

**Presentation to Worksafe BC -  
Thursday, November 23, 2006**

**Bill Saunders, President -  
Vancouver & District Labour Council**

**Part 4: “Working Alone or in Isolation”**

My name is Bill Saunders and I am the President of the Vancouver & District Labour Council which represents 117 affiliated local unions and 69,000 working women and men in Vancouver, and the surrounding districts of Richmond and North Vancouver.

I thank the panel for this opportunity to present our views on Part 4: - Working Alone or In Isolation in the proposed changes to the Occupational Health and Safety Regulations.

The affiliates to the Vancouver & District Labour Council are greatly concerned about these proposed changes as we have been dealing with the underlying issues of working in isolation and injuries to young workers for many years.

We commend you for your willingness to consider much needed changes to these regulations to safeguard workers health and safety in this province and to provide young workers with some basic protections that our experience show are much needed.

Every year on April 28, the Vancouver & District Labour Council participates in ceremonies marking a National day of Mourning to commemorate workers killed or injured on the job during the previous 12 months.

For the last few years, I have been paying particular attention to the numbers of “young workers” – those workers under 25 years of age – that have been killed or injured during the previous 12 months.

It is alarming to note that for the past several years these statistics have been rising.

Worksafe BC statistics show that after years of declining levels WCB claims filed by young workers have been on the increase since 2002.

In 2002, 8,630 claims were accepted. In 2003, there were 8,962 WCB claims from young workers and in 2004 an alarming 9,460 injury claims by young workers were approved by the WCB.

In 2005, 11 young workers were killed on the job, including Grant DePatie who was dragged to his death trying to collect gas payment from a gas and dash driver. His death was totally preventable.

While there may be many micro causes for the rising rate of WCB claims by young workers, it is clear that a few significant events have also occurred during this period.

In 2003 the Provincial government amended the Employment Standards Act to remove the child labour permitting system previously in place for young workers under the age of 15 year. This had the net effect of allowing children as young as 12 years of age to be treated as adult employees with the simple consent of their parents. No suitability investigation would be undertaken by Employment Standards and their consent as to the suitability of the particular employment would no longer be required.

This was a recipe for a health and safety disaster for young workers and recent statistics have borne this out.

I do not believe that parents are fully aware of the relatively dangerous, often unsupervised and largely unregulated environment that they are sending their children to work in. With no permit required and no pre employment investigation as to the conditions and suitability of the work, we are inviting disaster.

It is really up to Worksafe BC who is charged with the responsibility for protecting all workers in BC to step up and fill the immense gap necessary for the protection of young workers among the most vulnerable in our work force.

The Worksafe BC website clearly outlines the particular workplace dangers faced by youth.

- Lack of Preparation for the workplace
- inexperience and lack of training
- lack of confidence and understanding of their rights
- a sense of youthville invincibility
- Unwillingness to appear stupid and ask questions
- Distracted by other things going on in their busy lives
- too fast a pace of work
- they are often assigned more the more difficult or distasteful jobs due to their lack of seniority

The statistics tell the story. Injuries to young workers cry out for the kind of regulations and procedures that can provide some sort of systemic protections in the workplace and do not rely on each individual workplace to spontaneously work out and adopt the proper procedures.

Working alone or working in isolation is one the most pressing needs to be addressed to protect all workers but particularly young workers for the reasons stated above.

A number of high profile incidents have brought this issue to the attention of the general public and the time seems right to make the necessary changes. Let's do it right.

The Vancouver & District Labour Council has consulted our members, many of whom have long experience with health and safety issues and we are recommending the following:

- We do not support the notion of any worker except under exceptional circumstances being forced to work alone or in isolation. This presents a high risk of accidental injuries being made more severe or even becoming fatal more so than if there is someone readily available to render assistance and first aid immediately or even just to call for help.
- Regarding the special situation of young workers who often find themselves employed in service sector jobs working alone or in isolation and often working late at night. This lack of regulation has proven deadly on more than one occasion.

In addition to no worker being forced to work alone, we think that other changes to recommended procedures and regulations are required if we are to adequately address this problem and achieve safer working conditions.

We would recommend:

- that service stations adopt a pay before you pump policy. This should probably be a standing policy not just for nights but at all times and in all areas of the province, not just cities.
- workers need to be relieved of personal responsibility for fraud at the gas pumps and penalties put in place for employers who continue to demand that their workers make up these losses.
- access doors need to be secured between the hours of 10:00

pm and 6:00 am or workers need to be provided with a safe and secure work space protected by physical barriers and with adequate emergency communications to protect them from potential assaults and robberies.

It is our belief that the current regulations that are in place to protect these workers from workplace violence, the Working Alone or in Isolation regulation and the Violence regulation are not sufficient.

The working alone or in isolation regulation requires employers to check on the well being of workers and leaves the specifics to the employer. Working alone puts workers at risk of violence among other things. Check in procedures will only report incidents after something has already occurred.

As part of the violence regulation, employers are required to do risk assessments in any workplace that poses a risk to workers. Once the assessment is done, they are to eliminate or reduce the risk where possible. It is up to the employer to determine what steps are necessary and this will invariably lead to inconsistencies in application of the regulation.

Already employers are not currently following existing regulations in place to protect workers. Your own survey in July which inspected 366 gas stations concluded that "in virtually every inspection documented violations" were uncovered.

This system has to be strengthened.

The current regulation allows the employer to determine how to lessen the risk in their individual workplace. The regulation assumes that they will do so effectively yet your own survey casts this assumption in serious doubt.

In order to deal with the rising occurrences of theft and violence

5

in retail industries, there needs to be prescriptive regulations that clearly state what the employer needs to do in order to ensure that risks are eliminated.

I hope that Worksafe BC will seriously consider introducing the kind of regulations that will adequately protect the safety of late night workers and young workers.

Regulations requiring gas stations to lock their doors or provide a protected work space would be a great start.

Having a minimum of two people on shift at all times would also lesson the risks to workers.

And finally adquate education programs for young workers is a must. It is common knowledge to more experienced workers that many young workers show up on the job with misconceptions or ignorance of the dangers they may be facing.

All workers need to have an adequate understanding of the potential hazards they may be facing on the job and it should be the employer's responsibility to guarantee they receive this training. "As soon as practicable" is open to some interpretation and is not an acceptable standard for this important preventative measure. Time must be made for this training before workers are exposed to the potential dangers.

Once again I thank you for the opportunity to present our views and I hope that the panel is able to adequately address the issues that we have raised so that we will have a safer working environment for young workers and all workers in B.C

Bill Saunders,  
Vancouver, B.C.  
November 23, 2006