

COVID-19 Vaccine Policies

Support Package for Employers

2021-10-15

A guide to supporting vaccination and vaccination policies in the workplace.

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Timiskaming Acting Medical Officer of Health recommends workplace COVID-19 vaccination policies

A message from Dr. Glenn Corneil, Acting Medical Officer of Health for Timiskaming:

The COVID-19 pandemic has taken a toll on Timiskaming. With the onset of the fourth wave and the increased transmissibility of the Delta variant, the time to maximize our efforts and further protect the members of our community has come.

I am sincerely grateful to the employers and workplaces across Timiskaming who continue to keep their staff, customers, clients, and the community safe. They have been innovative and resourceful in response to endless revisions of guidelines, directives, and policies.

As I have stated repeatedly over the last months, vaccination against COVID-19 is the most powerful tool to protect yourself and your workplace from the risks of COVID-19. Vaccination is incredibly effective at protecting against serious illness and helps prevent the spread of the virus.

As of October 14, 2021, 79.9% of eligible Timiskaming residents born in 2009 or before are fully vaccinated. There is much work to be done to reach the goal of at least 90% full immunization coverage. The best time to receive your COVID-19 vaccination was when it first became available, and the second best time is now!

I am writing to you today to recommend, in the strongest possible terms, that all local employers institute a workplace COVID-19 vaccination policy for their business or organization. This is not an instruction issued under the Reopening Ontario Act and instituting a COVID-19 vaccination policy is voluntary. This is a necessary step towards putting the COVID-19 pandemic behind us and protecting ourselves, those we know, and those we do not. Vaccination policies will help protect workplaces from shutting down in the event of an outbreak, prevent workers from getting sick, and encourage more people to get vaccinated.

I have outlined the considerations and components that I recommend all employers include in their COVID-19 vaccination policy in the following document: “Timiskaming Health Unit’s COVID-19 vaccine policy support package for employers.” For convenience, we have also added information about vaccine policies to our workplace webpage. You will also find this support package at [this link](#).

Sincerely,



Dr. Glenn Corneil
Acting Medical Officer of Health for the Timiskaming Health Unit

Strategies to increase vaccination uptake

Employers play an important role when it comes to increasing vaccination uptake among employees. A few things you can do include:

- Lead by example and get fully vaccinated.
- Share reliable and factual information about COVID-19 vaccines, such as information from the [Timiskaming Health Unit](#), [Government of Ontario](#), [Public Health Agency of Canada](#), [Health Canada](#), or [World Health Organization](#).
- Share information about [how people can get a COVID-19 vaccination](#).
- Accommodate time off for staff to receive their COVID-19 vaccine. When possible, offer paid time off for recovery for employees that experience side effects after vaccination.
- Encourage new staff to get their vaccine as part of the orientation to your company.
- Create a workplace culture that supports and encourages COVID-19 vaccination.

Resources:

- [COVID-19 vaccine clinics](#)
- [COVID-19 vaccine information for Timiskaming](#)
- [Directive #6 \(COVID-19 vaccination policy in health settings\) resource guide](#) – this guide provides information on developing vaccine policies, a sample policy and resources to support an organization's educational program.

Paid leave for vaccination

Ontario workers may be eligible to receive three days of paid sick leave under provincial legislation. The pay is based on workers' regular wages up to \$200 per day. Workers may take time off work to get a vaccine or if experiencing a side effect from vaccination.

Employers can submit claims to the Workplace Safety and Insurance Board (WSIB) to get reimbursed for paying their employees the Ontario COVID-19 Worker Income Protection Benefit. Currently, the program is retroactive to April 19, 2021 and will continue to December 31, 2021.

Resources:

- [Ontario COVID-19 worker income protection benefit](#)

Establishing a vaccination policy for your workplace

Employers are responsible for maintaining safe environments for their workers. To help reduce the risk of COVID-19 transmission, employers should implement a vaccination policy to help protect workers and the public.

Your workplace policy should be in writing and adhere to the [Occupational Health and Safety Act](#), the [Ontario Human Rights Code](#), and [privacy laws](#).

NOTE: The information provided below is not legal advice. Employers should seek their own legal advice to address their specific workplace circumstances.

