

What We Heard:

Hazardous Work Protections for Young Workers

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Prepared for the B.C.
Ministry of Labour



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1 INTRODUCTION AND BACKGROUND

1.1 Youth Labour Protections and Hazardous Work in British Columbia

Youth employment in British Columbia is governed by the *Employment Standards Act*, which falls under the B.C. Ministry of Labour and is enforced by the Employment Standards Branch. In recent years, British Columbia has made changes to the *Act* to bring British Columbia's child labour laws in line with international norms; prior to October 2021, children as young as 12 were able to be employed in a variety of positions without special oversight or permission.

Changes in 2021 raised the minimum age for general employment to 16, with "light work" employment being allowed for youth aged 14 and 15 with parent or guardian consent. Permits are required to hire youth under 16 for any jobs that will require "not light work," regardless of parental or guardian consent.¹

The nature of many jobs puts workers in precarious or risky situations in the normal course of performing their job duties. While labour law in British Columbia outlines safety requirements and enforcement for these types of work sites, to minimize risk to workers, they remain hazardous jobs and tend to have higher injury and accident rates than other types of work.

1.2 Purpose of Engagement

As part of the Ministry of Labour's efforts to update labour protections for youth in B.C., the Ministry is considering implementing changes to regulations to minimize the risk of these types of hazardous work to youth. The Ministry identified twelve high-risk occupational fields, based on accident and injury rates available through WorkSafe BC and on what is considered hazardous work for young people in other jurisdictions, as well as four high-risk work environments; the Ministry sought input from the public on what age restrictions might be appropriate for these types of work.

The Ministry, in partnership with the Government Digital Experience (GDx) division, hosted an online public engagement survey to collect feedback from the public on this issue. Data collected through this survey were analyzed by R.A. Malatest & Associates Ltd. (Malatest), an independent consulting firm. This What We Heard report summarizes the key findings from this public engagement.

¹ Employment in the entertainment industry remains an exception to this requirement; permits are not needed for children 12 and under working in the entertainment industry.



2 RESEARCH METHODS AND RESPONDENTS

2.1 Approach and Design

The Ministry of Labour identified key occupations and work environments for potential regulation or age restriction, based on associated accident and injury rates as reported by WorkSafe BC and on what is considered hazardous work for young people in other jurisdictions. The list of all industries and work environments are included in the survey instrument, attached in **Appendix A**.

As the Ministry is considering implementing age-based restrictions on selected hazardous types of work, the survey was designed to ask respondents for their opinions on appropriate minimum ages for these types of jobs. Two open-ended comment fields were also provided to allow respondents to provide any additional feedback that they felt was not covered by the closed-ended survey items.

2.2 Public Engagement Process

The final survey questionnaire was programmed and hosted by the GDx division of the Ministry of Citizens' Services, and made available online at the [govTogetherBC](https://govtogetherbc.ca) platform. The survey was available for completion from April 21 to June 17, 2022.

Data collected from this survey were analyzed by Malatest and findings were returned to the Ministry in the form of this What We Heard report. The What We Heard report is intended for publication on the govTogetherBC platform, to provide transparency to the public of findings from the survey and next steps for the Ministry based on public input.

2.3 Data Analysis Approaches

Closed-ended survey items were analyzed using appropriate summary statistical methods (e.g., medians, modes,² frequencies). In some cases, where supported by appropriate sample sizes and research purposes, crosstabulations of survey items by demographic factors of interest (e.g., experience in industry, region) were conducted to identify any key areas of difference between groups. Only differences found to be statistically significant are reported on in this report.

Open-ended survey items were reviewed and thematically coded according to pre-developed coding frameworks (included in **Appendix B**). These applied codes were then summarized statistically, using frequencies to report how common each theme or concern was among respondents.

