

Naloxone in the workplace

OHS information for employers and workers in non-healthcare settings

Employers can authorize workers to administer injectable naloxone for suspected opioid overdoses, provided the employer and worker comply with [requirements established by the Government of Alberta](#). This bulletin introduces occupational health and safety (OHS) requirements for naloxone administration in non-healthcare settings, in general terms. Consult [the OHS laws](#) to make sure you know all the requirements that apply to you. If applicable, speak to a health and safety professional or seek legal counsel for specific questions about your OHS obligations.

KEY INFORMATION

- Naloxone is a drug that can temporarily reverse the effects of an opioid overdose (such as from fentanyl).
- OHS laws protect and promote the health and safety of Alberta workers.
- If employers choose to authorize injectable naloxone administration at the work site:
 - OHS Act and OHS Code requirements will apply.
 - Employers and workers must meet the requirements set out in [Ministerial Order 702/2023](#) and comply with any other legislation that applies to administering medication.

How naloxone works

High dose opioids can suppress an individual's ability to breathe. Naloxone is a medication that can temporarily reverse the effects of opioids, including decreased level of consciousness, from an opioid overdose. If it will be effective, naloxone usually works within minutes after administration, although sometimes more than one dose is needed. The effect is temporary, and an individual who is given naloxone must be closely monitored and emergency services called immediately. Additional doses may be required during this time, in addition to rescue breathing.

More information about naloxone is available on alberta.ca/opioid.

NALOXONE ADMINISTRATION

Naloxone is available in either an injectable (intramuscular) or nasal spray (intranasal) formulation. Where this bulletin discusses naloxone administration, it specifically refers to administration by injection. Many of the same general considerations apply to intranasal administration.

Work site opioid overdoses and naloxone

Naloxone is only one element in the care and treatment for unresponsive individuals affected by an opioid overdose. Employers are not required by OHS law to have naloxone at the work site. They also do not have to authorize its administration as part of their emergency response plan.

Employers must determine if administering naloxone is a work task that can be performed safely. If any work task can't be carried out safely (for example, if necessary controls don't exist or aren't implemented safely) the employer must determine that the task can't be performed.

OHS employer requirements

Under Alberta's OHS Act, employers have a general duty to ensure – as far as reasonably practicable – the health, safety and welfare of their workers. Employers also have other general duties under the act and must meet other requirements in both the OHS Act and the OHS Code.

Some OHS requirements are highlighted below. For a broader overview of employer roles and responsibilities, read [Guide to OHS: Employers](#).

Hazard assessment and control

Employers must conduct a hazard assessment and ensure that the appropriate controls are available and in

place to protect workers who may be involved in administering naloxone. The hazard assessment must meet the requirements set out in Part 2 of the OHS Code.

For information about step-by-step hazard assessment, read [Hazard Assessment and Control: a handbook for Alberta employers and workers](#).

See [page 3](#) of this bulletin for information about hazards associated with naloxone administration.

Training

An employer must ensure that workers are adequately trained in all matters necessary to work in a healthy and safe manner.

Naloxone administration is not part of approved workplace first aid training. A worker who is authorized to administer injectable naloxone can be a first aider but must also be separately trained and competent to administer injectable naloxone.

Training must build competence in rescue breathing, contacting emergency medical services and naloxone administration by injection. Alberta Health Services has developed [online “Naloxone Training for Workplace Administration”](#) that meets these requirements. Workers may also need to complete additional training as determined by the employer.

The employer must ensure that the worker is aware of the manufacturer’s specifications and directions for administering the naloxone formulation that is available at the work site.

NALOXONE KITS

Employers that choose to supply naloxone kits at the work site must ensure that these are appropriately identified, located, maintained, inventoried and stored. Employers must ensure provisions for safe disposal for sharps are available, if injectable naloxone used.

Emergency preparedness and response

If an opioid overdose could happen at the work site and workers are authorized to respond and administer naloxone, the employer must account for the possibility of related emergencies. Depending on the

circumstances, an employer must consider these actions for their emergency planning:

- Designating workers as emergency responders.
- Alarm and emergency communication requirements.
- Planning to summon and access first aid as needed.
- Appropriate personal protective equipment (PPE), as determined by the employer’s hazard assessment.
 - PPE selection, use and maintenance must meet requirements in Part 18 of the OHS Code.
 - PPE must protect against chemical and biological exposures (including opioid residues, and blood or other body fluids). It should be easily accessible and stored near naloxone kits.

For more on developing emergency response plans, read [Emergency response planning: an occupational health and safety tool kit](#).

See [page 3](#) of this bulletin for questions that can help guide emergency response planning discussions related to potential opioid overdoses.

First aid planning

[Workplace first aid requirements](#) are set out in Part 11 of the OHS Code. They do not include considerations related to first aid for the public. However, employers may choose to provide first aid to the public beyond the legislative requirements. If an employer chooses to do so, this is a work activity and OHS requirements apply.

