

COVID-19 PUBLIC HEALTH GUIDANCE on Face Covering Instructions for Businesses and Organizations (including Public Transit Services)

On July 7, 2020, the Medical Officer of Health for Simcoe Muskoka District Health Unit (SMDHU) instructed employers/persons responsible for businesses or organizations, including public transit services, within Simcoe Muskoka to develop and implement a policy requiring the use of face coverings by customers/clients, volunteers and employees in indoor public spaces of their premises. This requirement does not apply to areas **not** designated for public access, or for employees serving the public when they are behind a sufficient barrier consisting of a solid surface (such as glass or Plexiglas) that forms a complete barrier between employees/volunteers and members of the public. This [instruction](#) was issued under the authority of the provincial [Emergency Management and Civil Protection Act](#) (EMCPA) and is **effective 12:01 a.m. July 13, 2020**.

A policy requiring the use of face coverings for indoor public spaces provides additional protection to members of the public and employees from acquiring COVID-19. This policy is to be used in conjunction with other prevention measures outlined in the [letter of instruction](#) and other guidance provided for operating [businesses, organizations and municipalities](#), including:

1. To the fullest extent possible, ensure effective measures are in place to maintain physical distancing of 2 metres amongst all employees and clients.
2. Unless the nature of work requires the use of a medical mask, to the fullest extent possible, ensure all individuals wear a non-medical mask (for example, a face covering or a homemade cloth mask) when physical distancing is challenging or not possible.
3. Implement screening practices for employees and members of the public, including requiring those who are ill to stay home and be advised to be tested for COVID-19.
4. Promote excellent hygiene practices including hand hygiene, and cough and sneeze etiquette.

Under this requirement a business or organization includes a mall or other structure containing a number of businesses or organizations, and may include but is not limited to the following:

- Places of worship
- Community centres
- Convenience stores
- Farmers' markets
- Grocery stores and bakeries
- Gas stations
- Hospitals
- Independent health facilities
- Libraries
- Malls and plazas
- Mechanics' shops, garages and repair shops
- Offices of regulated health professionals
- Personal service settings
- Retail stores
- Restaurants, pubs and bars

These requirements **do not apply** to the following, as they are provincially regulated:

- Schools (elementary and secondary) under the Education Act, R.S.O. 1990, c. E.2, as amended and post-secondary institutions;
- Child care centres and providers governed by the Child Care and Early Years Act, 2014, S.O. 2014, c. 11, as amended;
- Day camps (indoor/outdoor).

While the health unit will commence with an educational and supportive approach, as per the EMCPA, those who do not comply with the above noted requirements may be fined. Individuals may be liable for a fine of \$750 - \$1,000 up to a maximum of \$100,000, while corporations may be liable for a fine of up to \$10,000,000 for each day or part of each day on which the offence occurs or continues. The following persons are exempted from wearing a face covering and **are not required to provide proof of such exemption**:

- a. The person is a child under the age of two years; or is a child under the age of five years either chronologically or developmentally and he or she refuses to wear a face covering and cannot be persuaded to do so by their caregiver.
- b. The person is incapacitated and unable to remove their face covering without assistance.
- c. Wearing a face covering would inhibit the person's ability to breathe such as, but not limited to, during moderate to intense physical activity (such as running) or activity that would preclude its use (such as swimming).
- d. For any other medical reason, the person cannot safely wear a face covering such as, but not limited to, respiratory disease, cognitive difficulties or difficulties in hearing or processing information.
- e. For any religious reason, the person cannot wear a face covering.