2.4 Participants

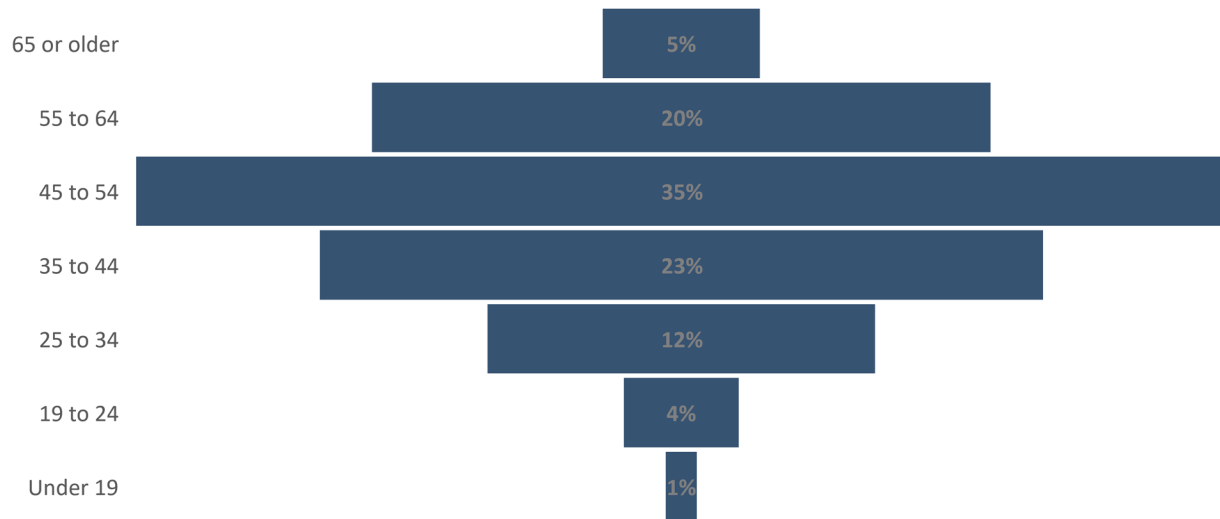
In total, 319 survey completions were collected over the engagement period. Of these respondents, 51% were women, 47% were men, and 1% were gender diverse.³ Indigenous people were underrepresented within this sample, representing about 3% of all respondents (as compared to 6% of the total B.C. population as of the 2016 Census).

² The mode, or modal response, in a data set is the response option selected by the largest number of respondents (but not necessarily a majority of respondents).

³ Percentages may not add up to 100% due to rounding.



Figure 2.1: Survey Respondents by Age



Source: *Hazardous Work Protections for Youth Survey (2022)*.
 Valid $n=298$
 Percentages may not add to 100% due to rounding.

The majority of respondents were middle-aged, falling in the 35 to 44, 45 to 54, and 55 to 64 age brackets (78% of total sample, combined). Minors represented approximately 1% of the total sample, and retired persons just 5%.

Table 2.1: Survey Respondents by Region

Region	Sample n	Sample Proportion	Provincial Population Proportion*
Lower Mainland / Fraser Valley	125	42%	61%
Vancouver Island / Sunshine Coast	53	18%	17%
Thompson / Okanagan	34	11%	12%
Cariboo	36	12%	3%
Northeast	15	5%	1%
Kootenay	11	4%	3%
Nechako	11	4%	1%
Northwest and North Coast	11	4%	1%

*Based on Census 2021 population counts for each region, and B.C. overall
 Source: *Hazardous Work Protections for Youth Survey (2022)*.
 Valid $n=296$

The Lower Mainland and Fraser Valley region was under-represented among survey respondents, accounting for 42% of the total sample (compared to 61% of the total B.C. population). Many Northern and Interior regions of the province, however, were overrepresented within the survey sample. For example, both Nechako and the Northwest / North Coast regions represented 4% of the total survey sample, but each account for about 1% of the total provincial population.



3 WHAT WE HEARD

3.1 Minimum Ages for Hazardous Industries

With a few exceptions, survey respondents tended to believe that 18 years old was the appropriate age to allow youth to work in hazardous industries. Two industries had overall ages lower than this: fish and animal food processing (modal response: 16 years old) and construction (modal response: 16 years old). Three types of work had higher recommended age minimums from respondents; work involving exposure to radiation, silica, and asbestos all received overall recommendations for a minimum age of 19 years old. **Table 3.1** below summarizes responses to all industry or occupational categories.

