

Employee COVID-19 Vaccination Policy

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HR-007-2021

Author:

Human Resources

Authority:

CAO

Required by

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Ongoing

Related Documents

- [Rapid Antigen Testing Procedure](#)
- [Wellness Check Procedure](#)
- [Vaccination Proof Reporting Procedure](#)

Relevant Procedures

- [Employee Vaccination Disclosure Procedure](#)
- [Employee Vaccination Exemption Procedure](#)

Relevant Forms

- [Medical Exemption Form](#)
- [Protected Ground Exemption Form](#)

1.0 Policy Statement

The Regional Municipality of Halton (the “**Region**”) expects all employees attending a Workplace to be fully vaccinated against COVID-19.

2.0 Purpose

The Region is committed to creating a safe workplace that protects employees against illness or injury, including the transmission and contraction of COVID-19. Appropriate safety measures are in effect at all Regional facilities and, while these measures are effective in reducing the transmission of COVID-19, vaccinations provide the best possible protection for employees against COVID-19 as, per the Government of Canada, full vaccination has been shown to be very effective at preventing severe illness, hospitalization and death from COVID-19, including the Delta variant currently circulating in Ontario.

3.0 Scope

This policy applies to all Regional employees including those employed on a permanent, part-time or contract basis (i.e. contracted by the Region directly, as well as those people employed by an employment agency), students, third party contractors (where permitted by agreements between the Region and a contractor) and volunteers.

Where employees are subject to an Ontario provincial directive with respect to COVID-19 vaccination that is more stringent than this policy, an employee vaccination policy for those employees will be established in accordance with such directive and that specific policy will prevail over this policy. In addition, where an employee’s departmental COVID-19 vaccination policy is more stringent than this policy, such departmental policy will prevail over this policy.

Definitions & Acronyms

COVID-19: COVID-19 is an acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). It may be characterized by fever, cough, shortness of breath, and several other symptoms. Asymptomatic infection is also possible.

Daily Wellness Check: This means either:

- the general online COVID-19 screening questionnaire established by the Region; or
- a department-specific COVID-19 screening process.

Fully Vaccinated: This means having received the completed series of an accepted COVID-19 vaccine, as recommended by the Office of the Chief Medical Officer of Health. An employee is considered fully vaccinated 14 days after receiving the final dose of the series. In the event that health authorities recommend additional doses or boosters, such dose or boosters will be considered to form part of the required series of vaccine.

Lab-Based Test: This is a polymerase chain reaction (PCR) test taken through a medical laboratory that detects SARS-CoV-2 genetic

material and is used to diagnose an active COVID-19 infection.

Medical Exemption: This is a situation in which an employee has provided written proof in form satisfactory to the Region from an appropriately qualified physician or nurse practitioner of a medical reason for not being vaccinated for COVID-19.

Protected Ground Exemption: This is a situation in which an employee has provided written proof in form satisfactory to the Region of a valid exemption from the requirement to be Fully Vaccinated based on a protected ground under the Ontario *Human Rights Code*.

Rapid Antigen Test: This is a COVID-19 test administered using a nasal swab to identify positive cases in asymptomatic individuals. This test safely yields a result within 15 minutes.

Workplace: Any location that a Regional employee performs tasks, jobs or projects for the Region, including Regional facilities and job sites. For the purpose of this policy, it does not include one's own residence.

4.0 Requirements

4.1 Timelines for Reporting Vaccination Status

- All Regional employees are required to provide proof of being Fully Vaccinated against COVID-19 no later than **September 24, 2021**, unless an approved Medical Exemption or Protected Ground Exemption applies in accordance with this policy.
- Employees who are not fully immunized by **September 24, 2021** (and do not have a valid exemption) must provide proof of receiving each dose of a two-dose COVID-19 vaccination series being administered as soon as it is received by the employee.

4.2 Proof of Vaccination

A Ministry of Health Dose Administration Receipt (or such other proof of vaccination that the Province of Ontario sanctions) is required to establish proof of vaccination and will be submitted in accordance with the procedure provided by the Region.

4.3 Exemptions

The Region has obligations pursuant to the Ontario *Human Rights Code* and understands its duty to accommodate employees who are not able to obtain a COVID-19 vaccine for a reason related to a protected ground. An employee can request accommodation in the following circumstances and are required to provide written evidence as follows:

Medical Exemption

Employees seeking a Medical Exemption must:

- Provide written proof, in a form satisfactory to the Region, from an appropriately qualified physician or nurse practitioner that sets out the Medical Exemption the employee is claiming.
- An accommodation meeting will occur to develop an individualized accommodation plan.

