

WORKSAFE SERVICES DIVISION OCCUPATIONAL HEALTH AND SAFETY LEGISLATION INTERPRETATIONS



Topic	Multiple Building Worksites	Issued by: V.P., WorkSafe Services
Statute	<i>First Aid Regulation</i>	Date Issued: January 11, 2005
Section	4(1)	Date Revised:

4(1) Subject to subsections (2) and (3), an employer shall provide and maintain the first aid kits, first aid providers and first aid rooms at a place of employment in accordance with Schedule A for the maximum number of employees present during a shift.

Question

I am an employer with multiple buildings on my site. In most instances, there is more than one employee working in all buildings at any one time. Does the first aid regulation require a first aid attendant in each building?

Response

In the *Occupational Health and Safety Act* a “place of employment” means any building, structure, premises, water or land where work is carried on by one or more employees, and includes a project site, a mine, a ferry, a train and any vehicle used or likely to be used by an employee”. *Premises* is defined to include “land and buildings together considered as a place of business”. Therefore, multiple buildings on one premises are considered a single place of employment.

This means that a first aid provider will not be required in every building. However, consideration should be given as to the best location for the first aid providers, first aid kits and first aid room.

Schedule A indicates the minimum number of first aid kits, first aid rooms and first aid providers based on the number of employees at a place of employment and the nature of the work.

In determining the number of first aid kits, first aid providers and the best location for those providers and first aid room for a particular place of employment, employers need to consider the following:

1. The combined number of employees per shift at the entire premises.
2. The location, accessibility and the number of employees per shift in each building or work area. Section 13(1) of the Regulation requires the first aid kit to be located at or near the working area that it is intended to serve.
3. Whether high hazard work is being carried out in any building or work area. For the purposes of the First Aid Regulation, if high hazard work is carried in at least one building or work area, the place of employment will be considered a place of employment with high hazard work.
4. The distance between buildings or work areas to ensure that timely first aid is provided to injured employees.

It should be noted, however, that depending on the layout of the premises, nature of the work being carried out and the number of employees on site, an occupational health and safety officer may require more attendants, kits and room than the required minimum.