

COLLEGE POLICY

POLICY:	Aviation Technology - Flight Alcohol and Drug Policy (Student)
APPROVED BY EXECUTIVE:	December 20, 2018
SUPERSEDES POLICY:	May 30, 2018

PURPOSE

Sault College (the “College”) is committed to ensuring all students attending courses in our Aviation Program - Flight are operating safely. Student health and safety performance relies on good judgment and precise action. We recognize that the use of illicit drugs and other mood-altering substances and the inappropriate use of alcohol and medications can adversely affect performance, and the safety and well-being of students and the public.

Recognizing the safety-sensitive nature of the aviation industry, this Policy has been developed and implemented to be consistent with industry standards and to support the College’s ongoing objective to ensure safety standards are met at all times in conjunction with flight operations, as well as to minimize the risks of accidents. This Policy is also consistent with Transport Canada regulations for crew members under the Aeronautics Act.

DEFINITIONS

Alcohol refers to beer, wine and distilled spirits, and includes the intoxicating agent found in medicines or other products.

Drug means any substance, including but not limited to alcohol, cannabis, illicit drugs, medications, or other mood-altering substances, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts.

Fitness for Flight, in the context of this Policy, means being able to safely conduct all flight-related duties without any physical or mental limitations due to the use or after-effects of alcohol, illicit drugs, medications or other mood-altering substances.

Illicit Drug means any drug or substance which is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g., street drugs such as methamphetamine and cocaine).

Medication refers to a drug obtained legally, either over-the-counter or through a doctor’s prescription or appropriate authorization.

Mood-Altering Substance refers to any other product that is legally or illegally used, resulting in cognitive or physical limitations that negatively impact performance on the job (e.g., any product containing cannabis including inhaled products, consumables, oils and creams synthetic marijuana, “bath salts”, doda, designer drugs, and other similar products).

Refusal to Test includes the following:

- Failure to report for a test
- Refusal to submit to a test
- Failure to provide a valid specimen absent a documented medical condition
- Attempting to tamper with a test sample
- Refusal to agree to disclosure of a test result to the College
- Attempting to avoid a test by failing to report involvement in an incident which may require testing or by avoiding College personnel following involvement in an incident
- Failure to advise of release from medical center/hospital if testing is delayed for medical reasons
- Failing or refusing to attend a medical evaluation where required under the Policy
- Any attempt to disrupt the testing process as described in the Policy

SCOPE AND APPLICATION

This Policy applies to all students in the Aviation Program – Flight while they are enrolled.

Students are expected to operate in a safe manner and in all ways be consistent with the Sault College Student Code of Conduct. In addition, it is expected that they will:

- Read and understand the Policy and their responsibilities under it;
- Remain fit for all flight-related duties and comply strictly with the standards set out below;
- Before a violation, seek advice and follow appropriate treatment if they have a current or emerging alcohol or drug problem and follow recommended monitoring programs after attending treatment;
- Intervene as appropriate to encourage a classmate to access assistance before an alcohol or drug problem impacts safe performance;
- Immediately report any violations or potential violations of this Policy by others to the Chief Flight Instructor (CFI) or designate; and
- Co-operate with an investigation into a violation of this Policy, including any request to participate in the testing program.

Details on the standards, procedures and definitions of terms are found in the following sections of the Policy. This Policy is subject to ongoing review and evaluation, and

modifications will be made as deemed necessary to respond to current circumstances and evolving needs of the organization.

STANDARDS

To minimize the risk of unsafe and/or unsatisfactory performance due to the use or after-effects of alcohol and other drugs, students are expected to comply with the following standards.

a. Illicit Drugs and Mood Altering Substances: The following are prohibited:

- Using and possessing illicit drugs and other mood-altering substances;
- Being under the influence of illicit drugs or other mood-altering substances;
- Having a positive drug test as determined through the testing program; and
- Distributing and offering for sale illicit drugs and other mood altering substances (trafficking).

