INTENT / PURPOSE

Fraser Health is committed to providing a safe workplace for all employees and physicians. To ensure the provision of a safe workplace, Fraser Health will continue to make a significant investment in workplace health initiatives through the introduction of broad-scale standardized use of safety engineered medical sharps devices.

POLICY

Fraser Health will provide a safe workplace by eliminating or reducing the risk of exposure to blood and body fluids by:

- Providing devices with engineered sharps protection measures for protecting employees and physicians. These devices are to be used in all departments unless there is a documented, clinically indicated reason for using the non-safety equivalent.
- Implementing additional control measures such as policies, procedures, education and training.
- Monitoring control measures, reviewing incident reports and statistics.
- Evaluating the control measures on a regular basis.

Fraser Health will utilize engineered sharps safety devices wherever they are required. However, procedures have been identified where currently available devices are not appropriate and interfere with the provision of patient care (see Management Guidelines for Requesting Non-Safety Devices). For these procedures a clinical variance can be documented and a non-safety device can be made available (through the process identified in this policy) until a suitable safety product or technique is identified.

Failure by an employee or physician to use supplied engineered sharps safety device and activate the associated safety feature where clinically appropriate may result in disciplinary action.

* This policy was initially published in March 2008 by Fraser Health Workplace Health
DEFINITIONS

Medical Sharp - a needle device, scalpel, lancet or any other medical device that can reasonably be expected to make parenteral contact.

Safety Engineered Medical Sharp - a medical sharp with a built-in safety feature or mechanism that eliminates or minimizes the risk of accidental parenteral contact while or after the sharp is used.

Not Clinically Appropriate - a safety-engineered medical sharp is considered not clinically appropriate if the use of that device will unreasonably compromise patient safety or the success of a specific medical or dental procedure and this cannot be safely addressed by a change in work practice or technique. For example, the safety-engineered mechanism may in some instances restrict:

- a device (i.e. scalpel) from reaching a tight space (i.e. nasal cavity, ear canal or a deep cavity such as a hip joint); or
- a clinician's line of sight.

STANDARDS

A. Health Services Administrator/ Directors

- Ensure the provision of engineered sharps safety devices where clinically acceptable devices exist and the implementation and maintenance of a Biological Hazards Exposure Control Program. This includes policies and procedures for minimizing the risk of exposure to blood and body fluid.

- Ensure Managers and Supervisors are aware of the requirements for use of engineered sharps safety devices and the Biological Hazards Exposure Control Program.

- Ensure the provision for resources, education and training of staff.
B. Managers and Supervisors

- Ensure risk identification and assessments are completed for their work area.
- Inform employees and physicians of any risks and ensures that the policy regarding the use of engineered sharps safety devices is communicated to them.
- Ensure employees are aware and understand that blood and body fluid exposures (sharps injuries and splashes) are not considered “part of the job”.
- Ensure employees attend required training programs.
- Ensure employees utilize available engineered sharps safety devices at all times except where clinically contraindicated and a documented variance has been obtained.
- Ensure that injuries incurred as a result of a blood and/or body fluid exposure incident (sharps injury or splash) are reported, investigated and any corrective measures recommended are implemented.

C. Employees

- Ensure that available engineered sharps safety devices are used at all times except where clinically contraindicated and a documented variance has been obtained.
- Complete available education and training on biohazard exposure control and how to utilize safety sharps products (via on-line learning, review of on-line educational videos and through hands-on training with supervisor or clinical educator).
- Utilize the safety feature as per manufacturer’s instructions.
- Activate the safety feature of the device immediately after use.
- Dispose of the activated device in a proper sharps disposal container as soon as possible after use.
- Report any concerns with the use of an engineered sharps safety device to the department Manager/Supervisor.
- Seek first aid immediately if a blood and body fluid exposure occurs.
POLICY TITLE
SAFETY ENGINEERED MEDICAL SHARPS DEVICES PROTECTION UTILIZATION AND VARIANCE REQUEST

NUMBER
TBA

AUTHORIZATION
Vice President, People and Organization Development

DATE APPROVED
July 2013

DATE(S) REVISED / REVIEWED

- Report blood and body fluid exposure incidents to their Supervisor and to the Workplace Health Call Centre.
- Follow established procedures and protocols for blood and body fluid exposure incidents.

