



**Subject:** COVID-19 Vaccination Verification Policy

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### **1.0 Background**

The Corporation of the County of Elgin has an obligation under Provincial legislation to take all necessary precautions reasonable in the circumstances to protect the health and safety of its workforce and members of the public from the hazard of COVID-19, and is committed to providing excellent service to our community and to building trust and confidence in local government.

A key element to ensuring this protection is putting in place a program requiring that all employees (excluding Long-Term Care Home Staff), Members of County Council and Council appointed Committees, staff of contractors and consultants acting on behalf of the Corporation and performing work in County facilities and/or buildings, interns, students, and volunteers are fully immunized against COVID-19 or regularly tested for COVID-19.

The County of Elgin considers vaccinations to be fundamental to the protection of individuals and the community. This policy is in line with Public Health guidance and supports the direction that vaccines provide a high level of protection against COVID-19 and related variants. Getting both doses of the COVID-19 vaccine and any subsequent recommended boosters is the best defense against the virus, including variants.

The Province of Ontario announced that beginning September 22, 2021, proof of COVID-19 vaccination will be required to access certain public settings and facilities. This policy aims to achieve full vaccination amongst those to whom the policy applies in alignment with provincial directives and subject to limited exceptions in accordance with the Human Rights Code (Ontario).

Vaccination, in combination with health and safety precautions, have been identified by Public Health as the single most effective means of reducing the transmission of COVID-19 in the workplace and in our community. Individuals who are unvaccinated are at higher risk of contracting and transmitting COVID-19 in our workplace and in the community. In addition to the current health and safety precautions (personal protective equipment, daily health screening, mandatory masking, social distancing, hand hygiene, enhanced cleaning, etc.), which will be maintained and



revised in accordance with Public Health guidance, the County of Elgin requires all active employees (excluding Long-Term Care Home Staff), staff of contractors and consultants acting on behalf of the Corporation and performing work in County facilities and/or buildings, volunteers, interns, and students on placements to select one of the following options:

- **Vaccination with proof of vaccination**
- **Not vaccinated, but in progress to complete vaccination**  
Mandatory rapid testing is required until proof of full vaccination is provided in accordance with vaccine administration guidelines.
- **Not vaccinated due to a medical accommodation**  
Physician or Nurse Practitioner note is required. Mandatory rapid testing is required three (3) times per week with 48 hours between testing and test will be provided by employer.
- **Not vaccinated**  
Mandatory rapid testing is required three (3) times per week with 48 hours between testing, as well as completion of an education program. These conditions will be required to occur outside of working hours, at the expense of the employee.
- **Decline attestation**  
Mandatory rapid testing is required three (3) times per week with 48 hours between testing, as well as completion of an education program. These conditions will be required outside of working hours, at the expense of the employee.

The policy is indefinite in nature to address the risks and impacts of the COVID-19 pandemic, noting the duration of the pandemic is unknown. The policy will be reviewed on a regular basis and amended as required as new information, data, and Public Health guidance regarding the COVID-19 pandemic evolves.

For employees, student placements and volunteers working at any of Elgin's three Long-Term Care Homes (Elgin Manor, Terrace Lodge, or Bobier Villa), mandatory proof of vaccination is required, subject to proof of a medical reason(s) or requirement for Ontario Human Rights Code accommodation. Employees at Elgin County Long-Term Care Homes are required to comply with the Infection Control 2.10 Immunization – Staff COVID-19 Policy, which includes further requirements mandated by the Minister of Long-Term Care, Chief Medical Officer of Health, the Province of Ontario, or other regulatory or legislative authority.

## **2.0 Purpose**

The purpose of the COVID-19 Vaccination Policy is to provide guidelines pertaining to the expectations and requirements the County of Elgin has of employees, Members of County Council



and Members of Council appointed Committees, volunteers, contractors, and students (interns and students on placements), with respect to COVID-19 and vaccinations.

