

First Aid Provision of First Aid Facilities and Personnel

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Director-General

This Policy Directive may be varied, withdrawn or replaced at any time. Compliance with this directive is **mandatory** for NSW Health and is a condition of subsidy for public health organisations.

CIRCULAR

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PROVISION OF FIRST AID FACILITIES AND PERSONNEL

1.0 INTRODUCTION

This document supersedes circular 98/38. This is a compliance support policy that must be implemented by Health Services. It assists Health Services to comply with their legal obligations in relation to the relevant sections of the legislation covering provision of first aid facilities and first aid personnel (see below). The document should be read in conjunction with this legislation as well as the WorkCover NSW publications *First Aid in the Workplace Guide 2001* (Catalogue No. 121), *Risk Assessment Code of Practice 2001* (Catalogue No. 963) and *Risk Management at Work Guide 2001* (Catalogue No. 425).

The document was developed in consultation with Area Health Service risk managers and health unions, and applies to all Area Health Services, all statutory health corporations, all affiliated health organisations and the Ambulance Service of NSW.

For the purposes of this compliance support policy, the term **Health Service** refers individually to all Area Health Services, all statutory health corporations, all affiliated health organisations and the Ambulance Service of NSW.

2.0 RELATED NSW LEGISLATION

The NSW Occupational Health and Safety Act 2000 (OHS Act) is the main piece of legislation setting out a worker's right to a safe and healthy working environment.

The Occupational Health and Safety Regulation 2001 (OHS Regulation) supports the OHS Act. It requires workplaces to adopt systems to identify, assess and eliminate or control risks to health and safety, and expands upon the consultation requirements specified under the OHS Act. Additional information about OHS consultation can be found in the *WorkCover OHS Consultation Code of Practice 2001*. Clause 20 of the OHS Regulation sets out specific minimum first aid requirements for workplaces.

In addition to these minimum requirements, the OHS Regulation requires employers to utilise a risk management approach to ensure that first aid facilities provided for employees in their workplaces are appropriate to their needs. Detailed information about risk management can be found in *Risk Management at Work Guide 2001*.

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In accordance with the provisions incorporated in the Accounts and Audit Determination, the Board of Directors, Chief Executive Officers and their equivalents, within a public health organisation, shall be held responsible for ensuring the observance of Departmental policy (including circulars and procedure manuals) as issued by the Minister and the Director-General of the Department of Health.

The purpose of this compliance support policy is to ensure that all Health Services have procedures in place to ensure that appropriate first aid facilities and first aid personnel are provided in accordance with the OHS Regulation. Health Services are not exempted from any provisions of the OHS Regulation that cover first aid.

3.0 RELATED NSW HEALTH POLICIES

C2003/75 NSW Health Policy and Procedures for Injury Management and Return-to-Work
C2002/19 Effective Incident Response – A Framework for Prevention and Management in the Workplace
C2001/22 Workplace Health and Safety – A Better Practice Guide (under review)

4.0 DEFINITIONS

4.1 First Aid

First aid is the initial first care given to a person who has been injured or has become ill. In situations where the injury or illness is serious, first aid is intended to provide emergency care to the casualty (St John Ambulance Trainers' Guide for Senior First Aid).

4.2 First Aid Personnel

Clause 20 (1) of the OHS Regulation defines trained first aid personnel as:

- a) A person who holds a current first aid certificate issued after successful completion of a WorkCover approved first aid course, or
- b) A person who holds a current occupational first aid certificate issued after successful completion of a WorkCover approved occupational first aid course, or
- c) A level 3 or greater New South Wales ambulance officer, or
- d) A registered nurse, or
- e) A medical practitioner.

4.3 Workplace

The OHS Act 2000 defines a place of work as premises where persons work.

Premises includes any place, and in particular includes:

- a) any land, building or part of any building, or
- b) any vehicle, vessel or aircraft, or
- c) any installation on land, on the bed of any waters or floating on any waters, or
- d) any tent or movable structure.

5.0 FIRST AID REQUIREMENTS

The provision of first aid facilities and personnel does not take the place of incident prevention, and the focus must always be on providing a safe workplace. Risks to the health and safety of staff should be eliminated where possible, or controls put in place to minimise the risk to the lowest practical level where elimination is not possible.

In the event that an illness or injury does occur at work, all employers must have in place first aid facilities that are adequate for immediate treatment, and trained first aid personnel if more than 25 persons are employed at that place of work.

The OHS Regulation requires Health Services to utilise risk management principles to determine the number, type and location of first aid facilities, and any additional first aid personnel most appropriate to the needs of the particular workplace.

Further information on the risk management process can be found in C2001/22 Workplace Health and Safety – A Better Practice Guide (under review) and the WorkCover publications *Risk Management at Work Guide 2001* and the *Risk Assessment Code of Practice 2001*.

