# **COVID-19 Vaccination Policy Template**

Template for Workplace Guidance Only

The COVID-19 Vaccination Policy Template was developed to help guide workplaces as they craft their own COVID-19 vaccination policies. The Policy Template should not be considered legal advice and employers and persons responsible for a business that is open are encouraged to seek legal advice or assistance in developing their vaccination policy. Each organization should evaluate risks associated with COVID-19 when considering and adapting the template. Employers have a general duty under the *Occupational Health and Safety Act* to take every reasonable precaution to protect their workers. <u>Ontario regulation 364/20</u> and sector-specific legislation, as applicable, should also be followed.

A workplace COVID-19 vaccination policy does not replace ongoing public health and individual protective measures required for COVID-19 prevention, however, increasing vaccine coverage rates assists with case and outbreak prevention and management.

Recommended components of a vaccination policy may change as the status of the pandemic changes, including any changes to applicable legislation, scientific or public health advice and direction.

# Policy Template

# Background – *statement on the importance of vaccines in the fight against COVID-19* Sample:

On March 11, 2020, the World Health Organization declared COVID-19 a pandemic virus. The first case in the Public Health Sudbury & Districts service area was reported on March 10, 2020. Globally, within Ontario and in the PHSD service area, variants of the virus have circulated, including the current dominance of the Delta variant with increased transmissibility and disease severity compared with previous COVID-19 virus strains.

Regardless of which SARS-CoV-2 variant is predominating in an area, vaccination, in combination with public health and individual measures, continue to work to reduce disease spread and severe outcomes. In particular, evidence continues to demonstrate that a complete two-dose series of Health Canada-approved COVID-19 vaccines provides substantial protection. Based on current data only a fraction of fully vaccinated people became infected, with the majority of recent cases and hospitalizations occurring in unvaccinated or partially vaccinated people.

COVID-19 is an acute respiratory illness caused by severe acute respiratory syndrome coronavirus (SARS-CoV-2). It may be characterized by fever, cough, shortness of breath, and other symptoms. Asymptomatic infection is also possible. The risk of severe disease increases with age, however, is not limited to the elderly and is elevated in those with underlying medical conditions.

## Purpose – statement of the reasons for which the policy is created

#### Sample:

The purpose of this policy is to outline organizational expectations with regards to COVID-19 immunization of employees, staff, contractors, volunteers, and students.

Contingent upon vaccine availability and unless medically contraindicated, it is the expectation that all eligible employees, staff, contractors, volunteers, and students are fully vaccinated against COVID-19 (i.e. against infections caused by SARS-CoV-2).

# Legislative framework – *statement of legislation that is considered as part of the policy* Sample:

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.

This policy is applied in accordance with the *Ontario Human Rights Code, Occupational Health and Safety Act* and any other applicable legislation and/or collective agreement.

Information collected under this policy and procedure is in compliance with relevant legislation including but not limited to the *Personal Health Information Protection Act* and the Ontario *Human Rights Code.* 

### Application – statement of to whom the policies applies

#### Sample:

The employer can reasonably inquire in the vaccination status of its workers if its workers work in a location with common areas or its workers could have contact with clients, customers, or the public.

Regardless of how often or how much time spent in their respective workplace, this policy applies to:

- Employees and staff
- Contractors
- Students
- Volunteers

#### Requirements – *statement of the actions required per the policy*

#### Sample:

All employees, staff, contractors, volunteers and students will be required to provide one of the following:

- 1. Proof of COVID-19 vaccine administration as per the following requirements:
  - a. If the individual has only received the first dose of a two-dose COVID-19 vaccination series approved by Health Canada, proof that the first dose was administered and, as soon as reasonably possible, proof of administration of the second dose; or
  - b. Proof of all required doses of a COVID-19 vaccine approved by Health Canada.

- 2. Written proof of a medical reason, provided by either a physician or nurse practitioner that sets out:
  - a. that the person cannot be vaccinated against COVID-19; and
  - b. the effective time period for the medical reason (i.e., permanent or time-limited).
- 3. Proof that the individual has completed an educational program approved by the organization.

## Policy implications - *statement of potential responses to requirements of the policy* Sample:

#### Implications will vary depending on employer's risk assessment and general duty under OHSA.

Employees, staff, contractors, volunteers and students who elect not to provide proof of COVID-19 vaccination per 1 above, and rely on 2 or 3, may be subject to additional requirements such as COVID-19 testing, redeployment, personal and public health protective measures, work exclusion/leave of absence, termination, etc., based on assessment by the employer of factors including for example, the work/role of the individual, the type of workplace, local epidemiology, etc., and in consideration of the duty to accommodate, as applicable.

#### Acknowledgements – additional context for policy

#### Sample:

Acknowledgement that the policy will be applied in accordance with the Ontario Human Rights Code.

Acknowledgement that the policy may change as the status of the pandemic changes and/or legislation or public health advice changes.

#### Procedure – workplace relevant procedures (steps) to action the above policy

As applicable to workplace setting and culture.

#### Resources

Provincial guidance for <u>COVID-19 safety plan</u> <u>Sample</u> of educational program