

Title: <b>MANDATORY COVID-19 VACCINATION</b>		HR-14-00
Document Path: Resources/CIMS/Human Resources/Policies and Procedures		
Approved By: VP People and Development		Version: 1.0
Effective Date: December 2021	Status: Current	Page 1 of 7

## Policy Name: MANDATORY COVID-19 VACCINATION

### **Purpose:**

The purpose of this policy is:

- To outline the process for confirming COVID-19 vaccination status and obtaining exemptions.
- To minimize the risk of COVID-19 to Labrador-Grenfell Health personnel, and to protect patients/residents/clients and other staff from exposure to COVID-19.

This policy applies to employees (regardless of physical work location or work arrangements), physicians (including fee-for-service physicians), locums, clergy, volunteers, students, and staff of vendors, contractors, and suppliers who regularly work alongside Labrador-Grenfell Health Personnel.

### **Preamble**

The goal of Canada's pandemic response is to minimize serious illness and death while minimizing societal disruption. The goal of Canada's COVID-19 immunization response is: to enable as many Canadians as possible to be immunized against COVID-19 as quickly as possible, while ensuring that high risk populations are prioritized. Labrador-Grenfell Health shares these goals.

Labrador-Grenfell Health is committed to maintaining safe workplaces for all employees and safe healthcare facilities for its patients/clients/residents. In an effort to ensure continued safety in all Labrador-Grenfell Health facilities, as well as to ensure additional health protection for all Newfoundlanders and Labradorians, all Labrador-Grenfell Health employees (regardless of physical work location or work arrangements), physicians (including fee for service physicians), locums, clergy, volunteers, and students ("Labrador-Grenfell Health Personnel") are required to be fully vaccinated against COVID-19 or have an approved exemption.

Mandatory vaccination of employees and agents is an important step in protecting our patients/clients/residents, healthcare workers and employees, and communities at large.

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Labrador-Grenfell Health will take the steps required for staff of any current vendors, suppliers, or contractors who regularly work alongside Labrador-Grenfell Health Personnel to follow the same vaccination requirements that apply to Labrador-Grenfell Health Personnel.

As of December 17, 2021, new vendors, suppliers and contractors are expected to adhere to the same vaccination requirements that apply to Labrador-Grenfell Health Personnel.

For vaccine product information, and additional resources for Health Care Professionals, refer to [NL COVID-19 Website for Health Care Professionals](#).

To book COVID-19 vaccination or for additional information regarding COVID-19 vaccine, refer to [NL COVID-19 Website](#).

### **Policy / Standard:**

Labrador-Grenfell Health Personnel who are not vaccinated and do not have an approved exemption by December 17, 2021 may be placed on an unpaid, non-disciplinary leave of absence.

Labrador-Grenfell Health Personnel who subsequently become fully vaccinated, or eligible for an approved exemption, will be entitled to return to work.

All proof of vaccination, requests for exemption, supporting documents and proof of COVID-19 test results will be collected, used, and stored in accordance with the employer's obligations pursuant to the Access to Information and Protection of Privacy Act, 2015.

This policy will be reviewed as required, but not less than every six months.

### **Materials Required:**

[Employee Family Assistance Program – Homewood Health FAQ](#)

### **Related Policies:**

[Access to Information and Protection of Privacy Act, 2015](#)

[Canadian Charter of Rights and Freedoms](#)

[Management of Information Act](#)

[Medical Act, 2011](#)

[Human Rights Act, 2010](#)

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[Occupational Health & Safety Act](#)  
[Respectful Workplace](#)

**Procedure:**

**Labrador-Grenfell Health Employees, Physicians, Locums, Clergy and Volunteers:**

1. Individuals are required to provide proof of vaccination by December 17, 2021. This is done through the Newfoundland and Labrador Centre for Health Information (NLCHI)'s [Employee COVID-19 Vaccination Status Portal](#) or providing proof to the Manager (as defined below) as set out in Step 6.
2. Individuals must enter the following information into the Portal:
  - Name;
  - Date of birth;
  - MCP;
  - Telephone number;
  - Email address;
  - Employee number (if applicable);
  - A statement confirming the individual's COVID-19 vaccination status.
3. Individuals provide consent to NLCHI for the collection of their personal information; NLCHI's verification of that information against the Integrated Employee Record and the COVID-19 Vaccination Database; and NLCHI's disclosure of that information to Labrador-Grenfell Health. Individuals who do not consent to this process will be required to provide confirmation of their vaccination status directly to their Manager (see Step 6).
4. NLCHI will combine the information provided with the Individual's work site / location from the Integrated Employee Record and the Individual's COVID-19 vaccination record in the COVID-19 Vaccination Database.
5. NLCHI will provide this record to the Labrador-Grenfell Health Human Resources. In the event there is a discrepancy between the information provided by the Individual and the information in the COVID-19 Vaccination Database, NLCHI will notify the Labrador-Grenfell Health Human Resources, who will follow up with Managers. Managers will be responsible for obtaining any required additional information from the Individual.
6. Individuals who do not wish to provide their personal information via the Employee COVID-19 Vaccination Status Portal must get direction from their Manager on acceptable alternatives to provide proof of vaccination status.

