

# COVID-19 WORKPLACE VACCINATION POLICY

## SAMPLE TEMPLATE FOR GUIDANCE ONLY

The Medical Officer of Health for York Region strongly recommends all local employers institute and ensure compliance with a workplace COVID-19 vaccination policy to protect workers and the public from COVID-19.

### Important Note

**While strongly encouraged, these recommendations are voluntary and are not intended to be enforceable under the [Reopening Ontario \(A Flexible Response to COVID-19\) Act, 2020](#)**

The COVID-19 Workplace Vaccination Policy Template was developed to help guide workplaces as they draft their own COVID-19 vaccination policies. **The Policy Template should not be considered legal advice and employers and persons responsible for a business are encouraged to seek legal advice or assistance in developing their own vaccination policy.**

Components and content of a vaccination policy may change as the status of the pandemic changes, including any changes to applicable legislation, and provincial or local public health guidance, information and direction. Workplaces should update this policy, as required.

Each organization should evaluate risks associated with COVID-19 when considering and adapting the template and adjust the content to be suitable to your workplace environment. Please refer to the **Recommendations for Establishing a COVID-19 Workplace Vaccination Policy** document for a list of key questions to consider when undertaking your organizational risk assessment and for the key components of a workplace vaccination policy.

Employers have a general duty under the [Occupational Health and Safety Act](#) to take every reasonable precaution to protect their workers. A workplace COVID-19 vaccination policy does not replace ongoing public health and individual protective measures required for COVID-19 prevention such as COVID-19 screening, physical distancing, masking and hand hygiene. However, increasing vaccine coverage rates assists with case and outbreak prevention and management and is the best way to protect ourselves and others against serious illness.



# WORKPLACE VACCINATION POLICY SAMPLE TEMPLATE

## BACKGROUND AND CURRENT SITUATION

COVID-19 continues to spread in our communities and workplaces, so it is important to protect yourself, your family and friends, your colleagues at work, customers and the community.

Vaccination, in combination with public health measures, continues to work to reduce infection and severe outcomes. In particular, evidence continues to demonstrate that full vaccination reduces the risks of COVID-19 disease and protects vaccinated individuals from severe consequences of COVID-19 and variants, including the Delta variant currently circulating in Ontario.

Reinforcing the need to get vaccinated is current with public health data, which indicates that only a small fraction of fully vaccinated people became infected, with the vast majority of recent cases and hospitalizations occurring in those not fully vaccinated.

## SCOPE AND PURPOSE

The purpose of this policy is to outline organizational expectations with regards to COVID-19 immunization of employees, staff, contractors, volunteers and students. Vaccination against COVID-19 is one of the best ways to protect workers who work in a location with common areas and/or where workers can have contact with other workers, patrons or the public. The Delta variant of the coronavirus is more contagious and may cause more severe illness.

**Contingent upon vaccine availability and unless medically contraindicated, it is strongly recommended that all eligible employees, staff, contractors, volunteers and students are fully vaccinated against COVID-19.**

To ensure that all employees, staff, contractors, volunteers, students etc. are informed about this policy, a communication plan has been developed and includes disseminating the policy to all employees via email. The policy will also be posted in designated areas in the workplace. To heighten awareness, any established workplace Health and Safety Committee will also be involved in communicating the policy.

## LEGISLATIVE REQUIREMENTS – WORKPLACE POLICY

This policy adheres to the [Occupational Health and Safety Act](#), the [Human Rights Code](#) (Ontario), privacy laws and applicable legislation.

## APPLICATION AND VACCINE REQUIREMENTS

This policy applies to all employees, staff, contractors, volunteers and students.

**Proof of full vaccination** (the definition needs to be aligned with the latest provincial guidance):

The province provides a definition of fully vaccinated individuals. Employers should ensure that the current provincial guidance is used. Click [here](#) for the current definition provided by the Ministry of Health. The Ministry will update the definition as needed.

## Methods of providing proof

- Methods of providing such proof could include a printed or electronic vaccination receipt (i.e., from [covid-19.ontario.ca/proof-covid-19-vaccination](https://www.covid-19.ontario.ca/proof-covid-19-vaccination) or by calling the Provincial Vaccine Booking Line at 1-833-943-3900), or a government-led proof-of-vaccination system
- **For those vaccinated outside of Ontario or Canada:** proof of immunization (e.g., an immunization record, proof of vaccination certificate (PVC)) and confirmation that the vaccine product is accepted; those vaccinated outside of Ontario or Canada can contact the local public health unit to have their immunization records documented in the provincial system; vaccination receipts are available through the province
- **Workers who do not provide proof of full vaccination should:**
- Indicate that they have a medical exemption, including if the reasons are temporary or permanent; the medical exemption should be written by a licensed doctor or nurse practitioner
- In the absence of a medical exemption:
  - Complete a vaccination education course with a signed declaration stating they understand the risks of COVID-19 and the benefits of vaccination; the vaccination education course should include information on:
    - How COVID-19 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
    - Possible side effects of COVID-19 vaccination
  - Make arrangements to get vaccinated and provide proof of vaccination by **[insert date, 2021]**

## ACCOMMODATIONS FOR NOT FULLY VACCINATED WORKERS

Employees who have an approved exemption or those who remain not fully vaccinated may be required to undertake additional infection and prevention control measures, including additional personal protective equipment, providing proof of negative COVID-19 tests (at least once or twice per week) as well as self-isolating if exposed to COVID-19. Alternative options for accommodation could include relocation and modified work or reassignments.

