

4.1 Temporary - COVID-19 VACCINATION STATUS COLLECTION POLICY

What is the purpose of this policy?

The COVID-19 pandemic has given rise to significant health and safety risks for employees and supported individuals. Vaccination plays a critical role in preventing the workplace transmission of COVID-19 and protects supported individuals and members of the public with whom we interact and provide services. Being able to confirm vaccination status also allows employees to support the participation of supported individuals in activities beyond their homes in venues where public health requires confirmation. This policy sets out our expectations regarding vaccination and the collection of vaccination status information.

We take seriously our obligation to ensure the health and safety of the people we support, employees and homeshare providers. We also understand that becoming vaccinated is a personal choice and the collection of medical information (ie. vaccination information) impacts individual privacy and can lead to feelings of discomfort.

The purpose of this Policy is to implement a vaccination status collection program in a manner that balances our need to reduce risk and conduct workforce planning while ensuring that the process for collecting and using vaccination status information is compliant with applicable personal information protection laws. This Policy is intended to be a part of, or supplement, our contagious disease prevention protocols.

Am I required to be vaccinated?

It is our hope that all employees will support workplace safety efforts by becoming vaccinated and sharing that information with us. However, we recognize that there are circumstances in which some individuals may choose not to become vaccinated, whether as a matter of personal choice or due to medical reasons. Please note that this approach may be subject to change in response to developments related to COVID-19.

Employees who choose not to become vaccinated against COVID-19 may be subject to additional safety restrictions, such as the continued use of personal protective equipment, testing, or limiting access to the workplace, work related activities, or to unvaccinated supported individuals and co-workers. Any such measures will be based on medical, scientific, workplace safety and public health guidance. Please note that accommodating unvaccinated individuals may not be possible in every case or may involve changes in work assignments.

What information am I being asked to share?

All employees are requested to report their vaccination status.

Consistent with applicable privacy laws, management will collect the minimum amount of personal information required to address workplace health and safety and staffing deployment issues raised by COVID-19. Accordingly, employees will be asked to report only:

- if they have been vaccinated against COVID-19,
- if so, whether they have received all required or recommended doses of the vaccine, and
- the dates of the immunizations.

Staff may also be requested to provide (for inspection only) documentation verifying their vaccination status. No copies of such documentation will be maintained in employee files.

What if I choose not to report my vaccination status? What are the consequences?

The purpose of collecting information about vaccination status is to ensure that we have sufficient information to address any health and safety risks in the workplace and where applicable to supported individuals in the community, and to ensure that we can continue to deploy staff consistent with public health requirements. Staff who have routine contact with co-workers and supported individuals will generally be expected to comply with this Policy by supplying information about their vaccination status.

However, staff who have little or no contact with people we support or coworkers may ask to be exempted from this Policy by making a request to their supervisor. Decisions about granting exemptions will be made on a case-by-case basis based on the reasons for the request, the nature of the employee's duties, and the availability of alternative protective measures.

No disciplinary consequences will be imposed if an employee chooses not to become vaccinated or seeks an exemption from the disclosure obligations under this Policy.

However, staff members who do not report their vaccination status under this Policy or are granted exemptions under this Policy will be deemed to be unvaccinated, and may be subject to additional protective measures in the workplace as discussed above, and in addition to redeployment and/or exclusion from the workplace. There may be disciplinary consequences imposed if employees do not comply with such restrictions or conditions.

How will my information be used?

While scientific investigation into the effects of vaccination continues, there is evidence to suggest that those who have been vaccinated are less likely to contract and transmit the disease. Those who have been vaccinated are also at a much lower risk to develop serious health complications should they nevertheless contract COVID-19.

We are seeking to collect information about the vaccination or immunity status of our employees in order to:

- Better understand the risk of infection in the workplace;
- Help mitigate the risk of infection for those at the greatest risk, including by putting accommodations or other protective measures in place for unvaccinated individuals;
- Plan for operational continuity in the event of an outbreak;
- Support the continuity of services to our the people we support in community settings where admission is available only to those who confirm vaccination status;
- Support risk mitigation and contact tracing efforts in the event that an exposure occurs within the workplace.

How will my information be protected?

Vaccination or immunity status information will be used only as described in this Policy. Disclosures can be made by emailing hr@spectrumsociety.org with a photograph of your vaccination record. This information will be maintained separately from other employment records, and will be destroyed as soon as possible if there is no business, legal or operational need to retain them.

Who will have access to my information?

Access to vaccination data will be shared internally on a strictly need-to-know basis and only for the purposes described above. This information will be shared externally only where permitted or required under applicable laws, such as where it is requested or required by public health officials or other government agencies.

Changes to this Policy

It is expected that the level of workplace risk posed by COVID-19 may change as new outbreaks, developments and scientific discoveries unfold. Accordingly, changes to this Policy may be introduced from time to time to respond to these developments or in response to Public Health Orders and/or WorksafeBC directives.

Who should I contact if I have questions or concerns?

If you have any questions or concerns about this Policy or the collection of your information, please contact hr@spectrumsociety.org. You may also wish to review our privacy policy at <https://sscl.sharevision.ca/public/PolicyDirectory/Personnel%20Policies/CodeOfConductPrivacyPolicy.pdf>