Table 3.1: Recommended Minimum Ages for Various Industry and Occupational Categories

Type of Work	Median Response	Modal Response	Valid <i>n</i>
Fish and animal food processing	16 years old	16 years old	278
Construction	17 years old	16 years old	298
Forestry	18 years old	18 years old	292
With dangerous machinery and tools	18 years old	18 years old	297
In forest fire-fighting	18 years old	18 years old	294
In abattoirs or slaughterhouses	18 years old	18 years old	277
In oil / gas field servicing and drilling	18 years old	18 years old	286
In power / transmission installation and servicing	18 years old	18 years old	282
At a smelter, foundry, refinery or metal processing / fabricating operation	18 years old	18 years old	278
With radiation	18 years old	19 years old	276
With silica	18 years old	19 years old	277
With asbestos	18 years old	19 years old	280

Source: *Hazardous Work Protections for Youth Survey* (2022).

Valid *ns* vary by survey item, see table for details.

Overall, respondents seemed to advocate the highest age possible for exposure to materials that pose risks of serious long-term illness: radiation, silica, and asbestos.

In select industries, respondents who identified as having experience as an employer in a given sector were significantly more likely to indicate that no minimum ages should be required for their industry. In particular, business owners in the construction, and oil and gas or power, sectors were more likely to believe that jobs in their own industries should not be subject to minimum age requirements.⁴

Responses from comments in an open-ended question on the survey also identified several other industries or sectors where minimum age requirements should be considered or implemented. These included:

- Agriculture (15% of valid responses);
- Motor vehicle operation and/or work around motor vehicles in operation (e.g., flagging) (8% of valid responses);

⁴ Based on proportional z-tests of significance, $p < .05$.



- Healthcare (6% of valid responses);
- Food service (6% of valid responses);
- Utilities work (4% of valid responses); and
- Childcare or caretaking of minors without supervision (1% of valid responses).

3.2 Minimum Ages for Hazardous Work Environments

With the exception of jobs that require hearing protection, most respondents felt that 18 years old was an appropriate minimum age for work in hazardous work environments. **Table 3.2** below summarizes responses to all hazardous work environment questions.

Table 3.2: Recommended Minimum Ages for Various Hazardous Work Environments

Environment Type	Median Response	Modal Response	Valid <i>n</i>
Work requiring hearing protection	16 years old	16 years old	291
Work in confined spaces	18 years old	18 years old	289
Work at excessive heights	18 years old	18 years old	294
Work requiring a respirator	18 years old	18 years old	288

Source: *Hazardous Work Protections for Youth Survey (2022)*.

Valid *ns* vary by survey item, see table for details.

Overall, respondents appeared to be the least concerned regarding work that requires hearing protection or poses a risk of hearing damage, with a much lower minimum age being considered acceptable overall. All other types of work, in contrast, were considered appropriate for those aged 18 and up.

Employers in the oil and gas and power sector were significantly more likely than other groups to indicate that no minimum age should be required for work in confined spaces, at excessive heights, or requiring a respirator.⁵

Responses from comments in an open-ended question on the survey also identified several other work environments where minimum age requirements should be considered or implemented. These included:

- Work with or around heavy machinery in operation (18% of valid responses);
- Work involving exposure to hazardous chemicals or fumes (15% of valid responses); and
- Work that puts person at risk of assault or exposure to violence (e.g., overnight shifts at gas stations) (8% of valid responses).

3.3 Other Concerns and Comments

A variety of themes and concerns were identified in open-ended responses to the final survey question, asking for any additional feedback on proposed minimum age requirements for hazardous work. The most common responses were that safety training and good workplace practices were more important than age in determining one's risk for injury (34% of valid comments), and that employers should be

⁵ Based on proportional z-tests of significance, $p < .05$.



held accountable for ensuring high quality safety training and/or ensuring strong cultures of safety in their workplaces (34%).

