

# COVID-19 Vaccination or Rapid Testing Policy

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## 1.0 Purpose

- 1.1 To implement COVID-19 related occupational health and safety protocols to provide a safe and healthy work environment, to ensure compliance with Alberta Public Health Orders issued by the Office of the Chief Medical Officer of Health, and to decrease the potential exposure to, transmission of, and infection with COVID-19 at or within North Peace Housing Foundation's work locations, while maintaining service to the *Foundation's* clientele.

## 2.0 Policy Statements

- 2.1 COVID-19 is a recognized serious workplace hazard. The *Foundation* has a legal obligation to provide and maintain a safe and healthy environment for all *Employees* and clientele. The *Foundation* is committed to doing so.
- 2.2 Despite the numerous past, present, and ongoing COVID-19 risk mitigation and health and safety measures in place, both at the *Foundation's* workplaces and within our communities, the COVID-19 pandemic continues to present a serious occupational health and safety risk and put significant strain on our health care system as the entire community.
- 2.3 The World Health Organization, Health Canada, Alberta Health, and other health authorities have consistently advised that immunization against COVID-19 is a safe and the most effective way to prevent or minimize transmission of COVID-19, and in connection, ultimately protect our *Employees*, clientele, and preserve workforce capacity to ensure effective program delivery.
- 2.4 The *Foundation* has a legal obligation to strictly adhere to the mandates and Public Health Orders of the Government of Alberta.
- 2.5 As a result of our legal responsibilities to those we serve and employ, all *Employees* will be required to be *Fully Vaccinated* against COVID-19, or alternatively, comply with *Rapid Testing* and *Proof of Negative Test Results* requirements as more specifically outlined in this Policy.
- 2.6 The *Foundation* recognizes and will act at all times in accordance with its obligations pursuant to the *Alberta Human Rights Act*, the *Occupational Health and Safety Act, Regulation, and Code*, and advice from the Office of Chief Medical Officer of Health.

## 3.0 Definitions

- 3.1 "*Foundation*" means North Peace Housing Foundation.
- 3.2 "*Employee*" means any individual employed by the *Foundation* (full-time, part-time, casual or otherwise), volunteering for the *Foundation*, or providing services to the *Foundation* (including those on contract and/or contractors), and practicum students, and as determined by the Executive Director in the event of uncertainty.

**3.3** “Fully Vaccinated” means:

- a. having received two doses of a vaccine considered valid by Health Canada in a two dose COVID-19 vaccine series, or one dose of a vaccine considered valid by Health Canada in a one dose COVID-19 vaccine series; and
- b. having fourteen days elapsed since the date upon which the person received the second dose of the COVID-19 vaccine considered valid by Health Canada of a two dose series, or one dose of the COVID-19 vaccine considered valid by Health Canada in a one dose vaccine series.

**3.4** “Partially Vaccinated” means:

- a. having received one dose of a vaccine considered valid by Health Canada in a two dose COVID-19 vaccine series; or
- b. have received the complete dosage series (typically two doses) but fourteen days have not elapsed since the date upon which the person received the second dose of the COVID-19 vaccine considered valid by Health Canada of a two dose series, or one dose of the COVID-19 vaccine considered valid by Health Canada in a one dose vaccine series.

**3.5** “Proof of a Negative Test Result” means as follows:

- a. A written or printed copy of a COVID-19 test result that indicates the individual has tested negative for COVID-19 on a *Rapid Test* from a sample that was taken within the prior 72 hours;
- b. Valid *Rapid Test* results should clearly outline the type of test, time of sample collection, clear indication of a negative results, and laboratory that completed the test (if applicable);
- c. A self-test completed offsite or self-produced documentation of a negative test result is not valid; and
- d. Testing must not be from the Alberta Health Services public COVID-19 testing system or from a rapid testing kit designed and intended for home/personal use.

**3.6** “Proof of Vaccination” means as follows:

- a. A vaccine record with QR code, which can be obtained from the Province of Alberta at <https://covidrecords.alberta.ca/home>; or
- b. If an *Employee* is unable to obtain a Province of Alberta-issued QR code (i.e. Definition 3.6(a) of this Policy), acceptable proof of vaccination that is from another Canadian province or territory, First Nation, or the Canadian Armed Forces, as determined by the *Foundation*.