Protected Ground Exemption

Employees seeking a Protected Ground Exemption must:

- Submit proper documentation to Employee Health, Safety & Wellness supporting the Protected Ground Exemption.
- Following receipt of such documentation, an accommodation meeting will occur to assess the exemption request.

Employees who are fully vaccinated or who meet the requirements of this policy as described in section 4.1(3), may continue to attend a Regional facility, conditional on completion of the Daily Wellness Check and have been granted entry in accordance with the guidelines of the Daily Wellness Check.

4.4 Employees Who Are Fully Vaccinated

Employees who are Fully Vaccinated may continue to attend Workplaces, conditional on completion of the Daily Wellness Check and have been granted entry in accordance with the guidelines of the Daily Wellness Check.

4.5 Employees Who Are Not Fully Vaccinated by September 24, 2021

- Complete a COVID-19 vaccination education module on TRAKS within 10 days. Employees who provide evidence of a Medical Exemption or Protected Ground Exemption are not required to complete the COVID-19 education module.
- Complete the Daily Wellness Check each day that an employee plans to enter a Workplace. The Daily Wellness Check must be completed prior to the start of the employee's shift.
- Complete Rapid Antigen Testing in accordance with Section 4.6. Employees must test negative for COVID-19 on the most recent Rapid Antigen Test to remain eligible to enter the Workplace.

- Employees that are not in a Workplace at least once per every seven days must provide a recent (less than 48 hours old) negative Rapid Antigen Test prior to entering a Workplace, but otherwise may not have to complete the regular testing requirements of this section.

4.6 Rapid Antigen Testing

Commencing **October 1, 2021**, employees who are not Fully Vaccinated are required, on their own time, to participate in a minimum of twice weekly Rapid Antigen Testing, on the schedule determined by the Region. The Region will arrange for Rapid Antigen Testing, and will incur the cost of testing until **November 1, 2021**.

Notwithstanding anything else in this policy, the frequency of Rapid Antigen Testing may be revised in the sole discretion of the Region.

4.7 New Hires

Successful candidates will be made an offer of employment on the condition of being Fully Vaccinated against COVID-19, and able to provide proof of vaccination in accordance with this policy.

4.8 Privacy of Employee Medical Information

- Employee medical information collected under this policy will be limited to:
 - Ministry of Health Dose Administration Receipts (or other Provincially-sanctioned proof of vaccination);
 - Rapid Antigen Test results and Lab-Based Test results; and
 - Proof of Medical Exemption or Protected Ground Exemption.
- Employee medical information is being collected and used for the express purpose of maintaining a safe Workplace, as described in section 2.0, and administering this policy. Except as provided in the next sentence, access to employee medical information will be restricted to employees assigned to Employee Health, Safety & Wellness. Medical information will only be used and disclosed in keeping with the purposes described in this section, or as otherwise permitted in accordance with applicable law.
- Employee medical information will be stored in a secure location by Human Resources in accordance with existing protocols that govern the collection of Confidential Medical Reports under the Region's Disability Management Policies.

5.0 Roles & Responsibilities

Human Resources will:

- Provide support to employees in the administration of this policy.
- Provide employees with a COVID-19 vaccination education module on TRAKS that addresses the following:
 - How vaccines work;
 - Vaccine safety related to the development of the COVID-19 vaccines;
 - The benefits of vaccination against COVID-19;
 - Risks of not being vaccinated against COVID-19; and
 - Possible side effects of COVID-19 vaccination.

Employee Health, Safety & Wellness will:

- Collect, maintain, and store:
 - Proof of vaccination and proof of Medical Exemption or Protected Ground Exemption from employees; and
 - Results of Rapid Antigen Tests and Lab-Based Tests.
- Manage the accommodation process for employees seeking an exemption from receiving the COVID-19 vaccine.

Employees will:

- As required by this policy, provide proof of COVID-19 vaccination, or proof of a Medical Exemption or Protected Ground Exemption.
- Complete the Region's COVID-19 vaccination education module on TRAKS if they are unable to provide proof of being Fully Vaccinated or proof of a Medical Exemption or Protected Ground Exemption by **September 24, 2021**.
- Fully vaccinated employees will complete the Daily Wellness Check and continue to attend a Workplace.
- Employees who are not Fully Vaccinated will participate in Rapid Antigen Testing and Daily Wellness Checks, as described in this policy.

6.0 Compliance & Monitoring

Employees who are non-compliant with this policy will be subject to discipline up to and including termination. Employees who

make false attestations about, or provide false documents related to, being vaccinated or having an approved Medical Exemption or Protected Ground Objection may be subject to disciplinary action, up to and including termination.

Note: This policy and the procedures developed under this policy, are subject to change at any time, based on the evolving pandemic situation, industry best practices/guidelines and/or regulatory requirements.