Approximately one in five comments to this final question (22%) recommended that the provincial government and associated agencies take more aggressive action against employers that do not take safety seriously. Many of these comments indicated that the need for age restrictions would be moot if employers who did not take safety seriously were caught and disciplined appropriately, and that unethical employers will still be putting the safety of their (adult) workers at risk even if they are not allowed to hire youth in the future.

A similar proportion of comments raised concerns that these age requirements would limit youths' access to high-paying jobs (20% of valid comments), or may have unintended consequences on career paths for youth pursuing careers in the trades (7% of valid comments). Some of these comments noted that access to these types of jobs is important for otherwise marginalized youth who may need to find employment to escape abusive living situations or live in economically disadvantaged households and need to contribute to their families' incomes. A few of these comments also noted that the requirements seem to target blue collar and working-class jobs, and the proposed changes do not seem to be "in touch" with the realities of many young workers and families in B.C.

Other themes identified in open-ended comments included:

- Minimum ages for hazardous work should be consistent across all categories of hazardous work (18% of valid responses);
- Youth can be particularly vulnerable to unsafe work environments, due to susceptibility to social pressure and a lack of knowledge about safety (15% of valid responses);
- It should be allowable to have youth work in lower-risk jobs within hazardous workplaces, such as site cleanup in construction sites (12% of valid responses); and
- The government should not be regulating hazardous workplaces any differently from other workplaces, with respect to youth employment (4% of valid responses).



4 SUMMARY

Overall, survey respondents tended to agree that 18 years old was an appropriate minimum age requirement for most types of hazardous work, with a few exceptions. For construction work and fish and animal processing work, a younger minimum age of 16 years old was deemed reasonable. For work involving exposure to material with long-term serious health impacts, such as silica, asbestos, and radiation, respondents tended to agree that an older minimum age of 19 years old was appropriate.

While most survey respondents tended to support relatively high minimum age requirements, some participants did raise concerns regarding these changes in their comments. It was noted that these changes would limit youths' access to high-paying jobs and may interrupt their pursuit of careers in trades (e.g., those who begin a trades path while still in high school, or who may have a birthday later in the year and so cannot begin work in their preferred trade until well after they have graduated high school). It was also noted that these changes may have uneven impacts on British Columbians; those living in natural resource-reliant communities, those with fewer opportunities to pursue post-secondary education, and those in challenging economic circumstances may be more adversely impacted by minimum age requirements than others.

Additionally, there were a considerable number of comments that urged the province to prioritize workplace safety through more rigorous enforcement of existing safety standards, and more aggressive discipline and remediation measures for employers that do not comply. While all these respondents valued and emphasized the need for safety in workplaces, it was felt that minimum age requirements for hazardous work do not address the root issue of youth injuries, which is an overall culture in certain workplaces that does not respect safety and puts pressure on all employees, regardless of age, to engage in unsafe work.



APPENDIX A: QUESTIONNAIRE



Public Survey - Employment Standards: Hazardous Work for Young Workers Under 19 Years Old

In 2019 government passed amendments to the *Employment Standards Act* to strengthen BC's employment laws to better protect young people at work. These changes increased the general working age from 12 to 16. They also introduced the concepts of "light work" that can be performed by children who are 14 or 15, and "hazardous work" that a person under age 16 cannot perform (or up to under age 19 for certain hazardous work).

The Ministry of Labour is now asking for public feedback on the hazardous work regulations that are being developed to make sure young people are not doing work that is unsafe for their age. We want to understand the concerns and expectations that young people, parents/guardians, and employers have around employment of young workers in hazardous industries.

As we look to develop these new regulations, we seek your input on whether young workers under 16, or up to under 19, should be restricted from certain types of hazardous work.

Background

The light- and hazardous-work amendments allow BC to comply with international labour standards aimed at protecting young workers from work that is likely to be hazardous or harmful to their health or safety. As well, the amendments bring BC into line with child employment standards in other Canadian jurisdictions.

