



COVID-19 Vaccination Policy

C-HR-224-AA

Document Title	COVID-19 Vaccination Policy
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Description	This policy establishes requirements for submission of vaccination status, COVID-19 testing requirements and the disclosure of COVID-19 vaccination status records
Effective Date	October 8, 2021
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Senior Management Team Responsibility	Vice President, Human Resources
Approver(s)	ELT

Revisions/Updates:

Revision Version	Revision Date	Revision(s)
Version 2.0	October 12, 2021	10 - Link to document added 14 - Changed to 48 hours (vs. 72 hours)

1. Purpose

The purpose of this policy is to outline TSSA's position with respect to COVID-19 vaccination of staff, contractors, vendors, visitors and regulated parties. This policy also establishes the parameters of disclosure of vaccination status.

In light of ongoing risks associated with COVID-19, TSSA is releasing this policy in order to continue to protect the health and safety of our workforce and the public we serve.

2. Scope

This policy applies to all staff, contractors, vendors, visitors and regulated parties.

This Policy takes effect on October 8, 2021 and remains in effect until rescinded by TSSA.

3. Legislative Framework

This policy is aligned with the TSSA's general duty under the Occupational Health and Safety Act to take every reasonable precaution to protect its workers 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 other applicable legislation.

4. Definitions

- 4.1 Vaccine** means a Health Canada or World Health Organization (WHO) approved COVID-19 vaccine.
- 4.2 Fully Vaccinated:** Having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by WHO (e.g., two doses of a two-dose vaccine series, does not need to be the same vaccine as long as 2 doses have been administered, or one dose of a single-dose vaccine series); and having received the final dose of the COVID-19 vaccine at least 14 days ago.
- 4.3 Vaccination** means inoculation with the Vaccine.
- 4.4 Rapid Antigen Test:** A point-of-care rapid antigen test for the novel coronavirus known as COVID-19 where the test kit has been obtained by TSSA and the test is taken in accordance with rapid antigen screening guidelines.
- 4.5 Staff:** All TSSA employees including managers and on-site contractors.
- 4.6 On-site** means anyone attending the TSSA Head Office, located at 345 Carlingview Drive, Toronto, Ontario M9W 6N9
- 4.7 Exemption:** Where an individual has a medical condition, or religion/creed beliefs as defined in the Ontario Human Rights Code that prevents them from being vaccinated.

5. Policy

- 5.1 Given TSSA's duties and responsibilities under the Occupational Health and Safety Act (the "OHSA"), including its responsibility to take every precaution reasonable in the circumstances to protect the health and safety of its workers, as well as its general responsibility to promote public safety in Ontario, TSSA strongly encourages all staff to be Fully Vaccinated against COVID-19 as soon as possible, and by no later than October 8, 2021, unless they have an approved exemption on file with TSSA Human Resources.
- 5.2 As directed, all staff must provide proof of vaccination status (i.e. vaccinated or not vaccinated) as soon as possible and no later than October 8, 2021. This allows TSSA to take significant safety measures towards our shared responsibility to prevent and/or protect against the spread of COVID-19. Staff who fail to comply with this requirement will be considered not vaccinated.
- 5.3 In order to be deployed for work, staff who are not Fully Vaccinated will be required to be granted an approved exemption by TSSA Human Resources and must follow directions issued by management which shall include mandatory COVID-19 rapid-antigen testing.

6. Responsibilities

6.1 Managers

- 6.1.1 Lead by example;
- 6.1.2 Follow all health and safety policies and protocols;
- 6.1.3 Comply with mandatory COVID-19 rapid-antigen testing requirements, if applicable;
- 6.1.4 Complete any required education or training about COVID-19, including vaccinations and safety protocols, if applicable;
- 6.1.5 Comply with all applicable legal obligations, including with respect to public health measures such as physical distancing, daily screening, wearing a mask, staying home if sick and/or have COVID-19 symptoms, and getting COVID-19 PCR test where appropriate and as directed by management;
- 6.1.6 Ensure staff complete any required education or training about COVID-19, including regarding vaccinations and safety protocols;
- 6.1.7 Effective immediately, only schedule Fully Vaccinated employees to hospitals, long-term care facilities, retirement homes and post-secondary institutions. For all other locations, all employees may be scheduled provided they are in compliance with this policy, or any future COVID-19 related-policy, in all other aspects. Scheduling decisions shall take into consideration any third-party vaccination requirement and shall be at the discretion of the management.
- 6.1.8 Abide by TSSA confidentiality requirements. Disclosure of an employee's vaccination status may be made to regulated and non-regulated parties,

October 8, 2021
Page 3 of 7

or to TSSA staff, or as required by law, in order to comply with a COVID-19 policy or safety direction, and only in cases where TSSA has obtained employee consent for disclosure.

