

Subject: COVID-19 Immunization Policy

Section Code:

Date of Issue: July 1, 2021

Date of Review:

Approved By: Senior Leadership

Date of Revision:

Date of Approval: June 30, 2021

Applicable To: All Staff, Volunteers, and Students

BACKGROUND

1. Given many of the individuals served by Thrive Group and its member organizations (collectively “Thrive Group”) live in a group setting (long-term care home or congregate setting) and may have underlying medical conditions, residents/clients are at increased risk for contracting the COVID-19 virus and experiencing serious outcomes.
2. High rates of vaccination in our organizations are important to protect all people who live in, work at, and visit our Homes. Vaccination also reduces the risk of outbreaks and the need to isolate residents/clients. Isolation means residents/clients lose in-person social interaction and the ability to engage in activities. The effects of isolation may be particularly significant for those who have dementia and/or a cognitive impairment.

PURPOSE AND POLICY STATEMENT

3. Thrive Group is committed to creating and maintaining a healthy and safe work environment for our Workers and for the residents/clients we serve, and to reduce the risk of transmission of COVID-19 in our workplace by encouraging high rates of vaccination. This Policy promotes this objective and seeks to reduce the risk of transmission of COVID-19 by implementing procedures in respect of proof of vaccinations, and providing educational programming and information about vaccinations to all Workers.
4. This Policy complies with and expands upon the application of the Minister of Long-Term Care’s Directive regarding Long-Term Care Home COVID-19 Immunization Policy and sets requirements in accordance with the Directive for Workers of Thrive Group.
5. Notwithstanding any options available under this Policy, Workers covered by this Policy who do not receive a COVID-19 vaccination may be restricted from certain work situations in accordance with the objective of protecting vulnerable residents/clients, and maintaining a healthy and safe working environment for all Workers. This is discussed in further detail below.

SCOPE

6. This Policy applies to Thrive Group’s Staff, volunteers and students on placement (collectively referred to as “Workers”), regardless of either frequency or duration of attendance at any Thrive Group home or program.
7. For the sake of clarity where used in this Policy, the term “Staff” shall have the same meaning as that prescribed under the *Long-Term Care Homes Act, 2007*. Specifically, “Staff” means a person who works:
 - a) as an employee of Thrive Group;
 - b) pursuant to a contract or agreement with Thrive Group; or,
 - c) pursuant to a contract or agreement between Thrive Group and an employment agency or other third party.

PROCEDURE:

8. By July 31, 2021, or within thirty (30) calendar days of commencing work with Thrive Group, all Workers covered by this Policy are required to provide proof of one of the following:
 - a) Vaccination against COVID-19; or
 - b) A medical reason for not being vaccinated against COVID-19; or
 - c) Completion of a COVID-19 vaccination educational program.
9. Requirements for Workers who are providing proof of vaccination against COVID-19 in accordance with paragraph 8 a) include:
 - a) If the Worker has received the total required number of doses of a COVID-19 vaccination series approved by Health Canada, proof of all required doses must be provided;
 - b) If the Worker has only received the first dose of a two-dose COVID-19 vaccination series approved by Health Canada, proof that the first dose was administered must be provided within thirty calendar days and proof of administration of the second dose must be provided as soon as reasonably possible based on the Worker’s eligibility;
 - c) For Workers vaccinated in Ontario, the only acceptable proof of vaccination is the receipt provided by the Ministry of Health provided to the Worker who was vaccinated. A hard copy or email copy of the receipt is acceptable. The receipt of vaccination provided by the Ministry of Health will be returned to the Worker. For Workers vaccinated outside of Ontario, Thrive Group will ensure the proof being provided by the other jurisdiction is valid

and that the vaccine administered is one of the ones that has been approved by Health Canada. No copies will be kept by Thrive Group.

10. Requirements for Workers who are providing a medical reason for not being vaccinated against COVID-19 in accordance with paragraph 8 (b) include:
 - a) Written proof must be provided as a medical note or certificate by a physician or a registered nurse in the extended class;
 - b) Written proof must set out that the Worker cannot be vaccinated against COVID-19 for a medical reason and the effective time period for the medical reason;
 - c) Once the effective time period of the medical reason has expired, if at all, the Worker shall, within thirty (30) days of expiry, provide Thrive Group with proof of vaccination or proof that the Worker has completed an educational program in accordance with this Policy.
11. Requirements for Workers who are providing proof of completion of a COVID-19 vaccination educational program in accordance with paragraph 8 (c) include:
 - a) Completion of the educational program approved by Thrive Group;
 - b) The educational program must, at a minimum, address all of the following topics:
 - i. How COVID-19 vaccines work.
 - ii. Vaccine safety related to the development of the vaccines.
 - iii. The benefits of vaccination against COVID-19.
 - iv. Risks of not being vaccinated.
 - v. Possible side effects.
 - c) Proof of education program completion must be in a form acceptable to Thrive Group.
12. Workers must sign an Acknowledgment Form to identify their COVID-19 vaccination status. A copy of the required Acknowledgement Form is referenced at the end of this policy as *COVID-19 Vaccine Status Acknowledgment Form*. The Worker's supervisor or designate will sign-off on the Acknowledgement Form that they have reviewed proof of vaccination, proof of medical reason for not being vaccinated, or acceptable proof of educational program completion. The Acknowledgement Form will be kept in the individual's file with a copy sent to the Infection Prevention and Control lead for outbreak planning and occupational health surveillance activities.
13. Thrive Group will follow up with Workers who have provided proof of a first dose and have not yet provided proof of a second dose. Workers providing proof of vaccination who have not provided

