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## COVID-19 Vaccination Policy

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Approved September 10, 2021

### Purpose

The purpose of this Policy is to reduce the risk of exposure to and transmission of COVID-19, a highly infectious and deadly communicable disease, in the workplace by providing occupational protection to our employees and other individuals who perform work for or on behalf of Woodview Mental Health and Autism Services (“**Woodview**”). Vaccination for COVID-19 has been found to be both safe and effective in preventing COVID-19 transmission, serious illness and hospitalization due to COVID-19.

This Policy has been developed by Woodview as a reasonable and necessary measure to prevent, respond to, and alleviate the outbreak of COVID-19 and the associated risks to the people we support, many of whom are medically fragile and/or may not be able to comply with social distancing and infectious disease transmission prevention protocols, as well as our staff and operations.

This Policy is also adopted to comply with our obligations under the *Occupational Health and Safety Act* (OHSA) and regulations (including Ontario Regulation 67/93), as well as government mandated vaccination policy requirements and applicable emergency orders.

This policy will be updated from time to time based on Federal and Provincial Public health Guidelines, Ministry of Health (MOH) guidelines, Ministry of Children, Community and Social Services (MCCSS) guidelines, Ministry of Education (MOE) guidelines, as well as Woodview’s mandate to provide a safe environment to all staff and persons supported.

### SCOPE:

Woodview’s **COVID-19 Vaccination Policy** applies to all Woodview employees, contractors who regularly enter Woodview worksites or premises (including third-party staffing agencies), volunteers, students and any person who performs work for Woodview (all collectively referred to herein as “**Staff**”).

However, it will not apply to contractors who do not regularly enter Woodview worksites or premises. This includes instances where Woodview hires a contractor to perform a single job (such as a plumber hired to repair a leaking pipe) or where Woodview retains a service provider to provide remote services (such as remote information technology services).

### DEFINITIONS:

“**Full vaccination**” or “**fully vaccinated**” is defined as meaning that a Staff has met both of the following criteria:

- a) They have received all required doses of a full series of a COVID19 vaccine or combination of COVID-19 vaccines approved by the World Health Organization (“WHO”) (e.g., two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series); and
- b) At least 14 days have passed since they received their final dose of the COVID-19 vaccine.

Being “**unvaccinated**” or “**not vaccinated**” is defined as not meeting the above criteria. For clarity, a staff who is partially but not fully vaccinated is considered to be unvaccinated or not vaccinated under this policy.

## **POLICY:**

1. **Vaccination for Staff:** Consistent with government mandated vaccination policy requirements, all Staff will be required to:
  - a) provide proof of full vaccination against COVID-19 (as defined below); or
  - b) provide written proof of a medical reason, provided by a physician or nurse practitioner, that sets out:
    - i. a documented and *bona fide* medical reason for not being fully vaccinated against COVID-19, and
    - ii. the effective time period for the medical reason;or
  - c) provide confirmation in writing that the Staff is unvaccinated or partially vaccinated for non-medical reasons (including religious reasons if applicable) and provide confirmation and satisfactory evidence to Woodview that, prior to declining vaccination, the Staff completed an educational session approved by Woodview about the benefits of COVID-19 vaccination.
2. **Rapid Antigen Testing.** Consistent with government mandated vaccination policy requirements, unvaccinated or partially vaccinated Staff will be subject to Rapid Antigen Testing in accordance with our ***Rapid Antigen Testing Policy***.
3. **Alternative Precautionary Measures for Unvaccinated or Partially Vaccinated Staff:** Unvaccinated or partially vaccinated Staff will be subject to alternative precautionary measures including leaves of absence in the event of an outbreak as declared by Public Health in their regular work location, restrictions on secondary employment in the event of an outbreak, and such other alternative measures as shall be determined to be reasonably based on Woodview’s assessment of the risk.
4. **Respect for Human Rights:** Woodview will provide accommodation up to the point of undue hardship to any Staff who is unable to vaccinate for bona fide and substantiated medical reasons (or other grounds protected under the Ontario Human Rights Code).

## **PROCEDURE:**

### **A. CANDIDATES**

1. Any offer made to a Candidate will be conditional on the completion of Schedule “A” – Vaccination Declaration Form. Unvaccinated or partially vaccinated new employees will be subject to Rapid Antigen Testing in accordance with our ***Rapid Antigen Testing Policy*** and otherwise comply with any requirements for staff who are not fully vaccinated.

## B. STAFF

1. **Support for Vaccination.** Woodview strongly recommends and supports all members of the Woodview community to be vaccinated for COVID-19. Woodview supports to Staff for vaccination will include:
  - a. Up to date information from public health regarding vaccination;
  - b. Paid time off to staff, up to a maximum of 3 hours total, to obtain two doses of the COVID-19 vaccination; and
  - c. Education on COVID-19 vaccine and access to information about vaccination.
  
2. **Disclosure of Vaccination Status.** Woodview requires that all existing Staff provide a complete form attached to this policy as **Schedule “A”** with supporting documentation confirming one (1) of the following options:
  - a. **Proof of Vaccination:** Confirmation of full vaccination status with documentary proof of full vaccination against COVID-19 as defined by this policy.

