

CAUSEWAY

Policy #81 COVID19 IMMUNIZATION POLICY

Effective Date: September 22nd, 2021

Next Review Date: December 15th 2021

1. POLICY STATEMENT

Causeway Work Centre (“the Employer”) is committed to the health and safety of its employees and all those accessing our services. This COVID-19 Vaccination Policy (this “Policy”) has been developed and implemented in accordance with provincial legislation and government directives.

The objective of this Policy is to reduce the transmission of COVID-19 to protect the health and safety of all employees, clients working in our social enterprises, Solutions for Youth participants, and students. To that end, and in accordance with provincial directives, the Employer requires that all employees, staff, and students be fully vaccinated against COVID-19, except as set out below.

This Policy will be interpreted and applied in a manner consistent with the Ontario *Employment Standards Act, 2000* (the “ESA”), Ontario *Human Rights Code* (the “OHRC”) and the Ontario *Occupational Health and Safety Act* (the “OHS”).

2. PREAMBLE

COVID-19 is defined as the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2). As COVID-19 has spread, mutations have occurred in the virus’s genetic code, resulting in several new variants of COVID-19. In this Policy, COVID-19 refers to both the initial COVID-19 virus and all of its mutations/variants.

COVID-19’s incubation period is usually five to seven days but can range from one to fourteen days. Individuals may spread COVID-19 within fourteen days of contracting the virus and may develop symptoms any time within those fourteen days. Although some people may not develop symptoms (i.e., are asymptomatic), they may still spread the virus. Common symptoms of COVID-19 include the sudden onset of a high fever, chills, sore throat, fatigue, and a dry cough. These symptoms may be accompanied by other symptoms such as body aches, loss of taste and smell, and diarrhea. More serious symptoms include difficulty breathing or shortness of breath, chest pain, and loss of speech or movement. In some cases, COVID-19 can be fatal.

The COVID-19 vaccine is one of the most effective ways to prevent transmission of and infection by COVID-19. Canadian public health authorities have stated that vaccines are safe, have few side effects, and have a high rate of effectiveness. For more information on COVID-19 vaccines, please see the [Government of Canada’s website](#).

3. DEFINITIONS

Fully vaccinated means having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by Health Canada and recommended by the applicable local public health unit, including any booster shots recommended, approved, and/or required from time to time (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 fourteen days ago.

Employee means, for the purposes of this Policy only, all employees, clients working in our social enterprises, Solutions for Youth participants, students and volunteers

Outbreak: Occurrence of a disease in excess of expected, as determined by the institution or the Medical Officer of Health or Associate Medical Officer of Health.

Direct face-to-face support/contact: A service provided to a person accessing Causeway where an employee is required to be in a common space with the person that they are supporting

4. SCOPE

This Policy applies to all employees (including those working in our social enterprises) of the Employer, whether unionized or not, and regardless of their role. It also applies to students, volunteers, and Solution for Youth participants.

5. POLICY

In accordance with the *Occupational Health and Safety Act* (the “OHSA”), the Employer will take all reasonable precautions to protect its employees from the transmission of COVID-19. In accordance with provincial legislation and government directives, the Employer has implemented this Policy, as set out below.

i. Proof Of Vaccination

- a) On or before November 1, 2021, all employees of the Employer must provide:
 1. proof of COVID-19 vaccine administration as per the following requirements:
 - a. if the employee has received the first dose of a two-dose vaccine series approved by Health Canada, proof that the first dose was administered and, as soon as reasonably possible, proof of the administration of the second dose; or
 - b. proof of all required doses of a COVID-19 vaccine approved by Health Canada (i.e. proof that the employee is fully vaccinated); or
 2. written proof of a medical reason, provided by a physician or registered nurse practitioner that sets out:
 - a. a documented medical reason that the employee cannot be vaccinated against COVID-19; and
 - b. the effective time-period for the medical reason (i.e. permanent or time-limited).
- a) Proof that an employee is fully vaccinated must be provided to the Assistant Administrator in the form of the electronic or paper receipt provided to the employee at the time of vaccination. An employee who has not provided proof satisfactory to the Employer that they are fully vaccinated is considered to be “not fully vaccinated” for the purposes of this Policy. The electronic or paper receipt for vaccination will be kept separately from the employee’s personnel file. **Proof of full-vaccination as defined by this policy is required no later than December 15th, 2021**
- b) All employees will be required to:

1. Submit the COVID-19 Immunization Decision Form annually and as requested. For example, at the time of onboarding.
2. Provide documentation of COVID-19 immunization, a valid medical exemption, or a signed COVID-19 Immunization Decision Form indicating why they are not immunized.

ii. Accommodation

- a) The Employer will assess any request for accommodation related to this Policy in accordance with its obligations pursuant to the *OHRC*. The Employer reserves the right to request such information as it deems necessary for such purposes. Accommodation requests will be assessed on a case-by-case basis.
- b) Employees requesting accommodation in relation to this Policy must:
 1. Disclose to their manager and the Assistant Administrator their need for accommodation;
 2. Provide the required supporting information/documentation to substantiate the reason(s) that they are unable to receive a COVID-19 vaccine; and
 3. Cooperate and participate in the Employer's efforts to accommodate, including by accepting reasonable accommodation.
- c) Any information or documentation provided in the course of the accommodation process be held in the strictest confidence, to be shared only on a "need to know" basis to facilitate the accommodation process.

iii. Privacy and Confidentiality

- a) The Employer shall ensure that all information collected pursuant to this Policy is used only for the purposes of this Policy, shared on a need-to-know basis only, stored securely, and securely deleted when no longer required.

