

Madawaska Valley

Association For

Community Living

**POLICY: COVID 19 IMMUNIZATION**

**PAGES: 5**

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**CATEGORY: HEALTH & SAFETY**

**Effective Date:**

This Policy and Staff COVID-19 Vaccination Declaration Form is effective September 23, 2021

**Policy Statement:**

This Policy reflects our obligations under the *Occupational Health and Safety Act* (OHSA) to take

Every reasonable precaution to protect employees, staff, contractors, volunteers and students.

And to comply with our obligations under applicable emergency orders (O. Reg 177/20 and O. Reg. 121/20, current Public Health advice/recommendations and MCCSS Directives.

This Policy is based on the significant risk factors for COVID-19 infection that are present in MVACL workplaces given the nature of support and as described in Ontario’s Response Framework including close contact, closed spaces, crowded places, forceful exhalation, and prolonged exposure, with the most serious risk factor being close contact.

This Policy will be updated regularly to reflect any changes in the degree of risk and any advice or recommendations from the authorities listed above.

**Purpose:**

The purpose of this policy is to outline the expectations related to COVID 19 immunization, including the tracking of vaccination received, the medical exemption process for those who have a medical contraindication to COVID-19 vaccines, and the training and declination process for those choosing not to be vaccinated.

**Scope:**

The responsibilities set out in this policy apply to all employees, staff, contactors, volunteers and students who:

• intend to be or have been vaccinated;

• cannot be vaccinated due to substantiated medical or religious reasons protected by the Ontario

Human Rights Code; or

• choose not to be vaccinated for other reasons.

Responsibilities for Individuals Served are included in a separate Policy

**Definitions:**

**Required Individual -** All MVACL employees, staff (full-time, part-time, casual and/or on contract), contractors, volunteers, students, and any person who performs work for MVACL are all collectively referred to herein as **“Required Individuals**”. This includes a Staff who is currently employed by MVACL or has, at the time this policy comes into effect, already accepted a position with MVACL.

**Contractors -** includes third-party contractors, healthcare practitioners, and other visitors with a specific purpose for people served or their environment (e.g., cleaning, maintenance). This does not include family for purposes of this policy.

**Fully Vaccinated –** having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by the World Health Organization; and having received the final dose of the vaccine at least 14 days ago.

**Previously Positive -** confirmed case of COVID-19 where the initial positive result was > 90 days ago AND they have been cleared from the initial infection. Requires confirmation from Public Health.

**High-risk environments** - include situations in which there is a risk of exposure to unvaccinated people and/or people who are positive with COVID-19. They also include close prolonged contact, areas with poor ventilation, and/or inability to maintain physical distance. Any area currently experiencing an outbreak is also a high risk environment.

**General Principles:**

**A. Expectation of Vaccination:**

• MVACL expects all **Required Individuals** who provide support or work in an area where

Individuals are supported or within office locations or meeting rooms to be fully vaccinated against COVID-19 as per Ministry of Health standards. This is necessary given the extreme risk associated with COVID-19 and is designed to keep all people we support and all Required Individuals safe and healthy.

• During the recruitment process, **Prospective Staff** will be informed that proof of full COVID-19 vaccination is a condition for hire/placement.

• **Existing Staff** must submit the COVID-19 Vaccination Declaration Form and submit a copy of their Ministry of Health vaccination record to Human Resources including the dates of vaccination (dose 1 and dose 2, where applicable) against COVID-19. In the case of vaccination outside of Ontario, equivalent COVID-19 vaccination proof must be provided including the details of the authorized administrator.

• As part of Active Screening, **Contractors** will be asked if they have been vaccinated prior to entry to a MVACL residence or other MVACL premise.

• Staffing Agencies contracted to provide personal support employment services to MVACL, as

Outlined in their contract, will ensure agency staff are fully vaccinated before providing service.

• Any costs associated with proof of immunization are the responsibility of the Required Individuals.

**B. Accommodation**

• MVACL will comply with the Ontario Human Rights Code (OHRC) and provide accommodation up to

The point of undue hardship for any **Required Individual** who is unable to be vaccinated for substantiated medical or religious reasons.