As a minimum, Health Services will need to consider the following workplace factors, in consultation with employees, to determine local needs and to plan first aid arrangements.

5.1 Location, size and layout of the workplace

The location, size and layout of the workplace will have a considerable impact on the type of first aid facilities and numbers of first aid personnel provided.

Health Services will need to consider:

- The type of activities and work being performed in different work areas
- The type of injuries or illnesses that could occur at the workplace, their potential severity and likely occurrence
- The distance to be travelled, and the time required to transport a person to first aid, or first aid to the person
- The ease with which first aid can be provided and be readily accessible to staff
- The type of first aid facilities available and accessibility of first aid personnel throughout the workplace.

For example, grounds staff working on the perimeter of a health service facility may be a considerable distance from the nearest treatment centre. A risk assessment may indicate that additional arrangements need to be put in place, including appropriate communication devices, to ensure that prompt first aid treatment is available for these staff in the event of an injury or illness occurring.

5.2 Number and distribution of employees and others at the workplace

Where there are employees in separate work areas, first aid facilities may need to be provided centrally, with portable first aid kits also being provided in each work area. In particular, first aid facilities should be located close to all work areas where the risk assessment process has identified that there is a greater likelihood of an injury or illness occurring.

Where employees work outdoors, in isolation or spend significant time in vehicles, a number of factors need to be considered when determining what first aid facilities should be provided.

These factors will include:

- The type of work performed
- The type of injuries or illnesses that could occur at the workplace, their potential severity and likely occurrence
- Access to communications eg telephone
- Whether the employee/s work alone, in groups, in shifts or have special needs eg disabled employees.

5.3 Types of work activities performed and the nature of the associated hazards

A wide variety of work is performed across Health Services eg working with chemicals in a laboratory or poisons in a pharmacy, administrative work in an office environment, hospitality services, housekeeping services, outdoor work in facility grounds and provision of medical treatment and other services in a variety of settings and health facilities and the broader community.

The types of work performed will influence the potential types of illnesses and injuries that may result. Additional first aid kits may need to be located in specific areas where it has been identified that there is an increased risk of injury or illness occurring. The risk assessment may also identify potential options for additional contents to be provided in the first aid kits, eg resuscitation masks, additional eyewash solutions, additional disposable gloves.

Examples of information sources that may assist in identifying areas of increased risk include:

- Incident notification data and analysis of incident/illness trends
- Consulting with employees
- Findings of risk assessments
- Results of the OHS Profile
- Material Safety Data Sheets for hazardous materials used in the workplace
- Labelling on hazardous substances.

6.0 PROVISION OF FIRST AID KITS

Health Services should provide sufficient first aid kits in workplaces to ensure prompt treatment. In keeping with the risk management approach, there should be periodic and post-use checking of first aid kits and first aid rooms to ensure that there is compliance with the minimum contents as prescribed in sections 20(5) and 20(7) of the OHS Regulation and that there are no out-of-date items.

Where emergency departments or other treatment services are provided, including wards, clinics, outpatient areas, or areas serviced by emergency trolleys or carts, these services may meet the minimum requirements of the OHS Regulation for the provision of first aid kits.

However, Health Services will need to ensure that they are appropriate to the needs of staff by conducting a risk assessment in consultation with employees.

Factors that will need to be considered include:

- Location, size and layout of the place of work
- Number and distribution of employees and others at the places of work
- Type of work being undertaken and the nature of associated hazards.

As a minimum requirement, all work vehicles and aircraft including trucks, buses, helicopters, motorcycles, planes and ambulances must be provided with a First Aid Kit Type C (for places of work other than construction sites, at which 10 or fewer persons work), as outlined in Appendix A. In some instances, this requirement may be already covered by the medical equipment included in the work vehicle or aircraft, eg the medical equipment included in community nursing vehicles, medical equipment included in ambulances. However, all items listed in the First Aid Kit Type C must be included as a minimum.

Staff employed at Ambulance stations would need to have prompt access to first aid kits in the circumstance when the ambulance is not on site at the station. As a minimum requirement, the Ambulance station must be supplied with the First Aid Kit relevant to the number of persons working at that station (as per Appendix A). This requirement may be covered by the medical equipment already available at the stations, eg in the medical supplies stores rooms. However, all items listed in the relevant First Aid Kit must be included as a minimum and must be provided in a location that ensures immediate access to the treatment.

Where the risk assessment identifies that existing treatment or emergency services are not sufficient for the timely treatment of injuries and illnesses in some parts of the workplaces, additional services will need to be provided.

