

COVID-19 Vaccination Policy

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Introduction

COVID-19 is a respiratory disease that has caused significant morbidity and mortality both globally and locally in Simcoe Muskoka. As of March 2022, there have been over a million cases in Ontario and over 10,000 deaths. Cases are estimated to be significantly higher given the changing eligibility guidelines for testing. Widespread measures like stay-at-home orders, closures of public spaces, physical distancing, and universal masking have been necessary to prevent infections, prevent deaths, and protect the healthcare system's capacity to treat individuals who become ill. Vaccination is an important intervention that prevents the spread of COVID-19 and has contributed to decreasing cases and deaths in Canada since its inception.

Rationale

There are several reasons to promote vaccination among Simcoe Muskoka District Health Unit (SMDHU) Staff, including the following:

SMDHU Staff are healthcare workers.

The National Advisory Committee on Immunization (NACI) considers healthcare workers a priority population for COVID-19 vaccination due to their increased risk of exposure to SARS-CoV-2 and their critical role in maintaining healthcare system capacity (1). Overall, 7% of COVID-19 cases are among healthcare workers (2). SMDHU Staff are at increased risk of exposure through the provision of direct clinical care at sexual health clinics, tobacco cessation workshops, prenatal classes, dental clinics, breastfeeding clinics, home visiting services and the provision of other frontline services. SMDHU Staff are also at increased risk of exposure to COVID-19 through site visits to long-term care homes, childcare centres, other congregate settings during non-outbreak and outbreak occurrences. During these site visits and when providing clinical care and services, SMDHU Staff regularly work with clients and colleagues who are at increased risk of infection and at increased risk of severe complications from COVID-19. For example, young children at breastfeeding clinics cannot be immunized at this time and remain vulnerable to infection, while older adults in long-term care homes have experienced the highest case fatality rates to COVID-19.

SMDHU Staff are critical public health service providers.

SMDHU Staff are essential to the public health system in Simcoe Muskoka and in the province of Ontario. SMDHU Staff lead case and contact investigations, manage institutional outbreaks, have led the mass COVID-19 vaccination campaign, and have been instrumental in minimizing the impacts of COVID-19 on the population. Any loss of services due to Staff illness potentially compromises SMDHU's capacity to protect the population.

SMDHU Staff are colleagues to individuals at increased risk of complications or death from COVID-19 infection.

The comorbidities which place individuals at increased risk of hospitalization or death from COVID-19 infection are common chronic diseases and are likely prevalent among SMDHU Staff. The nature of SMDHU work and office environment – working in close proximity to others, sharing meeting rooms, desks, phones, computers and other equipment - allows for ease of transmission and thus puts vulnerable, high-risk Staff at increased risk of acquiring COVID-19 and its complications.

SMDHU has a responsibility to the health and safety of its Staff and the Simcoe Muskoka community at large.

Under the Ontario *Occupational Health and Safety Act* (3), SMDHU has a responsibility to take all precautions reasonable in the circumstances to protect the health of its workers. Furthermore, SMDHU has a responsibility under the Ontario Public Health Standards (4) to promote and protect the health of its residents, and to be prepared to manage public health emergencies in its jurisdiction. These actions require a healthy workforce.

SMDHU can demonstrate community leadership.

As strong advocates and purveyors of preventive interventions, it is important that SMDHU show leadership in the area of COVID-19 vaccination.

COVID-19 Vaccination

COVID-19 vaccination is an effective and safe intervention which dramatically decreases the risk of hospitalization or death should an individual become exposed to the virus. Periodic booster vaccinations are necessary to maintain adequate protection against COVID-19 for individuals and the community. In Ontario, the rate of COVID-19 hospitalizations and deaths by vaccination status from February to March 2022 can be up to 22 times higher in unvaccinated individuals compared to those who have completed a primary series, depending on age (5).

Over time, protection from a primary series of a COVID-19 vaccine can decrease due to waning immunity. Vaccine effectiveness is estimated to be 36% within the first 60 days against the Omicron variant and provided no protection after 180 days. Following a booster vaccine, protection against the Omicron variant increases to 61%. Protection against severe outcomes is over 95% against both Delta and Omicron variants following a booster dose (6). Furthermore, vaccination may prevent secondary transmission in case of infection following vaccination. Researchers in England reported fewer infections in household contacts of immunized cases compared to household contacts of unimmunized cases (7).