Note: Cannabis in any form is considered a mood altering substance. Its use and possession by aviation students is prohibited at any time, on or off duty.

b. Alcohol: The following are prohibited:

- Consuming or being under the influence of alcohol while performing flight-related duties - i.e. while engaged in pre-flight planning, ground operations and flight operations
- Consuming alcohol during the 12-hour period prior to a scheduled flight;
- Testing positive for alcohol as determined through the testing program; and.
- Using alcohol after an incident until tested or advised by the College that a test is not required.

c. Medications: Students are expected to responsibly use prescribed and over-the-counter medications. A guideline on medications is in Appendix I. The following are prohibited:

- Performing any flight-related duties while unfit due to the use of a medication;
- Intentionally misusing medications (e.g., not using a medication as it has been prescribed or directed by the pharmacy, using someone

else's prescription medication, combining medication and alcohol use against direction);

- Possessing prescription medications without a legal prescription; and
- Distributing and offering for sale prescription medications (trafficking).

Students who may need to use a medication must:

- Investigate (through their doctor or pharmacist) whether the medication can negatively affect safe operation of an aircraft; and
- Refrain from taking any medication within 48 hours of performing any flight-related duties unless first disclosed and approved in writing by a Civil Aviation Medical Examiner or an aviation-aware physician.

- d. Standby Situations: If a student is not on the flight schedule but is standing by in anticipation of flying, they must be fully in compliance with these standards.

PREVENTION & ASSISTANCE

The College recognizes its obligations under the Human Rights Code. Students who have disabilities relating to alcohol and/or drug use or who require the use of medication in relation to a disability must advise the College and cooperate in the accommodation process so that the College can fulfill its obligations.

- a. Prevention: This Policy stresses the importance of prevention and early identification of potential problem situations. The College makes information available to students on health and safety hazards and recognizing related performance problems through program curriculum.

Students are encouraged to contact an academic counselor, their personal physician, or appropriate community services for help with any personal problem that may be affecting safe performance, including an alcohol or drug problem.

- b. Assessment/Rehabilitation: The College recognizes that alcohol and drug dependency are treatable illnesses and that early intervention greatly improves the probability of a lasting recovery. Anyone who suspects they have a substance dependency or emerging alcohol or drug problem is expected to seek advice and to follow appropriate treatment promptly before safe performance is affected or violations of this Policy occur.

However, accessing assistance or declaring a problem does not eliminate the requirement for maintenance of safe and acceptable performance associated with operating an aircraft. Should sanctions or testing be warranted, it cannot

be avoided by a request for assistance with a problem or by disclosure that the student is already involved in a treatment program.

- c. Aftercare: Any student who completes primary treatment (e.g., residential or out-patient treatment) for alcohol and/or drug problems as a result of a referral through the College may be required to participate in an aftercare program when returning to class in order to help them maintain recovery. They may also be required to enter into a written agreement which will outline the conditions governing their return to flight operations and the consequences for failing to meet those conditions.

INVESTIGATIVE PROCEDURES

- a. Suspected Violations:

Faculty, staff and students in the School of Aviation shall immediately report any suspected violation of this policy to the Duty Instructor, the Chief Flight Instructor, or the Chair.

Any suspected violation of this Policy shall result in immediate administrative grounding pending investigation and flight safety risk assessment.

A decision to administratively ground a flight crew member may be made by the Chair, the Chief Flight Instructor, the Assistant Chief Flight Instructor, the Aviation Safety Officer, or the Duty Instructor. The sole authority to reinstate a grounded flight crew member to flight status is the Chief Flight Instructor.

In all situations, an investigation will be conducted to determine whether Policy violation has likely occurred. The College has the right to investigate to determine whether drugs are possessed in violation of this Policy, and students shall cooperate with any reasonable inquiry made in such an investigation.

- b. Alcohol and Drug Testing: Students may be subject to alcohol and drug testing in the following circumstances and in accordance with the procedure set out in Appendix II.

An order to submit to a test shall be made by the CFI (or the CFI's designate) after consultation and agreement of the Dean (or the Dean's designate). The rationale for making an order will be documented as soon as possible.

Any Refusal to Test is a violation of this Policy.

Reasonable Cause:

Testing may be ordered when there are reasonable grounds to believe that a student has consumed alcohol or drugs in violation of this Policy.