• To determine whether accommodation is required and/or possible without undue hardship,

MVACL (under the advice of the Joint Health and Safety Committee) will use the **Risk Assessment Framework** adapted from the Public Services Health and Safety Association’s *General Infectious Disease Risk Assessment and Management Tool*.

• Due to the seriousness of COVID-19 and its impact on the health and safety of the people we support and required individuals, accommodation may not be possible in all circumstances.

• Required Individuals who fail to submit proof of vaccination will be considered not vaccinated.

• All Required Individuals must complete the **COVID-19 Vaccination Declaration Form** and return

To Human Resources with the required supporting documentation on or before

(October 1, 2021).

• Unvaccinated Required Individuals are subject to enhanced screening and additional precautionary measures including, but not limited to:

• Rapid Antigen testing with a negative test result taken at least every 7days. Refer to Rapid Antigen Testing Policy.

• Completion of MVACL; s approved mandatory COVID-19 Education Program. Unvaccinated Required Individuals are required to contact Human Resources to obtain appropriate training materials and/or information.

• A no work available circumstance when the person supported is symptomatic with probable or confirmed COVID-19 until the supported person’s isolation period is complete;

• Prevention (no work situation) from working in a location that is experiencing an outbreak until the outbreak is declared over by Public Health.

• Restriction from working in high-risk environments and/or limited to working for one employer for the duration of the pandemic.

* Restricted to working in one location within MVACL in the event of an outbreak.
* Failure to complete the **COVID-19 Vaccination Declaration Form** will result in the Required Individual being considered “unvaccinated” and subject to restrictions listed above.

**Procedures**

**A. Proof of full COVID-19 Vaccination is a requirement of employment for all prospective staff.**

**B. Proof of COVID-19 Vaccination or Consideration of Accommodation for Existing Staff**

1. Upon issue of this Policy, all Required Individuals will complete the COVID-19 Vaccination Declaration form.

2. MVACL will provide accommodation to the point of undue hardship, to existing staff who are unable to be vaccinated for medical or religious reasons. All unvaccinated staff will have their request for accommodation reviewed by Management and HR as per the Risk Assessment Framework. The reason for non-vaccination, the nature of work being performed, the risk to the work environment, and the current risk of community transmission of COVID-19 will be considered.

**C. Proof of Immunization and/or Consideration for Accommodation - Contractors**

1. As part of scheduling an appointment or visit, the MVACL supervisor or manager will alert the Contractor that they will be asked as part of screening if they have been vaccinated prior to entry to a MVACL residence or other MVACL premise.

2. For any Contractor who identifies that they have not been vaccinated when the visit is scheduled either as part of visit, the Site Manager will assess whether the accommodation is possible using **Risk Assessment Framework**. The nature of work being performed, the risk to the work environment and any other relevant factors will be considered.

**VACCINATION OPPORTUNITIES AND REIMBURSEMENT**

1. MVACL staff who are able to schedule an appointment at vaccination clinic during a scheduled shift are expected to work collaboratively with their Manager to schedule appropriate time to receive the vaccination(s).

2. All staff can use available sick leave credits for reasons related to COVID-19 as follows:

2.1. All MVACL employees may use leave from their sick time banks to attend a vaccination appointment that results in lost scheduled time. In addition, those who qualify, may use the **Ontario COVID-19 Worker Income Protection Benefit**. This benefit is an amendment to the Employment Standards Act (ESA).

2.2. Staff must make all requests for payment of sick time or use of the Ontario COVID-19 Benefit within the pay period it is used.

3. Costs associated with Rapid Antigen testing and mandatory COVID-19 Education is the responsibility of the unvaccinated Required Individual.

**REPORTING AND RECORD KEEPING**

All COVID-19 Vaccination and Accommodation records for Required Individuals will only be collected, used, or disclosed as necessary for legitimate operational purposes or as directed or requested by government authorities. All records will be kept in a secure manner consistent with MVACL’s privacy policies and practices.