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Submission ID: P08.9H6.HY2.T3B

Part 6, Section 6.33

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

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Title: Undergraduate Nurse

Type: Worker for large employer

Organization: Vancouver Coastal Health

Submission:

There are eight concerns that BCNU has with the proposal

1. No requirement for preference for safer devices such as blunts and retractables

2. Applies only to medical work places

3. Only references vascular hollow bore needles

4. Misses all subcutaneous devices

5. Misses all non-hollow bore needles such as scalpels and suture needles

6. Has no provision for logging medical sharps injuries

7. No consultation with the joint safety committee or worker in selecting devices

8. Lacks a neutral space concept in operating rooms and the use of no hand to hand methods

The regulation needs to include a hierarchy for selection of safety devices giving

preference to the types that are most effective. A blunt or retractable needle can not

puncture the skin after the safety device has been activated. A manual guarded device

still has potential for contact with the sharp. These inferior and cheaper devices are not

as safe. Preference should be given to the safer devices and is a principle used for

other safety devices under regulation such as for exposure to hazardous substances

under OH&S Regulation 5.55.

There is no reasonable purpose to restricting this regulation to medical

workplaces. Many workers in non-medical workplaces are exposed to medical sharps.

This includes emergency personnel, security, maintenance and cleaners. Those who

clean parks and streets, police and firefighters do not fit the definition of a person that

works in a health care work place. The contracting out of many non-clinical services

leaves it questionable as to whether even employees doing cleaning, food services or

security under a contractor for a health care facility are even covered under the regulation. Those workers do not fall under the category of health care for the WCB classification system.

Q: The proposed change is easy to understand

A: Agree

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: Disagree

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

A: Agree
