

OPERATIONAL POLICY

Created: November 17, 2021

Revised:

Scheduled Review: May 17, 2022

SECTION 3 – Operational Policies

3.38 Pandemic Vaccination Policy – COVID-19

Purpose

Our organization is committed to providing a safe working environment for our employees, attendees, volunteers, students, and members of the public with whom we interact regularly. The purpose of this policy is to outline organizational expectations and requirements with regards to COVID-19 vaccination of employees, volunteers, program attendees, contractors, and visitors, and students.

This policy is aligned with the employer's general duty under the Occupational Health and Safety Act to take every reasonable precaution to protect its workers (broadly defined) and the responsibility to assess the workplace for risks, including that of COVID-19 transmission. COVID-19 is a recognized serious workplace hazard.

This policy is applied in accordance with the Alberta Human Rights Act, Occupational Health and Safety Act and any other applicable legislation.

Information collected under this policy and procedure follows relevant legislation including but not limited to the Personal Information Protection Act, Health Information Act (when applicable) and the Alberta Human Rights Act.

Scope

This Policy applies to all employees, volunteers, contractors, program attendees, visitors, and any other individuals engaged in providing service to, or receiving services from, our organization in any capacity.

This Policy applies to all organizational premises, including any program or service operating outside of the main office location.

Policy

Our organization is committed to providing a safe and secure environment for all members of the community. The COVID-19 virus presents risk to all members of the community and our organization has a legal obligation under occupational health and safety legislation to protect employees and volunteers from contracting a work-related illness. Infectious diseases such as COVID-19 may be reduced by vaccinations.

The World Health Organization, Health Canada, Alberta Health, and other health authorities have consistently advised that immunization against COVID-19 is a safe and the most effective way to prevent or minimize transmission of COVID-19, and in connection, ultimately protect our Employees, volunteers, program attendees, contractors and visitors and preserve workforce capacity to ensure effective program delivery.

Beginning November 29th, 2021, we require everyone coming to the main building or participating in organized programming offsite, with the exception of residents of XXXXXX, to be fully vaccinated against COVID-19 and provide proof of vaccination.

XXXXXX residents will be asked their vaccination status when entering the XXXXXX. Proof of vaccination will not be required for program participants to access XXXXXX.

Employees and staff contractors

- Must be fully vaccinated against COVID-19 and provide proof of vaccination to their Supervisor by November 29th, 2021.
- Those individuals who cannot provide proof of vaccination must disclose in writing to their Supervisor, their reason for not being vaccinated (e.g. medical grounds), as soon as possible and no later than November 29th, 2021.

Program attendees, volunteers, and students, contractors, visitors

- Must be fully vaccinated against COVID-19 and provide proof of vaccination, upon entering our premises, and before accessing direct face to face services, programs, workshops, classrooms, training etc.

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- Those individuals who cannot provide proof of vaccination will be directed to online, virtual options or alternative service delivery options, if applicable.
- Discussions regarding accommodations for volunteers (e.g. work from home) will be had on a case by case basis.

In this Policy,

“fully vaccinated” means:

- a. having received two doses of a vaccine considered valid by Health Canada in a two dose COVID-19 vaccine series, or one dose of a vaccine considered valid by Health Canada in a one dose COVID-19 vaccine series; and
- b. having fourteen days elapsed since the date upon which the person received the second dose of the COVID-19 vaccine considered valid by Health Canada of a two dose series, or one dose of the COVID-19 vaccine considered valid by Health Canada in a one dose vaccine series;

“proof of vaccination” means:

- a. a copy of an individual’s Alberta Health COVID-19 Immunization Record, which can be obtained from their MyHealth Records account; or
- b. A vaccine record with QR code, which can be obtained at <https://covidrecords.alberta.ca/home>; or
- c. Where applicable, proof equivalent to (a) or (b) of this definition that is from another Canadian Province or Territory, or the Canadian Armed Forces.

“rapid test” means a Health Canada approved rapid antigen, rapid PCR, or lab based PCR test approved by Health Canada or the lab accreditation body of jurisdiction, and does not include a test from the Alberta Health Services public COVID-19 testing system.

