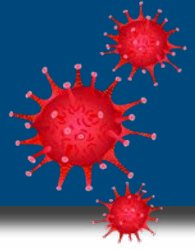


Recommendations for Establishing a Vaccination Policy for your Workplace



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

Promoting vaccine uptake is important to help reduce COVID-19 workplace outbreaks and build confidence for a safer return to work. The COVID-19 vaccine is the best way to protect your workplace from the risks of COVID-19. It is safe and highly effective at reducing virus spread and protecting against serious illness.

Workplaces can help encourage vaccination by creating a supportive environment that makes it easier for workers to get vaccinated, and by providing information from trusted sources. COVID-19 vaccination provides an important layer of protection for workers, their families, and the community.

Your workplace policy should be in writing and adhere to the [Occupational Health and Safety Act](#), the [Ontario Human Rights Code](#) and [privacy laws](#).

Please note: the information provided on this webpage does not contain legal advice and should not be relied on or treated as legal advice; those for whom these recommendations are intended may seek their own legal advice for their specific circumstance.

Developing a Workplace Vaccination Policy

Assess your workplace risk of COVID-19 transmission by considering the following:

- Does your workforce have a high vaccination rate?
- Can workers keep at least two metres apart while performing their work?
- Are there circumstances in which masks can or must be removed in the context of workplace activities? (This includes workers, customers/patrons and members of the public entering the workplace.)
- Are workers required to be in close contact with others or in the community while performing their work?
- How long and how often are workers in close contact with other workers, customers/patrons, or the public?
- Does your workplace have: physical barriers where workers cannot keep a distance from each other, customers/patrons, or the public; good ventilation; and/or personal protective equipment (PPE) to protect workers?
- Do you have workers who may be at risk for severe illness from COVID-19? Some people may have reduced immunity due to age, pre-existing health conditions or medical treatments.
- Is your workplace able to offer alternative work for people who require accommodation, for example remote work?

cont'd on next page

Key Components in a Vaccination Policy

1. Identify the scope and purpose.

- Explain purpose of the policy including the risks of COVID-19. Vaccination against COVID-19 is one of the best ways to protect workers who work in a location with common areas and/or where workers can have contact with other workers, customers/patrons, or the public. The Delta variant of the coronavirus is more contagious, with greater risk for severe illness and hospitalization.
- Explain who the policy applies to. Will the policy apply to all workers (i.e., not just employees but also contractors, volunteers, students etc.)? Is there a separate policy for customers/patrons?
- Explain that the policy may change as the status of the pandemic changes and/or legislation or public health advice changes.
- Have a clear communication plan to inform workers, customers/patrons, and the public about the policy.

2. List action steps workers must take.

When determined by the employer to be reasonably necessary to prevent the spread of COVID-19 in the workplace or in the community while performing their work, workplace policies should require workers to provide proof of vaccination with vaccines approved by Health Canada or the World Health Organization. Alternatively, workers who do not provide proof of vaccination may need to, for example:

- Indicate that they have a medical exemption, including if the reasons are temporary or permanent. The medical exemption should be written by a licenced doctor or nurse practitioner and does not need to include the reason for the exemption.
- Complete a vaccination education course, with a signed declaration stating that they have reviewed and understood the risks of COVID-19 and the benefits of vaccination. The vaccination education course should include information on:
 - How the COVID-19 vaccines work.
 - Vaccine safety related to the development of the COVID-19 vaccines.
 - The benefits of vaccination against COVID-19.
 - Risks of not being vaccinated against COVID-19.
 - Possible side effects of COVID-19 vaccination.

3. Set deadlines for when the actions must be taken.

Specify a reasonable date when workers must demonstrate compliance with the workplace policy.

4. List available supports for vaccination.

Demonstrate your commitment to supporting workers to get vaccinated. Ways to support workers to get vaccinated include:

- Providing vaccine information from credible sources, such as Durham Region Health Department's vaccine [webpage](#), or translated resources.
- Supporting vaccine champions to initiate conversations with their peers.
- Providing paid leave to get vaccinated.
- Reminding workers that they are entitled up to three paid sick days if they have side effects from the vaccine.
- Providing transportation support to get vaccinated.

cont'd on next page



durham.ca/novelcoronavirus

Durham Health Connection Line | 905-668-2020 or 1-800-841-2729

If you require this information in an accessible format, contact 1-800-841-2729.



5. Provisions for unvaccinated workers

Your policy should list alternative options for workers who decline to get vaccinated for reasons protected by Ontario's Human Rights Code, including those unable to complete their vaccination series for medical reasons. Some options to consider include:

- Use of additional PPE, frequent COVID-19 testing, worker relocation, and modified work or reassignments.
- In the event of a COVID-19 outbreak, unvaccinated and partially vaccinated workers (who have only received one dose of a two-dose COVID-19 vaccine series) are not be permitted to work in the outbreak area. Workers without vaccination records should be assumed to be unvaccinated.
- If reassignment is not possible, consider other options including whether unvaccinated workers may use vacation or unpaid leave until it is safe for them to return to the workplace.

6. Non-compliance

- Outline the potential consequences for workers who do not fulfill the requirements of the policy.

7. Privacy considerations

The policy should specify how individual vaccination status of employees will be used by employers to mitigate the health-related risks of COVID-19.

Information about workers' vaccination information must be protected in accordance with applicable privacy legislation. Knowing your workers' vaccination status may be important to help you take appropriate action quickly, in the event of COVID-19 cases in your workplace, to protect workers, their families, customers/patrons and the public. This may include sharing this information with public health officials.

When collecting information about workers' vaccination status:

- Identify ways to safeguard workers' personal health information.
- Limit information collected to what is reasonably necessary, e.g., copy of the proof of vaccination for each dose or the worker's name and date of vaccination for each dose.
- Keep worker vaccination information separate from their personnel file.
- Ensure personal health/vaccination information is kept in a secure manner and only used when required.

8. Staff contact

- Identify a staff member within your organization who staff can contact regarding questions about the policy, to request accommodation, or for more information on how to comply with the policy. The policy should also indicate the person to whom workers should provide proof of vaccination.

9. Continued adherence to COVID-19 prevention measures

Vaccination does not replace the need for strict adherence to established COVID-19 public health measures. Employers must continue to implement all COVID-19 prevention measures for their sector outlined in [provincial guidelines](#) and [Durham Region Health Department guidance](#) including, but not limited to: screening, physical distancing, wearing of masks and eye protection, hand hygiene, infection prevention and control, and a COVID-19 safety plan.

cont'd on next page



durham.ca/novelcoronavirus

Durham Health Connection Line | 905-668-2020 or 1-800-841-2729

If you require this information in an accessible format, contact 1-800-841-2729.



Resources:

[COVID-19 vaccines and workplace health and safety](#) (Ontario Ministry of Labour, Training, Skills Development)

[COVID-19 and Ontario's Human Rights Code – Questions and Answers](#) (Ontario Human Rights Commission)

[COVID-19 Guidance and Advice for Businesses and Organizations](#) (Durham Region)

[COVID-19 Vaccines](#) (Durham Region)

Adapted with permission from Toronto Public Health



durham.ca/novelcoronavirus

Durham Health Connection Line | 905-668-2020 or 1-800-841-2729
If you require this information in an accessible format, contact 1-800-841-2729.

