

Sunbeam Community & Developmental Services	
Manual: Community Living Manual	Number: CL-ic-078
Issued by: Chief Operating Officer Category: Infection Control	Issue Date: July 15, 2021 Date First Issued: September 13, 2021 Last Revision Date: July 15, 2021 Pages: 1 of 9
Policy Name: Covid19 Vaccination Policy	

PREAMBLE

COVID-19 vaccination makes it substantially less likely you will get COVID-19. Based on what is known about vaccines for other diseases and early data from clinical trials, experts believe that getting a COVID-19 vaccine also helps keep you from getting seriously ill even if you do get COVID-19. Getting vaccinated yourself may also protect people around you, particularly people at increased risk for severe illness from COVID-19.

*Excerpt from “Benefits of Getting a COVID-19 Vaccine”, Centres for Disease Control and Prevention, April 12, 2021:
<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/vaccine-benefits.html>*

GUIDING PRINCIPLE

COVID-19 vaccinations protect the health and safety of persons supported, employees, contracted service providers, volunteers, students and other stakeholders from acquiring COVID-19 and/or reduces the likelihood and severity of serious illness if a vaccinated individual is infected with COVID-19. Reducing the risk of COVID-19 infection in those who are vaccinated also ensures that the organization’s caregiving workforce does not become dangerously depleted. By encouraging employees to get vaccinated, the likelihood of infections and outbreaks is reduced — which allows for additional easing of restrictions within the organization and more opportunities for persons supported to enjoy activities that support their wellbeing and quality of life.

PURPOSE

The purpose of this policy is to minimize exposure to and transmission of infectious viral disease in the workplace by providing protection to employees, contracted serviced providers, volunteers and students, and thereby preventing exposure to the people we support and to each other. Vaccination for COVID-19 has been found to be both safe and effective in reducing the risk of infection and workplace related transmission, as well as reducing the severity of illness. This policy has been developed as a reasonable and necessary measure to prevent, respond to, and alleviate the outbreak of infectious viral disease and the associated risk to the people we support, many of whom are medically fragile / technologically dependent and / or cannot comply with social distancing and infectious disease transmission prevention protocols.

SCOPE

This policy applies to Sunbeam employees, contracted service providers, volunteers and students, while recognizing that persons supported and other stakeholders are referenced in this policy.

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POLICY

This policy is designed to be as minimally intrusive as possible and therefore the approach to vaccination varies depending on the degree of risk involving persons supported by Sunbeam, employees, contracted service providers, volunteers and students of Sunbeam, site and program specific risks, and assessed risk in local community.

In all cases, employees, volunteers and students who are unable to vaccinate due to a reason that is protected under the Ontario Human Rights Code will be accommodated where possible without undue hardship related to health and safety, cost, or other relevant considerations.

Employees, volunteers and students who choose not to be vaccinated and those that are accommodated as a result of a medical reason (**medical contraindication to receiving the COVID-19 vaccine**) or other protected grounds, or who are not **fully vaccinated**, will be required to comply with risk mitigation strategies reasonably necessary to prevent, respond to or alleviate the outbreak of viral infection in the workplace or amongst supported individuals, as outlined by Sunbeam Community & Developmental Services, Ministry of Children, Community and Social Services (MCCSS), local Public Health units, Public Health Ontario, the Ministry of Health (MOH) and other government and health authorities.

All **contracted service providers** must follow the organization's standard pandemic precautions and protocols when providing service.

- Contracted service providers who regularly have in-person interactions with persons served, or who regularly provide service in the presence of persons served must be fully vaccinated.
- Contracted service providers who may provide services in client program areas (group home sites, day program site, etc.) but when clients are not present are excluded from the vaccination requirement, however they are still required to follow the standard pandemic precautions and protocols of the organization.
- Sunbeam's contractual agreement with contracted service providers must state this policy requirement as a mandatory condition of service.

All **privately engaged third party caregivers** must follow the organization's standard pandemic precautions and protocols when providing caregiving services to any Sunbeam person served, whether at a Sunbeam site or elsewhere.