**3.7** “Rapid Test” or “Rapid Testing” means a Health Canada approved rapid antigen, rapid PCR, or lab based PCR test approved by Health Canada or the lab accreditation body of jurisdiction, and does not include a test from the Alberta Health Services public COVID-19 testing system or testing from a rapid testing kit designed and intended for home/personal use.

**3.8** “Unvaccinated” means not satisfying either Definition 3.3 or 3.4 of this Policy.

## 4.0 Vaccination and Rapid Testing Procedures

- 4.1** All *Employees* must declare their vaccination status to the *Foundation* by no later than **DATE 1** as being *Fully Vaccinated*, *Partially Vaccinated*, or *Unvaccinated*. *Employees* who are *Fully Vaccinated* or *Partially Vaccinated* must, concurrently with their declared vaccination status, provide *Proof of Vaccination* status to the *Foundation*.
- 4.2** All *Employees* must update their vaccination status with, and provide related *Proof of Vaccination* to, the *Foundation* if their vaccination status changes.
- 4.3** Subject to the exemptions outlined within this Policy, all new *Employees* hired on or after **DATE 1** will be required to be *Fully Vaccinated* prior to their first day of work and provide the *Foundation* with *Proof of Vaccination*.
- 4.4** Effective **DATE 2**, all *Employees* must comply with one of the following:
- a. Provide *Proof of Vaccination* to the *Foundation* demonstrating that they are *Fully Vaccinated*; or
  - b. Undergo *Rapid Testing* and provide the *Foundation* with *Proof of a Negative Test Result* obtained by the *Employee* within the previous 72 hours of the commencement of their workday or shift. *Proof of Negative Test Results* shall be sent to **EMAIL**. Subject to human rights considerations, *Employees* are solely responsible for undergoing *Rapid Testing* and obtaining *Proof of Negative Test Results* at their own personal cost and on their own personal time; the *Foundation* will neither reimburse *Employees* for any costs associated with *Rapid Testing* and/or obtaining *Proof of a Negative Test Result*, nor provide them with time away from work (whether paid or unpaid) for *Rapid Testing*.
- 4.5** Any *Employee* that does not comply with Section 4.4 of this Policy shall be considered non-compliant. The *Foundation* will review each incident of non-compliance in its own specific context and circumstances, and at its discretion (having regard to human rights, where applicable) will determine available options to address such non-compliance, including, but not limited to the following:
- a. Leave of absence without pay. If such leave of absence is **X weeks** or more, the *Employee* will be solely responsible for paying all benefits premiums (both the employee and employer portions), if they choose to continue their benefits coverage;
  - b. Reassignment or modification of duties (potentially along with any appropriate adjustment in pay) that would involve no or minimum in-person contact with coworkers or clientele, understanding that the *Foundation's* ability to consider such alternative arrangements may be very limited in most cases;
  - c. Conclusion of employment; and/or
  - d. Other potential available options for addressing such non-compliance, as determined by the *Foundation*.
- 4.6** In the event an *Employee's Rapid Test* yields a positive result for COVID-19, they must:
- a. immediately inform the *Foundation*;
  - b. comply with all Alberta Health Services' direction, guidelines, recommendations, and/or rules, including, but not limited to, those with respect to isolation; and

- c. follow all applicable Alberta Health Services recommendations with respect to follow-up COVID-19 testing.

**4.7** The *Foundation* will review on a case by case basis appropriate circumstances and evidence that must be established prior to an *Employee* returning to the workplace after testing positive for COVID-19, taking into account currently applicable Government of Alberta and/or Alberta Health Services' direction, guidelines, recommendations, and/or rules.

## **5.0 Exemptions - Human Rights and Accommodation**

**5.1** The *Foundation* recognizes, and is committed to, its responsibilities and duties pursuant to the *Alberta Human Rights Act*. If an *Employee* is unable to become *Fully Vaccinated* due to a protected ground as defined by the *Act*, the *Foundation* will consider requests for reasonable accommodation to the point of undue hardship. An *Employee* seeking a human rights accommodation exemption (i.e. medical or sincerely held religious belief) from becoming *Fully Vaccinated* must notify the *Foundation* immediately. The *Foundation* will advise the *Employee* of the supporting information and/or documentation required to consider their request.

**5.2** However, all *Employees* seeking a human rights accommodation exemption from becoming *Fully Vaccinated* should understand that this Policy is purposely designed to provide alternatives to *Employees* unable, or personally choosing not, to become *Fully Vaccinated*; namely, undergoing *Rapid Testing* and providing *Proof of a Negative Test Result*, or the potential options outlined in Section 4.5(a), (b), and (d) of this Policy. Consequently, it is anticipated in most cases that *Employees* that have a proven legitimate human rights exemption from becoming *Fully Vaccinated* will be reasonably accommodated in this manner.

