

# COVID-19 Vaccination Policy Toolkit

For Workplace Guidance Only

## INTRODUCTION

Employers have an obligation to maintain a safe work environment for their workers. To help reduce the risk of COVID-19 transmission, all employers should have a workplace vaccination policy. A workplace vaccination policy is an important measure employers can implement to protect their workers and the public.

The COVID-19 Vaccination Policy Toolkit includes:

- [Vaccination Policy Template](#)
- [Assessing the Risk of COVID-19 Transmission in Your Workplace](#)
- [Additional Ways Employers can Promote Vaccination](#)
- [Frequently Asked Questions](#)
- [Sample Letter to Share with Workers](#)

The toolkit was developed to help guide workplaces as they develop their own COVID-19 vaccination policies. This toolkit should not be considered legal advice. Employers and persons responsible for a business are encouraged to seek legal advice or assistance in developing their own vaccination policy. Each organization should assess the risks associated with COVID-19 when considering and adapting the template – See [Assessing the Risk of COVID-19 Transmission in Your Workplace](#). Employers have a general duty under the [Occupational Health and Safety Act](#) (OHS) to take every reasonable precaution to protect their workers. [Ontario regulation 364/20](#) and sector-specific legislation, as applicable, should also be followed.

A workplace COVID-19 vaccination policy does not replace ongoing public health and individual protective measures required for COVID-19 prevention, however, increasing vaccine coverage rates helps reduce the spread of COVID-19 in the workplace and the community.

## VACCINATION POLICY TEMPLATE

The vaccine policy may require revision from time to time as the pandemic evolves, legislature changes, or on the advice of scientific or public health. Here are recommended components of a workplace vaccination policy:

### Background

- Describe the importance of COVID-19 vaccines in protecting the public.

### Sample:

On March 11, 2020, the World Health Organization declared COVID-19 a pandemic. The first case in the North Bay Parry Sound District Health Unit region was reported on March 26, 2020. As the pandemic evolves, variants of the virus have circulated globally as well as locally in Ontario and in the Nipissing and Parry Sound districts. Some variants, for example, the delta variant, have proven to be more easily transmissible and/or cause more severe illness than the original strain. They have required more robust public health measures, including high vaccination rates.

COVID-19 vaccines, in combination with public health measures, are effective in reducing disease spread and severe outcomes. Recent data has shown that only a small proportion of fully vaccinated people have become infected with COVID-19, compared to unvaccinated individuals.

### **Purpose**

- Provide the reason(s) why this policy is in place.
- Specify how individual vaccination status of employees will be used by the employer to mitigate the health-related risks of COVID-19.
- Be specific about who this policy applies to.

### **Sample:**

The purpose of this policy is to outline the workplace's expectations with regards to COVID-19 immunization of employees, staff, contractors, volunteers, and students.

As the health and safety of our workers is a top priority, we are committed to taking all reasonable precautions to protect the health and safety of workers during the pandemic of COVID-19. Vaccination is an effective way to protect oneself and one's co-workers from COVID-19.

Contingent upon vaccine availability and unless medically contraindicated, it is the expectation that all eligible employees, staff, contractors, volunteers, and students are fully vaccinated against COVID-19 (i.e. against infections caused by SARS-CoV-2) regardless of how often or how much time is spent in their respective workplace.

### **Legislative framework**

- Reference the legislation that aligns with this policy.
- State that the policy may change as the pandemic evolves and/or legislation or public health guidance changes.

### **Sample:**

This policy is aligned with the employer's general duty under the *Occupational Health and Safety Act* to take every reasonable precaution to protect its workers (broadly defined) and the responsibility to assess the workplace for risks, including that of COVID-19 transmission. This policy is applied in accordance with the *Ontario Human Rights Code*, *Occupational Health and Safety Act* and any other applicable legislation and/or collective agreement.

Information collected under this policy and procedure is in compliance with relevant legislation including but not limited to the *Personal Health Information Protection Act* and the *Ontario Human Rights Code*.

As the pandemic evolves, and/or legislation or public health guidance changes, the purpose and requirements outlined in this policy may change.

### **Requirements**

- List the actions workers must take as per the policy.
- Specify a reasonable deadline for when employees must demonstrate compliance.

