

Centre for Independent Living in Toronto (C.I.L.T.) Inc.

COVID-19 Immunization Policy

Effective Date

November 22, 2021

Purpose

1. The purpose of this Policy is to outline organizational expectations with regards to COVID-19 immunization of employees and non-employees consistent with public health recommendations and with a view to protecting employees, non-employees and other members of the public from infection by the COVID-19 virus.
2. Conditional upon the availability of vaccine, and unless medically contraindicated, it is the expectation of CILT that all eligible employees and non-employees are fully vaccinated against COVID-19.

Definitions

In this Policy:

Employees include:

- Individuals engaged in a CILT employment agreement
- Individuals employed by an employment agency or other third party and performing services for CILT

Non-employees include all other individuals not captured in the above “employee” group, including but not limited to:

- CILT directors (that is members of CILT’s board of directors)
- CILT members
- Committee members
- Consultants
- Consumers
- Unpaid students on educational placements
- Visitors
- Volunteers

Background and Legislative Framework

Background

In its day-to-day site operations, CILT has a responsibility to protect the health and well-being of all employees and non-employees. The COVID-19 virus has caused significant suffering and mortality around the world. Full vaccination has been shown to be effective in reducing COVID-19 virus transmission and protecting vaccinated individuals from severe consequences of COVID-19 and its variants. The Toronto Medical Officer of Health (TMOH) has strongly recommended that local organizations develop, implement and ensure compliance with a COVID-19 vaccination policy.

Legislative Framework

This policy is aligned with CILT's general duty as an employer under the *Occupational Health and Safety Act* (Ontario) 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 *Human Rights Code* (Ontario), *Occupational Health and Safety Act* (Ontario) and any other applicable legislation.

Information collected under this Policy will be done so in compliance with relevant legislation, including, but not limited to, the *Personal Health Information Protection Act* (Ontario) and the *Human Rights Code* (Ontario).

Application of the Policy

Regardless of how often they are at CILT and how much time they spend there or in their respective workplace, this Policy applies to employees and non-employees.

Policy

Contingent upon vaccine availability, all eligible employees and non-employees are strongly encouraged to receive a COVID-19 vaccine, unless it is medically contraindicated or substantiated under a human rights exemption.

Employees

Employees will be required to provide one of the following:

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 or the World Health Organization, proof that the first dose was administered and, as soon as reasonably possible, proof of administration of the second dose.
 - b. Proof of full vaccination for COVID-19. "Fully vaccinated" means having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by the World Health Organization and recognized by the Canadian government (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 vaccine at least 14 days prior to providing proof. If an individual has only received the first dose of a two-dose COVID-19 vaccination series approved by the World Health Organization and recognized by the Canadian government, they must provide proof of that dose and, as soon as reasonably possible, provide proof of administration of the second dose.
 - c. A paper or electronic copy of the vaccination receipt(s) is required for proof in 1a or 1b.
2. Written proof of a medical reason, provided by either a physician or nurse practitioner that sets out:
 - a. that the person cannot be vaccinated against COVID-19; and

- b. the effective time period for the medical reason (i.e., permanent or time-limited). Time limited exemptions will be reviewed in advance of the close of the exemption period.
3. If an individual chooses not to be vaccinated, proof that the individual has completed an educational program provided by CILT that addresses all of the following learning components:
 - a. how COVID-19 vaccines work;
 - b. vaccine safety related to the development of the COVID-19 vaccines;
 - c. benefits of vaccination against COVID-19;
 - d. risks of not being vaccinated against COVID-19; and
 - e. possible side effects of COVID-19 vaccination.

For employees who elect not to provide proof of COVID-19 vaccination per 1 above, and rely on 2 or 3, if their duties:

1. can be performed remotely, they will be required to work from their home. On occasion, when work at the CILT office or some other location where work is being performed on behalf of CILT is required, they will be required to take additional health and safety measures as outlined below;
2. can be partially performed remotely from their home, they will be required to adhere to a schedule for working at the CILT office or some other location where work is being performed on behalf of CILT and take additional health and safety measures as outlined below; and
3. cannot be performed remotely from their home, they will be required to take additional health and safety measures as outlined below.