6.2 Employees and On-Site Contractors

- 6.2.1 Follow all health and safety policies and protocols;
- 6.2.2 Comply with mandatory COVID-19 rapid-antigen testing requirements, if applicable;
- 6.2.3 Complete any required education or training about COVID-19, including vaccinations and safety protocols; and
- 6.2.4 Comply with all applicable legal obligations, including with respect to public health measures such as physical distancing, daily screening, wearing a mask, staying home if sick and/or have COVID-19 symptoms, and getting COVID-19 PCR test where appropriate and as directed by management.

6.3 Human Resources (including Health & Safety)

- 6.3.1 Ensure that vaccination receipts, consent forms and proof of exemption letters have been uploaded in the system and are kept confidential.
- 6.3.2 Maintain a current listing for managers and Work Force Planning to be able to schedule employees at hospitals, retirement homes, long-term care facilities, post-secondary institutions, and other places as may be applicable.
- 6.3.3 Enrol staff in mandatory education sessions and keep records up to date and complete.

7. Vaccine Administration

Staff are responsible for scheduling and obtaining all recommended doses of a Health Canada approved vaccine. The vaccine may be obtained during regularly scheduled work hours contingent on supervisor approval and scheduling needs.

8. Non-Compliance

TSSA will do it's best to assist staff who are not Fully Vaccinated to carry out their work duties. However, if TSSA staff is unable to perform their duties based on their status as not Fully Vaccinated, staff will be put on an unpaid leave of absence until such time as work is available.

9. Vaccine Information and Disclosure

- 9.1 Staff are required to provide vaccination information and status to Human Resources by no later than October 8, 2021.
- 9.2 Accessing and uploading vaccine receipt instruction can be found [here](#).

- 9.3 Staff who provide false information to TSSA regarding vaccination or COVID-19 testing shall be subject to discipline, which may include termination of employment or contract.
- 9.4 Staff who have received only the first dose of an accepted vaccine shall comply with the mandatory COVID-19 rapid testing requirement until they are Fully Vaccinated.
- 9.5 Staff will be asked to sign a consent form to allow TSSA to disclose vaccination status to Management, Legal and the Work Force Planning team. This will allow TSSA to comply with various vaccination mandates and policies implemented in our regulated and non-regulated sectors. This information will be strictly controlled by TSSA in a manner consistent with TSSA's Access and Privacy Code and applicable privacy law.

Note: The decision to ask for disclosure at this time is in further support of TSSA's obligation to provide a safe and healthy workplace and will help TSSA make data-driven decisions in assessing risk and implementing hazard controls. By collecting this data, TSSA will have accurate and reliable data in which to determine next steps in maintaining the safety of the workplace from the hazard of COVID-19. This information may be disclosed to Management, Legal and the Work Force Planning team in order to schedule work and respond to other organization's vaccination attestation requirements.

TSSA is aware that this information is sensitive and is committed to collecting only the minimal amount of information necessary to assist in its COVID-19 workplace risk assessments and developing appropriate response strategies.

10. Employees working in close proximity

Staff are frequently required to work in close proximity (within 6 feet or 2 metres for more than 15 minutes) with industry contractors or other regulated parties. Any contractor or other regulated party who is performing work under these circumstances with TSSA staff must comply with any written direction from the relevant Statutory Director regarding mandatory vaccination or COVID-19 mitigation factors, or in the absence of written direction, must submit to TSSA by attestation form that they are either Fully Vaccinated or have received a negative rapid-antigen test or negative PCR test within 48 hours of beginning the work. The attestation form, which can be downloaded [here](#) and should be emailed to TSSAHR@tssa.org.