COVID-19 vaccinations are safe. With rigorous approval processes, and ongoing surveillance of adverse events, COVID-19 vaccinations are held to the highest standard. Serious side effects are rare. The Public Health Agency of Canada is reporting, as of March 18, 2022, adverse events following vaccination in 0.05% of doses, with only 0.011% of those events considered serious events (8).

Additional Public Health Measures

COVID-19 has been difficult to control due to its highly infectious nature, as well as the fact that it may be transmitted by asymptomatic individuals. A multilayer approach involving masking, physical distancing, hand hygiene, testing when symptomatic, and staying home when ill provides the most optimal protection for the community. These measures are particularly important in the context of an indoor environment, where ventilation, masking, and distancing are less effective in confined spaces. Periodic testing, such as rapid antigen

testing, is sometimes used in Ontario to identify individuals infected with COVID-19 that would otherwise not be detected through other mechanisms. However, vaccination remains the most effective protection against COVID-19, and unlike the other layers of protection, it only has to be performed periodically.

SMDHU commits to sharing trustworthy information about COVID-19 vaccination with all Staff, including information about COVID-19 vaccination safety and vaccination locations.

Assumptions

The policy makes the following assumptions, which are based on current scientific consensus:

- COVID-19 vaccines will continue to be effective but will require periodic booster vaccinations as per current and future provincial recommendations.
- COVID-19 is likely to be in circulation and surge in waves for the next number of years.
- Vaccination is a safe and effective intervention against COVID-19. By making vaccination an expectation for all employees, SMDHU helps protect its employees, their colleagues and families, and Simcoe Muskoka residents.

Should the above assumptions and/or the epidemiology of COVID-19 change, this policy is subject to revision.

Purpose

To outline the commitments SMDHU makes to encouraging and facilitating COVID-19 vaccination.

To establish expectations for SMDHU Staff to receive COVID-19 vaccination in order to:

- Protect clients who receive direct services from SMDHU Staff.
- Protect SMDHU Staff members and their SMDHU work colleagues (including some of those who, unknown to colleagues, may be at high risk of serious complications or death from COVID-19 infection).
- Protect the ability of the SMDHU to provide critical public health and emergency services.
- Provide leadership on this preventive measure to the community and our community partner.

Policy Definitions and Interpretation

For the purposes of this policy, the following definitions apply:

Staff: all individuals employed by or working for the SMDHU, including volunteers, students, contracted personnel (working on a full day basis for > 10 consecutive days), and members of the Board of Health.

Supervisor: the person to whom a Staff member directly reports.

Primary series vaccination: An individual has completed their “primary series vaccination” after having received a series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by Health Canada (e.g., two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series) and having received the final dose of the primary series at least 14 days ago.

Booster vaccination: An individual has received a “booster vaccination” after having received additional doses of the COVID-19 vaccine approved by Health Canada, recommended by NACI and supported by the Ontario Ministry of Health to bolster immunity following a primary series.

Up-to-date vaccination: An individual is “up to date” on their vaccinations if they have received all doses recommended by the Ontario Ministry of Health in their primary series of COVID-19 vaccine, including relevant booster doses based on established eligibility criteria. See Appendix A for reference regarding the most current “up to date” definition which will be updated in line when changes to the vaccine recommendations are made by the Ontario Ministry of Health.

Note: For those who may be immunocompromised as defined by the Ministry of Health guidance, it is the Staff member’s responsibility to self-identify as such and to receive the recommended number of doses in their primary series,

Policy

SMDHU’s goal is an up-to-date vaccination rate amongst staff of 100%.

To reach this goal all Staff as defined herein are required to be up to date with both their primary and booster vaccinations unless an exception under this policy applies. The only such exceptions are a valid medical exemption or other valid accommodation entitlement under the Ontario *Human Rights Code* (11). Those who do not comply with this policy may be subject to progressive steps beyond mandatory education and testing such as, but not limited to, unpaid leaves of absence and/or discipline up to and including termination for cause, as may be determined in SMDHU’s sole discretion. Reasonable accommodation where possible for those who are not up to date with their vaccination may be considered, depending on the Staff member’s position.

As detailed below, mandatory up-to-date vaccination is required for all Staff and new employees to support SMDHU’s goal of universal Staff vaccination.

Specifically, SMDHU requires all Staff to submit one of the following (each, a “Written Proof”):

1. Provide Written Proof to Human Resources of up-to-date vaccination against COVID-19. At their discretion, a Staff member may redact any personal information on their Written Proof aside from the Staff member’s name, the number and name of vaccination doses received by the Staff member, and the date(s) of the vaccination(s).; OR
2. Provide Written Proof of a medical reason, provided by a physician or nurse practitioner that sets out: (i) a documented medical reason for not being fully vaccinated against COVID-19, and (ii) the effective time-period for the medical reason; OR
3. Submit documentation (i) confirming declination of vaccination and (ii) providing any reasons for declining vaccination other than medical reasons, notably any reasons that may support a valid accommodation request under the Ontario *Human Rights Code*.