When planning first aid services, employers can consider factors such as:

- Legal requirements that apply to first aiders.
- The types of medical emergencies to which workplace first aiders might have to respond.
- If applicable, the ability and willingness of first aiders to respond to emergencies involving members of the public.
- Whether training and equipment over and above OHS first aid requirements will be needed.
- If additional controls will be needed to protect the first aiders for any services included in the first aid and emergency response plans.

A worker is [not required to respond](#) to any unsafe situation – for example, if the worker lacks competence and experience to respond or if the worker determines that it is unsafe to respond.

RESPONDING TO AN UNCONSCIOUS PERSON

When responding to an unconscious person at the work site, workplace first aiders and other responders must follow their training, first aid and emergency response procedures. They must determine whether the scene is safe before responding. Naloxone administration (if applicable) should not come before other life sustaining measures (for example, opening and securing the individual's airway).

If a workplace first aider or other worker responds to an unconscious individual at the work site, the employer's emergency response plan should be activated and 911 called immediately.

Violence and harassment

As [described below](#), a person who is given naloxone for an opioid overdose may become agitated and confused. Violence and harassment are considered hazards for the purpose of Part 2 of the OHS Code. Part 27 of the OHS Code requires an employer to develop and implement a [violence and harassment prevention plan](#).

OHS worker requirements

OHS worker requirements in relation to naloxone include:

- Participating in training provided by or on behalf of the employer.
- Being aware of the hazards associated with naloxone administration.
- Being familiar with and complying with the employer's emergency response procedures when responding to a suspected opioid overdose.
- Ensuring that they are familiar with measures to protect themselves from inadvertent exposure to opioids.
- Wearing and using required PPE appropriately.
- Disposing of used PPE and sharps appropriately.

As with the employer requirements, these are only some highlighted OHS worker requirements. For a broad overview of workers' rights and responsibilities, read [Guide to OHS: Workers](#).

Hazards associated with administering naloxone

There are many hazards associated with administering naloxone. Some hazards to consider include:

- Possible opioid residues on or around an unconscious individual.
- Possible exposure to blood and bodily fluids.
- Potential sharps injuries (for example, from discarded needles or from the sharps associated with injectable naloxone formulations).
- Naloxone may cause a previously unresponsive individual to behave unpredictably or violently, or experience physical withdrawal symptoms requiring emergency medical care.
- Providing care in a potential opioid overdose situation can be traumatic. Workers may need support and assistance after responding to an unconscious individual, or witnessing or intervening in an overdose, whether or not naloxone was administered.

Emergency response planning considerations

The following questions can help guide planning discussions related to potential opioid overdoses:

- Are workers likely to be in contact with individuals who are using opioids (including fentanyl) or have opioids in their possession?
- Are workers required to go into environments contaminated with opioids?
- Are workers willing to be trained and willing to administer naloxone to individuals with suspected opioid overdoses?
- Has the work site experienced an opioid overdose or has there been evidence of opioid drug use on site? (For example, finding drugs, needles or other paraphernalia.)
- Is there evidence that the risks for opioid overdose are greater in a particular industry or among occupations at a specific work site?
- What circumstances are workers likely to respond to where naloxone would be required as a rescue treatment?
- How quickly can professional emergency response personnel access the work site?
- Do workers require mental health supports related to responding to suspected opioid overdoses at the work site?

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

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-incident

Website

alberta.ca/ohs

Get copies of the OHS Act, Regulation and Code

Alberta King's Printer

alberta.ca/alberta-kings-printer

OHS

alberta.ca/ohs-act-regulation-code

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For more information

Alberta Ministerial Order 702/2023 (Mental Health and Addiction)

open.alberta.ca/publications/mha-702-2023

Alberta's opioid and addiction response

alberta.ca/alberta-opioid-crisis-response

CCOHS: First Aid – Administering Naloxone

ccohs.ca/oshanswers/hsprograms/firstaid_naloxone.html

First aid in the workplace (FA020)

ohs-pubstore.labour.alberta.ca/fa020

Emergency response planning: an occupational health and safety tool kit (BP040)

ohs-pubstore.labour.alberta.ca/bp040

Guide to OHS: Employers (LI009)

ohs-pubstore.labour.alberta.ca/li009

Guide to OHS: Workers (LI008)

ohs-pubstore.labour.alberta.ca/li008

Hazard Assessment and Control: a handbook for Alberta employers and workers (BP018)

ohs-pubstore.labour.alberta.ca/bp018

Right to refuse dangerous work (LI049)

<https://ohs-pubstore.labour.alberta.ca/li049>

Violence and harassment in the workplace (BP045)

ohs-pubstore.labour.alberta.ca/li045

Workers administering injectable naloxone (includes link to "Naloxone Training for Workplace Administration")

alberta.ca/workers-administering-injectable-naloxone

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