

My name is Tania Brinkley from The Hospital Employees Union.

I am going to give you examples of 3 of the changes to the regulations that has been proposed that will effect myself as a worker as well as my fellow co-workers.

I work at Royal Columbian Hospital as a Sterile Technician for 15 years. I am a shift worker. My shifts include week-ends and graveyards which ~~is~~ are reduced to a skeleton staff. I am the Chairperson of the Graduated Return to work Committee. I am the HEU representative on the Steering Committee of the OSHA sponsored PEARS project. I also represent my locals' members in retraining ^{for alternative jobs} of injured employees. I have held the position of Secretary - Treasurer of my local for more than 10 years now.

The first proposal I would like to comment on is 4.29 and 4.31. ~~is~~ violence in The Workplace regulation.

In 4.29 → The board proposes to delete 4.29 (c) "established procedures for reporting, investigating and documenting incidence"



of violence as required by Part 3 of The Workers Compensation Act and Part 3 of this regulation.

The Board says these provisions simply provide a cross reference to other parts of the regulation.

I disagree with the move to delete this section.

By deleting 4.29(c), it takes away a significant requirement in producing policies + procedures required by the employer on how ~~the reporting system works~~ reporting system works, how investigation is done and insuring these incidents are documented.

If any portion of 4.29(c) needs to be revised, we can agree that the cross reference "as required by Part 3 of The Workers Compensation Act and Part 3 of this regulation" could be deleted.



~~The~~ Similarity in 4.31 (1) leave the requirement that "Incidents of violence must be reported and investigated" in the ~~the~~ regulation. And in 4.31 (2) "The Employer must ensure that corrective actions are taken in response to incidence of violence" should be left in as it is currently in the regulation.

In the proposed change in 4.22 - Working alone or in isolation, The idea that training for this specific requirement should be deleted is appalling. Any employee that is required to check on an employee left alone should have adequate training in the work area, the work hazards as well as any special training required to enter into that area. As an example, I work in ~~area~~ an area that requires proper gowning and sterile procedure in order to enter in to my dept. Failure to do so will cause cross contamination in parts of this dept. As well as should the employee checker on the solo worker ^{in my} dept come into contact with biohazardous material or body fluids without their knowledge, it puts



the "checking" worker at risk of contracting illnesses or contamination.

We strongly urge the Board to leave this regulation 4.22 in the regulation as is.

The last regulation I would like to speak on is Regulation 4.51 (2). All of this regulation should remain complete and intact in section 4.51.

To quote "The Employer must ensure that a worker to be assigned to work which required specific measures to control the risk of MS1 is trained in the use of those measures, including, where applicable, work procedures, mechanical aids, and personal protective equipment.

My personal experience with this regulation is as follows. In my dept as with any work area, there is a variance of height of the workers ~~that~~ who ~~of~~ perform the various tasks requir



We store ~~and distribute~~ sterile items and distribute them according to necessity on surgery cases as well as needed (by the Operating Room). There are multiple levels of shelving on rolling shelves for storage. Recently, through a large number of ^{fore}arm/wrist injuries, some changes have been made to where the ~~ist~~ instrument sets are placed on these shelves. The heavier sets or awkward sets have been moved to a lower shelf in order to accommodate the staff that are shorter, so that they will not continue to injure themselves.

All the workers in the Sterile Processing Dept are trained in the changes in procedure to control the risk of injuries. Section 4.51 of the ergonomic regulations provides the requirement to ensure that training for all workers take place in the change in procedure. If this specific measure is overlooked, some worker may continue to place heavy items on the top shelves without realizing the changes is in place to reduce injuries.