### 3.0 Legislative Framework

- Occupational Health and Safety Act, R.S.O. 1990, c.O.1
- Human Rights Code, R.S.O. 1990, c.H.19 (“Ontario Human Rights Code”)
- Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990 c. M.56 (“MFIPPA”)

### 4.0 Applicability

This policy applies to:

- County of Elgin employees, including full-time, part-time, permanent, temporary, and casual staff;
- Members of Elgin County Council and Members of Council appointed Committees required to enter a County facility and/or building;
- Staff of contractors and consultants acting on behalf of the Corporation and performing work in County facilities and/or buildings;
- Volunteers; and
- Interns and students on placements.

**This policy does not apply to employees, student placements and volunteers working at Elgin Manor Long-Term Care Home, Bobier Villa Long-Term Care Home or Terrace Lodge Long-Term Care Home, who are governed by policies and procedures mandated by the Minister of Long-Term Care, Chief Medical Officer of Health, the Province of Ontario, or other regulatory or legislative authority.**

All new or rehired County of Elgin employees, including returning Seasonal and Student employees, are required to be fully vaccinated, including any required vaccine boosters, against COVID-19 as a condition of hire by the County of Elgin.

The County of Elgin also reserves the right to amend this policy as the County determines to be appropriate or required.

### 5.0 Definitions

**Attestation of a medical reason(s) of Ontario Human Rights Code reason(s)** – means a written statement that sets out that the person cannot be vaccinated against COVID-19.

**COVID-19** - a virus belonging to a large family called coronavirus which includes the virus that causes the common cold and more severe disease such as Severe Acute Respiratory Syndrome (SARs) and



Middle East Respiratory Syndrome (MERS-COV). The virus that causes COVID-19 is a novel coronavirus, named SARS-CoV-2.

**Educational Program** - an educational program that has been approved by and/or provided by the County of Elgin 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
- Possible side effects of COVID-19 vaccination

**Employees** – means County of Elgin employees, including full-time, part-time, permanent, temporary, and casual staff.

**Fully Vaccinated** – means having received the full series of COVID-19 vaccine or a combination of COVID-19 vaccines approved by Health Canada; and having received the final dose of the COVID-19 vaccine at least 14 days ago.

**Individuals** – means Members of Elgin County Council and Members of Council appointed Committees required to enter a County facility and/or building; Staff of contractors and consultants acting on behalf of the Corporation and performing in County facilities, and buildings; Volunteers; and Interns and students on placements.

**Proof of Medical Exemption** - written proof of a medical reason, provided by a physician or nurse practitioner in the extended class that sets out: (i) a documented medical reason for not being fully vaccinated against COVID-19, and (ii) the effective time-period for the medical reason.

Proof of Vaccination - documentation issued by the Ontario Ministry of Health, other province or territory or international equivalent indicating individual immunization status against the COVID-19 virus.

**Vaccine** - for the purposes of this Policy, a Vaccine is defined as a substance used to stimulate the production of antibodies and provide immunity against SARS-CoV-2.

**Vaccines approved by Health Canada** are as follows:

- Pfizer-Biotech COVID-19 vaccine
- Moderna COVID-19 vaccine
- Janssen (Johnson and Johnson) COVID-19 vaccine
- AstraZeneca/COVISHIELD COVID-19 vaccine



## **6.0 Continued Compliance with All Health and Safety Precautions**

Unless a legislated or regulatory exemption applies, all County of Elgin employees are expected and required to continue to comply with all applicable health and safety measures to reduce the hazard of COVID-19, including but not limited to compliance with established workplace access controls (e.g. screening), wearing a mask or face covering, using provided Personal Protective Equipment (PPE), maintaining appropriate physical distancing and self-monitoring of potential COVID-19 symptoms when at work or otherwise engaged in County business. The applicable Health and Safety measures are outlined in Elgin County's COVID-19 Safety Plan.

## **7.0 Responsibilities**

All levels of management are responsible for the administration of this Policy.

Management/Supervisors are expected to:

- Lead by example;
- Submit proof of their vaccination status and meet the requirements outlined in this policy;
- Ensure employees have submitted proof of their vaccination status, as outlined in this policy;
- Ensure employees complete any required education or training about COVID-19, including regarding vaccinations and safety protocols; and,
- Continue to enforce workplace precautions that limit the spread of COVID-19 virus.