11. Approved Exemptions

- 11.1 Staff who are not able to obtain a COVID-19 vaccine must apply to TSSA Human Resources for an approved exemption by uploading the following to e-HR by no later than October 8, 2021:
 - Written proof of a medical reason, provided by a physician or registered nurse in the extended class that sets out a documented medical reason/s for not being Fully Vaccinated against COVID-19, along with the effective time period for the medical reason; or
 - Letter from a Religious Leader supporting the request for a creed/religious exemption.

October 8, 2021
Page 5 of 7

- 11.2 TSSA will consider on an individual basis requests from staff for exemptions on medical grounds and/or because of their creed/religion.
- 11.3 Only those staff with a medical and/or creed/religious exemption will be considered for an accommodation. TSSA reserves the right to have the note reviewed by an applicable medical specialist. TSSA reserves the right to make the appropriate inquiries to verify the authenticity of a creed/religious-based claim.
- 11.4 After receipt of a staff member's request for exemption, TSSA will review the documentation submitted and, if the exemption is approved, engage in an interactive process with staff to clarify the nature of the request, determine exemption eligibility, and identify potential reasonable accommodation (with assistance from his/her supervisor). Accommodations will be granted where they do not create an undue hardship for TSSA and/or do not pose a direct threat to the health or safety of others in the workplace and/or to the employee.
- 11.5 To continue to protect the health and safety of the TSSA community, at the sole discretion of TSSA, staff with an approved exemption may be accommodated through other preventative measures.

12. Unvaccinated Staff

- 12.1 Any TSSA staff member who is not vaccinated, or not Fully Vaccinated and not exempt (see exemptions above), shall be required to complete an educational session about the benefits of COVID-19 vaccination.
- 12.2 After completing the on-line education session, all staff who remain not vaccinated, not Fully Vaccinated, or are not exempt shall participate in TSSA's Rapid Testing Program. Full details about rapid antigen testing requirements and processes, which will be supported by TSSA, will be shared with affected employees and contractors. Staff are required to comply with all testing requirements and processes, including providing proof of testing results to TSSA.
- 12.3 In the event of a positive rapid antigen test, staff are required to follow current Ontario Health care directives including undertaking any additional testing as required and quarantining as required by Ontario Health-

13. Exempted Staff

All staff who are exempt shall participate in TSSA's Rapid Testing Program, as required by and at the sole discretion of Management. These exempt staff will be required to produce rapid antigen test results as directed. Full details about rapid-antigen testing requirements and processes, which will be supported by TSSA, will be shared with affected staff.

14. External Contractors, Vendors, Visitors, and Regulated Parties

All Contractor, Vendors, Visitors and/or Regulated Parties who attend TSSA premises must provide proof to TSSA by attestation that they are:

- 1) Fully Vaccinated; or

- 2) Have tested negative for COVID-19 by using a rapid-antigen test or PCR test which was taken within 48 hours of their attendance.

This includes any person who has a scheduled meeting or examination at TSSA. The attestation form can be downloaded [here](#) and should be emailed to TSSAHR@tssa.org at least 24 hours before your scheduled meeting time or expected time of arrival.

15. Request for Exemptions Disability Accommodation

In accordance with TSSA's "Accessibility for Ontarians with Disabilities (AODA) Policy", TSSA provides reasonable accommodations, absent undue hardship, to qualified individuals with disabilities that enable them to perform their job duties. Those who need an accommodation regarding this policy because of a disability are responsible for requesting a reasonable accommodation from Human Resources.

16. Contact for interpretation

Please contact Human Resources with any questions.

17. Non-Retaliation

TSSA prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of this policy or any other health and safety concern. Employees also have the right to report work-related injuries and illnesses, and TSSA will not discharge or discriminate or otherwise retaliate against employees for reporting work-related injuries or illnesses or good faith health and safety concerns

18. Confidentiality

Information relating to an individual's proof of vaccination and/or the reason(s) for not receiving a COVID-19 vaccination will only be used to the extent necessary for implementation of this policy, for administering health and safety protocols, and for infection and prevention control measures in the workplace.

19. Policy Modification

Government and public health guidelines, restrictions and industry best practices regarding COVID-19 and COVID-19 vaccines are changing rapidly as new information becomes available and further research is conducted. TSSA reserves the right to modify this policy at any time in its sole discretion to adapt to changing circumstances and business needs, consistent with its commitment to maintaining a safe and healthy workplace.