

THE CORPORATION OF HALDIMAND COUNTY			
Grandview Lodge			
Department:	All	Subject:	Immunization Policy
Effective Date:	July 1, 2021	Policy #:	
Revised:	November 16, 2021	Author:	ADON
Reviewed:		Authority:	Council or CAO
Approval:	Council Sept 22, 2021		

1.0 PURPOSE

Employers across Canada have a legal obligation under the Occupational Health and Safety Act to provide their employees with safe workplaces and to take all reasonable precautions to protect employees from contracting a work-related illness. The vaccines available in Canada are currently thought to be between 80% and 95% effective in either preventing infection, or preventing symptoms of COVID-19 in the vaccinated person.

All existing staff, student placements, and volunteers are required to be fully vaccinated against COVID-19, unless it is medically contraindicated. All hires into new postings will be required to meet the job requirements as posted, which will include full COVID-19 vaccination.

The impacts of non-vaccination that were considered in the development of this policy can be categorized into three areas. 1. Residents 2. Staff 3. Costs to Employer/Public.

- Violation of Residents Rights under the LTCHA if we cannot allow them to resume normal activity because of our staff vaccination rate not reaching 70% threshold mandated by the Ministry of Health or fluctuating above/below.
- Health and Safety Risk to Residents – the lower the vaccination rate, the greater risk of transmission throughout the home
- Health and Safety Risks to Staff (vaccinated and unvaccinated) and their families should they contract the virus and transmit it throughout the home, to their families and the community
- Should an outbreak occur it risks the safety of residents and staff as staffing levels may be impacted.
- While a large percentage of our resident population is vaccinated, it is important to note that symptoms of Covid-19, even with a reduced severity, could be life threatening to our most vulnerable residents.
- In the event of outbreak the employer will have additional costs for overtime to adequately staff the home and for PPE required.

2.0 POLICY STATEMENT

Protection of our vulnerable residents is of paramount importance and the participation in COVID-19 vaccination is required for existing staff as of November 15, 2021, and will be required for any new hires into postings for all positions at Grandview Lodge. The ability for staff to work in some situations

will be restricted based on the vaccination status of that staff member (i.e. medical exemption). High rates of vaccination in our home is important to protect all people who live in, work, and visit it and to help reduce the risk of outbreaks and the need to isolate residents. Isolation means residents lose in-person social interaction and the ability to engage in activities; the effects of isolation may be greater for residents who have dementia and/or a cognitive impairment.

Grandview Lodge will provide the following supports for people subject to this policy to receive a vaccine: paid time, if required to receive the vaccine, assistance with booking vaccine appointment, peer-to-peer support.

Non-compliance with the policy will be managed as outlined herein and in accordance with Council approved policies, human resources policies, collective agreements and applicable legislation, and directives.

Statistical Information; All licensees must collect, maintain, and disclose to the Ministry of Long-Term Care, key data metrics that underpin the Directive. No identifying information will be provided to the ministry; in relation to this policy; all statistical information will be provided in aggregate form.

3.0 SCOPE

This policy applies to all Haldimand County – Grandview Lodge employees and volunteers regardless of their division, including students and agency providers working at Grandview Lodge.

3.01 Existing Staff

From July 1, 2021 until September 26, 2021 - existing staff have/had three options as directed by the Ministry of Health:

