

First Aid Regulation Webinar

QUESTION & ANSWERS



Q1. If filming shifts from a remote bush location requiring higher safety procedures to a house in town, is a first aid drill necessary for both locations, considering the change from class 3 or 4 to class 2?

An important factor to remember is that Drills are tied to procedures, but the guideline also talks about what constitutes a substantive change. For example, for the film industry, they will likely have to develop 4 sets of procedures, one for each class workplace. Assuming those 4 sets of procedures are pretty much the same except for the location of the nearest ambulance station and directions to hospital, then they would have to conduct 4 drills over the course of the year – one for each set of procedures. They may not need to conduct a drill at each workplace though unless they add in any special rescue equipment or modes of transport for particularly less accessible filming locations.

Q2. For shows that last only 3 weeks what would they be looking at for drills? Is this a must or a should regarding drills? What is the expectation for drills?

Drills are based on procedures, if the procedures are the same between all locations, you do not have to do a drill at each location, it would be one drill annually.

Q3. How long can a production company film in B.C. before they need to conduct a drill?

Drills are required at each location annually and whenever procedures change, see [section 3.17 \(4\)](#) for clarification. As for the expectations of when to conduct drills, the guideline states “as soon as practicable”; having stated this we are hopeful that employers and officers would take a risk-based approach. If the workplace is a class 4 workplace (remote and less accessible), that would require some special transport procedures to get injured workers into the care of BCEHS, we then would hope they would ensure their procedures are effective sooner rather than later. (There is no hard or fast rule here).

Q4. How many drills are considered practicable? ie. Beginning of show at the office, first location, etc

Definition of Practicable in regulation: “practicable” means that which is reasonably capable of being done. Refer [OHS Regulation Part 1: Definitions](#).

Q5. We provide production labour in an arena for concerts. We provide an OFA2, and while overhead work is happening, the arena, who contract us to provide the labour, provide an OFA3. Do we need to do the First Aid drills, or is that the responsibility of the arena, which is the prime contractor?

The following table provides guidance on when drills should be conducted based on the characteristics of the workplace or workforce. For multi-employer locations, drills should be initiated by the prime contractor unless there are other arrangements made in writing. For the purpose of conducting drills, a temporary location will be considered any location where workers are located for less than a year.



Workplace characteristics	Drill considerations
Single or multiple employer fixed location	<ul style="list-style-type: none"> Annually at each fixed location, and when procedures change.
Single or multiple employer working at various temporary locations	<ul style="list-style-type: none"> Annual drill at one location, provided procedures remain substantively the same If procedures vary substantially between locations, then multiple drills will be required

Q6. Who needs to be involved in the first aid drill? The whole workplace or just the key players?

There are no specifications mentioned; however, individuals involved would be key players such as: First Aid Attendant, and workers involved and JOHSC member (as they will be reviewing the outcome of the drills).

Q7. Who leads the first aid drills?

There are no specifications on who leads the drills; however, it is suggested that the key players who are involved in First Aid should be involved, for example: First Aid Attendant, Joint Health and Safety members (as they review the First Aid Assessments).

Q8. Are productions that prep, shoot, and wrap in less than a year required to conduct drills, and how does the change in first aid attendants affect this, particularly between pre-crew and shooting crew?

Although the regulation requires annual drills, the guideline suggests that employers conduct first aid drills as soon as practicable after procedures have been developed. While an employer might get away with not conducting a drill for a year if the workplace is Class 1, if the Class of workplace is higher and the complexity of the first aid response increases, so will the expectation for drills. Changing first aid attendants with the same certification level does not necessitate the requirement for new drill, as long as all first aid attendants are properly trained in the first aid procedures. However, changes to the level of first aid attendant required (ie the addition of more workers) would trigger a requirement for a new drill.

Q9. What procedures and processes should be evaluated during first aid drills?

A first aid drill should include mock scenarios that support the evaluation of the effectiveness of the procedures. If the workplace requires first aid equipment and procedures that exceed the minimum requirements of Schedule 3-A, those procedures should be incorporated into the annual drill. Drills must also be conducted when there are substantive changes to written first aid procedures. It is important to remember that: BCEHS should not be contacted for the purpose of conducting first aid drills.

Specific procedures and processes that should be assessed during FA drills would include;

- The ability of first aid attendants or other workers to access equipment, supplies, and first aid facilities
- Workers' familiarity with how to call for first aid and the location of first aid equipment
- How effectively the first aid attendant(s) can be summoned and respond to both minor and serious injuries
- How effectively an injured worker can be accessed and moved, and if there are any barriers present in the workplace



- How effectively an injured worker can be prepared (packaged) and transported to an area accessible to BCEHS, if required
- Whether first aid attendants are familiar with documentation and reporting requirements A first aid drill should include mock scenarios that support the evaluation of the effectiveness of the procedures listed above. If the workplace requires first aid equipment and procedures that exceed the minimum requirements of Schedule 3-A, those procedures should be incorporated into the annual drill

Q10. Does the safety meeting and reviewing first aid procedures count as a drill?