For example, workers in a facility that handle chemicals where a risk of eye splash is identified, may be relatively close to a hospital emergency service. However, an assessment of the workplace risk factors may identify that in order to promptly access the first aid treatment, a portable first aid kit should be supplied in that particular location rather than delaying treatment until the person is transported to the emergency department. The risk assessment in this situation may also identify the need for additional equipment such as an eyewash stand.

7.0 PROVISION OF FIRST AID ROOMS

Clause 20(7) of the OHS Regulation outlines the minimum requirements for first aid rooms and that they must be provided at a place of work where more than 200 persons work, or at a construction site at which more than 100 people work (Appendix B).

While it may be considered that emergency rooms and other treatment services within a facility meet the requirements of a first aid room, Health Services will still need to ensure that prompt first aid treatment is accessible to workers at their workplaces. Health Services must take into account the location of the place of work, the number of employees and the type of work being undertaken in order to determine if the existing services are adequate.

8.0 PROVISION OF TRAINED FIRST AID PERSONNEL

The minimum number of trained first aid personnel required is linked to the number of employees in the workplace (see 4.2 for definition of First Aid Personnel). Employers must provide trained first aid personnel if more than 25 people are employed at a place of work (clause 20(2)(b) OHS Regulation). First aid certificates must be renewed as needed to maintain continual certification.

An assessment of risk factors, as outlined above, may indicate that first aid personnel are required where there are less than 25 people employed at a place of work.

For example, where a risk assessment identifies employees who are working at a distance from the nearest treatment centre and are at a greater likelihood of more severe injury or illness requiring first aid, first aid personnel may be required to be closely located to ensure immediate first aid treatment.

It is recommended that access to first aid personnel is available wherever there are more than 25 persons at a workplace, regardless of whether or not those persons are employees.

9.0 FIRST AID COSTS

Costs relating to the provision of first aid kits and the gaining of a first aid qualification (as clauses 20(1)(a) and (b) OHS Regulation) when necessary in order to meet the legislation, are to be met by the employer, in accordance with the provisions of section 22 of the OHS Act.

10.0 DOCUMENTATION

Health Services are advised to document the measures taken to identify and assess workplace factors that may impact on the provision of first aid facilities and first aid personnel and arrangements that have been put in place to address these factors.

A first aid plan should include these measures such as the location and contact details for designated first aid personnel, emergency contact numbers, the location of first aid kits and first aid rooms and responsibilities for their management, training requirements, recording and reporting systems and response procedures.

Health Services need to communicate the first aid arrangements to all staff, including any altered arrangements.

11.0 PROVISION OF EDUCATION AND TRAINING

Information about the first aid arrangements must be provided at the very least annually and to employees during their facility and local department inductions. Updates of first aid information would be provided on an as-needs basis, as determined by a needs assessment. Information should include who to approach for first aid, reporting requirements and where to go for first aid.

Managers and supervisors must be familiar with first aid arrangements and assist with the provision of related information to employees.

12.0 REVIEW OF FIRST AID ARRANGEMENTS

It is recommended that Health Services put in place a system to ensure regular review of their first aid arrangements and whether those arrangements continue to be appropriate. Indicators for review and amendment of first aid arrangements might include modification to, or the introduction of new work practices or turnover of trained first aid personnel. Evaluation of the effectiveness of the first aid arrangements during an incident may also result in their modification. Health Services need to communicate any altered first aid arrangements to all staff.

13.0 FIRST AID SIGNAGE

Australian Standard AS 1319 – Safety Signs for the Occupational Environment advises on appropriate signage for first aid rooms. First aid rooms and first aid kits should be clearly identified with a recognisable first aid sign (white cross on a green background). All signs must be in clear view and not obstructed.

14.0 PROVISION OF ANALGESICS IN FIRST AID KITS/ROOMS

Analgesic drugs are not part of first aid. These are drugs requiring appropriate medical supervision and, despite their ready availability, should only be dispensed by persons with training in the administration of non-prescription medications. WorkCover approved first aid courses and occupational first aid courses do not include medication or pain management as topics. Employees should be responsible for carrying and dispensing their own prescribed or over-the-counter medications.

15.0 FIRST AID RECORDS

Personal information about the health of employees is confidential. The reporting and recording system for first aid should protect this confidentiality and be integrated with other accident and incident reporting systems in the workplace, in particular the Register of Injuries, which is required under section 63 of the Workplace Injury Management and Workers Compensation Act 1998. The injured worker or their representative should enter particulars of the injury in the Health Service's Register of Injuries as soon as possible after the injury has happened.

Details required to be entered into the Register of Injuries (as outlined in Form 2, Schedule 1 of the Workers Compensation Regulation 2003) include name of injured worker, address, age, occupation, industry and operation in which the workers was engaged at the time of injury, date (or deemed date) and hour of injury, nature of injury, cause of injury and remarks. The entry should be signed and dated, and include the address of the signatory.

