment.

Can I smoke cannabis on campus once it is legalized?

No, you cannot smoke cannabis on campus. Brandon University's *Use or Consumption of Tobacco, Cannabis and E-Materials policy*ⁱⁱ clearly states that everyone is prohibited from consuming or using cannabis on University Property. The *Non-Smokers Health Protection and Vapour Products Act* prohibits smoking or vaping it in public places — indoor and outdoor — including workplaces, group living facilities, streets and sidewalks, parks and beaches, school grounds, restaurant patios and the grounds of health-care facilities. This also includes the university parking lots.

Can students smoke cannabis in their residence room?

No, our residences are a smoke-free facility. This includes cigarettes, e-cigarettes and cannabis.

Can employees and students come to work or class “under the influence” of non-medical or medical cannabis?

Just like you are not permitted to come to work or class under the influence of alcohol, the same applies with cannabis. Medical cannabis is managed differently than recreational or non-medical cannabis. It is handled through the BU *Workplace Accommodation Policy and Procedures*.ⁱⁱⁱ

How much cannabis am I allowed to carry?

You are allowed to carry up to 30 grams.

Can I grow cannabis in my office?

No. BU's *Use or Consumption of Tobacco, Cannabis and E-Materials policy* prohibits it.

I don't smoke cannabis but I have an oil that I use. Is that ok?

If it is medically required, you would request an accommodation through the *Workplace Accommodation policy and procedures*. If you use the cannabis oil recreationally, it is the same as using alcohol in the workplace, it is prohibited.

What do I do if I think my coworker is impaired?

If you think someone may be impaired, let your supervisor know. BU's *Responsible Substance Use and Harm Reduction policy* says that staff and faculty are responsible to report if they suspect a coworker or colleague is showing signs of impairment.^{iv} (See Appendix A for Concerning Behaviours).

My friend makes 'weed cookies'. Is it ok if I have some of those at work?

According to the *Use or Consumption of Tobacco, Cannabis and E-Materials policy*, you are not permitted to use cannabis while at work, which includes consuming edible products. As it stands, Manitoba legislation currently does not ban the consumption of edibles other than in vehicles, boats and schools. You will not be able to buy pre-made edibles for at least another year, while the Canadian Government conducts research and seeks input from the general public.^v

What is the difference between medical cannabis and recreational marijuana?

Medical cannabis requires a physician to complete a medical document which is then submitted, along with an application, to a licensed pharmaceutical-grade cannabis supplier. The supplier operates under and is governed by Health Canada's *Access to Cannabis for Medical Purposes Regulations*.^{vi} No prescription or medical documents are required to purchase or use recreational marijuana/cannabis.

I have a prescription for medical marijuana so the University policies don't apply to me, right?

Wrong. Even with a prescription for medical cannabis/marijuana, all employees are still required to follow the *Responsible Substance Use and Harm Reduction policy* by speaking with your supervisor regarding an accommodation. The *Workplace Accommodation policy and procedures* will guide you through the process.

Can my supervisor actually ask me if I use marijuana?

Yes. If your supervisor suspects you are impaired, they have a responsibility to address it under the *Responsible Substance Use and Harm Reduction policy*.

I use cannabis to cope with stress. I believe this is a legitimate medical reason to use it. Why is my supervisor asking me for medical documentation from my doctor to support my usage?

Unless you have provided the necessary medical documents to support your medical need for cannabis, it is considered recreational cannabis. According to the *Responsible Substance Use and Harm Reduction policy*, you are not permitted to use recreational cannabis while at work. An accommodation can only be made when the need for cannabis use is medically supported by a licensed practitioner.

My coworker suffers from anxiety which I have also experienced. I gave them some of the marijuana my doctor prescribed for me to help them out. My supervisor says I can't do that and I'm in trouble for helping a coworker. Why?

Medical cannabis has been prescribed to you, for your condition and situation. As is the case with any medical prescription, you are not medically authorized to share this with anyone. Your coworker should seek medical treatment if she is experiencing panic attacks.

Where can I learn about the safe consumption of cannabis?

Sources:

<http://www.gov.mb.ca/cannabis/cannabisuseinmb.html>

<https://lgcamb.ca/>

<http://www.gov.mb.ca/cannabis/index.html>

Where can I access to support to resources in the community regarding substance use?

Lifeworks.com	1-877-207-8833
	User ID: bueap
	Password: bueap

Prairie Mountain Health	www.prairiemountainhealth.ca/index.php/mental-health
	1-888-379-7699

AFM (Addictions Foundation Manitoba)	www.afm.mb.ca
	Manitoba Addictions Helpline 1-855-662-6605

ⁱ <https://www.medicalnewstoday.com/articles/246392.php>

ⁱⁱ <https://www.brandonu.ca/governors/files/Use-or-Consumption-of-Tobacco-Cannabis-or-E-Materials-FINAL-September-2018.pdf>

ⁱⁱⁱ <https://www.brandonu.ca/ama/files/Accommodation-Policy.pdf>, <https://www.brandonu.ca/ama/files/Accommodation-Procedure-approved-1.pdf>

^{iv} <https://www.brandonu.ca/vp-finance/files/Responsible-Substance-Use-and-Harm-Reduction-20180912.pdf>

^v <https://www.canada.ca/en/services/health/campaigns/introduction-cannabis-act-questions-answers.html>

^{vi} <http://laws.justice.gc.ca/eng/regulations/SOR-2016-230/page-20.html#h-25>