- Although privately engaged third party caregivers are not required to disclose their vaccinated status to Sunbeam, doing so will aide the organization in its site-specific risk assessment.

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Sunbeam encourages all persons served to be fully vaccinated and will work together with persons served and their families / substitute decision makers / advocates to help with informed decision making and to facilitate vaccinations as requested. In the event that a person served is not fully vaccinated, or their vaccinated status is unknown to Sunbeam, this will be a consideration in Sunbeam's site-specific risk assessment and may impact the level of site-specific precautions in effect.

Where the vaccine is readily available to the public, candidates for employment will be required to demonstrate current vaccination as a pre-condition for employment, except where exempt for bona fide medical or religious reasons.

RESPONSIBILITIES

Senior Leadership

- Ensure compliance with the program.
- Ensure ample PPE supplies for all employees., volunteers and students.
- Provide vaccine information and associated forms.
- Recommend revisions to this policy to enhance and improve vaccination rates within the system.
- Determine risk and appropriate alternative measures in accordance with up to date information from Public Health, the Chief Medical Officer of Health, Ministries of Health and Long-Term Care, the Ministry of Children, Community and Social Services, and other government and health authorities.

Human Resources

- Provide each employees, volunteers and students at least annually with a reminder of this policy.
- Provide new employees, volunteers and students with information about the Vaccination Policy during orientation.
- Collect and securely record the applicable employee vaccination information as outlined in this policy.
- Notify managers and supervisors regarding those employees, volunteers and students who are not in compliance with the requirements of this policy.

Manager/Supervisor

- Ensure all employees, volunteers and students under supervision comply with the Vaccination Policy.
- Ensure that all contracted service providers comply with the Vaccination Policy.
- Ensure that the Vaccination Policy is made available to persons supported and their families /substitute decision makers / advocates when the policy is implemented, revised and at least annually otherwise (through applicable information sharing protocols,

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including but not limited to the policy bulletin process and / or posting on Sunbeam's website.)

- Securely record the vaccinated status of persons served in the program/service area for which you are responsible; this will be recorded based on persons served (or their families / substitute decision makers / advocates) voluntarily providing such information. Where privately engaged third party caregivers may also voluntarily provide information about their personal vaccination status, Managers will also securely record and monitor this information in the program/service area for which you are responsible.
- Securely record and monitor the vaccinated status of contracted service providers in the program/service area for which you are responsible; this function may be centrally managed by the Administration and Support division. Any non-compliance with regard to contracted service providers is to be immediately reported to the Chief Administrative Officer.

Employees, Volunteers and Students

- Notify Human Resources with supporting documentation within 1 week of having received the identified vaccination, in whole or in part.
- Comply with alternative measures where vaccination is declined and/or where there is no evidence to support fully vaccinated status.
- Cooperate with any accommodation procedures where vaccination is declined for protected reasons.

Contracted Service Providers

- Comply with this policy and comply with the terms/conditions of their service agreement with Sunbeam.

PROCEDURE

1. Candidates for Employment (hire date on or after September 13, 2021)

Where vaccines are readily available to the public, Sunbeam Community & Developmental Services (Sunbeam) will require as a condition of hire any new employee (employed after the effective date of this policy) to provide proof of current COVID-19 vaccination (either fully vaccinated, or partially vaccinated with a confirmed appointment to achieve fully vaccinated status) for the following viruses or its variants (subject to human rights related accommodation where appropriate) as a term of the offer. For partially vaccinated candidates, the condition of hire will require evidence of fully vaccinated status within 3 months of hire date.

A conditionally hired employee will have one week from the date of offer to produce satisfactory proof of being fully or partially vaccinated, failing which the offer will be withdrawn and the employee will not be hired.

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No conditionally hired employee will be permitted to perform any work or take part in orientation until the condition has been satisfied.

Conditionally hired employees who disclose valid, supported medical or other reason that is protected under the Ontario Human Rights Code for not submitting proof of vaccination will be required to notify Human Resources with supporting documentation as appropriate. Sunbeam will consider whether the reason disclosed, and the associated proof requires accommodation and if accommodation is possible without undue hardship to the organization.

