
Impairment in the workplace

OHS information for workers and employers

This bulletin looks at impairment in relation to occupational health and safety (OHS).

KEY INFORMATION

- Impairment can be caused by a number of factors, many of which cannot be tested for.
- Worker impairment (regardless of the cause) can create a work site health and safety hazard.
- Workers, employers and supervisors need to understand the effect of impairment on workplace health and safety. Safety-sensitive work must not be performed by an impaired worker.

Understanding impairment

Impairment can affect a worker's ability to pay attention, think clearly, or make good decisions. Impairment can also affect a worker's physical ability to do a work task.

Because of this, impairment can negatively affect a worker's ability to perform a job or task safely.

Impairment causes

A number of factors can cause or contribute to impairment, including:

- [Fatigue](#), sleep disturbances or extended work hours.
- Medical conditions or mental health concerns.
- Prescription or non-prescription medications such as antihistamines, decongestants or [opioids](#).
- Alcohol or recreational drug use (for example, [cannabis](#)).
- Temporary, situational stressors.

Signs of impairment

Possible signs of impairment include:

- Physical changes in health.
- Slurred speech.
- Clumsiness.
- Altered depth perception.
- Slowed reaction times.
- Yawning, excessive sleepiness, or falling asleep on the job.

- Deterioration in hygiene.
- Difficulty focusing on tasks.
- Forgetfulness.
- Inappropriate behaviours.
- Mood fluctuations.
- Change or deterioration in workplace performance.

However, how impairment shows is unique in each situation and for each individual. Likewise, the impact of impairment on the workplace can vary widely. Learn more at Canadian Centre for Occupational Health and Safety (CCOHS) [Impairment at Work – Policy and Recognition](#).

Responsibilities under Alberta's OHS legislation

Alberta's OHS Act and Code don't address impairment specifically. However if impairment is or could be a workplace hazard, employer, supervisor and worker responsibilities to ensure a healthy and safe workplace apply.

Here are some examples of what employers, supervisors and workers must do, in relation to impairment.

Employers:

- Assess impairment-related hazards and put appropriate controls in place for their workplace.
 - This may include stopping work to determine whether impairment could be creating a danger for workers.
- Ensure that workers are trained regarding the risk and control measures in place.
- Address and resolve health and safety concerns related to impairment in a timely manner.
- Report and investigate workplace incidents.

Supervisors:

- Report concerns about worker impairment, unsafe or harmful work site behaviour or conditions to the employer.

Workers:

- Do not work impaired.
- Report health and safety concerns relating to impairment to the employer or supervisor. Workers who report health

and safety concerns are protected under the OHS Act from disciplinary action.

- Understand workplace policies and participate in related training.

Best practices

Responding to impairment

Contact emergency services immediately if there is an incident requiring acute medical care.

Employers and supervisors can create a culture of health and safety by adhering to policy and helping workers seek assistance if necessary. If possible, discuss behaviors privately, and be clear that the intention of these conversations is to ensure the health and safety of the worker and others. Employers and supervisors should focus on the safety issues related to the impairment, rather than its cause.

Policy and procedures

Having an impairment policy and procedures in place can help remove stigma, build understanding, clarify expectations, and create a culture of health and safety. Policies may include a [fitness-to-work approach](#) that clearly communicates responsibilities and expectations related to addressing impairment as a workplace hazard. Employers may choose to reference external guidance, for example [CSA Standard Z1008:21, Management of impairment in the workplace](#), when developing their policies.

Factors to consider

Some key factors to consider when developing or revising a workplace policy are:

- Current legislation and laws (OHS, employment standards, privacy, human rights).
- Privacy and confidentiality.
- Applicable collective bargaining provisions.
- Other workplace policies and procedures (for example, those related to [alcohol and drug use](#), fatigue, fitness to work, or a duty to accommodate).
- Workplace environments and specific job duties.
- Size of the organization.
- Work hours and shift scheduling.
- Operations in multiple jurisdictions.

What to include

The CCOHS gives a [list of elements](#) that you should include in a workplace impairment policy. Here are some excerpts from that list:

- Statements of:
 - the policy's purpose and objectives,
 - who the policy applies to, and
 - applicable confidentiality rights.
- A definition of impairment as it applies to the workplace.
- A mechanism for employees to confidentially self-report when they feel they might be impaired (for instance, if taking a prescription medication that may cause impairment).
- Statement regarding what, if any, medical/therapeutic or non-medical substances are allowed on the premises, and if so, under what circumstances.
- Steps that will be taken when there are concerns about behaviour that might have an impact on the workplace or puts the safety of the worker or others at risk.
- Processes for accommodation, return to work/remain at work, and/or sick leave or benefits, as appropriate.
- Provision for a hierarchy of disciplinary actions.
- Statement about how workers, supervisors and other applicable work site parties will be trained about impairment (general awareness), the workplace impairment policy, and any other applicable policies or programs.

Duty to accommodate

If impairment arises from or is related to a protected human right, the employer may have other obligations under the *Alberta Human Rights Act*. Some causes of impairment (for example, medical conditions or alcohol/drug dependency) may activate a duty to accommodate under human rights legislation.

The Alberta Human Rights Commission provides information about [the duty to accommodate](#) and guidance on [obtaining and responding to medical information in the workplace](#).

Testing for impairment

Alberta laws do not address testing for impairment or drug and alcohol testing. Employers who choose to test workers in safety sensitive positions should seek legal advice on human rights, employment standards, privacy, and occupational health and safety issues before implementing a testing program.

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Contact us

OHS Contact Centre

Alberta toll-free

- 1-866-415-8690

Edmonton region

- 780-415-8690

Deaf or hard of hearing (TTY)

- 1-800-232-7215 (Alberta toll-free)
- 780-427-9999 (Edmonton region)

Notify OHS of health and safety concerns

alberta.ca/file-complaint-online.aspx

Call the OHS Contact Centre if you have concerns that involve immediate danger to a person on a work site.

Report a workplace incident to OHS

alberta.ca/ohs-complaints-incidents.aspx

Website

alberta.ca/ohs

Get copies of the OHS Act, Regulation and Code

Alberta King's Printer

alberta.ca/alberta-kings-printer.aspx

OHS

alberta.ca/ohs-act-regulation-code.aspx

For more information

Alberta Human Rights Commission: Duty to accommodate
albertahumanrights.ab.ca/employment/employer_info/accommodation/Pages/duty_to_accommodate.aspx

Alberta Human Rights Commission: Obtaining and responding to medical information in the workplace
albertahumanrights.ab.ca/employment/employer_info/accommodation/Pages/obtaining_med_info_employers.aspx

Canadian Model – Alcohol and Drug Policy (COAA and ESC)
coaa.ab.ca/document/canadian-model-version-6-0/

CSA Standard Z1008:21, Management of impairment in the workplace
csagroup.org/store/product/CSA%20Z1008%3A21/

CCOHS: Impairment at work – Policy and recognition
ccohs.ca/oshanswers/hsprograms/impairment.html

CCOHS: Impairment at Work – Reporting and Responding
ccohs.ca/oshanswers/hsprograms/impairment_reporting.html

CCOHS: Opioids in the Workplace
ccohs.ca/oshanswers/hsprograms/opioids.html

Fatigue, Extended Work Hours and Workplace Safety (ERG015)
ohs-pubstore.labour.alberta.ca/erg015

Workplace Strategies: Risk of Impairment from Cannabis
ccohs.ca/products/publications/cannabis_whitepaper.pdf

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