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7. Employees, Physicians, Locums, Clergy and Volunteers are required to confirm their vaccination status to Labrador-Grenfell Health, whether vaccinated or unvaccinated. Employees, Physicians and Locums who do not provide confirmation of their vaccination status may be subject to discipline.
8. New hires must provide proof of vaccination to Employee Health during the pre-placement screening process assessment and prior to starting work.
9. Following December 17, 2021, Individuals returning from leave will be responsible for providing proof of vaccination status to their Manager.

### **Labrador-Grenfell Health Personnel Seeking Exemptions:**

1. Individuals must advise their manager that they are seeking an exemption by December 13, 2021.
2. Individuals must send requests for Medical Exemptions to Employee Health. The request must include supporting medical documentation, Initial Request for Medical Accommodation Form from a health care provider.
3. Individuals must send requests for Non-Medical Exemptions to their manager, who forwards the request to Labour Relations.
4. Individuals are required to cooperate with the exemption request process, which may require providing additional information including medical information, depending on the nature of the exemption request.
5. Labrador-Grenfell Health Personnel with approved exemptions may be required to follow additional reasonable safety precautions, of a nature and at a frequency to be determined by the employer.

### **Responsibility of Managers:**

1. Managers are responsible for tracking compliance with this policy.
2. Managers will receive a list of Individuals indicating compliance with this Policy based on the information collected by NLCHI.
3. Managers are responsible to investigate any discrepancies between the information provided by NLCHI and the information reported by an Individual.

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4. Managers will ensure that any Individual who is on leave receives notice of this policy and provides confirmation of vaccination, or of their approved exemption, prior to their return to work.
5. Managers forward requests for non-medical exemptions to Human Resources.

### **Responsibility of Labour Relations:**

1. Labour Relations receives and assesses requests for non-medical exemptions, including whether additional information is required in support of the request.
2. Labour Relations advises the person seeking a non-medical exemption and their manager of the outcome of the exemption request.
3. Where an Individual is unvaccinated and has not obtained an approved exemption, Labour Relations places the employee on an unpaid leave of absence.

### **Responsibility of Employee Health:**

1. Employee Health receive and assess requests for medical exemptions, including whether additional information is required in support of the request.
2. Employee Health advise the person seeking an exemption and their Manager of the outcome of the exemption request.

### **Responsibility of Students:**

1. Students working with Labrador-Grenfell Health will be required to verify their vaccination status through their educational institution, which is responsible for providing confirmation of vaccination to Labrador-Grenfell Health.

### **Responsibility of Vendors, Contractors, Suppliers and Agency Staff:**

1. Labrador-Grenfell Health will take steps required for staff of any current vendors, suppliers, contractors or agency staff who regularly work alongside Labrador-Grenfell Health Employees and Agents, or within Labrador-Grenfell Health buildings (owned or leased), to follow the same vaccination requirements that apply to Labrador-Grenfell Health Personnel.

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2. Staff of Vendors, Contractors, Suppliers and Agencies may be required to provide proof of vaccination upon arrival or prior to entry into any Labrador-Grenfell Health facility, or on Labrador-Grenfell Health business.

### **Responsibility of Volunteers:**

1. Volunteers are required to provide proof of vaccination status to Human Resources.
2. Human Resources will ensure that current and future Volunteers are compliant with this policy prior to Volunteers beginning work for Labrador-Grenfell Health.

### **Definitions:**

**Covid-19 Vaccine:** A vaccine for COVID-19 as approved by Health Canada, as may be amended from time to time.

**Exemption:** An exemption under this policy means that a person is released from the requirement to be fully vaccinated. An exemption may be granted for medical or non-medical reasons, and it may be temporary or permanent.

**Fully Vaccinated:** A person is considered to be fully vaccinated when at least two weeks (14 days) have passed since an individual's second dose of COVID-19 vaccine, or first dose where an individual has received a one-dose series of COVID-19 vaccine.

### **Manager:**

- For an employee, their direct Manager.
- For a Manager, their Director or Clinical Chief.
- For a Director / Clinical Chief, their Vice President.
- For Clergy, the Manager of Operations.
- For Fee-for-Service Physicians and Locums, the Regional Director of Medical Services.

**Medical Documentation:** Documentation outlining medical reason(s) for not being fully vaccinated against COVID-19 provided by an appropriate health care provider, in line with guidance from the College of Physicians and Surgeons of Newfoundland and Labrador.

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## **References:**

[COVID-19 Vaccine Resources for Health Care Professionals](#). (2021). Government of Newfoundland and Labrador.

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Newfoundland and Labrador Centre for Health Information [Employee COVID-19 Vaccination Status Portal](#). (2021).