

10 March 2020

[Email to: GuidanceandEducationDevelopment@Worksafe.govt.nz](mailto:GuidanceandEducationDevelopment@Worksafe.govt.nz)

Tēnā koe

Tōpūtanga Tapuhi Kaitiaki o Aotearoa, New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on Worksafe draft cytotoxic drugs and related waste guidance document.

NZNO has consulted its members and staff in the preparation of this submission, in particular members of; Te Rūnanga o Aotearoa, and professional nursing and policy advisers. NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand, representing 53,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment matters. NZNO embraces te Tiriti o Waitangi and contributes to the improvements of the health status and outcomes of all people of Aotearoa New Zealand through influencing health, employment and social policy development.

We support the Cancer Nurses College, New Zealand Nurses Organisation submission. These nurse experts work in a range of settings including; oncology, haematology, paediatrics, surgery, community and rural health, research, education, management and health promotion and palliative care and raise valid concerns around the safe management of cytotoxic drug administration by nurses.

We wish to support their concerns with the risks of exposure to chemo administration for health staff who work outside the cancer ward, this includes; theatres, critical care, general ward, rheumatology and externally to the community nursing or rest homes. Examples of this include:

- other hospital staff such as cleaners exposed to chemo when cleaning toilets in areas where chemo has been administered;
- orderlies transporting drugs from pharmacy to clinical areas;
- medical staff administering in interventional radiology or theatre; and
- external nursing home/ rest home staff administering cytotoxic eye drops.

Further, we agree that staff involved with administering cytotoxic drugs must have received appropriate training and certified to the level of their competence with the administration of cytotoxic drugs, to ensure the safety of themselves and the patients.

To conclude, we recommend that an additional section on worker responsibilities is included in the document to guide and ensure that staff training is up to date, nationally consistent and

documented, including identifying risks, reporting spills, and wearing appropriate clothing. Please note our extensive previous submissions on this matter.

Nāku noa nā

A handwritten signature in black ink, appearing to read 'Leanne Manson'.

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