D. **Physicians**

- Ensure that available engineered sharps safety devices are used at all times except where clinically contraindicated and a documented variance has been obtained.
- Utilize the safety feature as per manufacturer’s instructions.
- Activate the safety feature of the device immediately after use.
- Dispose of the activated device in a proper sharps disposal container as soon as possible after use.
- Report any concerns with the use of an engineered sharps safety device to the department Manager.
- Seek first aid immediately if a blood and body fluid exposure occurs.
- Complete appropriate documentation for blood and body fluid exposure/biohazard incidents.
- Report blood and body fluid exposure incidents to the Workplace Health Call Centre.
- Follow established procedures and protocols for blood and body fluid exposure incidents.

E. **Joint Occupational Safety and Health Committee (JOSH)**

- Participate in an annual review of the Biological Hazards Exposure Control Program with Workplace Health.
- Make recommendations to improve the Biological Hazards Exposure Control Program.
- As part of monthly incident reports review medical sharps incident statistics.

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F. **BC Health Authority Safety Engineered Medical Device Committee (BC HA SEMD)**
   - Work collaboratively to develop SEMD selection criteria, review new SEMD technology and provide recommendations on the occupational safety concerns related to SEMD purchasing contracts or related contracts.
   - Provide subject matter expertise that will assist with the development of the contract specific health and safety criteria.
   - Participate in product review and selection process to ensure Occupational Health and Safety recommendations, standards or best practices are fulfilled.

G. **Health Shared Services BC (HSSBC)**
   - Coordinate contracts and/or purchases of medical sharps and develop clinical specifications for these contracts in consultation with Clinicians and Workplace Health. If more than one type of safety-engineered medical sharps device is available in commercial markets, the needle or sharp that provides the highest level of protection from accidental parenteral contact must be selected. To determine which device provides the highest level of protection, consideration should be given to evidence that a particular device has been shown to further reduce injuries, consideration and review of the different types of engineering controls that are commercially available for the relevant devices, information provided by manufacturers, independent testing agencies and/or objective product evaluation.
   - Where changes in stock items are being considered and/or stock items become unavailable, Workplace Health and Clinical stakeholders are immediately consulted.
   - Participate in the BC HA SEMD Committee and in the clinical variance request process.

H. **Workplace Health**
   - Administer the Biological Hazards Exposure Control Program.

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• Provide advice and guidelines to staff to assist with compliance with program requirements.
• Ensure appropriate education and training is available for all staff and physicians.
• Evaluate the program annually in conjunction with the JOSH Committee and HSSBC.
• Collaborate with clinical specialists, the BC Health Authority Safety Engineered Medical Sharps Committee and category leads within HSSBC on evaluation of new safety engineered sharps.
• Participate in the BC HA SEMD Committee and coordinate the clinical variance request process.

PROCESS FOR REQUESTING NON-SAFETY DEVICES

Available safety engineered medical sharps devices are to be used in all departments unless there is a documented, clinically indicated reason for using the non-safety product. In-house Replenishment should not release any non-safe ty devices until they receive a copy of an approved Request for Non-Safety Device Form.

a. User identifies a clinical practice that s/he feels requires a non-safety medical sharps device.

b. “Request for Non-Safety Device” form completed by the requester in consultation with the department Manager. Form can be obtained from Fraser Health’s FHPulse web site.

c. Request submitted, discussed with and agreed to by the department Manager.

d. Request faxed to Workplace Health Exposure Prevention Specialist.

e. Exposure Prevention Specialist will acknowledge receipt of request and discuss next steps with the department Manager.

f. Request will be reviewed by Workplace Health, HSSBC Supply Chain Clinical Coordinator, clinical representatives and Medical Chief or Director (where applicable).

 g. “Request” Approved – Supply Chain Clinical Coordinator will document variance, provide In-house Replenishment with a copy and coordinate implementation of a non-safety device.