The order may be based on a credible report of consumption or personal observations of indicators such as:

- Smell (of alcohol or cannabis);
- Erratic or atypical behavior or changes in behavior of the student;
- Changes in the physical appearance or speech patterns of the student; or
- Any other observations that suggest alcohol or drug use may be a factor.

Once the order to test is made, the student must remain under direct supervision until transported to the collection site. The student will be escorted to the drug testing site by the CFI (or a designate) and will be removed from the flight schedule until the investigation is complete. Depending on the test result, a medical assessment may also be required.

Post Incident:

Alcohol and drug testing may be ordered after a serious or potentially serious incident as part of a full investigation into the circumstances.

A serious incident is one resulting in:

- A fatality;
- A serious personal injury to any individual requiring medical attention away from the scene;
- An environmental incident that causes or has potential to cause adverse effects;
- A significant loss or damage to property, equipment or vehicles;
- A tail strike, hard landing, fuel exhaustion or other similar events; or
- Any violation of a Transport Canada regulation.

In addition to the incidents listed above, at its discretion, the College may require a post-incident test after any other serious incident or a near miss considered to have had significant potential for more serious consequences as part of an investigation.

Self-Reporting of an incident:

- Students shall promptly self-report an incident to their instructor or the CFI; and
- Students shall participate fully in any subsequent investigation.

Post Violation and Post Treatment Testing

- i. Return to Flight – Post Violation: In those situations where a student is reinstated after a Policy violation, they will be required to pass a return to flight test and may be subject to unannounced testing as set out in an agreement with the College.
- ii. Return to Flight - Post Treatment: Unannounced testing may be used as a monitoring tool as determined on a case-by-case basis to support the recovery of any student assuming flight duties after primary treatment for an alcohol or drug problem.

CONSEQUENCES OF A POLICY VIOLATION

Any violation of the provisions of this Policy will result in the application of sanctions up to and including expulsion. The appropriate sanctions in a particular case will depend on the nature of the violation and the circumstances surrounding the situation.

The College may also report the violation to the Regional Aviation Medical Officer or the law enforcement as it deems appropriate.

A positive drug test, an alcohol test result of .02% BAC or higher, and/or failure to complete the testing process are deemed to be a violation of this Policy and grounds for sanctions up to and including expulsion.

Should the student be allowed to return to continue their classes, they may be required to enter into an agreement which may require any or all of the following conditions, or any other condition appropriate to the situation:

- Adherence to any recommended treatment and aftercare program;
- Successful completion of an alcohol and drug test prior to being eligible for flight scheduling;
- Ongoing unannounced testing for the duration of their agreement;
- Adherence to any ongoing rehabilitation conditions or requirements; and
- No further Policy violations during a monitoring period.

Failure to meet the requirements of the agreement will be grounds for sanctions or expulsion as set out specifically in the agreement.

APPENDIX I GUIDELINE ON MEDICATIONS

All students are required to manage potential impairment during class hours due to the legitimate use of medications. The following drug categories have been associated with performance impairment and are provided as a guideline to assess their situation. The list is not exhaustive; there are numerous other over-the-counter and prescription drugs which when taken may impact negatively on overall safe performance.

Therefore, students are required to consult with their doctor or pharmacist to determine if use of the medication will have any potential negative impact on safe performance by explaining their job functions. If the medication they are using will affect their ability to operate safely, they are to take appropriate action to minimize safety risk by advising their Instructor.

Anticonvulsants are used to control epileptic seizures and can cause drowsiness in some patients (e.g., Dilantin).

Antihistamines are widely prescribed for hay fever and other allergies (e.g., Allegra, Dimetane). They are also found in many cold medications. These medications may cause drowsiness.

Barbiturates, Sedatives, Hypnotics, Tranquilizers, and Antidepressants are used to treat sleep disorders and depression (e.g., Ativan, Imovane, and Paxil). Potential side effects may include mild sedation, hypnotic state, dizziness or drowsiness.

Cold Tablets/Cough Mixtures, in particular nighttime remedies, can cause drowsiness (e.g., Sinutab, Contac, Triaminic, Tussionex and preparations containing dextromethorphan (DM) or codeine).

