



HUMAN RESOURCES POLICIES & PROCEDURES

COVID-19 VACCINATION

EFFECTIVE DATE:	September 2021
REVISION/REVIEW	
DATE APPROVED BY BOARD OF DIRECTORS:	September 2021
Signed:	

SCOPE:

All employees, students, volunteers, and contractors who provide services in an Educational and Community Partnership program.

RATIONALE:

To continue to protect the health and safety of CLOC and its stakeholders from the spread of COVID-19.

POLICY STATEMENT:

It is important to protect the health and well-being of CLOC’s stakeholders where there is evidence of a risk with identified measures for management.

MCCSS has directed CLOC to develop, implement and ensure compliance with a COVID-19 vaccination policy.

To facilitate this policy, CLOC is requiring that all personnel provide proof of one of the following:

1. full vaccination against COVID-19; or
2. written endorsement of a medical exemption, provided by a physician or registered nurse in the extended class that sets out:
 - i. a documented medical exemption for not being fully vaccinated against COVID-19, and
 - ii. the effective time period for the medical exemption; or
3. completion of an educational session approved by CLOC about the benefits of COVID-19 vaccination prior to declining vaccination for any reason other than a medical exemption.

All personnel who fail to submit proof of vaccination or medical exemption, are considered unvaccinated and are required to undergo regular Rapid Antigen Testing (RAT).



Reference:

Infectious Diseases Policy

Harassment Policy

Privacy Policy

Confidentiality Policy

Code of Conduct

Personnel COVID-19 Vaccination Declaration Form

CLOC's Visitor Guidelines (most current version)

Ontario Human Rights Code

Canadian Charter of Rights and Freedoms

Ontario Regulation 67/93 Health Care

- Public Health Agency of Canada, "COVID-19 signs, symptoms and severity of disease: A clinician guide" (18 September 2020): <https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/guidance-documents/signs-symptoms-severity.html>.
- National Advisory Committee on Immunization, "Recommendations on the use of COVID-19 vaccines" (12 January 2021): <https://www.canada.ca/en/public-health/services/immunization/national-advisory-committee-on-immunization-naci/recommendations-use-covid-19-vaccines.html>. ("NACI Recommendations")



COVID-19 Vaccination – PROCEDURE

PREAMBLE

Public health measures are intended to protect people receiving services and employees from COVID-19 transmission, while supporting individuals' dignity, mental health and well-being by enabling them to engage in the community and maintain key relationships.

Vaccination against COVID-19 helps reduce risk of severe outcomes including hospitalizations and death due to COVID-19 in residential locations, for people receiving services, employees and visitors.

People who are not eligible, or cannot be vaccinated due to medical conditions, need to be protected. Achieving high immunization rates with service providers who regularly provide essential, close contact and direct therapies and interventions to vulnerable populations will support achieving this protection.

EXPECTATION AND PROOF OF VACCINATION

CLOC expects all personnel who provide services in an Educational and Community Partnership program to be fully vaccinated against COVID-19 as per Ministry of Health standards. This is necessary given the extreme risk associated with COVID-19 and is designed to keep all employees and the people we support safe and healthy.

- During the recruitment process, prospective employees are informed that applicants are required to show proof of vaccination against COVID-19 as a condition for hire/placement. In the case of vaccination obtained outside of Ontario, satisfactory documentation should include the date, location, type of vaccine and name of authorized administrator/agency.
- Existing personnel must submit a copy of their Ministry of Health vaccination record to Human Resources including the dates of vaccinations against COVID-19. In the case of vaccination obtained outside of Ontario, equivalent satisfactory documentation should include the date, location, type of vaccine administered and name of authorized administrator/agency.
- Personnel are considered fully immunized (i.e., fully vaccinated) against COVID-19 if they: have received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines (e.g., two doses of a two-dose vaccine series, or dose of a single-dose vaccine series) and at least 14 days have passed since they have received their final dose of the COVID-19 vaccine.
- Any costs associated with proof of immunization are the responsibility of personnel.

All personnel must complete the **Personnel COVID-19 Vaccination Declaration Form** and return to Human Resources within one week of receiving the form.