Employees are expected to:

- Continue to follow all health and safety policies and protocols to ensure personal safety and prevent the spread of COVID-19 before and after vaccination;
- Submit proof of vaccination status, Rapid Antigen Test results or an approved exemption, and meet the requirements outlined in this policy;
- Follow direction provided by the employer in cases where Rapid Antigen Testing identifies a positive case including completion of a laboratory-based polymerase chain reaction (PCR) test;
- Complete any required Educational Program or training about COVID-19, including regarding vaccinations and safety protocols;
- Adhere to any additional mandates or directives or reporting requirements from provincial or federal authorities; and,
- If additional booster doses of the COVID-19 vaccine are required, ensure subsequent doses are also received.

Individuals are expected to:

- Continue to follow all health and safety policies and protocols to ensure personal safety and prevent the spread of COVID-19 before and after vaccination;
- Submit proof of vaccination status, Rapid Antigen Test results or an approved exemption, and meet the requirements outlined in this policy;



- Follow direction provided by the County of Elgin in cases where Rapid Antigen Testing identifies a positive case including completion of a laboratory-based polymerase chain reaction (PCR) test;
- Adhere to any additional mandates or directives or reporting requirements from provincial or federal authorities; and,
- If additional booster doses of the COVID-19 vaccine are required, ensure subsequent doses are also received.

All County employees are required to create and foster a work environment free from harassment and disrespectful behaviour, as outlined in HR Policy 2.80 *Workplace Harassment and Discrimination Policy and Program* and HR Policy 2.80.1 *Commitment to a Civil Workplace Environment and Workplace Interactions*.

## **8.0 Procedure**

County of Elgin employees, including full-time, part-time, permanent, temporary, and casual staff (herein referred to as “**employees**”); and Members of Elgin County Council and Members of Council appointed Committees required to enter a County facility and/or building; Staff of contractors and consultants acting on behalf of the Corporation and performing in County facilities, and buildings; Volunteers; and Interns and students on placements (collectively referred to as “**individuals**”) will be required to select one of the following options and the following procedure(s) will apply:

### **8.1 Vaccination with proof of vaccination**

- The County of Elgin requires all employees and individuals to whom the policy applies to disclose their COVID-19 vaccination status through a confidential Vaccine Declaration Form. The only acceptable proof of vaccination is the receipt or other documentation provided by the Ministry of Health/Public Health, or equivalent out-of-province health body to the person who was vaccinated.
- Employees must disclose their vaccination status to the County of Elgin in accordance with the established process by no later than Wednesday, September 22, 2021.

Individuals must disclose their vaccination status to the County prior to entering a County facility and/or building.

### **8.2 Not vaccinated, but in progress to complete vaccination**

- Employees and individuals who, by Friday, October 22, 2021, disclose that they have not received two doses of COVID-19 vaccine (or a single dose in the case of a single dose vaccine series), but have disclosed they are in progress to complete vaccination must participate in mandatory Rapid Antigen Testing three (3) times per week with 48 hours between testing, until proof of full vaccination is provided;



- Employees and individuals must provide verification of the negative test result in a manner that enables the County of Elgin to confirm the results at its discretion; and,
- Rapid Antigen Testing will be available onsite at no charge for those employees and individuals who have scheduled their second dose of the COVID-19 vaccination in accordance with vaccine administration guidelines.
- Rapid Antigen Tests will be supplied by the County for employees and individuals who have scheduled their second dose of the COVID-19 vaccination.

### **8.3 Not vaccinated due to a medical accommodation**

- Provide Proof of Medical Exemption;
- Employees and individuals must participate in mandatory Rapid Antigen Testing three (3) times per week with 48 hours between testing, until proof of full vaccination is provided;
- Employees and individuals must provide verification of the negative test result in a manner that enables the County of Elgin to confirm the results at its discretion; and,
- Rapid Antigen Tests will be supplied by the County for employees and individuals who have submitted the required documentation for medical exemption from receiving the vaccination.

