



CITY OF SURREY
Human Resources Department

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July 4, 2007

WorkSafeBC
Prevention Policy & Regulation Review Department
Policy and Research Division
PO Box 5350 Station Terminal
Vancouver, BC
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Dear Sirs:

**RE: PROPOSED AMENDMENT TO OH&S REGULATION PART 4: GENERAL
CONDITIONS**

We appreciate the opportunity to comment on the above-proposed amendment.

The City of Surrey does not support the proposed amendments to the Working Alone or in Isolation Regulation OHS 4.20.1-4.22.

The proposed definition of "to work alone or in isolation" is overly encompassing. In essence, this proposed definition would apply to every employee, in every workplace in the Province. In addition, the inclusion of the term "in ill health" as a criteria, makes the definition too broad. No employer is able to predict or assess when an employee will be "in ill health". There are many employees in the workplace who currently take medications to treat their medical conditions. Most supervisors and managers are not aware of an employee's medical information. Workers would need to disclose this medical information to employers so that the appropriate controls are put in place for the given circumstances. Accordingly, an employer should not be held responsible for a workplace incident stemming from an undisclosed employee medical condition.

We support the existing regulation 4.21 (1), which provides a more workable framework for safeguarding the workforce with respect to Working Alone or In Isolation matters. However, we do not support the proposed deletion of wording within 4.21 ("under conditions which present a risk of disabling injury..."). The removal of this wording would impose an unreasonable and impractical imposition on employers whereas they would be required and responsible for implementing written procedures for innocuous circumstances where an employee may find themselves working alone in very low risk situations (i.e. a

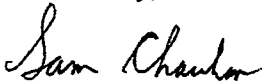
clerk working alone in a file room).

While the City certainly acknowledges that employee health and safety is an important matter, we would strongly suggest that written procedures be limited to situations that present "reasonable risk of injury". In this regard, the existing Regulation is a more reasonable approach, where the requirements apply to situations where workers are alone, a risk of injury is present, and they would not be able to secure immediate assistance.

The remainder of the proposed changes OHS regulation 4.22.1 –4.22.2 do not apply to employers within the Local Government Classification Unit and are not commented on here.

Should you have any questions or require clarification on the City's position as noted above, please do not hesitate to contact me directly at 604-591-4658.

Yours truly,



Sam Chauhan
Senior Advisor, Occupational Health & Safety

CC: Citywide JOHSC.
General Manager, Human Resources