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**CATEGORY:** HUMAN RESOURCES

**SUBCATEGORY:** HEALTH, SAFETY & WELLNESS

**SUBJECT:** EMPLOYEE COVID-19 VACCINATION

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### **Policy Statement**

The Region of Peel has an obligation under provincial legislation to take all necessary precautions to protect the health, safety and wellbeing of its workforce and is committed to providing excellent service to our community and to building trust and confidence in local government.

To help reduce the risk of COVID-19 transmission, this employee vaccination policy is an important measure that compliments other workplace health and safety measures in place including health screening, masking, physical distancing, hand hygiene, and enhanced cleaning.

This policy is in line with Public Health guidance and supports the direction that vaccines provide an elevated level of protection against COVID-19 and related variants.

The Region is demonstrating its commitment to ensuring the health, safety, and wellbeing of all members of its workforce and broader Region of Peel community.

### **A. PURPOSE**

The purpose of this policy is to outline the Region of Peel's requirement for employee COVID-19 vaccination and provide employees with direction on the requirement to receive the COVID-19 vaccination, provide proof of vaccination status or an exemption, and conditions for attending work without vaccination.

The COVID-19 pandemic has been an evolving public health issue in Canada. The Region continues to monitor guidance from all applicable public health authorities and reserves the right to revise this Policy as determined to be necessary and appropriate, and at a minimum will be reviewed annually beginning December 2022.

### **B. SCOPE**

This Policy applies to all regional employees, students, and volunteers (for the purposes of this Policy, individually "employee" and collectively "employees").

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All employees, regardless of vaccination status, must continue to practice the recommended public health measures as directed by the Region for the prevention and control of COVID-19 infection and transmission.

Information obtained under this Policy will be collected and protected in accordance with applicable privacy legislation.

## **C. DEFINITIONS**

**“Fully Vaccinated”:** In Ontario, 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;
  - 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; and,
  - They received their final dose of the COVID-19 vaccine at least 14 days ago.

[COVID-19 Fully Vaccinated Status in Ontario \(gov.on.ca\)](https://www.ontario.ca/covid-19-fully-vaccinated-status)

**“Proof of Vaccination”:** Documentation issued by the Ontario Ministry of Health, other province or territory or international equivalent indicating the employee’s COVID-19 vaccination status. Proof of vaccination is available at:

<https://covid19.ontariohealth.ca/>

**“Education Session”:** An educational program that has been approved by and/or provided by the Region of Peel and addresses 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
- Side effects of COVID-19 vaccination

**“Undue Hardship”:** This refers to the extent to which an employer must attempt to accommodate the needs of an employee or job applicant on protected grounds under the *Human Rights Code*.

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## **D. POLICY**

### **1. Vaccination Disclosure**

Employees are strongly encouraged to become fully vaccinated against COVID-19.

Employees of the Region must provide confirmation of their vaccination status by **October 8, 2021**. The Region may request proof of vaccination at any time.

New employees who commence employment on or after October 8, 2021, are required to be fully vaccinated against COVID-19 as a condition of being hired by the Region of Peel.

Employees who are not fully vaccinated by **November 8, 2021**, will be required to comply with the Policy as follows prior to the November 8, 2021 deadline:

- i) Where an employee is not able to be fully vaccinated for *grounds protected by the Ontario Human Rights Code*, the Region will commit to accommodate the employee to the point of undue hardship as described below, and the employee will be required to participate in regular testing for COVID-19 and demonstrate a negative result at intervals to be determined by the Region. For clarity, philosophical objections are not a protected ground under the *Ontario Human Rights Code*; or
- ii) In the case of an employee who has chosen not to be fully vaccinated for *reasons other than those mentioned above*, the Region will require employees to participate in regular testing for COVID-19 (at the employee's own expense) and demonstrate a negative result at intervals to be determined by the Region. The completion of an education session will also be required.

### **2. Accommodation**

The Region will comply with its obligations under the *Ontario Human Rights Code* and will accommodate employees who are legally entitled to accommodation up to the point of undue hardship.

The Region will work with employees who are unable to be vaccinated due to a protected ground to develop and implement an appropriate individual accommodation plan. Accommodated employees will be required to participate in regular testing for COVID-19 and demonstrate a negative test result at intervals to be determined by the Region. Completion of the education session will not be required.

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In all instances, the Region will require the employee to provide reasonable evidence in support of their accommodation request.

### **3. Compliance**

Employees failing to comply with this Policy by November 8, 2021, shall be placed on an unpaid leave of absence. In all instances the Region will review any such unpaid leaves and reserves its rights to implement any corrective measures that it deems appropriate.

Employees who are subject to vaccination guidelines and requirements set out in specific legislation and/or applicable directive(s) issued by the government, Chief Medical Officer of Health or public health authority and any Region policy that has been adopted to reflect same, shall be required to comply with such legislation, directive, or policy.

Employees who provide false information in relation to information that is required under this Policy, may be subject to disciplinary action, up to and including termination.

## **E. RESPONSIBILITIES**

### **People Leaders**

- Apply this policy to employees, including ensuring that employees have disclosed their vaccination status as per the terms of this Policy.
- Follow all Federal or Provincial mandates or directives regarding the vaccination of employees in relation to COVID-19.
- Follow all Region required workplace precautions in relation to COVID-19.
- Provide employees with access to information on COVID-19, health, and safety precautions, and on the efficacy of COVID-19 vaccines, as directed by the Region.
- Always maintain confidentiality.
- Role model a respectful workplace in interactions with others as it relates to employee vaccination.

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**Employees**

- Comply with this Policy, including providing information required by this Policy.
- Follow all Federal or Provincial mandates or directives or reporting requirements regarding vaccination in relation to COVID-19.
- Follow all Region required workplace precautions in relation to COVID-19.
- Follow direction provided by the Region in cases where rapid antigen testing identifies a positive case including a laboratory-based polymerase chain reaction (PCR) test.
- If additional doses of the COVID-19 vaccine are required to maintain full vaccination status, ensure subsequent doses are also disclosed to the Region in accordance with this Policy.
- Role model a respectful workplace in interactions with others as it relates to employee vaccination.

**Human Resources**

- Create a procedure for collecting and storing information required by this policy.
- Provide support documents for the implementation of this policy.
- Assist with any labour relations or health and safety issues arising from the application of this policy, including liaising directly with union leadership.
- Assist People Leaders with any accommodation questions, concerns, and requests.

**Related Policies/Resources**

- [Respectful Workplace](#)
- [Code of Conduct](#)
- [Health, Safety & Wellness](#)
- [Employee Screening Tool](#)
- [PH \(Public Health\) Covid-19 portal](#)

<b>APPROVAL SOURCE:</b>	Executive Leadership Team
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<b>RESPONSIBILITY:</b>	Human Resources