### **Sample:**

All employees, staff, contractors, volunteers and students will be required to provide one of the following by **[insert date]**:

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 Health Canada, proof that the first dose was administered and, as soon as reasonably possible, proof of administration of the second dose; or
  - b. Proof of receiving the full series of a vaccine or a combination of vaccines approved by Health Canada.
2. Written proof of a medical reason, provided by either a licensed doctor or nurse practitioner that states:
  - a. the person cannot be vaccinated against COVID-19 – It does not need to include the reason for the exemption; **and**
  - b. the effective time period for the medical reason (i.e., permanent or time-limited).
3. Proof that the individual has completed 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:
  - a. How the COVID-19 vaccines work
  - b. Vaccine safety related to the development of the COVID-19 vaccines
  - c. The benefits of vaccination against COVID-19
  - d. Risks of not being vaccinated against COVID-19
  - e. Possible side effects of COVID-19 vaccination

Vaccination education courses that have been approved by this workplace include the following: **[hyperlink to courses approved by the workplace]**

### Policy Implications

- List alternative options for workers who decline to get vaccinated, as well as those unable to complete their vaccination series for medical reasons.
- The appropriate implications will vary depending on employer's risk assessment ([See \*Assessing the Risk of COVID-19 Transmission in Your Workplace\*](#)), the work of the worker, and general duty under OHSA.

### Sample:

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, may be subject to additional requirements such as COVID-19 testing, reassignments, personal and public health protective measures, work exclusion/leave of absence, worker relocation, modified work, etc., based on assessment by the employer of factors including for example, the work/role of the individual, the type of workplace, local epidemiology, etc., and in consideration of the duty to accommodate, as applicable.

### Important Considerations

- Information about employees' vaccination information must be protected in accordance with applicable privacy legislation. When collecting information about an employee's vaccination status:
  - Identify ways to safeguard their personal health information

- Limit information collected to what is reasonably necessary, e.g., copy of the proof of vaccination for each dose
- Keep their vaccination information separate from their personnel file
- Ensure personal health/vaccination information is kept in a secure manner and only used when required
- Identify who employees should contact at your organization if they have 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 employees should provide proof of vaccination.
- Have a clear communication plan to inform employees about the policy.
- Knowing your employees' vaccination status may be important to help you take appropriate action quickly, in the event of COVID-19 cases in your workplace, to protect employees, their families, customers/patrons and the general public. This may include sharing that information with public health officials.

## **ASSESSING THE RISK OF COVID-19 TRANSMISSION IN YOUR WORKPLACE**

Risk for COVID-19 transmission is possible in every business, organization or service. Certain factors may increase the risk. Performing a workplace risk assessment can help employers identify some of these risks and put in place mitigation strategies (e.g., vaccination policy, personal protective equipment).

Some risk factors include the following:

- A large number of workers onsite at any one time
- Spacing issues where workers are working within 2 metres of other people
- Masks being removed by workers, customers, and others entering the workplace
- Work related travel
- Poor ventilation at the workplace
- Immunocompromised workers or customers/patrons
- The inability for workers to work remotely
- Lack or absence of physical barriers if distancing is not possible

## **ADDITIONAL WAYS EMPLOYERS CAN PROMOTE VACCINATION**

In addition to implementing a vaccination policy, employers can play a critical role in encouraging their employees to get fully vaccinated against COVID-19 by:

- [Sharing clear and concise information to educate employees about COVID-19 vaccines.](#)
- Sharing information about when and where workers can get vaccinated in nearby locations [through the Health Unit](#) and/or [a pharmacy](#).
- Focusing on benefits of COVID-19 vaccines (health and safety of themselves, loved ones and co-workers).
- Sharing the message from multiple levels within the organization.
- [Requesting a mobile COVID-19 vaccine clinic for your workplace.](#)
- Reminding employees that they are legally entitled to up to [three paid sick days](#) if they experience side effects from the vaccine.
- Offering flexible scheduling to make it easier for employees to get vaccinated. Consider scheduling shifts 48 hours from the time of vaccination, where possible. If vaccination is

scheduled during work hours, consider paying workers for the time it takes to get vaccinated. Workers who don't have to decide between getting paid and getting vaccinated will be more likely to get the vaccine.

## FREQUENTLY ASKED QUESTIONS

Please see the frequently asked questions below for information to support vaccination in your workplace.

### **Q: Can employers ask workers who don't show proof of vaccination to complete regular Rapid Antigen Testing?**

A: Some workplaces are considering rapid antigen tests (RATs) as part of their vaccine policy. RATs are an additional screening method to help stop the spread of COVID-19 in workplaces. Employers can choose to have workers test on-site or at home before entering the work premises. RATs take about 15 minutes to produce results. RATs can be used on an individual up to 2-3 times per week. RATs are not to be used to screen customers/clients or the general public. For more information about RATs, please visit: [ontario.ca/testingonsite](https://ontario.ca/testingonsite)

Any individual who is trained can perform RATs. To be considered trained, an individual must watch and review [appropriate training resources on the Ontario Health website and scroll to Testing; Training and Resources](#).