Non-employees

For non-employees:

- In-person interactions at the CILT office or some other location where work is being performed on behalf of CILT will be by appointment only.
- Non-employees must provide proof of full vaccination for COVID-19 in order to have In-person interactions at the CILT office or some other location where work is being performed on behalf of CILT. "Fully vaccinated" means having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by the World Health Organization and recognized by the Canadian government (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 vaccine at least 14 days prior to providing proof.
- If an individual has only received the first dose of a two-dose COVID-19 vaccination series approved by the World Health Organization and recognized by the Canadian government, they must provide proof of that dose and, as soon as reasonably possible, provide proof of administration of the second dose.
- A paper or electronic copy of the vaccination receipt(s) is required for proof.

- Non-employees who are accessing essential services from CILT **and** have a medical or substantiated human rights exemption for not being fully vaccinated must provide reasonable proof of the exemption, e.g., written documentation provided by either a physician or nurse practitioner.
- All other non-employees will not be permitted to attend at the CILT office or some other location where work is being performed on behalf of CILT or otherwise access services from, or provide services to, CILT. Access to virtual services may be arranged if feasible.

Proof of full vaccination for COVID-19 or proof of a medical or substantiated human rights exemption for not being fully vaccinated may be requested at every in-person encounter with CILT.

Health and Safety Measures

For employees and non-employees who are not fully vaccinated **for any reason**, health and safety measures shall include providing evidence of a negative COVID-19 antigen test forty-eight (48) hours before each in-person encounter with CILT.

- CILT is responsible for the cost of tests where:
 - Employees have a medical or substantiated human rights exemption
 - Non-employees accessing essential services and who have a medical or substantiated human rights exemption
- Employees and non-employees are responsible for the cost of the test where it is a personal choice to remain unvaccinated

CILT, acting reasonably, may alter duties, and location of work from time to time, and therefore may alter health and safety measures, including testing requirements.

Unless a legislated or regulatory exemption applies, all CILT employees and non-employees are expected and required to continue to comply with applicable health and safety measures to reduce the hazard of COVID-19, including, but not limited to, complying with established workplace access controls (e.g. screening), wearing a mask or face covering, using provided PPE, maintaining appropriate physical distancing, enhanced hygiene and self-monitoring of potential COVID-19 symptoms when at work or otherwise engaged in CILT business.

Employees and non-employees who remain unvaccinated due to a substantiated *Human Rights Code* related accommodation request or a substantiated medical reason, may be required to take additional infection and prevention control measures, including self-isolating if exposed to COVID-19.

Employee Support for Vaccination

CILT will provide the following supports for employees subject to this Policy to receive a COVID-19 vaccine: assistance with booking a COVID-19 vaccine appointment, resources regarding COVID-19 vaccination, and for eligible CILT employees, paid time off to attend a COVID-19 vaccine appointment and CILT's Employee Assistance Program.

Responsibilities

Supervisors/managers are responsible for the administration of this Policy and are expected to:

- lead by example, and;
- ensure employees and non-employees complete any required education or training about COVID-19, including that regarding vaccinations and safety protocols.

Employees and non-employees are required to:

- follow all health and safety policies and protocols, and;
- complete any required education or training about COVID-19, including regarding vaccinations and safety protocols.

Non-compliance with the policy

In accordance with CILT's operational policies, and applicable legislation, directives, and policies non-compliance with this Policy may result in corrective action, up to and including termination of employment of employees and otherwise the termination of the relationship between CILT and non-employees.

Confidentiality Statement

CILT shall protect the confidentiality of the health information collected under this Policy in accordance with its Policy Regarding the Privacy and Protection of Personal Health Information.

Ongoing Monitoring and Assessment of COVID-19 Workplace Safety Measures

CILT will continue to monitor its COVID-19 risk mitigation strategy and the evolving public health information and context, to ensure that it continues to optimally protect the health and safety of employees and non-employees in the workplace and the consumers that it serves. To that end, and informed by Toronto Public Health, the latest scientific research, guidance and legislation from the Ontario government, the federal government, the Ministry of Health, the Public Health Agency of Canada, Public Health Ontario, Local Health Units, and any other relevant health bodies and occupational health and safety experts, CILT will continue to assess other available workplace risk mitigation measures. If it is determined that additional precautions are necessary, CILT may decide to deploy new measures (including at an individual level) to protect employees and consumers from COVID-19 and may amend this Policy accordingly and/or communicate the required precautions to impacted employees and non-employees.

Related Documents

CILT Return to Office Procedures