

First Aid – Compliance Game Plan



Do your workplace first aid arrangements comply with new OHS first aid 'harmonization' rules'

Ultimate responsibility for treating workplace illnesses and injuries falls to the doctors, nurses and medical professionals. But it often takes time for those individuals to arrive. And in those precious minutes and hours in-between lives may be saved or lost, injuries contained or aggravated. That's why OHS (or in some jurisdictions, workers comp) laws require employers to ensure their workplace has appropriate first aid personnel, facilities and equipment. Here's a 7-step game plan to comply with these laws, including the recent 'harmonization' changes taking effect in all parts of Canada.

Step 1: Do a First Aid Needs Assessment

First, have a competent person do a first aid needs assessment at your workplace. **Explanation:** First aid requirements for any particular workplace vary depending on 3 site-specific risk factors:

- The number of workers who work there during a shift;
- How dangerous the work is; and
- How far the site is from the nearest hospital or health facility.

The point of the first aid assessment is to use these risk factors to determine what's required at your own workplace. While specifics vary by jurisdiction, workplaces in which large numbers of workers perform high-risk operations must meet more stringent first aid rules, especially when they're located in rural, remote or isolated locations far from a hospital and/or hard for emergency responders to reach. By contrast, first aid requirements are less strict for operations involving low-risk work performed by small numbers of workers in sites located near a hospital.

Step 2: Provide Appropriate First Aid Kits

While first aid kits are a must for all workplaces, the numbers, sizes and types of kits required depend on the 3 risk factors. But thanks to the new 'harmonization' initiative, the standards those particular first aid kits must meet are now the same all across Canada. **Rule:** Workplace first aid kits must meet the criteria for the particular classification of kit listed in Canadian Standards Association CSA Z1220-17, *First Aid Kits for the Workplace*. There are 3 classifications, each of which come in small, medium or large sizes:

- **Type 1: Personal First Aid Kits** which you may have to provide to all workers who work in isolation or don't otherwise have access to a workplace first aid kit;
- **Type 2: Basic First Aid Kits** which are required in low-risk work environments; and
- **Type 3: Intermediate First Aid Kits** which are required in higher-risk work environments.

Step 3: Provide an Appropriate First Aid Room

For some workplaces, just having the required numbers and types of first aid kits required by CSA Z1220-17 is enough to comply. Other employers must have a first aid room, depending on the number of workers per shift, with thresholds differing by province. Thus, you must have a first aid room if you have:

- 200 workers or more per shift (FED, ON, NL);
- 100 workers or more per shift (MB, NB, NS, PEI, QC, SK); and
- 75 or more workers per shift and the workplace is more than 20 minutes away from fixed medical services (NT, NU).

In Alberta and Yukon, the requirement to have a first aid room depends on a combination of the number of workers per shift and the hazard level of the workplace. For example, in Alberta, a company with 200 or more workers per shift doing medium hazard work needs a first aid room as does a company with 100 or more workers per shift doing high hazard work. In Yukon where physical expanses can be vast, travel time to the hospital is an additional factor. In addition, the first aid room must be:

- Big enough to provide first aid services;
- Conveniently located near work areas and restrooms;
- Accessible by workers on stretchers;
- Available and accessible during all working hours;
- Adequately lit, heated and ventilated;
- Kept clean, dry and sanitary; and
- Staffed by a registered nurse or a certified first aid attendant.

As with first aid kits, first aid room equipment requirements have been harmonized in accordance with CSA Z1220-17.

First Aid Stations

ON, SK and YK also require employers to provide 'first aid stations,' basically scaled down first aid rooms, in certain situations where establishing a first aid room isn't really necessary or would be impractical. For example, employers in Ontario with fewer than 200 workers in any one shift must have at least one first aid station but don't need a first aid room; those with more than 200 workers in any one shift must have a first aid room. In general, a first aid station is a substitute for a first aid room. If the workplace already has a first aid room, it doesn't need a first aid station, too.

Step 4: Provide Certified First Aid Attendants

The site-specific risk factors for first aid kits and rooms also determine how many certified first aid attendants (also called 'first aiders' or 'first aid providers') and what kind of certification they need. The new harmonization

rules recognize 2 kinds of first aid attendant training levels: Intermediate and Advanced, as opposed to Level 1 and Level 2 required by many jurisdictions before harmonization. The good news is that most of these jurisdictions are continuing to recognize the validity of existing Level 1 and 2 qualification over a grace period, typically one year, until employers can ensure that attendants meet the Intermediate and Advanced qualifications. As before, attendants must be certified and trained at the employer's expense and be:

- Physically and mentally capable of performing their duties;
- Assigned to the first aid room or station;
- Assigned to work close to the first aid station or room for which they're responsible;
- Assigned duties that won't interfere with their prompt and adequate rendering of first aid; and
- Readily available and accessible to workers during work hours.

Step 5: Maintain Appropriate First Aid Records

All jurisdictions require employers to create and retain first aid logs and records of all injuries and illnesses and any cases that are referred for medical treatment to a doctor or hospital. While specifics vary by jurisdiction, in general, first aid records should contain:

- The date and time the injury or illness was reported;
- The date and time the injury or illness occurred;
- Where in the workplace it occurred;
- The work-related cause of the injury or illness, if any;
- The injured or ill worker's full name, age and position;
- A brief description of the injury or illness;
- A brief description of the first aid rendered, if any;
- A brief description of the arrangements made, if any, for the treatment or transportation of the injured or ill worker;
- The names of any witnesses, if applicable; and
- The name and signature of the first aid attendant.

First aid records must be retained for: 2 years (FED); 3 years (AB, BC); or 5 years (MB, NB, NL, NS, SK). NT, NU, ON, PEI, QC and YK require employers to retain first aid records but don't specify for how long.

Step 6: Tell Workers Where to Get First Aid

Tell workers where they can get first aid, such as the location of first aid kits and rooms, the names and locations of certified first aid attendants, emergency procedures and emergency phone numbers. In general, employers must post this information in a conspicuous place that's accessible to every worker, such as in a break room, cafeteria or by restrooms.

Step 7: Ensure Emergency Transportation Is Available

Ensure that transportation, such as an ambulance service, is available to take injured or ill workers to the nearest hospital, healthcare facility or other 'fixed medical facility' in case on-the-scene first aid isn't enough. If ambulance services aren't readily available, employers must ensure that other transportation is available that:

- Is suitable given the distance to be travelled and the types of serious injuries or illnesses that may occur;
- Protects the occupants from the weather;
- Has a system to allow the occupants to communicate with the hospital or healthcare facility to which the worker is being taken; and
- Can accommodate a stretcher and an accompanying person.