No, Safety meetings and reviewing first aid procedures do not count as drills. A first aid drill should include mock scenarios that support the evaluation of the effectiveness of the procedures.

Q11. For Film and TV shows, there are often individuals traveling from BC to Alberta or other provinces do they conduct drills and assessments in Alberta/other provinces as well?

If a production company is actively operating in B.C., they are required to register with WorkSafeBC as employers. Therefore, when filming in B.C. the production company would be expected to follow WorkSafeBC regulations when filming in B.C. [Motion picture & television industry - WorkSafeBC](#). At this time, Alberta does not require specific drills for first aid.

Q12. Do we need to document the drill and, if so how?

Employers should maintain drill records to establish compliance with the requirements of section 3.17(4). Drill records should contain the following information:

- Date and time of drill
- Names and rolls of participants
- Brief summary of scenario tested
- Summary of observations and outcomes, including any deficiencies identified Preliminary
- Any corrective actions taken revision OHS Guidelines Part 3: Occupational First Aid Issued by WorkSafeBC Preliminary Revision: June 2024 29 If significant deficiencies are observed, or the drill cannot be conducted as intended, employers should address any deficiencies and perform the drill again, if procedures change significantly.

Q13. We are a live theatre in BC and our work locations are all local. We do not have remote or inaccessible workplaces. Do we still need to do drills?

Yes, drills are required annually even if the workplace is not remote or inaccessible. Having stated this: Drills are based on procedures, if the procedures are the same between all locations, you do not have to do a drill at each location, it would be one drill at annually.

Q14. We currently have 49 attendants over 5 venues. Do we need to do 49 annual drills or do the attendants just need to be present for a drill or is there no requirement for each attendant to participate in a drill?

Drills are required at each location annually (if the location is a permanent fixed location), and whenever procedures change, see section 3.17 (4) for clarification. If the location or venue is a temporary location and if the procedures do not change, you do not have to conduct drills at each location; in this case, one drill would be sufficient.



Q15. Does an assessment need to be done for each location or only one for each class-type of location? (i.e. one assessment for every single house we film at, or just one “house” assessment that covers all houses) or if there are 20 temporary movie shoots in a span of 30 days, would we be required to conduct a First Aid Assessment at each location?

The First Aid Assessment is not a Risk Assessment, guidelines have a task-based assessment, where all the risk factors in location are the same. The employer can choose to do one FA assessment but, given the (location and risk factors must be the same for these). Additionally-if you're wondering about drills, they are based on procedures, if the procedures are the same between all locations, you do not have to do a drill at each location, it would be one drill at annually.

Q16. Would a hazard rating change from the standard motion picture rating of Moderate in certain areas/cases, such as in a woodshop or construction?

Where the work being performed at a separate workplace is not generally consistent with work described in the employer's classification unit description and poses a greater risk to workers, then a different hazard rating could be used. However, if you are in the same location, and if the classification unit describes “supporting activities; for Motion Pictures the supporting activities include: administrative, construction, and casting then we would utilize the assigned hazard rating as moderate.

Q17. Can only one member of the JHSC complete the WorkSafeBC assessments or is it expected that all JHSC take part in all assessments?

As part of its Terms of Reference, the JOSHC should determine an appropriate level of involvement that is practicable for the workplace.

Q18. Do you have to have a first aid (Level 1 through 3) to get the transportation endorsement? Do the teamster drivers have to have a transportation endorsement to drive someone to seek medical aid?

Basic and intermediate FA attendants would require their courses in order to obtain the transportation endorsement. Refer to schedule 3-2-4 for more information as to what types of courses are needed (dependent on their class).

No, drivers do not require a transportation endorsement, they are drivers and not FA attendants.

Specialized equipment required for worker transportation and evacuation For less-accessible workplaces, employers are expected to maintain equipment necessary to safely move a worker to an area accessible to first aid attendants and BCEHS personnel. This requirement is indicated in Schedule 3-A by either the requirement for an advanced first aid attendant or the requirement for one or more first aid attendants with transportation endorsement. Equipment necessary to safely move an injured worker will normally include the ETV equipment listed in G-Schedule 3-A (D2) 6 Emergency transportation [Editorial revision] unless alternative means of safe transport is provided.

Q19. What Barriers that may affect BCEHS response time?

- Employers must also consider known barriers that may affect BCEHS response time, or time to transport to hospital such as: o Road or weather conditions which may make a workplace inaccessible to BCEHS or may prevent air transportation from flying.
- Barriers between workplace and hospital or ambulance station (such as train crossings, lift bridges, temporary road closures, construction zones), if there is no other method of accessing the workplace and these could result in significant delays.



