

# COVID-19 WORKPLACE VACCINATION POLICY

Approved by the Board October 6<sup>th</sup>, 2021

## 1. INTRODUCTION

OECM is committed to providing a safe working environment for all its employees, service providers and visitors who attend its workplace.

COVID-19 is a serious health risk, which can result in hospitalization and death. It is for this reason that it is critical that OECM and its staff take all necessary precautions to protect against COVID-19. While OECM has made significant efforts to ensure the safety of everyone in its workplace by redesigning the workspace, upgrading sanitary measures, and implementing safety protocols, vaccination against COVID-19 is one of the best ways to protect those persons working in or visiting the OECM workplace.

## 2. PURPOSE

The purpose of this COVID-19 Workplace Vaccination Policy (the “**Policy**”) is to provide guidelines pertaining to the expectations and requirements of OECM for all officers, directors, employees, and all others who attend OECM’s workplace, with respect to the requirement for full COVID-19 vaccination.

## 3. SCOPE

This Policy applies to all OECM employees, officers, directors, contractors, and all other individuals employed or contracted to provide service in any capacity to OECM (collectively the “**Staff**”), and all other persons who attend OECM’s workplace (collectively the “**Visitors**”).

This Policy shall remain in force until it is amended or replaced.

## 4. VACCINATION

### A. Mandatory Vaccination

OECM requires all Staff prior to entering its workplace to be fully vaccinated against COVID-19, as recommended by the Ministry of Health and Chief Medical Officer of Health of Ontario and Toronto Public Health, unless they qualify for a valid exemption from vaccination as set out below. Visitors to OECM’s workplaces will be required to provide proof of vaccination prior to entry, without exception.

### B. Evidence of Vaccination

On or before October 15, 2021, all Staff must provide to Human Resources copies of the vaccination receipt of their second vaccination of a two dose vaccine series, or single vaccination in a one dose vaccine series, issued by the Ministry of Health,

confirming that they have been fully vaccinated. The preferred form of confirmation is a Confirmation of COVID-19 vaccination receipt issued by the Ontario Ministry of Health in respect of the final dose of the full series (“all doses”) of an approved COVID-19 vaccine or combination of approved vaccines received by the Staff member. These vaccination receipts can be downloaded or printed through the provincial portal (<https://covid-19.ontario.ca/covid-19-vaccine-booking-support#vaccination-receipts>) or by calling the Provincial Vaccine Booking Line at 1-833-943-3900. This version of the vaccine receipt contains a watermark and a digital signature to deter forgery. When available, proof of full vaccination will be the digital vaccine certificate issued by the Ministry of Health, Province of Ontario.

Staff who have been vaccinated in a jurisdiction outside of Ontario should contact their local public health unit to record their vaccination status and receive proper documentation.

Staff who commence employment with OECM after October 15, 2021 will be required to provide proof of vaccination or a valid exemption as provided in this Policy, before commencing their employment.

Visitors to OECM’s workplace will be required to provide proof of vaccination prior to entry, without exception.

### **C. Accommodation for Staff Who Have Not Been Vaccinated**

Where a Staff member is not vaccinated, they will be required to disclose in writing by October 15, 2021 to Human Resources the reason for not being vaccinated (e.g., religious, medical grounds or personal choice). This information will be kept in the Staff member’s confidential medical information file and is collected for the purpose of minimizing risks to Staff and others who may be in the OECM office in the event of an occurrence of COVID-19 and for the purpose of accommodations as set out below.

OECM is committed to a workplace that is free from harassment and discrimination in accordance with Ontario human rights laws. OECM will accommodate Staff from the requirement of full vaccination who qualify, based upon one or more protected grounds of discrimination under the *Human Rights Code*, including medical or religious exemption, up to the point of undue hardship.

Staff seeking exemption and accommodation under this Policy are required to identify the specific ground of discrimination under the *Human Rights Code* that they believe that the requirement of COVID-19 vaccination would infringe and must provide such information as OECM requires to establish the existence of the prohibited ground, related restrictions, and possible methods of accommodation. In the event that a Staff member seeks a medical exemption from the COVID-19 vaccination requirement, they must provide a written document from a physician, or by a registered nurse extended class or nurse practitioner containing all such information as may be stipulated by the College of Physicians and Surgeons of Ontario, from time to time, or as otherwise approved by the Ministry of Health, Province of Ontario and indicating whether it is a temporary exemption and how long it will apply, or a permanent exemption. The requirement for a written document will be replaced by the digital vaccine certificate, once recognized medical exemptions are integrated as part of the digital vaccine

certificate issued by the Ministry of Health, Province of Ontario. Staff members should contact Human Resources in this regard.

Where a Staff member provides a valid reason for having not received COVID-19 vaccination, including a medical or religious exemption, OECM will work with the individual to develop and implement appropriate accommodation. At the discretion of OECM, accommodation may consist of the requirement to wear additional PPE in the OECM workplace, frequent COVID-19 testing and reporting of results, modified work or reassignments, or working remotely. OECM will accommodate a Staff member to the point of undue hardship to OECM but requires that the Staff member satisfy their duty to cooperate with OECM in the accommodation process.

In cases where a Staff member does not have a valid reason for not receiving full COVID-19 vaccination, OECM will review the information and may implement necessary actions up to and including requiring the Staff member to attend education sessions, requiring wearing of additional PPE in the workplace, restricting access to the workplace, requiring proof of a current negative COVID-19 test before permitting access, placing the individual on an unpaid leave of absence, and/or modifying or terminating their contract of employment.

#### **D. Supporting Staff in Becoming Fully Vaccinated**

To further assist Staff with becoming fully vaccinated, OECM may undertake a variety of initiatives, including:

- Providing vaccine education sessions and information from credible sources including how COVID-19 vaccines work, vaccine safety in the development of COVID-19 vaccines, benefits of vaccination, risks of not being vaccinated, and possible side effects of vaccination.
- Supporting vaccine champions to initiate conversations with their peers.
- Providing paid leave to get vaccinated.
- Confirming to Staff that they may be entitled to paid sick days if they have side effects from the vaccine.

#### **E. Non-Compliance**

Staff failing to comply with this Policy may be subject to disciplinary action, up to and including termination of employment.

#### **F. Policy Modifications**

Government and public health guidelines and restrictions and business and industry best practices regarding COVID-19 and vaccines are changing rapidly as new information becomes available, further research is conducted, and additional vaccines are approved and distributed. OECM reserves the right to modify this Policy at any time in its sole discretion to adapt to changing to public health considerations and business needs, consistent with its commitment to maintaining a safe and healthy workplace.

## 5. **PRIVACY**

The individual vaccine status of Staff and Visitors will be used to mitigate health risks against COVID-19, as knowing our Staff members' and Visitors' vaccination status may be important to assist us to take appropriate action quickly in the event of COVID-19 cases in the workplace and thereby protect workers, their families, and the general public. However, Staff and Visitor vaccination status information will be protected in accordance with applicable privacy legislation.

By collecting information about Staff members' and Visitors' vaccination status, we will:

- a) Identify ways to safeguard Staff members' and Visitors' personal health information.
- b) Limit information collected to Staff members' and Visitors' name and date of vaccination for each dose.
- c) Keep Staff vaccination information separate from their personnel file; and
- d) Ensure personal health/vaccination information for all Staff members and Visitors is kept secure and is only to be used when required.

## 6. **STAFF CONTACT**

If you have any questions regarding either this COVID-19 Workplace Vaccination Policy, or how it affects you, please contact Human Resources