Staff are required to submit one of the above acceptable forms of Written Proof twice per calendar year: by May 31 and November 30 (and not earlier than 30 calendar days prior to each deadline). SMDHU reserves the right to determine whether submitted Written Proof is acceptable for the purposes of this policy.

- For the purposes of the policy, all Staff are required to be up to date with their COVID-19 vaccinations and recommended to receive each vaccination dose as per the most current [Ontario Recommendations](#).

Implementation of Policy

Any disciplinary and/or administrative measures taken with respect to Staff who are not up to date with COVID-19 vaccination doses will be determined at the discretion of SMDHU with regard to local epidemiological conditions as determined by the Medical Officer of Health.

Procedures

Documentation of vaccination status by all existing Staff:

- Each existing Staff member is required to provide Human Resources with acceptable Written Proof twice per calendar year: by May 31 and November 30 (and not earlier than 30 calendar days prior to each deadline).
- Staff who have not provided this information to Human Resources by the applicable deadline will receive a reminder email from their applicable VP explaining SMDHU's expectations and this policy, which reminder will be copied to their Supervisor for follow up.

Procedures relating to new and returning Staff:

- All job postings will (i) state that up-to-date vaccination is an essential requirement of the job, will (ii) provide a definition of vaccination status, and (iii) state that SMDHU is an equal opportunity employer, and that the possibility of accommodation will be considered during the hiring process as required.
- During all hiring interviews, applicants will be informed about this policy by the Selection Committee Chair and be asked whether they can comply with the requirement of being up to date with their vaccination or if they will require accommodation under this policy. If accommodation needs are raised in the interview process, these needs will be discussed in that process so that SMDHU can gain a better understanding of them. Candidates who cannot comply with SMDHU's vaccination requirements and who do not claim a valid accommodation need will be given no further consideration in the hiring process.
- Qualified candidates who are selected to receive a job offer will receive such job offers conditional on (i) proof of up-to-date vaccination or proof of need for accommodation under this policy, and ii) SMDHU's determination that accommodation can be provided without undue hardship. A copy of this policy will be included in all letters of hire to new Staff for acknowledgement and sign off.
- Staff who have been off work and will be returning to work will be allowed to return to work once they have provided acceptable Written Proof in accordance with this policy. Any and all accommodation requests must be addressed as outlined within this policy before Staff may return to work.

Educational Session concerning COVID-19 vaccines

SMDHU may make available an educational session for unvaccinated Staff without a bona fide medical exemption that will address (i) how COVID-19 vaccines work (ii) vaccine safety related to the development of the COVID-19 vaccines (iii) the benefits of vaccination against COVID-19 (iv) the risks of not being vaccinated against COVID-19 and (v) the possible side effects of COVID-19 vaccination.

Procedures relating to employees without up-to-date vaccination records:

- For Staff who can prove valid medical or other Ontario *Human Rights Code* grounds for exemption from having to prove up-to-date vaccination, SMDHU will comply with its obligations to consider reasonable accommodation if possible and, if required, will grant such accommodation. Each such case will be assessed and dealt with on its own merits depending on the nature of a Staff member's position and the potential to jeopardize the health and safety of others. Without limiting the generality of this paragraph, accommodation terms may include the following:
 - When in shared workspaces, using appropriate COVID-19 source control and personal protective equipment as required by SMDHU, potentially beyond the period of time for which this is also required of vaccinated Staff, including a mask when in a room with other persons. As well, mandatory rapid antigen testing at a minimum rate of two tests per week may be required.
 - For Staff who work in-person with clients, in clinic, or in community spaces, using appropriate COVID-19 source control and personal protective equipment at work as required by SMDHU, potentially beyond the period of time for which this is also required of vaccinated Staff, including a mask and eye protection. As well, mandatory rapid antigen testing at a minimum rate of two tests per week may be required.
- For the protection of SMDHU Staff, clients and members of the community we serve, for Staff who fail to provide acceptable Written Proof of up-to-date vaccination under this policy, or who fail to show valid medical or other Ontario *Human Rights Code* grounds for exemption from having to prove up-to-date vaccination, SMDHU will determine, in its sole discretion, an appropriate response on a case-by-case basis in accordance with the policy statements contained herein and applicable legislation including the Ontario *Occupational Health and Safety Act* (3). Depending on the circumstances, SMDHU's response may include appropriate disciplinary measures, administrative actions, and/or accommodation measures.
 - Appropriate accommodation will vary depending on the type of work context and exposure to other colleagues and clients, considering the local epidemiology of the circulating COVID-19.
 - Depending on the nature of the position and the potential to jeopardize the health and safety of others, examples of accommodation may include using appropriate COVID-19 source control and personal protective equipment as required by SMDHU, potentially beyond the period of time for which this is also required of vaccinated Staff, including a mask when in a room with other persons. As well, mandatory rapid antigen testing at a minimum rate of two tests per week may be required. Proof of testing must be submitted to Human Resources prior to attending a work shift.
 - Any accommodations granted to employees who fail to show valid medical or other Ontario *Human Rights Code* grounds for exemption shall be temporary in nature and shall be granted without prejudice to SMDHU's right to revoke or otherwise end such accommodation measures in response to evolving epidemiological conditions or for any other reason whatsoever.
- SMDHU employees shall comply with provincial directives and facility policies to provide to such facilities proof of vaccination or medical exemption as requested.