- Hours of operation, doctor availability, hospital diversion protocols, or routine closures of BCEHS stations that would significantly impact transport time to hospital.
- Where barriers to transport are identified, the employer should take all reasonable measures to eliminate or otherwise minimize the impact of these barriers on the time it may take to transport a worker to medical treatment. Consider providing supplemental emergency transportation to safely transport an injured worker to hospital or to meet BCEHS enroute and/or a higher level of first aid attendant and equipment to better manage injuries while waiting for BCEHS. First aid procedures should be updated as well to consider these barriers (e.g., in the event of a worker injury, consider hospital emergency room availability in transport decisions)

Q20. Can you clarify what certifications that attendants already have will still be valid?

If you have a valid OFA Level 1, 2, or 3 certificate, you do not need to do anything until it's time to renew. Starting November 1, 2024, these certificates will be accepted as equivalent to basic, intermediate, and advanced, respectively. You can also talk to your employer to find out if your current certification level will be sufficient after November 1, based on the results of the employer's written first aid assessment.

If you have an OFA Level 2 certificate that expires between July 2 and October 30, 2024, your certificate will be accepted as valid through October 31, 2024. This extension applies only to Level 2 certificates.

You must successfully complete an intermediate course by October 31, 2024, to work as intermediate attendants beginning November 1, 2024.

Training providers in B.C. have begun to offer basic and intermediate training to meet the new standard, with advanced level training available later this summer.

If the film industry has EMA's hired to provide first aid services, starting November 1st, 2024 EMAs who hold a valid license issued by EMALB will not be required to obtain a first aid certificate, as long as the employer confirms they have an understanding of the BC first aid requirements. This may be done by the EMA confirming they have completed a WorkSafeBC jurisprudence package, or through other employer provided training.

Q21. Ambulances are only 2 wheel drive and accessibility may not be there for snow or muddy roads ie for mountains etc, winter conditions. Please confirm.

Agreed, most BCEHS ambulances are only 2-wheel drive. While they may be issued chains, they may not be able to access some roads during winter conditions. Employers would be expected to take this into account as part of their risk assessments.

Q22. Can Industrial Ambulances transport to a hospital with sirens and lights?

No. Industrial ambulances must follow the rules of the road. There is no exceptions made for these vehicles under the Motor Vehicle Act.

Q23. Is an employer required to provide first aid to an audience member?

This question is out of scope for WorkSafeBC, as we only regulate first aid services to workers. Suggest employers seek legal advice on the provision of first aid to audience members.



Q24. As far as adding rescue systems to grids/loading gallery's is there a grace period for having these installed? Or are we expected to be in compliance come November 1?

Officers will expect employers to have made reasonable attempts to come into compliance by November 1st. There is no formal "grace" period, however officers are aware that employers may have legitimate challenges in achieving compliance by November and will consider these in their enforcement decisions.

Q25. Do you know if WSBC is looking at doing any kind of program with productions, similar to the PACE program (re the JOHS), to help them with incorporating these new regs?

We are not aware of this being considered at this time.

Q26. Are there any equivalencies related to quantity of attendants. Specifically, if 2 Basic attendants are required, would 1 INTERMEDIATE attendant be an equivalent, or perhaps 1 ADV is equivalent to 2 BASIC?

No. There are no number equivalencies, however employers are always able to substitute a higher level first aid attendant for a lower. If Schedule 3-A requires an Intermediate attendant and a basic attendant and the employer provides 2 advanced attendants instead, that would be acceptable. However, providing one advanced attendant instead would not.

Q27. Are Psychological First Aid attendants, who hold LEVEL 3 (advanced) tickets and are covered by the Union, currently receiving training in this area?

First aid attendants receive basic training in identifying mental health emergencies only. If an employer identifies psychological risk factors, they should consider providing additional relevant training to workers and/or first aid attendants to help manage this risk.

Q28. When BC productions are Filming in locations out of province, for example Fortress mtn. In AB, do these regulations apply to BC Workers or would AB regs apply?

While WorkSafeBC prevention officers do not have jurisdiction to enforce BC regulation in Alberta worksites, employers registered in BC with workers who live in BC should consider ensuring compliance with both provincial requirements (or the one with the most stringent requirements).

Q29. How will WorkSafe be ensuring employers will be following the new guidelines? Will there be an increase in site visits by WorkSafe to ensure compliance?

While WorkSafeBC does not have immediate plans to perform "inspectional blitzes" for the new first aid requirements, employers should expect officers to educate, consult, and enforce these new requirements as part of their normal inspectional activities.

NOTE: While the information was up to date, and correct at the time of the webinar, please check the [WorkSafeBC website](#) for the most up to date first aid information and resources.

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