Government is implementing these improvements for the employment of young people in two phases. In the first phase, which came into effect on October 15, 2021, the Government brought into force changes to:

- Require a permit from the Director of Employment Standards to employ a child 15 or younger – up from the previous requirement of 11 or younger, and
- As an exception, allow 14- and 15-year-olds to perform "light work" without a Director's permit but with parental consent.

The second phase of the Government's regulations, which is the subject of this public engagement, will be setting out the work that will be prohibited for young people up to under age 19 due to its hazardous nature.



What work should be designated as hazardous work for young people?

The Ministry has reviewed hazardous work regulations in other Canadian jurisdictions, as well as WorkSafeBC injury statistics for adult and young workers, and identified a number of industries and areas of work to consider for British Columbia's hazardous work regulation for young people. An employer would not be permitted to employ a young person to work in any areas of work that are identified as hazardous. Based on this research, the Ministry has grouped the occupations into these categories for ease of consultation:

- Construction:
 - General construction labour, as well as demolition, excavation, wrecking, roofing, electrical and plumbing, or flagging on a construction site.
- Forestry/Arborists:
 - Logging, sawmill, pulp mill, silviculture & other tree services, and forest fire-fighting.
- Fish and animal food processing.
- Oil/gas & power industries.
- Production process at a smelter, foundry, refinery or metal processing or fabricating operation.
- Silica, Asbestos and Radiation.
- Work with specific occupational health and safety risks.

Construction

Following are injury rates for a sample of construction sub-sectors:

Injury Rate (BC average for all occupations is 2.1/100 workers)

Excavation	2.1
Electrical	2.8
Building Demolition	3.0
Traffic Control	3.0
Plumbing/HVAC	4.5
Roofing (low & steep)	5.4
Construction Labour	7.0
Framing/Residential Forming	7.8

Between 2016 and 2020, 669 BC workers under 19 were injured in construction jobs, of which 26 suffered long-term disabilities.

In Saskatchewan, Manitoba, Ontario and NWT workers must be 16 to work on a construction site.



1. What should be the minimum age to work on a construction site?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

Forestry/Arborists

Logging, sawmill, pulp mill, silviculture & other tree services, and forest fire fighting.

Injury Rate (BC average for all occupations is 2.1/100 workers)

Pulp & paper mills	1.6
Sawmill/shake mills	2.6
Mechanized tree falling	2.7
Forest firefighting	6.2
Silviculture	7.0
Other tree services (incl. Arborists)	7.4
Manual tree falling/bucking	19.9

Between 2016 and 2020, 37 BC workers under 19 were injured in the forestry/arborist sector, of which 6 suffered long-term disabilities.

In Saskatchewan, Nova Scotia and NWT workers must be 16 to work in forestry/logging operations. In Manitoba workers must be 18.

4. What should be the minimum age to work in forestry jobs (logging, sawmills, pulp mills, silviculture)?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

5. What should be the minimum age to work in tree services, e.g. arborist, tree chipper?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old



6. What should be the minimum age to work in forest fire-fighting?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

Fish and animal food processing.

The BC injury rate for all ages for fish and animal processing:

Injury Rate (BC average for all occupations is 2.1/100 workers)

Fish packing	3.0
Abattoir/Slaughterhouse	15.7

Between 2016 and 2020, 34 BC workers under 19 suffered injuries in this sector, although none resulted in long term disabilities.

No Canadian jurisdiction has a minimum age for this work, but in some jurisdictions it may fall under industrial work that is restricted to those who are 16 or older. In the US, 18 is the minimum age for work in a slaughterhouse or meat/food processing.

7. What should be the minimum age to work in fish and animal food processing?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

8. What should be the minimum age to work in abattoirs or slaughterhouses?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

Oil/Gas & Power Occupations

Injury Rate (BC average for all occupations is 2.1/100 workers)

Oil or gas field servicing	0.6
Oil or gas drilling	0.9
Power pole/powerline installation or service	1.2
Cellular, microwave, radar, or transmission tower erection, installation or service	3.4



Between 2016 and 2020, 3 BC workers under 19 were injured in the oil and gas industry, but no long-term disabilities. There were 2 workers under 19 injured in the power industry, but no long-term disabilities.