Cannabis is derived from the cannabis plant and delivers various pharmacologically Active agents to the consumer, including delta-9-tetrahydrocannabinol (THC). Cannabis use is associated with a wide range of adverse effects, including adverse effects on memory, motor coordination and judgment. THC is fat-soluble and can accumulate in the body resulting in prolonged exposure to of the brain to the substance over time even after discontinuation of consumption. The risk for impairment may continue while the substance washes out of the body's fat stores and the brain continues to be exposed to it.

Motion Sickness Drugs are used to prevent motion sickness and nausea (e.g., Gravol, Antivert). Side effects may include drowsiness.

Muscle Relaxants are used to treat musculoskeletal pain. Most common side effects are sedation and drowsiness (e.g., Flexeril, Robaxial).

Narcotics (e.g., Demerol, Codeine, OxyCotyn, and Percocet) may contain side effects such as drowsiness, dizziness and light-headedness. Codeine is often found in combination drugs such as 222s, 292s or Tylenols 1, 2, 3s.

Opioid Agonist Treatment (e.g. methadone, suboxone, buprenorphine). – are prescribed to treat opioid use disorder and chronic pain. The use of these may result in drowsiness, dizziness, and light-headedness and may impact reaction time and cognitive functioning.

Stimulants are medication used for central nervous system stimulation and for appetite suppression and can produce sensations of well-being which may have an adverse effect on judgment, mood and behavior (e.g., amphetamines or medications sold as “diet pills”).

APPENDIX II ALCOHOL AND DRUG TESTING PROCESS

The alcohol and drug testing process is based on rigorous collection, analysis and reporting procedures designed to ensure the accuracy and integrity of the results. Steps in the testing process are highlighted below.

1. Testing will be conducted in those circumstances outlined under the Policy to determine the presence of six classes of drugs: cannabinoids, amphetamines including methamphetamine and MDMA (ecstasy), cocaine, opiates, phencyclidine and alcohol. If the College concludes there is justification to include additional drugs in this list, students will be advised of the change. Testing for additional drugs may also be required on an individualized basis on the advice of a treatment centre or substance abuse professional in a post-treatment situation.
2. Collection of specimens for drug testing and administration of alcohol tests will be performed by trained collection agents. In post-incident and reasonable cause testing situations, samples will be collected as soon as possible after the decision to test (within two hours if possible), but collection attempts will end at eight (8) hours for an alcohol test, and thirty-two (32) hours for a drug test.
3. All individuals who are tested are required to sign a form to acknowledge the accuracy of the student and collector information and authenticity of the specimen(s). They will be given a copy of the Drug Testing Custody and Control Form and the Alcohol Testing Form for their records.
4. Alcohol tests will be administered by a calibrated evidential breath analyzer with a printout of test results. Drug tests will be administered by urinalysis using split sample collection for transfer to the laboratory or using a Point of Collection (quick test) urine drug screen at the collection site with confirmation testing at the lab should it be required. In certain situations, oral fluid will be collected for testing and analysis in the laboratory.
5. All laboratory testing will be conducted by a fully qualified and accredited laboratory performing a confirmation test by gas chromatography/mass spectrometry (GC/MS) and using parallel procedures for the oral fluid test.
6. Laboratory confirmed positive drug test results will be reviewed by a qualified Medical Review Officer (MRO). This is an independent physician who will endeavor to discuss the result with the student in an effort to determine whether a positive test could have resulted from the legitimate use of medications. The individual concerned will be given an opportunity to explain the finding to the MRO who will then determine whether the

Result will be reported to the College's Dean or designate as a negative, or a verified positive, or a tampered or substituted specimen result.

7. In the case of a verified positive drug test result, or a tampered or substituted finding, the student may ask the MRO to require the split sample to be tested within seventy-two (72) hours of receiving their results. If a second confirmed positive test is reported, the person who requested the second analysis is responsible for reimbursing the College for the associated costs.
8. If the urine test is reported as dilute and negative or cancelled because the specimen is invalid, the student will be required to provide an additional specimen for testing as soon as possible.
9. All test results will be reported directly to the College's Dean or designate, except for the release of information in accordance with this Policy and in situations affecting health and safety, results of all testing will be maintained by the Program Administrator and will be kept confidential unless otherwise required by law or authorized by order of a tribunal or court.