If an employee has a medical reason for not being vaccinated now or in the future, it is the employee's responsibility to contact HR to provide a letter to take to their attending physician (included as **Appendix 1**); each case will be considered on its own facts, in accordance with any applicable legal obligations under the Human Rights Code.

The County will require Proof of Medical Exemption that sets out at least the following:

- That the employee or individual cannot be vaccinated against COVID-19; and
- The general nature of the medical reason why the employee or individual cannot be vaccinated and confirmation that this is a genuine medical condition and not simply the patient's preference or self-evaluation; and,
- The effective time period for the medical reason (i.e., permanent or time-limited).

This medical information received is to be submitted to and retained by HR in a confidential file.

The County will work with the employee or individual to determine whether and how they may be accommodated, as required, in accordance with the Human Rights Code (Ontario). Without limitation, such measures for employees may include changes to work assignments, work location, as well as regular paid Rapid Antigen Testing.

**note:** These conditions may also be increased following further consultation with Public Health





#### 8.4 Not vaccinated

The following conditions will be required to occur outside of working hours for employees:

- Employees who, by Friday, October 22, 2021, disclose that they have not received two doses of COVID-19 vaccine (or a single dose in the case of a single dose vaccine series), or who have not disclosed their vaccination status as required, shall attend mandatory education on the benefits of vaccination;
- Employees and individuals must participate in mandatory Rapid Antigen Testing three (3) times per week with 48 hours between testing, until proof of full vaccination is provided; by means as determined appropriate by the County of Elgin, in consultation with Public Health, until such time as they are considered fully immunized;
- Employees and individuals must provide verification of the negative Rapid Antigen Test result in a manner that enables the County of Elgin to confirm the results at its discretion. In cases where testing identifies a positive case, employees will be directed to stay home utilizing sick time or unpaid/personal time until verification in a manner that enables the County of Elgin to confirm their ability to return to work is provided prior to attending the workplace in accordance with the County of Elgin COVID-19 Safety Plan and individuals will not be permitted to enter County buildings and/or facilities; and,
- Employees must undertake mandatory training/Educational Program (\*) outside of working hours.

(\*) Mandatory training/Educational Program sessions addresses the following:

- How COVID-19 vaccines work;
- Vaccine safety related to the development of the COVID-19 vaccines;
- The benefits of vaccination against COVID-19;
- The risks of not being vaccinated against COVID-19; and,
- Possible side effects of COVID-19 vaccination.

**note:** These conditions may also be increasing following further consultation with Public Health

#### 8.5 Decline attestation

The following **conditions will be required to occur outside of working hours** for employees:

- After Friday, October 22, 2021, employees and individuals must participate in rapid antigen testing conducted at interval frequency/location(s) and/or by means, as determined appropriate by the County of Elgin, in consultation with Public Health, until such time as they are considered fully immunized;





- Employees and individuals must provide verification of the negative Rapid Antigen Test result in a manner that enables the County of Elgin to confirm the results at its discretion;
- If an employee or individual has chosen not to be vaccinated, without Proof of Medical Exemption (noted above), the employee shall pay for each Rapid Antigen Test. The time required to receive a Rapid Antigen Test will be unpaid time/personal time for the employee or individual, and mileage will not be paid if travel is required to receive the test; and,
- Employees must undertake mandatory training/Educational Program (\*).

(\*) Mandatory training/Education Program sessions outside of working hours which addresses the following:

- How COVID-19 vaccines work;
- Vaccine safety related to the development of the COVID-19 vaccines;
- The benefits of vaccination against COVID-19;
- The risks of not being vaccinated against COVID-19; and,
- Possible side effects of COVID-19 vaccination.

**note:** These conditions may also be increasing following further consultation with Public Health

The County of Elgin reserves the right to require Rapid Antigen Testing of any employee or individual at any time.

Additional details regarding the implementation of this policy will be available in the COVID-19 Safety Plan.