In Saskatchewan and Manitoba workers must be 16 to work on a drilling or servicing rig.
In Saskatchewan and NWT, workers must be 16 to work in power line construction or maintenance.

9. What should be the minimum age to work in oil/gas field servicing and drilling?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

10. What should be the minimum age to work in power/transmission installation and servicing?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

Production process at a smelter, foundry, refinery or metal processing or fabricating operation.

Injury Rate (BC average for all occupations is 2.1/100 workers)

Smelter	1.4
Die Casting or Non-Ferrous Foundry Operations	1.7
Galvanizing, Electroplating, or Protection Plating	4.3
Sheet Metal Fabrication	4.3
Ferrous Foundry Operations	5.1

Between 2016 and 2020, there were 17 BC workers under 19 years old injured in this sector, of which 2 suffered long-term disabilities.

In Saskatchewan and NWT, 16 is the required age to work in this sector.

11. What should be the minimum age to work at a smelter, foundry, refinery or metal processing or fabricating operation?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old



Radiation, Silica, Asbestos.

The BC injury rate for asbestos abatement or mould remediation workers is 4.3. Similar figures are not available for workers dealing with radiation or silica. However, BC's *Workers Compensation Act* explicitly recognizes these exposures as work-related hazards for occupational disease.

In Saskatchewan, workers must be 18 to work with radiation, silica or asbestos. In Manitoba workers must be 18 to work with radiation.

12. What should be the minimum age to work with Radiation?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

13. What should be the minimum age to work with Silica?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

14. What should be the minimum age to work with Asbestos?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

General Occupational Health and Safety issues:

Confined spaces, heights, work requiring hearing protection or respirators.

We do not have BC injury data for these items, however some Canadian and US jurisdictions have minimum ages for workers exposed to these hazards.

Confined spaces – A confined space is an enclosed or partially enclosed area, with limited means of entry and exit for emergency response services, that is not designed or intended for continuous human occupancy but is big enough for a worker to enter to perform work. Confined spaces in the workplace pose a significant risk of injury and death. Hazards in confined spaces can result in fire, explosion, unconsciousness, asphyxiation, or drowning.

Saskatchewan and NWT do not permit youth under 16 to work in confined spaces. Manitoba does not permit those under 18 to do so.

15. What should be the minimum age to work in confined spaces?



- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

Heights – Ontario requires window washers to be 18 years old if they are working higher than three metres. Manitoba requires workers to be 16 for work involving scaffolding or swing stages or work involving the use of a ladder at heights greater than 1.5 metres.

16. What should be the minimum age to work at excessive heights?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

Work requiring hearing protection – Loud machines and equipment are among the most common causes of harm to workers' hearing.

No Canadian jurisdictions have age requirements for work that requires wearing hearing protection. The US has a minimum age of 18 for work that requires hearing protection.

17. What should be the minimum age for work requiring hearing protection?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old

Work requiring a respirator – Workers need respirators where there is exposure to dangerous air contaminants such as gases, fibres, fumes, bacteria or pollen.

Saskatchewan, the Northwest Territories and Washington mandate a minimum age of 18 for work requiring a respirator.

18. What should be the minimum age for work requiring a respirator?

- a. No minimum age
- b. 16 years old
- c. 17 years old
- d. 18 years old
- e. 19 years old



Do you have any comments to explain or provide details on any of your answers to this survey?

Are there any other examples of hazardous work you feel we have missed? Please tell us more.

To get a better understanding about who is responding to this questionnaire, please provide a bit of detail about yourself.

These questions, like all other questions in this questionnaire, are optional.

What is your age?

Please choose **only one** of the following:

- Under 19
- 19 to 24
- 25 to 34
- 35 to 44
- 45 to 54
- 55 to 64
- 65 or older

How do you identify?

Please choose **only one** of the following:

- Woman
- Man
- Gender diverse

Do you identify as an Indigenous person?