Failure to complete the **Personnel COVID-19 Vaccination Declaration Form** results in the person being considered “unvaccinated” and may be subject to enhanced screening and additional precautionary measures including, but not limited to:

- wearing enhanced PPE (facial protection) at all times;
- having Rapid Antigen Testing and show proof of a negative COVID-19 test result at a minimum one time per week dependent on shift/visitation schedule;
- working with one employer within the Developmental Services Sector for the duration of the Pandemic as defined by the Emergency Order under Ontario Regulation 146/20.

REPORTING AND RECORD KEEPING OF VACCINATIONS

All records about COVID-19 vaccinations and accommodations for CLOC personnel (existing and prospective) are only collected, used, or disclosed as may be necessary for legitimate operational purposes or as directed or requested by governmental authorities. All records are kept in a secure manner consistent with CLOC’s Privacy policies and practices.

VACCINATION OPPORTUNITIES AND REIMBURSEMENT

1. CLOC personnel are expected to work collaboratively with their supervisor/manager to schedule appropriate time to receive vaccination(s).
2. All staff can use available sick leave credits for reasons related to COVID-19 as follows:
 - 2.1 On April 29, 2021, the government amended the Employment Standards Act (ESA) that provides employees who do not have sick time, with access of up to 3 days of paid sick leave for reasons related to COVID-19. Employees can use this benefit for COVID related purposes including attending a vaccine appointment.
 - 2.2 CLOC full time employees are to use sick days from their sick bank accrual.

ACCEPTED VACCINATION

CLOC accepts the COVID-19 vaccines approved by [Health Canada](#) and/ and the [World Health Organization](#) (WHO).

In the case of vaccination obtained outside of Ontario, equivalent satisfactory documentation should include the date, location, type of vaccine administered and name of authorized administrator/agency.



ACCOMMODATIONS

CLOC upholds the Canadian Charter of Rights and Freedoms and the Ontario Human Rights Code and provides accommodations on human rights grounds such as substantiated medical and religious exceptions. Rapid Antigen Testing is required as part of the accommodation (see below). Unvaccinated personnel requiring accommodation must:

- provide written endorsement of a medical exemption, provided by a physician or registered nurse in the extended class that sets out:
 - i. a documented medical exemption for not being fully vaccinated against COVID-19, and
 - ii. the effective time period for the medical reason;
- provide written endorsement of a religious exemption, provided by religious or spiritual leader that sets out:
 - iii. a documented religious exemption on the grounds of the religious belief(s), practice(s) or observance(s) held by the personnel that precluded the individual from being vaccinated against COVID-19 .

All requests for accommodation are submitted to Human Resources. Personnel declining to be vaccinated for ethical reasons or due to a disbelief in vaccinations are not protected under the human rights legislation. [Ontario Human Rights Commission Policy Statement on COVID-19 Vaccination.](#)

Due to the seriousness of COVID-19 and its impact on the health and safety of CLOC's work environments, and the people we support, accommodations may not be possible in all circumstances.

ENHANCED PRECAUTIONS AND RAPID ANTIGEN TESTING

All personnel who fail to submit proof of vaccination or medical/religious exemption, are considered unvaccinated and are obligated to arrange for (pay for, if applicable) and provide results of a negative COVID-19 antigen test no more than seven days prior to working a shift, in alignment with provincial guidance, and provide verification of negative test results as specified by CLOC. This requirement is to be more frequent should an outbreak in the workplace occur or upon advisement from Public Health, Chief Medical Officer or MCCSS.

Risk Assessment

Where an existing personnel declines the COVID-19 vaccination, CLOC performs a risk assessment to determine whether alternative precautionary measures are required to address the risk of working while unvaccinated since all other precautionary measures have proven ineffective to eliminate the risk of outbreak in congregate care settings. Considerations include, but are not limited to: recommendations by Public Health, service agreements or contractual obligations with partnering entities, the type of work performed (whether it is direct support, work in a congregate care setting,



individualized support, or administration/office work), whether there is an outbreak in the workplace, and the present community risk level (the zone that applies in the region and whether the area has a high rate of infection).

