

COVID-19 VACCINATION STATUS COLLECTION POLICY

What is the purpose of this policy?

The COVID-19 pandemic has given rise to significant health and safety risks for employees, contractors, volunteers, and clients. Vaccination plays a critical role in preventing the workplace transmission of COVID-19 and protects clients and members of the public with whom we interact and provide services. Being able to confirm vaccination status also allows employees, contractors, and volunteers to support the participation of clients in activities beyond our worksites in venues where public health requires confirmation. This policy sets out our expectations regarding vaccination and the collection of vaccination status information.

We take seriously our obligation to ensure the health and safety of our clients, contractors, volunteers, and employees. We also understand that becoming vaccinated is a personal choice and the collection of medical information (i.e. vaccination information) impacts individual privacy and can lead to feelings of discomfort.

The purpose of this Policy is to implement a vaccination status collection program in a manner that balances our need to reduce risk and conduct workforce planning while ensuring that the process for collecting and using vaccination status information is compliant with applicable personal information protection laws. This Policy is intended to be a part of, or supplement, our contagious disease prevention protocols.

Am I required to be vaccinated?

It is our hope that all employees, contractors, and volunteers will support workplace safety efforts by becoming vaccinated and sharing that information with us. However, we recognize that there are circumstances in which some individuals may choose not to become vaccinated, whether as a matter of personal choice or due to medical, religious, or other reasons. We will be requiring proof of vaccination from those employees, contractors, and volunteers who are in direct contact with our clients. Mask wearing and frequent sanitizing should continue to be observed by all, regardless of vaccination status. This policy applies to all employees, contractors, volunteers who have direct contact with the public while in their role with SRCHN.

Please note that this approach may be subject to change in response to developments related to COVID-19 and Work Safe BC or Public Health Orders.

Employees, contractors, or volunteers who are not vaccinated against COVID-19 may be subject to additional safety restrictions, such as the continued use of personal protective equipment, testing, or limiting access to the workplace, work related activities, or to unvaccinated clients and co-workers. Any such measures will be based on medical, scientific, workplace safety and public health guidance. Please note that accommodating unvaccinated individuals may not be possible in every case or may involve changes in work assignments, such as limiting interactions with clients to being strictly by phone or through online activities.

What information am I being asked to share?

All employees, contractors and volunteers who are in direct contact with our clients must show proof of their vaccination status.

Consistent with applicable privacy laws, management will collect the minimum amount of personal information required to address workplace health and safety and staffing deployment issues raised by COVID-19. Accordingly, employees, contractors, volunteers are requested to show proof of:

- if they have been vaccinated against COVID-19,
- if so, whether they have received all required or recommended doses of the vaccine, and
- the dates of the immunizations.

Employees, contractors, and volunteers may also be requested to provide (for inspection only) documentation verifying their vaccination status. No copies of such documentation will be maintained in employee files.

What if I choose not to report my vaccination status? What are the consequences?

The purpose of collecting information about vaccination status is to ensure that we have sufficient information to address any health and safety risks in the workplace and where applicable to our clients in the community, and to ensure that we can continue to deploy staff consistent with public health requirements. Employees, contractors and volunteers who have routine contact with co-workers and clients will generally be expected to comply with this Policy by supplying information about their vaccination status.

However, employees, contractors or volunteers who have no contact with clients or coworkers may ask to be exempted from this Policy by making a request to their supervisor. Decisions about granting exemptions will be made on a case-by-case basis based on the reasons for the request, the nature of the employee's duties, and the availability of alternative protective measures.

No disciplinary consequences will be imposed if an employees or contractors chooses not to become vaccinated or seeks an exemption from the disclosure obligations under this Policy.

However, employees, contractors or volunteers who do not report their vaccination status under this Policy or are granted exemptions under this Policy will be deemed to be unvaccinated and may be subject to additional protective measures in the workplace as discussed above, and exclusion from the workplace or cancellation of the contract. There may be disciplinary consequences imposed if employees, contractors, or volunteers do not comply with such restrictions or conditions.

How will my information be used?

We are seeking to collect information about the vaccination or immunity status of our employees, contractors, and volunteers in order to:

- Better understand the risk of infection in the workplace;

- Help mitigate the risk of infection for those at the greatest risk, including by putting accommodations or other protective measures in place for unvaccinated individuals;
- Plan for operational continuity in the event of an outbreak;
- Support the continuity of services to our clients in community settings where admission is available only to those who confirm vaccination status;
- Support risk mitigation and contact tracing efforts in the event that an exposure occurs within the workplace.

How will my information be protected?

A notation will be made in the paper personnel files showing that the proof of Vaccination has been seen. These files are kept under lock and key within the SRCHN office. Only the Executive Director or Programs Manager has access to the files.

Who will have access to my information?

Access to vaccination data will be shared internally on a strictly need-to-know basis and only for the purposes described above. This information will be shared externally only where permitted or required under applicable laws, such as where it is requested or required by public health officials or other government agencies.

Changes to this Policy

It is expected that the level of workplace risk posed by COVID-19 may change as new outbreaks, developments and scientific discoveries unfold. Accordingly, changes to this Policy may be introduced from time to time to respond to these developments or in response to Public Health Orders and/or WorksafeBC directives.

Who should I contact if I have questions or concerns?

If you have any questions or concerns about this Policy or the collection of your information, please contact the Executive Director through e-mail at ed@sookeregionchn.org or by phone at (778) 365-1878.