RATs are for asymptomatic workers only. Symptomatic workers should not use RATs and instead be instructed to self-isolate and arrange to be tested at an Assessment Centre. Workers should not be at work if symptomatic. Assessment Centres do not have the capacity to function as a workplace testing screening program and asymptomatic employees should not be sent there. To check if your workplace is eligible to get free RATs through the Provincial Antigen Screening Program, please visit [the Government of Ontario website](#).

The Chambers of Commerce in North Bay, West Nipissing, and Parry Sound are offering RATs for small businesses. Please visit the links below for more information:

<https://www.nbdcc.ca/free-rapid-antigen-screening-program/>

<https://www.westnipissingchamber.ca/rapid-tests>

<https://www.psachamber.ca/rapid-testing-kits?rq=Rapid%20tests>

### **Q: Should workplaces schedule time off for employees after vaccination?**

A: After vaccination, about 10% of individuals experience common side effects, which may include: pain, redness, swelling at the site where the needle was given, tiredness, headache, muscle pain, chills, joint pain and low fever. Serious side effects are rare.

Where possible, consider scheduling shifts 48 hours after vaccination. [Bill 284, COVID-19 Putting Workers First Act, 2021](#) allows employees to claim job-protected paid leave for various COVID-19 reasons including COVID-19 vaccination or for side effects from a COVID-19 vaccination. If time off after vaccination is not planned, employees who are not feeling well enough to return to work following vaccination, should not be required to do so.

**Q: An employee received their vaccine and is experiencing side effects. Are they permitted to attend work?**

A: There are mild non-respiratory symptoms (not related to breathing, such as headache, muscle ache, fatigue, joint pain) that can occur with COVID-19 that may also occur in the 48 hours after vaccination as a result of the vaccine.

In the 48 hours after vaccination, if an employee develops the following symptoms (and no others), and where the symptoms are mild (i.e. the employee feels well enough to work) and symptoms only began after vaccination, the employee can continue to work:

- Headache
- Fatigue/tiredness
- Muscle ache
- Joint pain

The above guidance only applies to workers who:

- Are required to be at work in-person AND
- Have received a COVID-19 vaccine within the 48 hours before coming to work (including day of vaccination, which is considered day 1) AND
- Do not have a known exposure to a confirmed COVID-19 case in the last 14 days.

Pain, redness and swelling at the injection site are more common symptoms of vaccination and are not symptoms that you would have with COVID-19.

Active screening of employees, including after vaccination is required. If COVID-19 is suspected employees should be excluded from work and seek further medical evaluation.

Reference: [Guidance for Employers Managing Workers with Symptoms within 48 hours of COVID-19 Immunization](#)

**Q: Why should employers promote vaccination?**

A: Promoting vaccination not only helps to protect your workers but can also protect your workplace by:

- Reducing the number of employee absences due to COVID-19, which can also impact workforce productivity or the ability to operate
- Keeping your workforce healthier by reducing rates and spread of COVID-19

**Q: If employees do not want to get vaccinated, can employers require that they get a vaccine?**

A: Receiving a COVID-19 vaccine is voluntary. The Ontario Human Rights Code and other similar laws try to balance people's right to non-discrimination and civil liberties with public health and safety. Organizations and staff are encouraged to be flexible in exploring if accommodation is necessary, including alternate ways an individual may continue to safely work or receive a service without being vaccinated.

It is important to note that mandatory vaccination already occurs in certain settings (e.g. Measles, Mumps, Rubella vaccines for children who attend primary or secondary school). As more information becomes available about the effectiveness of COVID-19 vaccinations in reducing

COVID-19 spread, it is possible that COVID-19 vaccinations will be mandated in additional settings.

The North Bay Parry Sound District Health Unit can assist employers with their workplace COVID-19 vaccination policies. Employers can reach the COVID-19 Response Team at [covid-19.response@healthunit.ca](mailto:covid-19.response@healthunit.ca)

**Q: Can employers require employees to provide proof of vaccination?**

A: Although the choice to receive the COVID-19 vaccination is voluntary, employers can ask for proof of vaccination to ensure fitness to safely perform work or protect other people. Organizations should be clear about why proof of vaccination is needed and ensure that informed consent is received to obtain this information. For more information, we recommend reviewing [COVID-19 and Ontario's Human Rights Code - Questions and Answers](#).

Employees who choose not to be vaccinated or to produce proof of vaccination may be reassigned/accommodated to other areas of work if deemed necessary to do so.

If your workplace is looking to issue proof of vaccination requirements, we recommend that you seek legal advice prior to doing so.