2. *Current Employees (hire date prior to September 13, 2021)*

Sunbeam strongly encourages all employees to be vaccinated for COVID-19 where such vaccines are reasonably available (either in the community or through Sunbeam’s onsite vaccination program).

To facilitate vaccination for employees, Sunbeam will provide where necessary and as determined by Sunbeam management:

- Vaccination will be coordinated in the workplace where feasible;
- Should an employee have a confirmed vaccination appointment that overlaps with a scheduled shift at Sunbeam, the employer will be flexible in working with the employee to ensure that they may attend their vaccination appointment.

3. *Volunteers and Students*

If volunteers and students are not fully vaccinated for COVID-19, once the vaccine is available to them, for reasons unrelated to a valid supported medical reason or other protected ground under the Human Rights Code, the volunteer or student will be assigned to tasks that restrict their interactions with supported individuals and staff if such tasks are available. If such tasks are unavailable, then volunteers and students who are not fully vaccinated will not be scheduled.

4. *Reporting and Record Keeping*

In order to prevent, respond to and alleviate the outbreak of virial disease in the workplace Sunbeam requires information about the vaccination status of the people we support and our employees, contracted service providers, volunteers and students.

All current Sunbeam employees, volunteers and students who have received the COVID-19 vaccination, in part or in whole, should notify Human Resources with supporting documentation within 1 week of having received vaccination.

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- In the absence of reported and supported evidence of vaccination status, the employee, volunteer or student will be assumed to be not fully vaccinated, and the corresponding policy / procedure requirements will apply.

Vaccination records will be maintained documenting vaccinations and waivers for Sunbeam employees, contracted service providers, volunteers and students in a secure manner and will only be collected, used or disclosed as may be necessary for legitimate operational purposes or as directed or requested by governmental authorities.

Sunbeam encourages persons supported and their families / substitute decision makers / advocates to disclose the vaccination status of the person supported to Sunbeam to better inform Sunbeam's site-specific risk assessment.

5. Accommodation

Employees who decline the vaccination for bona fide protected reasons (medical or other reason that is protected under the Ontario Human Rights Code) must submit a medical or other protected reason waiver as required.

Sunbeam will assess based on the information provided whether accommodation is required and/or possible without undue hardship. Where required by law, Sunbeam will provide accommodation to the point of undue hardship for employees who are unable to vaccinate for medical or other protected reasons. Such situations will be assessed on a case-by-case basis.

Where an employee declines the vaccination for supported valid medical or protected reasons, or otherwise, they may be subject to alternative precautionary measures, reasonable in the circumstances, designed to keep the employee, other staff, and the people we support safe. The measures implemented will depend on the following:

- The assessed degree of risk from the virus for which the employee has not been vaccinated within the organization and the community at-large; Sunbeam uses a number of metrics and information sources as a guide to its **community / site assessed risk level**, including but not limited to:
 - assessed level of risk at the employee's work site / location, including the vaccination status and medical condition(s) of the individuals who live at, receive service at, or work at the site / location;
 - other risk related factors at the site / location such as volume and frequency of visitors to the site, ability of persons served to comply with **IPAC** precautions and protocols;
 - the frequency and nature of face-to-face, in-person interactions between the unvaccinated employee and persons supported by the organization;
 - active virus infection and transmission rates in local areas based on current data from local public health units and other government and health authorities.

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For greater certainty, employees, contracted service providers, volunteers and students who are not fully vaccinated will be subject to protocols applicable to the community / site assessed risk level in which they work or reside, whichever is higher. Other considerations include:

- the effectiveness of alternative measures as a substitute for vaccination;
- the availability of suitable alternative work for which the employee is qualified;
- the degree of risk posed to other employees, contracted service providers, volunteers, students and people supported;
- the terms of the collective agreement or employment contract applicable to the employee;
- the cost of any alternative measures;
- evidence of the effectiveness of the vaccine;
- the recommendations or guidance from Public Health, the Chief Medical Officer of Health, Ministries of Health and Long-Term Care, the Ministry of Children, Community and Social Services, and other government and health authorities.
- any emergency orders, directives, regulations or legislation in place with respect to the virus in question, vaccination for the virus or other rights or obligations the organization may have with respect to the virus outbreak or pandemic; and
- any other factors that may impact the available alternatives to vaccination.