## **6.0 Support for Vaccination**

**6.1** To assist *Employees* in becoming *Fully Vaccinated* against COVID-19, the *Foundation* will endeavor to facilitate access to vaccination, including providing *Employees* with COVID-19 vaccination leave in accordance with the *Employment Standards Code*.

## **7.0 Prevention of Harassment, Bullying, or Discrimination**

**7.1** The *Foundation* recognizes, and is committed to, its responsibilities and duties pursuant to the *Occupational Health and Safety Act*.

**7.2** Harassment, bullying, or discrimination of any type against individuals based on their vaccination status, compliance with this Policy, or any other reason will not be tolerated by the *Foundation*. *Employees* experiencing harassment, bullying, or discrimination are encouraged to review the *Foundation's* **NAME OF APPLICABLE POLICY/POLICIES**.

## **8.0 Continued Compliance with Health and Safety Precautions**

**8.1** All *Employees* are expected and required to continue to comply with all applicable health and safety measures to reduce the workplace hazard of COVID-19, as communicated and directed by the *Foundation*. Such compliance includes, but is not limited to, compliance with Alberta Public Health Orders, compliance with screening protocols, outbreak status response/management compliance, wearing a mask or face covering when required, using provided personal protective equipment, maintaining appropriate physical distancing, and self-monitoring for potential COVID-19 symptoms daily prior to attending the workplace.

**8.2** If an *Employee* has uncertainties in respect of the applicable health and safety measures that must be complied with, they must seek immediate guidance and/or clarification from the *Foundation*.

**8.3** Information from the Government of Alberta relating to COVID-19 public health actions can be accessed and reviewed at <https://www.alberta.ca/covid-19-public-health-actions.aspx>.

## **9.0 Non-Compliance**

**9.1** If an *Employee* refuses or fails to comply with this Policy, or provides false or misleading information in any regard, they may be subject to disciplinary action up to and including termination of employment.

## **10.0 Confidentiality and Privacy**

**10.1** The *Foundation* is committed to maintaining the privacy and confidentiality of *Employees'* personal information in accordance with all applicable privacy legislation, including the *Freedom of Information and Protection of Privacy Act*.

**10.2** Information disclosed by an *Employee* and collected by the *Foundation* pursuant to this Policy:

- a. is personal information as defined by the *Freedom of Information and Protection of Privacy Act*, and such information has been collected pursuant to section 33(c) of the *Freedom of Information and Protection of Privacy Act* and will only be used by the *Foundation* for the purpose of compliance with, and enforcement of, this Policy;
- b. shall be treated as strictly confidential and only made available to those persons who have a legitimate need to know the information;
- c. will remain in the *Employee's* confidential personnel file for the purposes of ensuring the health and safety of the *Foundation's Employees* and clientele in the event of possible COVID-19 transmission in the workplace, as well as protecting against the risk COVID-19 presents to the *Foundation's Employees* and clientele generally; and
- d. will be managed in accordance with the *Freedom of Information and Protection of Privacy Act*, and will be permanently destroyed upon revocation of this Policy.

**10.3** If an *Employee* has any questions about the collection, use, or disclosure of information pursuant to this Policy, please contact **INSERT**.

## 11.0 Policy Updates

**11.1** This Policy will be periodically monitored and reviewed by the *Foundation* (at least every 6 months). Given the continuously evolving nature of the COVID-19 pandemic, this Policy may be amended regularly. The *Foundation* reserves the right to amend this Policy at any time, including to incorporate changes to, or new, public health guidelines, Government of Alberta mandates and guidelines, Alberta Public Health Orders, applicable legislation, and the *Foundation's* internal COVID-19 risk assessments. *Employees* will be promptly notified of any amendments to this Policy.

**11.2** This Policy is considered temporary and will remain in place only for as long as required to achieve its purpose.

### ***Employee Acknowledgement:***

**All *Employees* must review this Policy and provide a signed copy of it to the *Foundation* acknowledging and confirming they have read and understand it and the requirements within.**

I, \_\_\_\_\_, acknowledge I have received, read, and understand this **COVID-19 Vaccination or Rapid Testing** Policy and its within requirements.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_