Developing a workplace vaccination policy

Assess your workplace risk of COVID-19 transmission by considering the following:

- How many workers are part of your workforce?
- Can workers keep at least two metres apart while performing their work?
- Are there circumstances in which masks can or must be removed in the context of workplace activities? (Consider workers, customers/patrons, and members of the public entering the workplace.)
- Are workers required to be in close contact with others, at the workplace or in the community, while performing their work?
- How long and how often are workers in close contact with other workers, customers/patrons, or the public?
- Does your workplace have any of the following: physical barriers when workers cannot keep distance from each other, customers/patrons, or the public; good ventilation; and/or personal protective equipment (PPE) to protect workers?
- Do you have workers who may be at risk for severe illness from COVID-19? Some people may have reduced immunity due to age, pre-existing health conditions, or medical treatments and these conditions may be invisible.
- Is your workplace able to offer alternative work for people who require accommodation, for example remote work?

Key components in a vaccination policy

1. Identify the scope and purpose

- Explain the purpose of the policy including the risks of COVID-19. 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, customers/patrons or the public. The Delta variant of COVID-19 is more contagious, with greater risk for severe illness and hospitalization.
- Explain who the policy applies to. Will the policy apply to all workers (i.e., not just employees but also contractors, including staff from third party agencies, volunteers, students, etc.)? Is there a separate policy for customers/patrons?
- Explain that the policy may change as the status of the pandemic changes and/or legislation or public health advice changes.
- Have a clear communication plan to inform workers about the policy.

2. List action steps workers must take

When determined by the employer to be reasonably necessary to prevent the spread of COVID-19 in the workplace or in the community while performing their work, workplace policies should require workers to provide proof of vaccination, with vaccines approved by [Health Canada](#) or the [World Health Organization](#).

Alternatively, workers who do not provide proof of vaccination may need to, for example:

- Indicate that they have a medical exemption, including if the reasons are temporary or permanent. The medical exemption should be written by a licenced doctor or nurse practitioner and needs to include the reason and the time period (temporary or permanent) for the exemption. [Click here](#) for an example of a medical exemption form.
- Complete a vaccination education course, with a signed declaration stating that they have reviewed and understood the content. The vaccination education course should include information on:
 - How the 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; and,
 - Possible side effects of COVID-19 vaccination.
- Unvaccinated workers should have serial asymptomatic rapid antigen screening in conjunction with proof of a medical exemption or a vaccination education course. You can find resources about setting up this screening [here](#).

3. Set deadlines for when the actions must be taken

Specify a reasonable date when workers must demonstrate compliance with various elements of the workplace policy.

4. List available supports for vaccination

Demonstrate your commitment to supporting workers to get vaccinated. Ways to support workers to get vaccinated include:

- Providing vaccine information from credible sources or translated resources
- Supporting vaccine champions to initiate conversations with their peers
- Providing paid leave to get vaccinated
- Reminding workers that they are entitled to up to three paid sick days, if they have side effects from the vaccine
- Providing transportation support to get vaccinated

5. Provisions for unvaccinated workers

Your policy should list alternative options for workers who decline to get vaccinated for reasons protected by Ontario's Human Rights Code, including those unable to complete their vaccination series for medical reasons. The appropriate response(s) may depend on the work of the worker, the type of workplace and consideration of the duty to accommodate (if applicable). Some options to consider include:

- Use of additional PPE, worker relocation, and modified work or reassignments.
- Set up rapid antigen screening for unvaccinated workers. You can find resources about setting up this screening [here](#).

- In the event of a COVID-19 outbreak, unvaccinated and partially vaccinated workers (who have only received one dose of a two-dose COVID-19 vaccine series) should not be permitted to work in the outbreak area. Workers without vaccination records should be assumed to be unvaccinated.
- If reassignment is not possible, consider other options including whether unvaccinated workers should receive paid or unpaid leave or use vacation days until it is safe for them to return to the workplace.

6. Non-compliance

Outline the potential consequences for workers who do not fulfill the requirements of the policy.

7. Privacy considerations

The policy should specify how individual vaccination status of employees will be used by employers to mitigate the health-related risks of COVID-19.

Information about workers' vaccination information must be protected in accordance with applicable privacy legislation. Knowing your workers' vaccination status may be important to help you take appropriate action quickly in the event of COVID-19 cases in your workplace, to protect workers, their families, customers/patrons, and the general public. This may include sharing that information with public health officials.

When collecting information about a worker's vaccination status:

- Identify ways to safeguard workers' personal health information
- Limit information collected to what is reasonably necessary, e.g., copy of the proof of vaccination for each dose
- Keep worker vaccination information separate from their personnel file
- Ensure personal health/vaccination information is kept in a secure manner and only used when required

8. Staff contact

Identify who at your organization staff should contact with questions about the policy to request accommodation, or for more information about how to comply with the policy. The policy should also indicate the person to whom workers should provide proof of vaccination.