*Note, you should have received a vaccination receipt in person or by email upon vaccination. If you do not have a copy, please call the Provincial Vaccine Information Line at 1-888-999-6488 (TTY 1-866-797-0007) or contact your local public health unit.*
  - b. **Medical Exemption:** Written proof provided by a physician or nurse practitioner in the form attached to this policy as **Schedule “B”** that sets out:
    - i. A documented medical reason for not being fully vaccinated against COVID-19, and
    - ii. the effective time period for the medical reason;

OR

  - c. **Education Session:** Confirmation that the staff is unvaccinated as defined by this policy for non-medical reasons, and that the staff will provide proof of completing an educational session approved by Woodview by September 24, 2021 and confirm their choice not to be vaccinated.

Existing Staff who fail to comply with the foregoing requirements by September 24, 2021 or thereafter cease to comply with these requirements will be deemed to have failed to comply with Ministry mandated policy requirement and will therefore be ineligible for active duty and suspended without pay pending satisfaction of the requirements above. Such Staff may be subject to progressive discipline up to the point of termination for cause for failure to comply with the policy.

Staff who become fully vaccinated after they provide the above declaration and who provide documentary proof of full vaccination against COVID-19 as defined by this policy shall thereafter be treated as fully vaccinated under this policy.

3. **Rapid Antigen Testing:** Unvaccinated or partially vaccinated Staff are required by government mandated restrictions to participate in rapid antigen testing in accordance with our **Rapid Antigen Testing Policy**.

4. **Alternative and / or Additional Precautionary Measures for Unvaccinated Staff:**

In addition to rapid antigen testing, unvaccinated and partially vaccinated Staff will be subject to alternative precautionary measures which will include:

- a. Unpaid leave of absence during any period of outbreak (or suspected outbreak) in the Staff's regular work location, provided that affected employees may use their accrued sick, vacation or lieu entitlements during this period to offset any financial impact and subject to accommodation for bona fide human rights related restrictions where possible without undue hardship; and
- b. Additional alternative precautionary measures as determined based on Woodview's legal obligations or assessment of the risk, which measures may include but not be limited to:
  - i. restrictions on secondary employment in the event of an outbreak (i.e. will not be permitted to work for more than one employer in a high risk environment);
  - ii. location transfers;
  - iii. changes or restrictions in work assignments or opportunities;
  - iv. enhanced hygiene, screening or PPE;
  - v. leaves of absence without pay (as a last resort), but with the opportunity to use accrued paid time off entitlements if any; and/or
  - vi. any such other measures as may be developed and deemed appropriate based on current Public Health information and the risks identified.

These measures are in addition to any and all other policies and procedures that are in place for infection prevention and pandemic response for Woodview Staff. Woodview reserves the right to determine and modify the measures applicable to any particular Staff where reasonably necessary based on the particular risks involved in any specific case.

**C. ACCOMMODATION**

1. Staff employed as of September 10, 2021 who are unvaccinated or partially vaccinated for bona fide human rights related reasons and require accommodation must submit **Schedule "A"** and a request for accommodation with any supporting documents by September 24, 2021 (or immediately if new human rights related restriction becomes apparent after that date). Unvaccinated and partially vaccinated Staff who fail to request accommodation and provide the foregoing documentation will be considered unvaccinated for non-human rights related reasons. Staff requesting religious accommodation under this policy shall also be asked to provide written confirmation of their need for accommodation from their religious or spiritual leader.
2. Woodview will assess based on the information provided whether accommodation is required and/or possible without undue hardship. Where required by law, Woodview will provide accommodation to the point of undue hardship.
3. Due to the ongoing serious health and safety issues, accommodation short of undue hardship may not be possible in all circumstances. Each situation will be

assessed on a case-to-case basis depending on the needs of the work location (example, high medical care home), job role of the staff, COVID situation, Public Health guidelines etc.

#### **D. REPORTING AND RECORD KEEPING**

Information about vaccination status will be collected by Woodview as such information is reasonably necessary to assess risk to People Supported and Staff as well as to ensure compliance with relevant government mandated vaccination policy requirements. Vaccination records will be maintained documenting COVID-19 vaccinations and unvaccinated or partially vaccinated status in a secure manner and will only be collected, used, or disclosed as may be necessary for legitimate operational purposes or as directed or requested by governmental authorities.

All personal health information will remain confidential and shall not be collected, used, or disclosed except as permitted by this Policy or required by law. Woodview may report aggregate data (in a non-identifying format) to the Ministry of Health, and / or the Ministry of Children, Community, and Social Services, and / or the Ministry of Education, and / or local school boards, as required by government mandates, and personal information will not be shared except where required by applicable law and/or government directives.

#### **E. CONSEQUENCES OF NON-COMPLIANCE**

Failure to adhere to the requirements of this policy may result in ineligibility for active duty and corresponding unpaid suspension from active duty and/or progressive discipline up to and including termination for just cause.

#### **F. REVIEW**

This policy will be reviewed on a regular basis upon receipt of new and relevant information.