**Q: How can employers protect employees' health and safety if some employees need to work near an employee who is not vaccinated?**

A: Vaccination is an additional public health measure that protects against COVID-19. Other public health measures that contribute towards a safer workplace should continue to be practised, such as staying home when not feeling well, active screening before work, physical distancing, wearing a mask/face covering indoors, wearing a mask and eye protection when unable to maintain at least 2 metres distance, regular handwashing, environmental cleaning and disinfection and optimizing ventilation.

The Occupational Health and Safety Act defines employee's and employers' rights and obligations. Employees may refuse to work if they believe it is unsafe for them or another employee. [Visit the Ontario Ministry of Labour, Training and Skills Development to learn more.](#)

**Q: Can businesses require proof of vaccination for guests, passengers, or customers (e.g. hospitality sector, live entertainment, mass transportation, etc.)?**

A: The Government of Ontario has announced that they will require people to be fully vaccinated and provide proof of their vaccination status to access certain businesses and settings starting September 22, 2021. This approach focuses on higher-risk indoor public settings where face coverings cannot always be worn and includes:

- Restaurants and bars (excluding outdoor patios, as well as delivery and takeout);
- Nightclubs (including outdoor areas of the establishment);
- Meeting and event spaces, such as banquet halls and conference/convention centres;
- Facilities used for sports and fitness activities and personal fitness training, such as gyms, fitness and recreational facilities with the exception of youth recreational sport;
- Sporting events;
- Casinos, bingo halls and gaming establishments;
- Concerts, music festivals, theatres and cinemas;

- Strip clubs, bathhouses and sex clubs;
- Racing venues (e.g., horse racing).

Additionally, certain global industries (e.g. airlines) have announced that they intend to require vaccination proof, subject to medical exemptions. The Canadian government has updated the requirements around vaccination on international travel. If your organization is not included in the mandatory list provided by the provincial government and is looking to issue proof of vaccination requirements, we recommend that you seek legal advice prior to doing so.

**Q: My employee, who has already been vaccinated, was just informed that they are a close contact of a case. Do they need to self-isolate?**

A: Some fully immunized or previously positive individuals are required to self-isolate. Local public health officials determine if an individual is required to self-isolate. The employee should follow the direction of local public health regarding self-isolation requirements.

**Q: Does vaccination replace the need to follow public health measures (such as wearing a mask/face covering and physical distancing)?**

A: Getting fully vaccinated against COVID-19 does not replace the need for following effective and proven [COVID-19 public health measures](#). Local employers must continue to apply all COVID-19 prevention measures for their sector outlined in provincial guidelines and the North Bay Parry Sound District Health Unit's guidance including, but not limited to:

- Screening
- Physical distancing of two metres
- [Wearing of masks/face coverings](#)
- Hand hygiene
- Infection prevention and control
- COVID-19 safety plan

## **SAMPLE LETTER TO SHARE WITH WORKERS**

The letter below can be customized for your organization.

**[Insert date]**

Dear **[Worker]**,

COVID-19 continues to bring challenges to communities, workplaces and households. We recognize and appreciate your efforts to adapt to the ever-changing situation at work, as well as your efforts to keep those around you safe. We want to protect the health and safety of our workers. As you know, we have put in place preventive measures at **[Insert organization/business name]** to help keep our workers and clients safe.

We are committed to taking all reasonable precautions and we want to support your efforts to stay safe and healthy by promoting the COVID-19 vaccine. COVID-19 vaccines give you and the rest of our workers an added layer of protection against the virus.

Receiving a COVID-19 vaccine is voluntary. However, if the vaccine is available and you aren't medically contraindicated, it is expected that all eligible employees, staff, contractors, volunteers, and students are fully vaccinated against COVID-19 regardless of how often or how much time is spent in the workplace.

Here are some key points about COVID-19 vaccination:

- Health Canada has one of the most rigorous scientific review systems in the world and only approve a vaccine if it is safe, has an impact and meets the highest manufacturing and quality standards.
- All COVID-19 vaccines available in Canada are effective at preventing COVID-19 and decrease the risk of severe symptoms and hospitalization.
- The most common side effects are mostly mild, experienced in the first one to three days and include: pain in the arm where you got the shot, feeling tired, headache, muscle pain, joint pain, chills, and mild fever.

Your health and safety continue to be our priority and we encourage you to visit the [North Bay Parry Sound District Health Unit's website](#) for the most up to date COVID-19 vaccine clinic schedule.

Please contact **[insert workplace COVID-19 vaccine working group/team/individual contact here]** if you have any questions.

Thanks again for all your efforts.

Sincerely,  
**[Insert signature]**

**[insert name]**