The Register of Injuries must be kept for at least five years after the last entry and must be made available for inspection by a WorkCover inspector or an authorised representative of the worker.

It is unlikely that all of these requirements would be met if first aid records are solely held in an employee's medical file. It would be difficult to ensure the confidentiality of other unrelated information in these files.

Information for the reporting of all workplace incidents, injuries and illnesses is outlined in C2003/75 NSW Health Policy and Procedures for Injury Management and Return-to-Work and the WorkCover brochure *How to Notify Work-Related Incidents* (Catalogue No. 1287.1)

16.0 ADDITIONAL FIRST AID REQUIREMENTS

Health Services should also be aware of the requirements of other clauses in the OHS Regulation that make particular reference to first aid.

Clause 74 (Emergencies – particular risk control measures) requires that employers must, when persons are in a confined space, ensure that appropriate emergency equipment (including rescue and first aid equipment) is provided.

Clause 207 (Electrical work on electrical installations – safety measures) requires that employers must ensure that if work is being conducted on energised circuits and apparatus (in an emergency or if the risk would be greater if the work is conducted non-energised), a safety observer competent in electrical rescue and cardiopulmonary resuscitation is present.

Robyn Kruk
Director-General

OBSCOLETTE

**MINIMUM REQUIREMENTS FOR FIRST AID KITS
UNDER THE NSW OHS REGULATION 2001**

DESCRIPTION OF CONTENTS	CONTENTS OF KIT		
	A	B	C
Adhesive plastic dressing strips, sterile, packet of 50	2	1	1
Adhesive dressing tape, 2.5 cm 5 cm	1	1	-
Bags, plastic, for amputated parts:			
• Small	2	1	1
• Medium	2	1	1
• Large	2	1	-
Dressings, non-adherent, sterile, 7.5cm 7.5 cm	5	2	-
Eye pads, sterile	5	2	-
Gauze bandages:			
• 5 cm	3	1	1
• 10 cm	3	1	-
Gloves, disposable, single	10	4	2
Rescue blanket, silver space	1	1	-
Safety pins, packets	1	1	1
Scissors, blunt/short nosed, minimum length 12.5 cm	1	1	-
Splinter forceps	1	1	-
Sterile eyewash solution, 10 ml single use ampules or sachets	12	6	-
Swabs, prepacked, antiseptic, packs of 10	1	1	-
Triangular bandages, minimum 90 cm	8	4	1
Wound dressings, sterile, non-medicated, large	10	3	1
First aid pamphlet as approved by WorkCover	1	1	1

- First Aid Kit A For construction sites at which 25 or more persons work or other places of work at which 100 or more persons work.
- First Aid Kit B For construction sites at which fewer than 25 persons work or other places of work at which fewer than 100 and more than 10 persons work.
- First Aid Kit C For places of work (other than construction sites) at which 10 or fewer persons work.

Note: The content of these kits represents minimum requirements, and additional contents may be required depending on the nature of the workplace hazards.

MINIMUM REQUIREMENTS FOR FIRST AID ROOMS UNDER THE NSW OHS REGULATION 2001

An employer must ensure that the first aid facilities at a place of work at which more than 200 persons work, or at a construction site at which more than 100 persons work, includes a first aid room that:

- Is under the control of a trained first aid personnel as described at 4.2 (b), (c), (d) or (e) above, and
- Is located so that it is readily accessible during working hours to persons working at the place of work or site, and
- Is situated a convenient distance from
 - toilets and
 - a sink or wash basin equipped with suitable drainage and a supply of clean hot and cold running water, and
 - a means of boiling water and
- Has an access door that is wide enough to allow the entry and exit of a patient on a stretcher, and
- Is well lit and well ventilated, and
- Contains the following:
 - a work bench or a dressing trolley,
 - a cupboard for storage,
 - a suitable container fitted with a disposable bag or liner for soiled dressings,
 - a suitable container for the safe disposal of needles or other sharp implements,
 - an electric power point,
 - a couch with blankets and pillows,
 - a telephone,
 - a stretcher, lifting frame or similar device for transporting patients,
- A sufficient supply of soap and disposable towels,
- A copy of the current edition of an occupational first aid handbook approved by WorkCover,
- The items specified in Appendix A in relation to First Aid Kit A in quantities not less than those specified,
- A portable first aid kit for use outside the first aid room, being a kit that contains the items specified in Appendix A in relation to First Aid Kit B, in quantities not less than those so specified,
- Special appliances, requisites and equipment for first aid as are otherwise required by law or are necessary or appropriate having regard to the nature of the work undertaken at the workplace or site, and
- Does not contain anything except equipment, requisites or appliances for first aid or occupational health purposes, and
- Is not used for anything other than first aid or occupational health purposes.