Steps for Businesses and Organizations

1. Develop a policy supporting the requirement issued by SMDHU's Medical Officer of Health, under the authority of EMCPA that everyone is required to wear a face covering in the indoor public areas of your premises.
 - For services that require longer interactions or close contact, consider offering alternative services to customers who are unable to wear a face covering (e.g. provide online, telephone, curbside pickup or off-peak hour services).
2. Communicate the policy to all employees and volunteers. Educate and train them on the requirements of the policy and how to handle circumstances involving policy implementation.
 - Consideration: In addition to the information and resources provided in the sample policy below, is there other education, information or resources your employees/volunteers need to implement your policy (e.g. how to properly use, clean or dispose of face coverings)?
3. Communicate the policy to members of the public before or when entering your premises.
 - Provide a verbal reminder to members of the public to wear a face covering.
 - Post [public signage](#) in high visibility areas of all entrances reminding people to wear a face covering.
 - Consideration: Will your business/organization have face coverings available for employees and/or members of the public who enter into indoor public space of your premises who do not have one?
4. Ensure that all employees, volunteers and members of the public wear a face covering in indoor public spaces, unless they are exempted as noted above.

Sample Policy

Mandatory Use of Face Coverings in Indoor Public Spaces within [Name of Business/Organization]

Policy

Beginning July 13, 2020, all employees, volunteers and members of the public are required to wear a face covering upon entering and remaining within indoor public spaces of [name of business/organization]. A face covering means a medical or a non-medical mask or other face covering such as a bandana, scarf or cloth (including hijab and niqab) that covers the nose, mouth and chin.

Temporary removal of the face covering is permitted where necessary to receive services provided by our business/organization (e.g. eating, drinking or exercising).

The following persons are exempted from wearing a face covering and will not be required to provide proof of such exemption:

- The person is a child under the age of two years; or is a child under the age of five years either chronologically or developmentally and he or she refuses to wear a face covering and cannot be persuaded to do so by their caregiver.
- The person is incapacitated and unable to remove their face covering without assistance.
- Wearing a face covering would inhibit the person's ability to breathe such as, but not limited to, during moderate to intense physical activity (such as running) or activity that would preclude its use (such as swimming).
- For any other medical reason, the person cannot safely wear a face covering such as, but not limited to, respiratory disease, cognitive difficulties or difficulties in hearing or processing information.
- For any religious reason, the person cannot wear a face covering.

Employees are not required to wear face coverings in employee-only areas that are not accessible to the public except in circumstances where physical distancing cannot be maintained or sharing a smaller size enclosed workspace with another person for a prolonged period of time.

Steps to Implement Policy

1. Communicate the policy to employees and educate and train them on the requirements of the policy including how to respond to potential circumstances they may experience when implementing the policy, such as:
 - A member of the public:
 - arrives without a face covering;
 - requests more information about the policy and bylaw (see [SMDHU letter of instruction](#));
 - requests information about the importance of wearing a face covering or the science on the use of face coverings to prevent exposure to COVID-19 (see [SMDHU website](#));
 - reacts aggressively in response to being asked to wear a face covering;
 - asks if they can be turned away or fined for not wearing a face covering (see [SMDHU FAQs](#));
 - asks about other COVID-19 prevention measures in place at your business/organization (e.g. availability of alcohol-based hand sanitizer, screening measures for the public/employees, physical distancing practices, cleaning and disinfection practices).
2. Communicate the policy to members of the public.
 - Download, print and post [public signage](#) in high visibility areas at all entrances to the premises reminding people to wear a face covering.
 - Provide a verbal reminder to visitors and customers to wear a face covering.
3. Ensure all employees, volunteers and members of the public entering the premises wear a face covering in indoor public spaces of (name of business/organization)
 - Provide verbal reminders to member of the public to wear a face covering prior to entering the premise and those who remove their face covering while in the premise.
 - People who are unable to wear a face covering due to health, age or other reasons do not require proof for the exemption. See exemptions list above.

This policy has been created in compliance with the requirement by the Simcoe Muskoka District Health Unit Medical Office of Health under the authority of the provincial Emergency Management and Civil Protection Act.

Additional information

More information about face coverings is available [here](#) including links to provincial guidance on the proper use, removal, cleaning, and disposal of face coverings and masks. If you have questions contact Health Connection at 1-877-721-7520.