Please choose **only one** of the following:

- Yes
- No



In what region of B.C. or area do you live?

Please choose **only one** of the following:

- Vancouver Island / Sunshine Coast
- Lower Mainland / Fraser Valley
- Thompson / Okanagan
- Kootenay
- Cariboo
- Northwest and North Coast
- Nechako
- Northeast
- Outside B.C.

Employment Status

Please select your status:

- Employee
- Employer
- Self-employed
- Student, or
- Retired

Employment Sector

Please indicate if you work in or own a business in any of these sectors:

- Construction:
 - General construction labour, as well as demolition, excavation, wrecking, roofing, electrical and plumbing, or flagging on a construction site.
- Forestry/Arborists:
 - Logging, sawmill, pulp mill, silviculture & other tree services, and forest fire-fighting.
- Fish or animal food processing.
- Oil/gas or power industry.
- Smelter, foundry, refinery or metal processing or fabricating operation.
- Work involving Silica,
- Work involving Asbestos
- Work involving Radiation
- None of the above.



Your parent or guardian must agree for you to be allowed to provide feedback to the B.C government about hazardous employment.

If you are under 19, by checking the "Parent Agrees" your parent is conclusively deemed to have read and agrees unconditionally to consent for providing feedback to the Child Employment Engagement.

Only answer this question if the following conditions are met:

Answer was 'Youth (Under 19 years of age)' at question '1 [Q1]' (Which of the following best describes you?)

- Parent Agrees

Submit your survey.

Thank you for completing this survey. Your responses will be collated and combined with other stakeholder feedback to help us develop the Hazardous Work Regulation. Stay tuned for future communications.



APPENDIX B: CODING FRAMEWORKS



Q6: Do you have any comments to explain or provide details on any of your answers to the survey?			
Code	Name	Description	Examples
1	Training more important than age	Ability to work in dangerous occupations should be based on having completed appropriate training, certifications, etc.	"...Training in the different trades should be a priority. Anyone working in a trade whether it is hazardous or not should be qualified."
2	Government needs to do more to ensure safe working sites	Concern is broader than just age in dangerous work, but general concerns about government's lack of oversight / inability to ensure reasonably safe workplaces means needing tighter restrictions on youth working in these workplaces	"I put 19 for many answers, however I consider this to only be required due to a failure on the part of the government to prevent workers from unsafe working conditions..."
3	Should not be regulating hazardous work differently than other workplaces	Comment indicates that government should not be crafting legislation that targets hazardous work	"We already have new and young worker legislation in BC (OHS 3.23). Rather than drafting legislation that will restrict hazardous work to a specific age group, strengthen the existing legislation OHS 3.23."
4	Age for hazardous work employment should be consistent	Comment indicates that the age at which someone can legally work in a hazardous workplace should be consistent across all types of hazardous work	"Each should be 18 years old."
5	Employers should be accountable for safety training	Concern that employers do not spend enough time / are not concerned enough about safety training for new hires and young people, or emphasis that employers need to be held accountable more for the culture of safety in their workplaces	"...I have 2 workplace injuries that were both obtained while being considered a young worker. Both injuries could have been avoided with proper training on the employer's part..."
6	Restricting ages in these types of jobs will restrict access to "good jobs"	Concern that these are well-paying jobs that behoove youth to have access to, and restricting ages to these jobs will unfairly limit youths' ability to earn and/or gain career experience	"Some of these ideas would eliminate/severely constrain early trades programs from high schools that give many youth a strong start an on ramp into building their lives and our economy. Focus on education and require more enforcement of the current young workers program."
7	Youth can be particularly vulnerable	Comment indicates that youth are more likely to be unaware of the risks of various types of work, and/or less likely to speak up for themselves when they are asked to do unsafe work, making them particularly vulnerable to unsafe workplaces	"...there is far too much leeway with youth's health, and they may be pressured or unaware of the long-term risk. Anecdotally, I was exposed to silica dust from grinding concrete at 18, and it took weeks of doing so before my parents recognized this might be a hazard and got me a respirator. There was no indication from my work."
8	Impact on trades paths for youth	Comment raises concerns about how youth interested in a career in the trades may be impacted by age restrictions, such as not being able to get an apprenticeship	"Age restrictions in some instances could exclude youth from apprentice and trades programs where they may engage in hazardous work."