- Show proof of full immunization against COVID-19
 - Provide medical documentation showing unable to receive any COVID-19 vaccine
 - Take an educational course, approved by Grandview Lodge
 - If still not willing to vaccinate, staff will be required to sign a Declination Form (Appendix 1) that outlines the risks of not being vaccinated to themselves, the residents and their coworkers – as well as an accountability statement indicating they are aware of the impacts or consequences that could arise if they contract and transmit the virus within the home.
- a. Providing proof of vaccination** For people who are vaccinated in Ontario, the only acceptable proof of vaccination is the receipt provided by the Ministry of Health to the person who was vaccinated. This includes either the physical/hard copy receipt or email version of the receipt a person would have received from Public Health Ontario.
- b. Proof of a medical reason for not being vaccinated** Proof must be provided by either a physician or a nurse practitioner (note: A nurse practitioner is a registered nurse who holds an extended certificate of registration under the Nursing Act, 1991). In some instances, the medical reason for the person not being vaccinated may be time-limited. As we would with any other type of medical accommodation, we will need to follow up periodically to ensure that nothing has changed from the physician's/nurse practitioner's point of view on vaccination for that staff member, by requiring updated medical documentation. Should the medical circumstances change, allowing the employee to be vaccinated, documentation as per 3.01a will be required.

- c. **The educational course is not considered “mandatory”**, since there is an option of a or b above. Staff who choose c –will be required to complete the course with a passing grade of 95%, on their own time. The County will pay for the course, instructor, materials, venue, etc., but since it is not a mandatory training – it will not fall under the scope of the existing Collective Agreements and not be paid time. The educational program has been approved by Grandview Lodge / Haldimand County and addresses all of the following learning components: • how COVID-19 vaccines work; • vaccine safety related to the development of the COVID-19 vaccines; • benefits of vaccination against COVID-19; • risks of not being vaccinated against COVID-19; and • possible side effects of COVID-19 vaccination. The Ministry of Health requires that proof of completion be provided prior to staff working in the home and as such staff will not be permitted to attend work until a passing grade is achieved.

The Ministry of Health has announced that employers may develop their own policies related to COVID-19 vaccination. Effective September 27, 2021 this policy is amended to require the following:

Item 3.01 above, in its entirety, is redundant and shall be replaced as follows:

3.01 (Revised) All staff, students and volunteers of Grandview Lodge will be required to be fully vaccinated as of November 15, 2021 (as per Ministry directive), unless providing the necessary documentation for a valid medical exemption. For the purposes of this policy, the following definitions apply:

“Fully vaccinated”: An individual is considered fully vaccinated if they have received:

- The full series of a COVID-19 vaccine authorized by Health Canada, or any combination of such vaccines, or
- One or two doses of a COVID-19 vaccine not authorized by Health Canada, followed by one dose of a COVID-19 mRNA vaccine authorized by Health Canada, or
- Three doses of a COVID-19 vaccine not authorized by Health Canada;
- Final dose of the COVID-19 vaccine was received at least 14 days before providing the proof of being fully vaccinated.

Note: This definition may be amended to require future doses/boosters of the COVID-19 vaccine approved by Health Canada, if deemed necessary.

Unvaccinated staff with medical exemptions will be required to receive routine COVID-19 testing as per the direction of the Grandview Lodge Administrator or designate, taking into consideration Ministry of Health Directives and best practices.

3.02 New Hires

COVID-19 full vaccination for all Grandview Lodge hires, including students, is a job requirement unless a valid medical exemption is provided. Medical exemptions will be managed by Human Resources and routine documentation will be required, as requested, on an ongoing basis. Grandview Lodge will accommodate as necessary.

Item 3.03 becomes redundant as of September 27, 2021 as per the approved policy amendments.

3.03 Existing Staff Posting into another Line/Shift, Job Status or Classification

Internal and external job postings – Job documents will show COVID-19 vaccination as a job requirement. Any existing Grandview Lodge staff member applying to a new line or shift, a new status (i.e. part time to full time) or a new classification (i.e. nursing to housekeeping), must meet the job

requirements in the posting. The only exception would be those with medical exemption (with documentation as per 3.01b.)