### **9.0 Accommodations**

Employees requiring any further Ontario Human Rights Code accommodations under this policy may request accommodations by advising their Supervisor/Manager/Director. Individuals requiring any further Ontario Human Rights Code accommodations under this policy may request accommodations by advising HR ([vaccineinfo@elgin.ca](mailto:vaccineinfo@elgin.ca)). The County of Elgin is committed to fulfilling its obligations under the Ontario Human Rights Code.

### **10.0 Inactive Employees**

Inactive employees who are on a leave of absence are not required to comply with s.8.0 so long as they remain on a leave of absence. Employees must comply with this policy prior to returning to work. HR will send information to inactive employees.

### **11.0 COVID-19 Screening**

Regardless of vaccination status, all active employees, Members of County Council or Council appointed Committees, staff of contractors and consultants acting on behalf of the Corporation and



performing work in County facilities and/or buildings, volunteers, interns, and students on placements shall:

- a.) Complete daily screening for COVID-19 symptoms prior to attending any County facilities and/or buildings;
- b.) Be tested for COVID-19 where persons fail screening (provincial COVID-19 self-assessment or County of Elgin COVID-19 self-assessment, or County facility active screening) and be restricted from entering the County building and/or facility; and
- c.) Provide verification in a manner that enables the County of Elgin to confirm their ability to return to work or enter the County building and/or facility prior to attending the workplace in accordance with the County of Elgin COVID-19 Safety Plan.

### **12.0 Collection of Information and Privacy Considerations**

The County of Elgin will maintain vaccination disclosure information, including documentation verifying receipt of a vaccination series approved by Health Canada or the World Health Organization, in accordance with privacy principles and any applicable legislation including the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)* and the *Personal Health Information Protection Act (PHIPA)*. This information will be retained by Human Resources (HR), and will only be used to the extent necessary for implementation of this policy, for administering health and safety protocols, and infection and prevention control measures in the workplace.

Employees or individuals may also be required to disclose their vaccination status by law or to otherwise give effect to this policy, including, but not limited to, situations where employees or individuals are directed to stay home as a result of the daily screening tool in order to comply with the clearance criteria to return to the office (e.g. after experiencing symptoms, a COVID-19 exposure, or a travel quarantine exemption) or enter a County and/or facility.

### **13.0 New or Rehired Employees**

All new or rehired employees must provide the required proof of vaccination to HR prior to commencing their employment, engagement, assignment, or placement. This policy shall form one of the conditions of employment which new employees accept as part of an offer of employment into such positions.

Individuals can download copies of their vaccination documentation at this link: [covid19.ontariohealth.ca](https://covid19.ontariohealth.ca). If the individual has a red and white health card, call 1-833-943-3900.

### **14.0 Ongoing Monitoring and Assessment of COVID-19 Workplace Safety Measures**

The County of Elgin will continue to closely monitor its COVID-19 risk mitigation strategy and the evolving health information and context, to ensure that it continues to optimally protect the health and safety of its employees in the workplace, volunteers, contractors, students, elected officials and the public that they serve. To that end, and in consultation with Public Health and occupational



health and safety resources, the County will continue to assess other available workplace risk mitigation measures. If it is determined that additional precautions are necessary, the County of Elgin may decide to deploy new measures (including at an individual level) to protect employees, volunteers, contractors, students, and elected officials and the public from COVID-19, and may amend this policy accordingly and/or communicate the required precautions to impacted employees.

#### **15.0 Consequences of Non-Compliance with Policy**

Employees who fail to comply with this policy will be subject to progressive disciplinary action up to and including termination.

#### **16.0 Provincial Legislation**

The County of Elgin has a legal duty under the Occupational Health and Safety Act (OHSA) to take reasonable precautions to protect workplace health and safety, including hazards posed by infectious disease such as COVID-19 and associated variants.

#### **17.0 Training**

All employees and individuals to whom this policy applies will have this policy shared with them on, or as soon as possible following, the effective date of this policy. All new employees, Council appointed Committee Members, staff of contractors, consultants, volunteers, interns and students on placements will have the policy shared with them prior to commencement of first day of employment or entering a County building and/or facility, where possible.