Q6: Do you have any comments to explain or provide details on any of your answers to the survey?			
Code	Name	Description	Examples
9	Allow lower-risk jobs within hazardous workplaces	Comment indicates that youth should be kept away from hazardous jobs, but should still be able to work in lower-risk jobs on these worksites (e.g., sweeping up at a construction site)	"...I see many young hires getting caught up in the attractive wages of some of these high hazard positions...Let the younger generations cut their teeth on low-hazard type employment getting out of the gate instead of letting them cut their arm off." "Categories are too broad. There are many tasks in these industries that would be safe for youth over 15, such as a floor sweeper or a trades general helper in a maintenance shop."
10	Other	Comment substantively responds to the question, but cannot be coded to any of the above	
96	Off-topic – suggestion for another type of work that should be restricted	Comment identifies another sector or type of work that should also be considered hazardous and have ages restricted	"Health care workers are not included. This is a very dangerous job for young people and should be restricted."
97	Off-topic – complaint about employment restrictions on youth under 16	Comment complains about restrictions that exist on under-16s being able to work at all (i.e., needing parental consent / permit)	"I think that 13/14/15 year olds should not need a permit to work and they especially should not need parental consent. Being able to work is very important for kids who come from abusive homes to be able to turn things around and get out."
98	Off-topic – complaint about survey	Comment complains about survey question, wording, structure, etc.	"Your lumping of statistics across diverse job tasks – such as in forestry – is inappropriate..."
99	Off-topic – irrelevant or unintelligible	Comment does not respond to the question, or meaning cannot reliably be interpreted	



Q7: Do you have any other examples of hazardous work you feel we have missed?			
Code	Name	Description	Examples
1	Motor vehicle operation	Work operating vehicles, or working on roadways (e.g., traffic control)	
2	Working with or around heavy machinery	Work operating heavy machinery, or working in the vicinity of heavy machinery in operation	
3	Agriculture	Work on farms and other agricultural settings	
4	Work involving exposure to hazardous chemicals / fumes	Work that involves exposure to potentially harmful chemicals or fumes	
5	Work that puts person at risk of assault / exposure to violence	Work that can put an individual at risk of assault or exposure to violence (e.g., working night shifts alone)	
6	Healthcare	Work in health care settings	
7	Work with utilities	Work with or around utilities like gas lines, electrical work, etc.	
8	Caretaking of minors	Work involving caretaking / responsibility of minors without supervision of an adult	
9	Food service	Work in the food service industry, especially food preparation	
10	Other	Comment substantively responds to the question but cannot be coded to any of the above	
96	Off-topic – nothing to add	Respondent has no additional comment or suggestions	
97	Off-topic – whataboutism, “any work can be dangerous,” etc.	Respondent says any work can be dangerous, highlights hazards of “safe” jobs, etc.	
98	Off-topic – complaint about survey	Comment complains about survey question, wording, structure, etc.	
99	Off-topic – irrelevant or unintelligible	Comment does not respond to the question, or meaning cannot reliably be interpreted	



Q8Other: I am responding to this survey as a...Other, please specify.			
Code	Name	Description	Examples
1	Citizen	Respondent is answering the survey as an interested citizen, not affiliated with any of the other groups listed	
2	Educator	Respondent is answering the survey as an educator	
3	Health and safety officer	Respondent is answering the survey as a health and safety officer or professional	
4	Family member or friend	Respondent is answering the survey as a family member or friend of someone impacted by the proposal, other than a parent	
98	Off-topic – complaint about survey	Comment complains about survey question, wording, structure, etc.	
99	Off-topic – irrelevant or unintelligible	Comment does not respond to the question, or meaning cannot reliably be interpreted	