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h. “Request” Denied – Suitable safety alternatives and/or best practice procedure reviewed with User(s) and Manager by Supply Chain Clinical Coordinator and Workplace Health.
   
   I. Manager continues to disagree.
   
   II. Workplace Health will review Occupational Health and Safety Regulations and associated guidelines with the Manager to ensure the requirements contained therein are clearly understood.
   
   III. Manager makes final decision.

REFERENCES

- Fraser Health Authority's “Blood and Body Fluid (BBF) Exposure” Policy
- Fraser Health Authority's “Workplace Health and Safety” Policy
- Workers’ Compensation Board of British Columbia(1999), Occupational Health and Safety Regulation, sections 6.33 - 6.41. Specifically, section 6.36 (Enacted by B.C. Reg. 319/2007, effective February 1, 2008; Amended by B.C. Reg. 312/2010, effective February 1, 2011.) which states:  (1) “Engineering and work practice controls must be established to minimize or eliminate the potential for exposure to biohazardous material”.

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POLICY TITLE
SAFETY ENGINEERED MEDICAL SHARPS DEVICES
PROTECTION UTILIZATION AND VARIANCE REQUEST

AUTHORIZATION
Vice President, People and Organization Development

DATE APPROVED
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NON-SAFETY MEDICAL SHARPS DEVICE REQUEST FORM

The form is to be submitted in order to request a non-safety medical sharps device where an employee or physician feels that the currently available safety sharps medical device is not clinically appropriate.

The Fraser Health Engineered Sharps Protection Utilization and Variance Request Policy outlines the steps involved in submitting the request, as well as the review process.

Please note that the process requires the staff member or physician to discuss their request with the department manager. If the manager feels the request is warranted, she will submit a completed form to Workplace Health. The request will then be reviewed by Workplace Health, HROSC Supply Chain Clinic Coordinator, clinical representatives and the Medical Chief or Director (where applicable). Reviewer’s recommendations will be discussed with the requester’s department manager.

NON-SAFETY DEVICE – PRODUCT & PROCEDURE INFORMATION

DATE: ____________ MANAGER: __________________

SITE: __________________ PHONE #: __________________

CSR: __________________

NAME (REQUESTED): __________________

JOB TITLE (REQUESTER): __________________

PHONE #: __________________

PRODUCT NAME (IF KNOWN): __________________

FH MEDITECH (IF KNOWN): __________________

VENDOR CATALOGUE (IF KNOWN): __________________

DESCRIPTION OF THE NON-SAFETY PRODUCT BEING REQUESTED:

[Space for description]

PLEASE READ:
A) THE MEDICAL PROCEDURE FOR WHICH THIS NON-SAFETY MEDICAL SHARPS DEVICE IS NEEDED:

B) THE CLINICAL REASON WHY THIS NON-SAFETY MEDICAL SHARPS DEVICE IS NEEDED:

WOULD THIS PRODUCT REPLACE A CURRENTLY USED PRODUCT/DEVICE?

YES ☐ NO ☐

☐ YES – PRODUCT NAME: __________________

☐ IS THIS A SAFETY PRODUCT? ☐ YES ☐ NO

☐ FH MEDITECH #: __________________

FAX COMPLETED FORM TO: 604-431-2896

*ATTENTION EXPOSURE PREVENTION SPECIALIST:

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**OUTCOME OF NON-SAFETY MEDICAL SHARPS DEVICE REQUEST**

**REVIEWERS USE ONLY:**

**DATE RECEIVED:**

**REVIEWER NAMES & TITLES:**

**DATE REVIEWED:**

**REVIEWER COMMENTS:**

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**REQUEST APPROVED:**

- Yes
  - Manager notified via email by [NAME] [DATE]
  - Approval submitted to In-House Replenishment by [NAME]
  - FH MedTech #: [NUMBER]
  - Vendor Ctrl #: [NUMBER]

- No
  - Manager notified via email by [NAME] [DATE]
  - Manager provided with reviewer comments and practice recommendations
  - Note below whether Manager agrees with reviewers recommendations.
  - Yes, manager will follow-up with requester.
  - No, manager has declined to go ahead with purchasing of non-safety device.

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