Employees and individuals will be required to acknowledge that they have read and understood the policy.

Any questions about this policy can be directed to [vaccineinfo@elgin.ca](mailto:vaccineinfo@elgin.ca)

#### **18.0 Policy Implementation**

Implementation of this policy will be in accordance with applicable Council and/or Corporation by-laws, policies and procedures, legislation, and collective agreement provisions.



**APPENDIX 1 - MEDICAL EXEMPTION FOR COVID-19 VACCINATION – LTC HOMES**

County of Elgin LTC Homes staff, contractors (including those providing direct care and/or having direct interaction with long-term care home residents), students and volunteers are required to be fully compliant with the applicable COVID-19 Vaccination policy and to report their vaccine status to the Human Resources (HR) Department.

Individuals who have a medical contraindication to mRNA COVID-19 vaccines (an allergist/immunologist-confirmed severe allergy or anaphylactic reaction to a previous dose of a COVID-19 vaccine or to any of its components that cannot be mitigated; a diagnosed episode of myocarditis/pericarditis after receipt of an mRNA vaccine), as outlined by the National Advisory Committee on Immunizations (NACI) are required to have their treating Physician or Nurse Practitioner complete the information below and submit to HR. The medical exemption is not considered valid until reviewed and accepted by HR. Please submit completed forms in confidence to [VaccineInfo@elgin.ca](mailto:VaccineInfo@elgin.ca).

**Employee Consent**

Last Name:	First Name:	Employee ID#:
Job Title:	Department:	Supervisor:
Phone #:	Email Address:	
<p>I, _____ hereby authorize my treating physician or nurse practitioner to release the information on this form to the County of Elgin Human Resources Department. By signing and submitting this form, I understand that the request for medical exemption to COVID-19 vaccination will require a review and approval process by the Human Resources Department.</p>		
Signature:		Date:



**Physician or Nurse Practitioner Attestation**

I attest that based on my knowledge of my patient and the information available to me, \_\_\_\_\_(please print name) has a documented medical reason for exemption from being fully vaccinated against COVID-19 in relation to a condition outlined on page 3 of this document.

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

**CPSO or CNO#:** \_\_\_\_\_

**Address:**

**Phone**

**Fax**

\_\_\_\_\_



**Signature of Physician or Nurse**

**Date**

**Employee Last Name:** \_\_\_\_\_ **First Name:** \_\_\_\_\_

*The following conditions are the only absolute medical exemptions from the COVID-19 vaccine as expressed by the National Advisory Committee on Immunizations (NACI) as of July 22, 2021. Please indicate which medical condition applies to your patient, as well as the effective time period for the medical reason (i.e. permanent or time-limited).*

- Severe Reaction (including myocarditis/pericarditis), severe allergic reaction, or anaphylaxis after a previous dose of an mRNA vaccine:** Individuals who have a **documented** severe or anaphylactic reaction to a previous dose of an mRNA vaccine should not receive additional doses of an mRNA vaccine.
- Severe Allergic Reaction or Anaphylaxis to any components of an mRNA Vaccine:** Individuals who have a **documented** severe or anaphylactic reaction to one or more mRNA vaccine components should not receive an mRNA vaccine. Please confirm which component your patient is allergic to, and the type of reaction experienced:

Vaccine Product	Potential Allergen (vaccine or container)	Description of Allergic Reaction
Pfizer-BioNTech COVID-19 Vaccine	(i.e. Polyethylene glycol(PEG))	
Moderna COVID-19 Vaccine	(i.e. PEG Tromethamine (trometamol or Tris))	

*\*Reference: [NACI Recommendations on the Use of COVID-19 Vaccines: Contraindications and Precautions](#)*

- Report of Adverse Event Following Immunization (AEFI) Submitted
- AEFI not submitted. Please complete and submit an [AEFI Form](#) or provide an explanation why an AEFI will not be submitted.
- Patient has been referred to an allergist or specialist related to their documented

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contraindication to being fully vaccinated for COVID-19.

**\*\* Effective Time Period for the Medical Reason Listed Above:**

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