The Employer may be required, pursuant to directives of the Province and/or upon request, to report aggregate statistical information to the Office of the Chief Medical Officer of Health ("OCMOH") or the Ministry of Health. The vaccination status of employees may be used by their employer to mitigate the health-related risks of COVID-19. To help protect workers, their families and the community, knowing the status of vaccination for employees will be important to help take appropriate action quickly, in the event of COVID-19 transmission in the workplace. This can include sharing the information with Ottawa Public Health

iv. Protective Measures

- a) Employees must at all times continue to adhere to the infection prevention and control measures put in place in response to the COVID-19 pandemic, which include, but are not limited to, the following:

1. Enhanced hand hygiene, including washing one's hands with soap and water for at least 20 seconds (or using alcohol-based hand sanitizer if soap and water are not available) often throughout the day while at work;
2. Wear a facemask, in all situations, including in any open spaces (ex: Resource Centre, Reception Area, Hallways). The only situation in which you are not required to wear a facemask is when you are in an enclosed space by yourself.
3. Maintaining a distance of at least two metres from others while at work, even when a face mask is worn;
4. Avoiding touching one's eyes, nose or mouth while at work, unless one has just washed one's hands;
5. Wearing a face mask in any area where one might encounter another individual while at work (unless they are unable to do so for a medical reason or other reason protected by the *OHRC*, in which case accommodation must be requested in accordance with this Policy);
6. Completing a COVID-19 self-screening daily prior to commencing work and signing in and out of the building using the sign-in form located at the back entrance
7. Self-monitoring, and reporting exposures to, symptoms of, or a positive test result for COVID-19 to one's supervisor; and
8. Following all relevant public health guidance relating to quarantining/self-isolation and staying home when sick.

Please refer to Causeway's COVID-19 Safety Plan for complete protective measures.

6. MONITORING CONTRAVENTIONS

- a) Employees who fail to comply with this Policy for reasons unrelated to a protected ground under the *OHRC* may be subject to administrative and/or disciplinary measures, as determined by the Employer:
 1. Mandatory Completion of a Covid-19 Vaccine Education Program, with a signed declaration stating that the content has been reviewed and understood.
 2. Relocation or modification of work based on ability to complete job duties
 3. Mandatory rapid COVID-19 testing 2 times per week, prior to entry into the workplace
 4. Requirement to use vacation or unpaid leave until safe to return to work
 5. Infectious Disease Emergency Leave
 6. Claim of Frustration
 7. Discipline and up to dismissal
- b) In the event of a COVID-19 outbreak, unvaccinated and partially vaccinated employees (who have only received one dose of a two-dose COVID-19 vaccine series and less than 14 days since their second dose) will not be permitted to work in the outbreak area. Employees without vaccination records are assumed to be unvaccinated.
- c) Consequences for contraventions of this policy for employees will follow normal disciplinary procedures outlined by Causeway Work Centre and consistent with Collective Agreement where applicable.

INCUMBENT EMPLOYEES AND APPLICANTS

New and incumbent employees are required to submit the **COVID-19 Immunization Decision Form and vaccine receipt (proof of immunization)** to the satisfaction of the employer.

All new employees are required to meet the COVID-19 immunization requirement prior to their start date.

All students and volunteers are required to meet the immunization requirements specified in this Policy prior to the start of their assignment. Volunteers who cannot meet the Covid19 Immunization requirements may be assigned to a low-risk/low-contact volunteer assignment.

SPECIAL EVENT ATTENDEES AND DONORS

The Employer will follow Ontario Public Health and Ottawa Public Health guidelines for all outdoor and indoor gatherings to ensure the safety of donors and event attendees.

7. REVIEW AND MODIFICATION OF POLICY

- a) The Employer will review this Policy on a regular basis and reserves the right to modify its contents at any time, based on current available public health information and recommendations, any further legislative amendments, and operational requirements.

References

- Public Health Agency of Canada. Canadian Immunization Guide, Evergreen Edition - <http://www.phac-aspc.gc.ca/publicat/cig-gci/index-eng.php>
- Publicly Funded Immunization Schedules for Ontario-December 2016
http://www.health.gov.on.ca/en/pro/programs/immunization/docs/immunization_schedule.pdf

Legislative & Administrative Authorities

- Occupational Health and Safety Act, R.S.O. 1990, c. O.1
- Personal Health Information Protection Act, 2004, S.O. 2004, c. 3, Sched.
- The Health Protection and Promotion Act

RESOURCES

i. COVID-19

- Government of Canada – <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19.html>
- Public Health Ontario – <https://www.publichealthontario.ca/en/diseases-and-conditions/infectious-diseases/respiratory-diseases/novel-coronavirus>
- World Health Organization – https://www.who.int/health-topics/coronavirus#tab=tab_1

- Centers for Disease Control and Prevention – <https://www.cdc.gov/coronavirus/2019-ncov/your-health/about-covid-19.html>
- Government of Ontario -https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/directives/vaccination_policy_in_health_settings.pdf

ii. Immunization

- Government of Canada’s *Canadian Immunization Guide* – <https://www.canada.ca/en/public-health/services/canadian-immunization-guide.html>
- Government of Canada’s *National Advisory Committee on Immunization (Statements & Publications)* – <https://www.canada.ca/en/public-health/services/immunization/national-advisory-committee-on-immunization-naci.html>
- Government of Canada’s *Vaccine Safety in Canada* – <https://www.canada.ca/content/dam/phac-aspc/documents/services/publications/healthy-living/immunization-vaccine/vaccine-safety-poster-eng.pdf>
- Government of Canada’s *Approved COVID-19 Vaccines* – <https://www.canada.ca/en/health-canada/services/drugs-health-products/covid19-industry/drugs-vaccines-treatments/vaccines.html>
- Ottawa Public Health’s *COVID-19 Vaccination in Ottawa* – <https://www.ottawapublichealth.ca/en/public-health-topics/covid-19-vaccine.aspx>