



Staff and Client COVID-19 Vaccination Policy

Purpose

The purpose of this policy is to establish CMHA Toronto's expectations regarding COVID-19 vaccination for staff, volunteers, contractors, and students in order to ensure safety and to continue to provide necessary care and support to our clients.

The agency has and will continue to take all reasonable precautionary actions, as defined by Public Health, to keep our agency employees, staff, contractors, volunteers, students and visitors safe from exposure to the COVID-19 virus or its variants ("COVID-19").

Scope

This policy applies to all staff, volunteers, contractors, new hires and students of CMHA Toronto and staff from external agencies.

Definitions

Coronavirus disease (COVID-19) is an infectious disease caused by a newly discovered coronavirus

A **COVID-19 vaccine** is a vaccine intended to provide acquired immunity against severe acute ^[OBI] syndrome coronavirus 2 (SARS-CoV2), the virus causing corona virus- 2019. For the purpose of this policy, vaccine includes any subsequent dose, booster or boosters that may be required or recommended by the Ministry of Health and Long-Term Care (MOHLTC) and Public Health.

Policy

CMHA Toronto is obligated under the *Occupational Health and Safety Act* to take all reasonable precautions to ensure a healthy workplace. CMHA Toronto has assessed the transmission risk associated with various work functions, and is mandating that all staff receive the vaccination.

CHMA Toronto has and will continue to take all reasonable precautionary actions, as defined by Toronto Public Health ("TPH") and other authorities, to keep CMHA Toronto staff, and visitors safe from exposure to the COVID-19 virus or its variants ("COVID-19"). However, due to the nature of COVID-19, and despite taking all reasonable precautions, CHMA Toronto cannot guarantee that our staff, and visitors will not be exposed to this virus while in the workplace.

CMHA Toronto requires all staff to obtain and maintain current vaccination against COVID-19 unless they qualify for and provide valid documentation for a medical exemption or an exception permitted under the Ontario Human Rights Code.



Exceptions may be extended to external contractors if they are providing an essential service where programs or equipment would be damaged or unable to run if the contractor is prevented from coming on site. If a contractor is not fully vaccinated, they must have a negative test for COVID-19 PCR within 72 hours of on-site visit.

Full-time and part-time staff can receive the COVID-19 vaccination during paid time. Scheduling of time to receive the vaccination must be agreed to by your manager and must be done in such a way that does not cause disruptions to client care, or have detrimental impact to the operations of CMHA Toronto.

Any current full-time or part-time staff who elect to get a COVID-19 vaccination outside of their regular scheduled work time will not be compensated for that time.

Causal employees, students or volunteers who receive the COVID-19 vaccination will be required to do so on their own time and will not be compensated for that time.

Staff who are required to work at partner sites are obligated to follow the policies and procedures related to COVID-19 vaccination of the partner who operates the site and may be required to provide proof of vaccination and/or permitted exemption to the that partner organization.

All job postings will indicate that CMHA Toronto requires all staff to be vaccinated for COVID-19 and provide proof of vaccination unless they qualify for a medical or human rights exemption.

CMHA Toronto will establish protocols to prevent transmission of COVID-19. Such protocols may include different procedures for vaccinated and unvaccinated staff.

Staff who are not fully vaccinated by October 25, 2021 at 4:30 pm or who have not requested and submitted valid documentation of a medical or human rights exemption will be placed on two-week unpaid leave effective October 26, 2021 and will have until November 8, 2021 at 4:30 pm to meet the requirements of this policy.

A list of vaccine locations across the city of Toronto can be found [here](#).

Alternatively, booking information, resources and walk-in appointments are available at the [CAMH Vaccine Clinic](#) located at 100 Stokes St, Bell Gateway Building (Queen St Site) Gymnasium.

Confidentiality & Documentation

CMHA Toronto will collect proof of vaccination for all staff, students and volunteers who are vaccinated for COVID-19. All staff are required to sign the COVID-19 Acknowledgement and COVID-19 Attestation Forms through ADP. The People and Culture (HR) Department will retain these documents in a confidential manner and will limit release of information on a need-to-know only basis.

New employees will be required to submit vaccination receipts as a condition of employment during their onboarding.

Unvaccinated staff are required to provide proof of exemption based on religious or medical conditions.



Continued Safety Precautions

All staff shall continue to adhere to agency mandated safety precautions regarding masking and other PPE, physical distancing and handwashing regardless of their vaccination status.