Procedure

To assist employees in becoming fully vaccinated against COVID-19, we will endeavor to facilitate access to vaccination, including providing employees with COVID-19 vaccination leave in accordance with the Employment Standards Code. Employees are to work with their supervisor to schedule an appropriate time to receive their vaccinations, once they become eligible.

Accommodations

- a. **Protected Grounds**
 - i. When an employee provides a reason based on a protected ground such as medical reasons, we will work with the employee to develop and implement an appropriate accommodation up to the point of undue hardship.
 - ii. Written proof of a medical reason, provided by either a physician or nurse practitioner that sets out:
 - that the person cannot be vaccinated against COVID-19; and
 - the effective time for the medical reason (i.e., permanent, or time-limited).
- b. **Personal Reasons**
 - i. Any employee may request a workplace accommodation citing the nature of their personal reason for non-compliance with this policy.
 - ii. We are not obligated to provide workplace accommodation for reasons beyond or out of scope of the protected grounds. We will, however, consider any workplace accommodation request and will do its best to find a suitable and reasonable solution.
- c. Possible accommodations may include COVID-19 rapid testing before working from site, redeployment/re-assignment, work exclusion/leave of absence, or termination. Should rapid testing be approved as an accommodation, staff must continue to adhere to the

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Pandemic Response Plan, including screening and isolation measures in the case of a positive test result.

- d. When determining reasonable accommodations, we will assess factors of the work/role of the employee, the type of workplace, job description, local epidemiology, etc.
- e. **Bona Fide Occupational Requirement (BFOR)** The law recognizes that, in certain situations, a limitation on individual rights may be reasonable and justifiable. Discrimination or exclusion may be allowed if an employer can show that a discriminatory requirement of a job is essential for performing that job. Where the COVID-19 vaccination is a bona fide occupational requirement, we are not obligated to find workplace accommodations.

Prevention of Harassment, Bullying or Discrimination

Harassment, bullying, or discrimination of any type against individuals based on their vaccination status, compliance with this Policy, or any other reason will not be tolerated. Employees experiencing harassment, bullying, or discrimination are encouraged to review the Harassment and Complaint Procedure (Policy 7.6.2).

Continued Compliance with Health and Safety Precautions

All individuals attending at our premises, including any program or service operating outside of the main office location, are expected and required to continue to comply with all applicable health and safety measures to reduce the risks of COVID-19. Such compliance includes, but is not limited to, compliance with Alberta Public Health Orders, compliance with screening protocols, outbreak status response/management compliance, wearing a mask or face covering when required, using provided personal protective equipment, maintaining appropriate physical distancing, and self-monitoring for potential COVID-19 symptoms daily prior to attending at our premises.

If an individual has uncertainties in respect of the applicable health and safety measures that must be complied with, they must seek immediate guidance and/or clarification from us.

Information from the Government of Alberta relating to COVID-19 public health actions can be accessed and reviewed at <https://www.alberta.ca/covid-19-public-health-actions.aspx>.

Non-Compliance

Employees who refuse or fail to follow this policy, or provide false or misleading information in any regard, may be subject to disciplinary action up to and including termination of employment.

Volunteers and contractors who refuse or fail to follow this policy, or provide false or misleading information in any regard, may be subject to termination of their services and relationship with the organization.

Program attendees and visitors who refuse or fail to follow this policy, or provide false or misleading information in any regard, may be denied access to our premises and/or programs and services for a prescribed period of time or indefinitely.

Confidentiality

Information relating to proof of vaccination and/or the reason(s) for not receiving a COVID-19 vaccination will remain in their confidential Human Resources file for the purposes of ensuring the safety of employees, volunteers, contractors, and local communities, in the event of a COVID-19 outbreak. Vaccination status will only be shared to the extent necessary for our organization to safely manage its operations.

Review of Policy

This policy will be reviewed every six months (when activated), or sooner, as deemed necessary by the leadership team.