Alternative Measures

Based on the Risk Assessment associated with an unvaccinated personnel, there may be other reasonable measures implemented, which may include:

- Enhanced PPE;
- Re-assignment/transfer to lower risk locations;
- Re-assignment: the Employees may not be permitted to work with people receiving services (either those at high risk of susceptibility to COVID-19 or all Supported Individuals);
- Temporary remote work;
- Modifications to the work/service/support performed;
- Continuing restrictions on secondary employment;
- Temporary, unpaid leave of absence.

EDUCATIONAL PROGRAM

All personnel who are not confirmed to have been vaccinated are required to complete a COVID-19 educational program that is delivered and/or approved by CLOC. *The program must address all of the following learning components:*

- How COVID-19 vaccines work;
- Vaccine safety related to the development of the COVID-19 vaccines;
- Benefits of vaccination against COVID-19;
- Risks of not being vaccinated against COVID-19; and
- Possible side effects of COVID-19 vaccination.

CONTRACTORS

Instructions issued by the Office of the Chief Medical Officer of Health include contractors as a required individual under the vaccination policy. A required Individual is a **contractor** or person who provide services in an Education and Community Partnership program of CLOC. In such circumstances, these contractors are subject to this vaccination policy and procedure.

CLOC uses other facilities contractors that fall outside of this scope. These contractors are screened by CLOC and if screening is passed , are allowed entry to complete their contract. Contractors are expected to ensure the appropriate PPE is utilized and social distancing is maintained. CLOC makes every effort to maintain a list of vaccinated contractors to draw from as needed.

Signed: Terri Gray, Executive Director	Date: September 2021
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APPENDIX

PERSONNEL COVID-19 VACCINATION DECLARATION FORM

All personnel who provide direct support or work in an environment where individuals are supported are expected to be immunized against infectious diseases of public significance including COVID-19.

This ***Personnel COVID-19 Vaccination Declaration Form*** must be completed and submitted within one week of receiving it and is to be returned to Human Resources along with substantiated medical evidence of vaccination/documentation.

In the case of a bona-fide accommodation request, the personnel must provide written endorsement of a medical or religious exemption as specified and submit along with this form to Human Resources. This information is needed to determine whether it is possible, in the circumstances, to provide an accommodation. Depending on the information provided additional supporting evidence may be requested. Examples of who may provide attestation includes Primary healthcare provider, clergy or religious leader.

Failure to complete this Form will result in the staff being considered “unvaccinated” in accordance with CLOC’s COVID-19 Vaccination Policy.

Based on the Risk Assessment associated with an unvaccinated Employee, alternatives to the vaccination that are reasonable in the circumstances will be implemented. Alternative measures may include one or a combination of the following:

- Enhanced PPE;
- Re-assignment/transfer to lower risk locations;
- Reassignment: the Employees may not be permitted to work with people receiving services (either those at high risk of susceptibility to COVID-19 or all Supported Individuals);
- Temporary remote work;
- Modifications to the work/service/support performed;
- Continuing restrictions on secondary employment;
- Temporary, unpaid leave of absence (during this time, unvaccinated employees may be permitted to use any unused vacation, lieu time or personal leave days).

All staff who choose not to be vaccinated for personal reasons must complete an educational package that includes information about the benefits of vaccination and the risks of not being vaccinated.

- For clarification regarding this policy and your concerns please contact Human Resources.

This is effective as of September 23, 2021



VACCINATION STATUS

Name of Staff: _____

- I have already received the COVID-19 vaccination(s) and have previously supplied medical evidence of vaccination to Human Resources.
- I have received COVID-19 vaccination(s) and will supply medical evidence within one week.
- I will become fully vaccinated and will supply medical evidence as soon as reasonably possible after each vaccination. I understand that I am considered unvaccinated until such time as I provide medical evidence.
- I hereby decline COVID-19 vaccination for medical or religious reasons and hereby seek accommodation and will provide information substantiating the reasons for declining vaccination from my medical, religious or other relevant practitioner.
- I hereby decline COVID-19 vaccination for personal reasons and accept the risk of exposure to and infection with COVID-19 that continues to exist based on the nature of my work and despite the health and safety measures adopted by CLOC. As a result I am obligated to undergo RAT testing, vaccination training and may be subjected to other precautions as outlined in the policy.

I confirm that I have read the Vaccination Policy and had the opportunity to seek clarification regarding this policy prior to completing this form.

Signature _____

Date Signed _____