Alternatives to vaccination for employees may include one or a combination of the following:

- Enhanced PPE use;
- Reassignment: staff may not be permitted to work with Supported Individuals (either those at high risk of susceptibility to COVID-19 or all Supported Individuals);
- Temporary remote work, where feasible;
- Modifications to the work / service / support performed based on qualifications, availability, safety and relevance;
- Temporary, unpaid leave of absence (during this time, unvaccinated staff may be permitted to use any unused vacation or comp time – at the discretion of management).

In summary, at least annually, each employee, volunteer and student must do one of the following:

- i. Provide Sunbeam with proof of vaccination of each dose;
- ii. Provide Sunbeam with documentation which supports protected reason(s) (medical or other reason that is protected under the Ontario Human Rights Code) for not being vaccinated; or
- iii. Participate in an employer-offered educational program about the benefits of vaccination and the risks of not being vaccinated.

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Sunbeam will track and report on the implementation of its COVID-19 vaccination policy, including overall staff immunization rates based on its recordkeeping related to points i., ii, and iii. above. The immunization status of individual staff members is considered part of the employee's employment record and held to the required standard of security and confidentiality and only used operational requirements of the organization. Immunization status is considered personal health information and is held to the appropriate standard of use, security, confidentiality and disclosure as such.

6. COMMUNICATION

This policy will be shared with all employees, volunteers and students during orientation.

7. REVIEW / EVALUATION

This policy will be reviewed / evaluated at least annually by the organization.

DEFINITIONS

- **Community / site assessed risk level** - as described within this policy document, as determined by the organization, on a continuum ranging from Low risk to High risk, visualized as follows:

RISK CONTINUUM	Low - - - - - High			
Sunbeam's Local / Site Specific COVID-19 Risk Assessment	LOWER RISK		HIGHER RISK	
MCCSS COVID-19 Precaution Level	Normal	Additional	Enhanced	Comprehensive / Outbreak

- **Contracted service providers** – service providers engaged by Sunbeam, but not employees of Sunbeam (examples: employees of external staffing / resource agencies, employees of lab services; employees of oxygen providers; employees / contractors of various trades companies; etc).
- **Employees of the organization** – all employees of Sunbeam Community & Developmental Services, including employees of the Sunbeam Developmental Resource Centre (SDRC) and Developmental Services Ontario (DSO) Central West Region.
- **Fully Vaccinated individual** - An individual ≥ 14 days after receiving their second dose of a two-dose COVID19 vaccine series or their first dose of a one-dose COVID-19 vaccine series.
- **IPAC** – Infection Prevention and Control
- **Medical contraindication to receiving the COVID-19 vaccine** – the only medical contraindications to receiving COVID-19 vaccination which will be accepted and

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recognized by Sunbeam as valid will be those specified by the Ontario government and / or by the vaccine information sheets provided by the COVID-19 vaccine manufacturers.

- **Partially Vaccinated individual** – An individual who has had at least one dose of COVID19 vaccine but does not yet meet the definition of “Fully Vaccinated”
- **Privately engaged third party caregivers** – individuals having no legal relationship with Sunbeam; most often these are third party caregivers who have been engaged by persons served or their families to provide one-on-one care and support to the person served. The third-party caregiver may provide such services at a Sunbeam location, or elsewhere.
- **Students** – individuals doing their student placements or practicums at the organization.
- **Unvaccinated individual** – An individual who is neither Fully Vaccinated nor Partially Vaccinated, or who has allowed their vaccinated status to lapse.
- **Volunteers** – volunteers are volunteers of the organization.
- **Week** – for the purpose of this policy, a week is defined as Sunday to Saturday inclusive.