- In all cases, Staff who are not up to date with their COVID-19 vaccinations and who work in the office, in clinic, or in the community may be required to submit to antigen point of care testing for COVID-19 and demonstrate a negative result at intervals to be determined by the Medical Officer of Health, but at a minimum twice every seven calendar days. The negative test result will need to be verified by SMDHU in a manner that allows SMDHU to confirm the result at its discretion. For more details, contact Human Resources.

Privacy

Any personal information received pursuant to this policy and relating to an employee's vaccination status will:

- be collected only as necessary and reasonable to achieve the purposes of this policy, including protecting the health and safety of employees and clients, limiting the spread of COVID-19 in the workplace and compliance with applicable laws;
- be used for the purpose of protecting the health and safety of workers and third parties in the workplace, including, for example, effectively responding in the event of a COVID-19 outbreak;
- be disclosed only to representatives designated by SMDHU to enable them to carry out the objectives of this policy and to protect the health and safety of the employee concerned, co-workers, visitors, suppliers, or the general public, if any; and,
- not be disclosed to any third party unless SMDHU receives employee consent or as otherwise required by law.

Personal information received under this policy will be treated as confidential and will be stored and retained by SMDHU in accordance with its [Personal Health Information Privacy Policy IM0101](#). Such personal information will be destroyed by SMDHU as soon as it is no longer of any use.

Continuation of Health and Safety Matters

Pursuant to public health guidelines, all Staff, including those who have been vaccinated, must continue to comply with SMDHU's COVID-19 health and safety policies and guidelines, except as provided for in this policy or until advised otherwise.

Revisions

This policy will be reviewed by the Medical Officer of Health annually or when new information on COVID-19 vaccination or epidemiology changes significantly, to ensure that it is up to date.

Related Policies

OP0110 Work From Home Policy

HR0709 Leave of Absence (unpaid)

HS0106 Influenza Immunization

IM0101 Personal Health Information Privacy Policy

Related Procedures

[Antigen Screening Procedures](#)

Related Forms

[HS0122 \(F1\) Statement of Medical Exception for COVID-19 Immunization](#)

[HS0122 \(F2\) Refusal of COVID-19 Immunization](#)

[HS0122 \(F3\) Ineligible to Receive COVID-19 Immunization](#)

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9. Getting the COVID-19 Vaccine [Internet]. Toronto, ON: Queen's Printer for Ontario; 2022 Apr 22 [cited 2022 Apr 22]. Available from: <https://covid-19.ontario.ca/getting-covid-19-vaccine>

10. Ontario. Ministry of Health. COVID-19 Vaccine Booster Recommendations Version 8.3 July 22, 2022 [Internet]. Toronto, ON: Queen's Printer for Ontario; 2022 [cited 2022 August 10]. Available from: https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/vaccine/COVID-19_vaccine_third_dose_recommendations.pdf

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Final Approval Signature: _____

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Revised November 15, 2022
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Appendix A

Updated November 15, 2022

For reference:

- [Getting the COVID-19 vaccine](#) – Ontario's most current recommendations on COVID primary series and booster vaccination (9).
- [COVID-19 Vaccine Guidance](#) Version 3.1 November 7, 2022

Archived Version – Not Current

- [COVID-19 Vaccine Booster Recommendations](#) Version 8.3 July 22, 2022 (10).