

13 December 2019

WorkSafe New Zealand
PO Box 165
WELLINGTON 6140

By email: GuidanceandEducationDevelopment@worksafe.govt.nz

Safe and healthy shiftwork: a guide for persons conducting a business or undertaking

Dear Sir/Madam

The New Zealand Medical Association (NZMA) wishes to provide feedback on the above consultation. The NZMA is New Zealand's largest medical organisation, with more than 5,000 members from all areas of medicine. The NZMA aims to provide leadership of the medical profession, and to promote professional unity and values, and the health of all New Zealanders.

The NZMA welcomes the development of this guide. We note that the NZNO has identified a number of concerns relating to the poor quality of the draft guide. The NZMA shares these concerns and supports the recommendations that the NZNO has made to improve the resource. We also direct WorkSafe to an article on shift work for junior doctors¹ that may be useful to draw on or include as an additional resource in the guide. Finally, and importantly, the acronym PCBU will be unfamiliar to many healthcare providers and we ask WorkSafe to ensure that it is defined in full ('persons conducting a business or undertaking') on the front cover and again at first mention in the body of the guide.

Yours sincerely



Dr Kate Baddock
NZMA Chair

¹ Horrocks N, Pounder R. Working the night shift: preparation, survival and recovery--a guide for junior doctors. Clin Med (Lond). 2006 Jan-Feb;6(1):61-7. Available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4954435/>