

## Vaccination Policy

### PURPOSE

**[The Employer]** has an obligation to take all necessary precautions to protect the health and safety of its workforce, and recognizes the importance of immunization to reducing the risk of serious infection and transmission of infection among employees and those it supports. To that end, we will strive to do everything we reasonably can to fight COVID-19.

**[The Employer]** has a duty and commitment to protect the health and safety of its employees and those it supports. **[The Employer]** expects all employees to receive the COVID-19 vaccine, subject to the duty to accommodate under the Ontario *Human Rights Code*.

There are several reasons why a comprehensive vaccination policy is required. First, as a **[description of organization]** organization serving some of the most medically vulnerable people in our region, **[the Employer]** has an obligation to provide the safest level of care. Second, the prevalence of the Delta variant, of concern globally and within Ontario, has increased transmissibility and disease severity as compared to previous COVID-19 virus strains. Third, we are required to meet the obligations within the instructions issued by the Office of the Chief Medical Officer of Health on August 30, 2021 and the Memorandum and Guidelines issued by MCCSS issued on August 31, 2021.

This Vaccination Policy provides a framework for those entering **[the Employer's]** workplaces regarding COVID-19 vaccination status.

### APPLICATION

This policy applies to all **[Employer]** employees, volunteers, students, contractors and service providers.

### EFFECTIVE DATE

This Policy is to take effect immediately.

### POLICY REQUIREMENTS

#### A. NEW HIRES

1. All new hires will be required to be fully vaccinated as a condition of employment, subject to the duty to accommodate under the Ontario *Human Rights Code*.

#### B. EMPLOYEES

2. Current employees must provide proof of one of the following:
  - (a) Proof of full vaccination against COVID-19<sup>1</sup>; or

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<sup>1</sup> "full vaccination" means having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by Health Canada (e.g., two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series); and having received the final dose of the COVID-19 vaccine at least 14 days ago.

- (b) A medical reason, provided by a physician or registered nurse in the extended class that sets out: (i) a documented medical reason for not being fully vaccinated against COVID-19, and (ii) the effective time-period for the medical reason; or
  - (c) Participation in an employer-offered educational program about the benefits of vaccination, followed by a written statement that the employee, after attending the educational session, has declined vaccination for a reason other than a medical reason.
3. By **[DATE]**, all current employees are required to report their COVID-19 vaccination status to **[the Employer]** by **[INSERT PROCESS FOR REPORTING]**

**Example: All current employees are required to report their COVID-19 vaccination status to [the Employer] by completing the mandatory certification of vaccination status form and, if confirming vaccination dose(s), by sending copies of your Ministry of Health COVID-19 vaccine Dose Administration Receipts to Human Resources.**

Employees will be required to update their vaccination status in accordance with the established process and by the dates set out in this policy, as they obtain each dose of COVID-19 vaccine.

Personal documentation on vaccination status can be retrieved by from the Ministry of Health by visiting <https://covid19.ontariohealth.ca>.

When an enhanced COVID-19 vaccine certificate system is implemented by the Ontario government, any subsequent documentation will be in accordance with that system. Employees who have previously provided vaccine dose receipts, may be required to provide proof pursuant to the enhanced COVID-19 vaccine certificate system.

Information about personal vaccination status will be kept confidential to Human Resources (and in limited need to know circumstances to key managers) and will not be disclosed except as required for the purposes of implementing and enforcing this Policy, staffing, meeting Public Health requirements, and complying with partner directives.

4. Except for employees with a valid and approved medical exemption as described in paragraph 2(b) above, employees who will not be fully vaccinated by September 23, 2021, will be required to complete an educational program approved by **[the Employer]**, by September 23, 2021, which will be consistent with the Ministry of Health recommendations. Attestation to the completion is required.

Time spent completing this education program will be **[insert depending on contract/collective agreement: paid / unpaid]**.

5. Effective, September 23, 2021, employees who are unvaccinated for any reason will be required to participate in regular rapid antigen testing for COVID-19 and provide a digital image of a negative test result **[INSERT FREQUENCY]**

**EXAMPLE: every Monday and Thursday morning before 8:30 a.m. regardless of the days of the week that the employee is on site that week.**

**EXAMPLE: up to 48 hours prior to the start of each shift.**

Proof of the negative result shall be sent to a secure source that will be established for this purpose. **[The Employer]** reserves the right to audit the rapid antigen test results from time to time.

Until further notice, **[the Employer]** will provide the rapid antigen tests to employees required to test. The rapid antigen tests are for routine asymptomatic screening of members of employees. They are not to be given, sold or administered to others, or be used for symptomatic testing.

Those who receive a positive rapid antigen screening result must not report to work and must immediately inform Human Resources of the result. The employee is required to immediately self-isolate, book a nasopharyngeal swab (PCR) test at one of the local community testing sites and call Human Resources to report the results upon receipt and to allow Human Resources to begin the contact tracing process as needed. Employees will thereafter follow the direction of Human Resources in terms of next steps depending on the results of the PCR test.