4.0 PROCEDURE

- a) Employees will be given every reasonable opportunity to be informed of the risks, benefits and side effects of the COVID-19 vaccine. This includes, but is not limited to, the following:
 - Education on the benefits, potential risks and side effects of the COVID-19 vaccine;
 - Posting of a notice in accessible locations, e.g. Staff Lounge and bulletin boards of COVID-19 information;
 - Sending reminders to those Employees who have not yet received immunization by November 15, 2021;
 - Promotional information, staff town hall and up to date information sharing on COVID-19 vaccines and the vaccine statistics for the Homes
- b) The Infection Control Specialist (ICS) or designate will collect the required information and documentation related to staff vaccination and report data as necessary to Human Resources and to the required Ministry;
- c) Staff who do not produce proof of being fully vaccinated for COVID-19 by November 15, 2021 will be placed on an unpaid leave of absence effective November 16, 2021 for failure to comply with the policy.
- d) The Home will inform any unvaccinated staff with a medical exemption, essential care givers, private care givers and support workers that in the event of outbreak, they may be excluded from work;
- e) As per Directive 3, dated November 12, 2021, staff members can continue to work within the home with increased rapid testing if they meet **all of the following requirements**:
 - Began working or attending the home on or prior to October 1, 2021
 - Have provided proof of at least one dose of a COVID-19 vaccine by November 15, 2021
 - Must provide proof of final required dose of a COVID-19 vaccine, as required by Section C, before December 13, 2021.
- f) Staff members covered under 4.0(e) shall work directly with the Infection Control Specialist (ICS), or designate to ensure accountability. Rapid testing will be required to be completed a minimum of 3 times per week. If a staff member works less than 3 shifts per week, they will be required to be tested on each shift.
- g) Contracted resident care providers, including agency staff, may not be permitted to enter the Home during the outbreak if they are unvaccinated;
- h) Unvaccinated staff will complete a declination form (Appendix 1) This declination form will be kept on the employee file with a copy to the Infection Control Specialist (ICS) for outbreak planning and occupational health surveillance activities (*redundant as of September 27, 2021*);
- i) Efforts should be taken to minimize contact of unvaccinated staff with unvaccinated residents through re-assignment of primary care groups and cohorting activities in an outbreak ;
- j) Unvaccinated staff will be required to wear PPE as directed by the home at all times after precautions have been lifted for vaccinated staff and be required to have weekly PCR testing at a local assessment center unless otherwise directed by Public Health;
- k) Unvaccinated staff will be required to maintain single site/single employer declaration and be cohorted to a single unit for the duration of the pandemic; unless otherwise directed by the Ministry (*redundant as of September 27, 2021*);
- l) The Infection Control Specialist will maintain a list of staff vaccine status and provide regular updates to the Home's leadership team;
- m) Staff who are medically unable to receive the COVID-19 vaccine will be excluded from work and sent home or reassigned as able during an outbreak. Reassignment of staff may include an assignment to another Haldimand County division, outside of Grandview Lodge and may not follow the employees regular schedule. Such reassignment would not be eligible for additional

compensation such as mileage or pay differential. Likewise, an employee will not suffer a loss of earnings if reassigned to a lower paying classification;

- n) Reassignment will depend on operational need, risk assessment and done in collaboration with the Public Health and Haldimand County's Human Resources Division;
- o) Should an employee decline an offer of reassignment, they will be excluded from work without pay until the outbreak is declared over in consultation with Public Health;
- p) All employees can return to work once the outbreak is declared over in consultation with Public Health.

Payment of Wages During Outbreak

Staff who have a medical accommodation regarding the COVID-19 vaccine and cannot be reassigned by the employer, will be paid for their missed work as per the schedule as posted at the declaration of the outbreak. Employees must provide adequate documentation from their physician indicating the medical contraindications for vaccination in order to receive payment. Annual physicians note is required.

Directions for Staff in a COVID-19 Outbreak

Category	Asymptomatic Staff	Staff Working On Outbreak Unit	Staff Working on Non Outbreak Unit
A	Fully vaccinated. (14 days after second dose)	May continue to work on outbreak unit (s)	May continue to work on non outbreak unit (s)
B	Unvaccinated/medical	Reassignment OR sick leave of absence using banked sick time until outbreak is declared over	