

I am here today to speak to the same issues as my fellow presenters are. I am a member of the BC Government Employees Union, representing the members of the Social, Educational & Health Services Component. These members, who are taxpayers, will be appalled to find out that they have not been consulted as they are the stakeholders who will be profoundly effected by the loss of Health & Safety regulations.

A very small inconspicuous notice in the newspaper is not advising the community of what events are to come. It reflects more that the Government has something to hide. These are serious issues and require a serious commitment by government to uphold its duty to inform the public. There should community debate, input, and meaningful dialogue with time for workers to prepare, not just some closed hearings in one or two cities of the Province.

One of my major concerns here today is the mention of 'regulations that focus on results' Lets be clear here, Results, does not mean improved services for workers, it means less cost to the employer.

I am opposed to the WCBs move to performance based regulations. What is of particular concern is just how these regulations will be enforced. The proposed amendments to the 1st aid regulations state that (and I quote)

" the employer is not obligated to follow the recommendation s in the Practice guide. The employer may, after conducting the assessment process required by the Occupational health and safety regulations, legitimately conclude that a different type of (first aid) service should be provided. It is also mentions that employers are expected to exercise judgment in determining what first aid services are needed"

Giving employers the ok to not implement recommendations, without any penalties virtually guarantees that no measures will ever be put into place. Why would an employer bother? The message to employers clearly says that WCB is not serious.

Results based outcomes mean just that, an employer would not have to bother when Employers will not be held accountable there is no point

The larger questions are how will WCB measure the degree of wrongdoing? & How many people will be injured or die for those losses to count for some attention?

This is a disgraceful process, and one that can not be supported and should not be supported given the years it has taken in the past to implement the current regulations. It is ludicrous to entertain that this process will have any validity.

These changes are being pushed by Governments agenda to help big business and certainly not to help workers, and ignores the previous work done by Employers,

Government & Unions who worked together recognizing the importance of enforceable regulations.

I would also like to make a comment on the WCB wanting to remove the Redundancy and Duplication out of the Legislation. What WCB sees as Redundancy and Duplication in many cases is important reminders to workers and employers that particular requirements exist.

For instance the WCB proposed to remove the word 'training' from all the regulations because Section 1.15 of the WCB Act creates a "General duty for Employers to train workers"

First of all that would have Part 4 under General Conditions for the training in section 4.22 of the "working alone or in isolation" removed.

This is an important provision for many of my members who often work alone

For example Social Workers often do home visits and protocol is an essential element to limit the possible risks which would effect their health and safety. Home visits are a required duty they must perform in doing their job.

Therefore, if a member was wondering about the procedures of working alone the regulations they would look up in section 4.21 removing the training provision of section 4.22 would mean that they would not necessary know what procedures, protocols or process would be necessary, to carry out their jobs, and there would be no process of checking to make sure that the worker was apprised of those elements of the job either, because no notice of training would be readily available.

Added to this the employer will not have an obligation to assure that any training is even in place which will make the worker more venerable at their job with a higher degree of risk compounding their ability to do their job safely. To suggest that this Regulation is somewhere in the Act only creates a larger workload issue and is of no real help to the employee if the Employer does not recognize the value of training in the first place.

With these proposed changes, there will be no level of enforcement in place by WCB to monitor or uphold the regulation either.

Unions already set aside time to reflect the International Day of Mourning on April 28th, to fight for the living and mourn for workers that have been killed by or injured as a result of unsafe workplace conditions. And it is a slap in the face to the memory of these workers for WCB to entertain the deregulation of hard won safety regulations for more corporate profit.