The organization will consider reasonable accommodation on a case-by-case basis and, if required, grant such accommodation unless it would amount to undue hardship based on cost, health and safety or other factors.

## PROOF OF VACCINATION AND TIMELINES

Under this new policy, all staff will be required to provide proof of a first COVID-19 vaccination dose no later than **[Insert date, 2021]**. Confirmation of a full series is required no later than **[Insert date, 2021]**.

Employees must disclose their vaccination status in accordance with the established process by no later than **[insert date, 2021]**.

Employees who, by **[insert date, 2021]**, disclose that they have **not** received the full series of doses of COVID-19 vaccine (or a single dose in the case of a single dose vaccine series), or who have not disclosed their vaccination status as required, shall attend mandatory education on the benefits of vaccination, in addition to the obligations identified under “Application and Vaccination Requirements” above.

For workers who do not provide proof of vaccination, the organization will keep a copy of the medical note provided by the employee’s physician or nurse practitioner or a copy of the signed written declaration for a reason related to a protected ground under the [Occupational Health and Safety Act](#), or proof of completion of a vaccination education course

## PRIVACY CONSIDERATIONS

Information about employees’ vaccination and medical information will be protected in accordance with applicable privacy legislation. Knowing an employee’s vaccination status may be important to help our organization take appropriate action quickly in the event of COVID-19 cases in the workplace to protect employees, your families, customers/patrons and the general public. This may include sharing that information with public health officials.

The organization will collect, share, maintain and dispose of vaccination disclosure information, including documentation verifying receipt of a vaccination series, in accordance with privacy legislation. This information will only be used to the extent necessary for implementation of this policy, for administering health and safety protocols and infection and prevention control measures in the workplace.

Employees may also be required to disclose their vaccination status by law or to otherwise give effect to this policy, including, but not limited to, situations where employees are directed to stay home as a result of the daily COVID-19 screening tool in order to comply with the clearance criteria to return to work (e.g., a COVID-19 exposure or a travel quarantine exemption).

## NON-COMPLIANCE

Employers who do not comply with this policy may be subject to **[employers insert consequences]**.

## AVAILABLE SUPPORTS FOR VACCINATION

The health and safety of our employees is a priority for this organization. To support COVID-19 vaccination, we are providing:

**[Employer to list supports and resources available to employees (e.g., paid leave to get a vaccine, transportation, sharing resources from credible sources, offering incentives such as gift cards, prizes, etc.)]**

The following resources and supports are available to employees to assist with getting fully vaccinated against COVID-19:

- Find a York Region [COVID-19 vaccination clinic](#) or contact Access York at [accessyork@york.ca](mailto:accessyork@york.ca) or call 1-877-464-9675
- [York.ca/COVID19](#) provides valuable information on vaccine effectiveness and safety, answers to frequently asked questions and [resources to share the important message of COVID-19 vaccination](#); there are also resources available in many languages
- Employees are also legally entitled to up to [three paid sick days](#) if they experience side effects from the vaccine

An employer can access resources from other organizations to help support an education program:

- Ontario Ministry of Health - [Resource Guide](#)
  - **Refer to page 13, Appendix 2 Resources to Support the Creation of Covered Organization's Educational Program**
- City of Toronto - [COVID-19 Vaccination Understanding the Benefits and Risks](#)
- Sunnybrook Health Sciences Centre - [Sunnybrook COVID-19 e-learning module](#)

## **STAFF CONTACT**

If you have any questions about the policy or procedures, including if you need to request accommodation, or for more information about how to comply with the policy, please contact [**employer to insert contact details**].

## **CONTINUED ADHERENCE TO COVID-19 PREVENTION MEASURES**

Getting fully vaccinated against COVID-19 does not replace the need for following effective and proven COVID-19 public health measures. Employees are expected to comply with all COVID-19 prevention measures including, but not limited to:

- COVID-19 safety plan
- COVID-19 screening
- Physical distancing
- Wearing of masks
- Wearing of eye protection where physical distancing cannot be maintained, and application of source control masking is not universal
- Hand hygiene
- Self-monitoring of symptoms

**Acknowledgement:** York Region would like to thank the following Public Health Units for permission to adapt aspects of their vaccination recommendations/guidance for workplaces: Toronto, Hamilton, Halton, Sudbury & Districts and Simcoe Muskoka.