9. Continued adherence to COVID-19 prevention measures

Vaccination does not replace the need for strict adherence to established COVID-19 public health measures. Employers must continue to implement all COVID-19 prevention measures for their sector outlined in provincial guidelines and Timiskaming Health Unit guidance including, but not limited to: screening, physical distancing, wearing of masks and eye protection, hand hygiene, infection prevention and control, and a COVID-19 safety plan.

Resources:

- [Directive #6 \(COVID-19 vaccination policy in health settings\) resource guide](#) – this guide provides information on developing vaccine policies, a sample policy and resources to support an organization’s educational program.
- [COVID-19 and Ontario’s Human Rights Code – Questions and answers](#)
- [COVID-19 vaccines and workplace health and safety](#)

Educational resources for workplaces

- [COVID-19 vaccine clinics](#)
- [COVID-19 vaccine information for Timiskaming](#)
- [Directive #6 \(COVID-19 vaccination policy in health settings\) resource guide](#) – this guide provides information on developing vaccine policies, a sample policy and resources to support an organization’s educational program.

Workplace guidance after vaccination

Thank you for getting vaccinated! It is important to continue to follow the public health measures at home, in the workplace, and in the community. The COVID-19 vaccine along with public health measures will provide the best protection and help stop the spread of COVID-19.

Screening after vaccination

It is important that workplaces continue to screen workers daily for COVID-19 symptoms, even after they have been vaccinated. If a worker has symptoms, they should receive a COVID-19 test.

Resources:

- [Public health measures after your COVID-19 vaccine](#)
- [COVID-19 worker and employee screening](#)

Example policy

This resource is adapted from the Government of Ontario Resource Guide for Directive 6. NOTE: The information provided below is not legal advice. Employers should seek their own legal advice to address their specific workplace circumstances.

Covered Organization ABC's COVID-19 Immunization Policy

Purpose

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, all eligible employees, staff, contractors, volunteers, and students are strongly encouraged to receive a COVID-19 vaccine, unless it is medically contraindicated.

Background

ABC Covered Organization recognizes the importance of immunization of employees, staff, contractors, volunteers, and students, due to the nature of their work with _____ and the potential for exposure in the community. This COVID-19 immunization policy aims to protect the ABC Covered Organization's population including employees, staff, contractors, volunteers, and students.

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. The risk of severe disease increases with age but is not limited to the elderly and is elevated in those with underlying medical conditions.

Application of the Policy

Regardless of how often they are at ABC Covered Organization and how much time they spend there or in their respective workplace, this policy applies to:

- employees, staff, and other workers that are or may be in the workplace environment
- contractors (including people on contract and people employed by an employment agency or other third party)
- students on an educational placement
- volunteers

Policy

It is important to protect the health and wellbeing of ABC Covered Organization's employees, staff, contractors, volunteers, and students where there is evidence of a risk with identified measures for management. The Acting Medical Office of Health for the Timiskaming Health Unit coverage area has recommended that ABC Covered Organization develop, implement, and ensure compliance with a COVID-19 vaccination policy.

To facilitate this policy, 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 the World Health Organization 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 the World Health Organization
2. Written proof of a medical reason, provided by either a physician or nurse practitioner that sets out:
 - a. The reason that the person cannot be vaccinated against COVID-19; and
 - b. The effective time period for the medical reason (permanent or time-limited).
3. Proof that the individual has completed an educational program approved by ABC Covered Organization.

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, are required to perform rapid antigen testing, at a frequency of not less than X in alignment with provincial guidance, and provide verification of negative test results as specified by ABC Covered Organization (e.g., in person on the worksite, remotely via email or app).

Educational Program

The educational program has been approved by an approved vendor and/or provided by ABC Covered Organization and addresses all of the following learning components:

- how COVID-19 vaccines work;
- vaccine safety related to the development of the COVID-19 vaccines;
- benefits of vaccination against COVID-19;
- risks of not being vaccinated against COVID-19; and
- possible side effects of COVID-19 vaccinations

Support for Vaccination

ABC Covered Organization will provide the following supports for people subject to this policy to receive a vaccine: _____ (for example: paid time off, assistance with booking vaccine appointment, peer-to-peer support, etc.).

Non-compliance with the policy

In accordance with ABC Covered Organization’s human resources policies, collective agreements, and applicable legislation, directives, and policies _____.

Confidentiality Statement

In accordance with ABC Covered Organization’s confidentiality policies, workers’ data will be protected in the following ways: _____.

Disclaimer:

This document is intended for illustrative purposes only. Please be advised that this example of a policy does not constitute legal advice and should not be relied on as such.