

November 14, 2023

re: WorkSafeBC Consultation on proposed amendments to Part 4 of the Occupational Health and Safety Regulation

Thank you for the invitation to provide feedback on the proposed amendments to the Occupational Health and Safety Regulation.

Doctors of BC is supportive of efforts to address violence and harassment in the workplace, including in health care settings such as hospitals where health care workers often report experiencing harassment and violence. Health care facilities have the means and resources to establish effective and robust measures to mitigate harassment and violence towards their employees, and we support the proposed requirement to develop a harassment and violence prevention program in these settings provided that any required training for physician employees is appropriate, efficient, and provides for meaningful physician input into the training considerations.

While we support efforts to address violence and harassment in the workplace, we have concerns with the burden these proposed requirements will place on clinics where physicians are considered the employer. These clinics are often significantly smaller and under-resourced compared to larger health care facilities, and as such, the relative burden on physician employers to meet the requirements of the proposed harassment and violence prevention programs (e.g. contracting risk assessments, provision of training programs, development of written policies/procedures, etc.) will be significantly greater than the burden on larger employers, such as health authorities with considerably greater resources and capacity. Physicians already report experiencing substantial levels of burnout from ever-increasing administrative demands placed on them, in addition to their clinical obligations. Adding these requirements to their workload has the potential to further exacerbate the burnout of an already-strained physician workforce. As such, we recommend that WorkSafeBC consider the size/capability of the employer when applying the requirements of establishing harassment and violence prevention programs to ensure that smaller clinics are not disproportionately burdened; the extent and stringency of the requirements should scale relative to the capacity of the organization/clinic to implement them.

Given these concerns, we strongly recommend WorkSafeBC consider the impact of the proposed changes on physician participants in employee training programs and physician employers in smaller clinic settings and ensure that such changes do not lead to a net increase in administrative burden on physicians. Our [Burdens Solutions Tool](#) outlines steps that can be taken to reduce burdens on physicians. In the context of these proposed changes, we recommend that WorkSafeBC provide sufficient supports for physician employers to implement these workplace violence and prevention programs; these supports can include providing physicians with content-complete training programs for their staff, templates for written policies and procedures, and financial supports for contracting risk assessments from qualified experts, among others. If these proposed changes are enacted, we also recommend working to reduce other WorkSafeBC administrative tasks that impact physician employers to improve access to care for British Columbians by continually decreasing the non-clinical administrative burden on physicians.

Thank you again for the opportunity to provide input on these proposed amendments. We welcome further opportunities to discuss how these changes can be implemented in an effective way that reduces workplace harassment/violence while also avoiding further burdens on physicians.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Viccars', with a stylized flourish at the end.

Deb Viccars
VP, Policy, Planning, & Law
Doctors of BC