Employee test results will be kept confidential to Human Resources (and in limited need to know circumstances to key managers) and will not be disclosed except as required for the purposes of implementing and enforcing this Policy, staffing, meeting Public Health requirements, and complying with partner directives.

### **C. VOLUNTEERS AND STUDENTS**

6. Volunteers and students are required to be fully vaccinated for COVID-19. If volunteers and students are not fully vaccinated for COVID-19, then volunteers and students who are not fully vaccinated will not be scheduled.
7. All volunteers and students are required to report their COVID-19 vaccination status to **[the Employer]** by **[INSERT PROCESS FOR REPORTING]**.

**Example: by completing the mandatory certification of vaccination status form and, if confirming vaccination dose(s), by sending copies of your Ministry of Health COVID-19 vaccine Dose Administration Receipts by [INSERT DATE] to Human Resources.**

8. **Optional (the alternative is to be silent on this topic for volunteers and unpaid students): A medical or educational exemption may be sought; however, testing will need to be arranged and discussed prior to the individual attending at [the Employer's] workplaces.**

### **D. CONTRACTORS AND SERVICE PROVIDERS**

9. Prior to September 23, 2021 **[the Employer]** will contact all contractors and service providers that send individuals to **[the Employer's]** workplaces. **[The Employer]** will advise the contractors and service providers of the COVID-19 Vaccination Policy.
10. Contractors and service providers who access **[the Employer's]** facilities are required to be fully vaccinated for COVID-19.

11. Contractors and service providers operating at **[the Employer's]** workplaces must report their vaccination status to their direct employer or as determined by their Employer. The contractor or service provider will complete an attestation form confirming that the individuals they send are fully vaccinated. **[The Employer]** reserves the right to audit by requesting the direct employer for proof of vaccination status for contracted employees and service providers.
12. All new contractors or service providers will be referred to this policy and the requirement to complete this attestation.
13. **Optional (the alternative is to be silent on this topic for contractors/service providers): A medical or educational session exemption may be sought; however, testing will need to be arranged and discussed prior to the individual attending at [the Employer's] workplaces.**

#### **E. ACCOMMODATION**

14. **[The Employer]** acknowledges its obligations under the Ontario *Human Rights Code* and will comply with its duty to accommodate in appropriate cases.
15. Current employees and candidates for employment who are not vaccinated due to a medical reason are to provide written proof from a physician or registered nurse in the extended class supporting the medical exemption. Current employees and candidates for employment who are not vaccinated due to another protected ground as set out in the Ontario *Human Rights Code* should advise Human Resources, and the employee and **[the Employer]** will follow the requirements of the Ontario *Human Rights Code* with respect to the accommodation process. Employees are expected to cooperate in this process and provide necessary documentation.

#### **F. STATISTICAL DATA COLLECTION**

16. **[The Employer]** will collect, maintain, and disclose to the MCCSS and the Ministry of Health as required, in aggregate form and in a manner set out by the Ministries, statistical information related to this policy.

#### **G. STAGE 2**

17. As of **[DATE]**, **[the Employer]** will review key metrics (e.g. staff vaccination rates, community transmission, outbreak status, IPAC compliance, and other risk factors) to assess the effectiveness of this policy and determine if further steps are required.

Failure by employees to adhere to the requirements of this Policy may result in discipline up to and including termination.

Regardless of vaccination status, all individuals attending at **[the Employer's] workplaces** will continue to be required to follow public health protocols relating to being masked and keeping physically distanced, as set out in **[The Employer]'s** existing policy.

This Policy and these measures will remain in place until further notice and are subject to change in accordance with Public Health guidelines and directives.

Any concerns or questions related to this Policy should be directed to Human Resources.

## **References**

John Hopkins Medicine.

<https://www.hopkinsmedicine.org/health/conditions-and-diseases/coronavirus>

Ministry of Health. June 2021

[https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/vaccine/COVID-19\\_vaccine\\_info\\_sheet.pdf](https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/vaccine/COVID-19_vaccine_info_sheet.pdf)

National Advisory Committee. June 2021.

<https://www.canada.ca/content/dam/phac-aspc/documents/services/immunization/national-advisory-committee-on-immunization-naci/recommendations-use-covid-19-vaccines/recommendations-use-covid-19-vaccines-en.pdf>

Public Health Ontario

<https://www.publichealthontario.ca/en/about/blog/2021/covid-19-transmission>

Ontario Health

[https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/contact\\_mngmt/COVID-19\\_fully\\_vaccinated\\_interim\\_guidance.pdf](https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/contact_mngmt/COVID-19_fully_vaccinated_interim_guidance.pdf)