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Part 6, Section 6.33

Sector: 7660 - Service Sector, Health Care and Social Assistance

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Type: Worker Health & Safety Representative

Organization: Vancouver General Hospital (VCH)

Submission:

I am very concerned that the proposed regulation does not cover all sharps that are commonly used in Healthcare and that are proven to cause potentially dangerous needlestick injuries- I'm especially talking about the needles used to give intramuscular and subcutaneous injections and sharps used in other procedures such as scalpels.

I'm surprised also that you are not including an enforcement for the use of the "Hands Free" method of sharps transfer in the operating room. This method has been proven to prevent injuries , but in many areas is not being implemented primarily due to reluctance of surgeons to adjusting to a new method. We need this included as part of the regulation so safety is enforced amongst this reluctant group.

In all areas of change front line workers need to be part of the selection of new devices and the decision must be made based on the safest product, not what will give a minimum amount of safety but at the cheapest price. The introduction of these new devices needs to include very thorough training and follow-up to insure that workers rapidly adapt and feel comfortable to the new products. Every change involves extra effort and with today's heavy workloads nurses are often tempted to cut corners to save time. Education needs to be included in the regulation. In my rating of the regulation below I am stating that the changes will have a positive impact on my workplace but the impact will not be as positive as it could be if they include the areas I have mentioned.

Q: The proposed change is easy to understand

A: Neutral

Q: The reasons given in the explanatory notes to support this change are relevant

A: Neutral

Q: The proposed change will have a direct effect on the work carried out at my workplace

A: Agree

Q: The proposed change will have a positive impact on the health or safety at my workplace

A: Agree

Q: I support the proposal

A: Neutral

Q: I will participate in the regulatory review on-line process in future

A: Neutral