proof of a second dose are required to cooperate with Thrive Group in setting second dose proof timelines in consideration of individual circumstances and access to vaccines.

14. For the purposes of this Policy, unless a Worker has provided proof that they have received the total required number of doses of a COVID-19 vaccination series approved by Health Canada, they will be considered “Unvaccinated”.
15. All Workers covered by this Policy will be given every reasonable opportunity to be informed of the risks, benefits and side effects of the COVID-19 vaccine.
16. Information about COVID-19 vaccines may be posted in accessible locations, e.g. staff break room, health and safety bulletin boards and by sending reminders to Workers who have not yet provided proof of full vaccination.
17. Promotional information, virtual updates, and home/program specific updates will include information on COVID-19 vaccines and the vaccine statistics for the homes/programs.

COLLECTION AND DISCLOSURE OF STATISTICAL INFORMATION

18. Thrive Group’s Infection Prevention and Control lead or designate will collect statistics under this Policy in respect of vaccination rates, total number of individuals covered by the Policy for the reporting cycle, total number of individuals who have provided proof under each category set out in paragraph 8 (broken down by the category of proof provided) and the status of each Worker who has submitted proof, and will report data monthly to the Ministry of Long-Term Care in a manner that is determined by the Ministry. No personal identifying information will be provided to the Ministry in relation to this Policy.
19. The Infection Prevention and Control lead or designate will maintain a list of Worker vaccine status and may provide updates to the leadership team as may be necessary or appropriate to meet the objectives of this Policy.
20. Information collected in conjunction with this Policy will be retained for the duration of the Workers employment with Thrive Group and will be destroyed following the cessation thereof in accordance with the record-keeping requirements of the *Employment Standards Act, 2000*.

OUTBREAK MANAGEMENT

21. Workers covered by this Policy are hereby advised that in the event of outbreak, they may be temporarily excluded from work.
22. An outbreak is determined by local public health authorities. In the event of an outbreak, precautionary measures will be put in place as per direction from public health authorities, and as per Thrive Group’s COVID-19 Pandemic Plan.

23. At Thrive Group's direction if there is an outbreak or risk of an outbreak (as assessed by Thrive Group), unvaccinated Staff will not be allowed to work on the outbreak unit/program. Attempts will be made by Thrive Group to reassign/redeploy Unvaccinated Staff, where able under cohorting requirements, to a non-outbreak area of the home or another program location. If this is not possible, Unvaccinated Staff may be required to take an unpaid leave of absence for the duration of a COVID-19 outbreak. Where applicable, Staff may be permitted to apply accrued but unused paid vacation, sick time and/or paid statutory leave to any such period of unpaid leave upon written request to, and with written approval by, their supervisor or designate.
24. Volunteers and student placement workers may not be permitted to enter Thrive Group's premises during the outbreak if they are Unvaccinated.
25. Workers will be advised of any specific applicable limitations and restrictions that may be imposed in the context of an outbreak. Unvaccinated Workers may be subject to additional and/or enhanced limitations and restrictions during periods of outbreak, as may be determined to be necessary and appropriate.

GENERAL RULES APPLICABLE TO UNVACCINATED WORKERS

26. Unvaccinated Workers covered by this Policy will be required to wear masks and eye protection at all times and will be required to have rapid antigen testing each day they work, in addition to any other requirements or recommendations that may now or later be imposed at law or by public health authorities.
27. Unvaccinated Workers covered by this Policy will be required to maintain single site declaration for the duration of the pandemic and in accordance with applicable legislation.

ENFORCEMENT

28. Any Workers found in violation of this Policy may be subject to remedial and/or disciplinary action, up to and including termination of employment, cancellation of contract and/or revocation of privileges. Remedies and/or disciplinary action will be administered in accordance to applicable contracts/collective agreements and underlying policies.
29. This Policy and the consequences for breach of Policy, will be applied by Thrive Group in a manner which complies with the Ontario *Human Rights Code*, *Employment Standards Act, 2000*, the *Occupational Health and Safety Act*, privacy legislation, and any other applicable laws and existing contracts or collective agreements.
30. Thrive Group reserves the right to amend this Policy as may be necessary or appropriate, as determined in its sole discretion, from time to time.