Procedures

Informing CMHA Toronto on Vaccination Status or Requesting an Exemption

1. By 4:30 pm on October 25, 2021 all existing staff must choose which of the following three options they will follow to comply with this policy and staff hired after October 25, 2021 are required to make this choice within 5 days of starting employment with CMHA Toronto:
 - a. Maintain full vaccination and provide proof of vaccination to CMHA Toronto through the ADP employee profile.
 - b. Provide documentation from a physician or nurse practitioner that they are medically contraindicated from receiving the COVID-19 vaccine. The medical note must indicate that you cannot receive any COVID-19 vaccines AND the effective timeframe for the medical restriction (permanent or time limited).
 - c. Provide documentation from a spiritual leader that they are a current, active member of a congregation whose religious beliefs prohibit vaccination as a serious, substantial tenet of that religion;
2. Staff who are undecided prior to October 25, 2021 will participate in a vaccine education module through [Covid-19 Vaccination in Canada: An Educational Series for Primary Care Professionals](#). This self-learning series from the University of Toronto Department of Family and Community Medicine and the Ontario College of Family Physicians is designed to provide primary care professionals with the knowledge and skills to support Canada's COVID-19 vaccination effort. This module may be reviewed during your working hours.
3. Staff in categories b and c of step 1 are required to undergo COVID-19 testing. Testing must be completed two times per week for full-time unvaccinated staff. A date stamped photo of the test result will need to be submitted to no later than 8:30 am Monday and Wednesday mornings. Part-time and relief staff in categories b and c will be instructed by CMHA Toronto on when they must undergo COVID-19 testing.
4. Employees who test positive on the rapid test must contact their manager and arrange for a confirmatory diagnostic PCR test at a testing center. They will need to self-isolate at home pending the result of the confirmatory test.

Uploading Proof of Vaccination or Documentation for Exemption

1. Vaccination receipts can be downloaded [here](#). Those who need support obtaining a copy of their vaccination receipt including those who do not have access to a computer or printer can call the Provincial Vaccine Contact Centre at 1-833-943-3900.
2. Upload vaccination receipt to ADP employee profile



3. Submit your COVID-19 Vaccination Acknowledgement and COVID-19 Attestation in the Forms link that will be sent to all staff
4. People and Culture will inform each staff’s manager whether or not they have completed these steps by the deadline and/or that a staff person is not compliant with this policy.

References

Recommendations on the use of COVID-19 Vaccines. National Advisory Committee on Immunization (NACI). January 12, 2021.

CNA welcomes the beginning of COVID-19 vaccination programs in Canada. Canadian Nurses Association. December 17, 2020.

Early Impact of Ontario’s COVID-19 Vaccine Rollout on Long-Term Care Home Residents and health Care Workers. Science Table COVID-19 Advisory for Ontario. March 8, 2021 reference: <https://covid19-sciencetable.ca/sciencebrief/early-impact-of-ontarios-covid-19-vaccine-rollout-onlong-term-care-home-residents-and-health-care-workers/>

Revision History

Revision Date (YYYY-MM-DD)	Level of Change (Minor/Major/N/A)	Revision Comments	Date Approved (YYYY-MM-DD)
N/A	N/A	N/A	2021-05-01
2021-07-13	Minor		2021-07-21
2021-09-21	Major	Addition of mandatory vaccine status reporting and accommodation	

Policy Properties

Lead Author	Management & Occupational Health & Safety Committee
Next Review Date	June 2022
Related Policies / Forms	Influenza Vaccine Policy Sick Leave Policy PPE Policy Infection and Prevention Control Policy Face Covering Policy



COVID-19 Vaccination Policy FAQ

What is the definition of fully vaccinated?

Definition of a Fully Immunized Individual

For the purposes of case/contact/outbreak management, an individual is defined as fully immunized if they have received:

1. The full series of a COVID-19 vaccine authorized by Health Canada, or any combination of such vaccines,
2. 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,
3. Received their final dose of the COVID-19 vaccine at least 14 days ago.

Why is CMHA Toronto mandating vaccinations as a policy?

On August 17, 2021, the Ontario Government announced that it will mandate COVID-19 vaccination policies for multiple sectors in Ontario including hospitals, school and child care settings and other high-risk settings. Additionally, Hospitals and other health care settings issued Directive 6 pursuant to the *Health Protection and Promotion Act* mandating hospitals, ambulance services and home and community care service providers to mandate a COVID-19 vaccination policy for employees, staff, contractors, students and volunteers. As variants continue to rise, we are implementing a mandatory reporting of vaccination status for all staff.

COVID-19 vaccines are safe and effective. Mandating vaccines for our staff, volunteers and contractors will improve the safety and well-being of our clients, and our colleagues. We want to do everything possible to reduce the possibility of COVID-19 entering our workplace and reduce the burden on the overall healthcare system.

Unvaccinated health care workers pose risks to clients and other staff as well as to health care system capacity due to the potential of introducing COVID-19 into healthcare settings. In addition to those concerns, the prevalence of the Delta variant globally and within Ontario is of great concern as the Delta variant is more transmissible and the resulting disease more severe as compared to prior COVID-19 strains.

When do I need to be fully vaccinated by?

By October 25, 2021, all CMHA TO employees, students, volunteers, contractors and other staff members who provide services to CMHA- TO must be fully vaccinated.



Between **September 22th and November 8th**, all partially vaccinated and unvaccinated team members are required to follow the rapid antigen testing procedures outlined in the Policy and complete the COVID-19 vaccination e-learning session.

Does this Policy apply to me if I am solely working remotely?

Yes, for equity across the agency and in the event you will need to come into the workplace at some point, we require all CMHA Toronto team members to be fully vaccinated by **October 25, 2021**.

If I am not fully vaccinated, do I stop coming into work and/or the office?

Team members will continue to work normal work hours regardless of their vaccination status in advance of the October 25, 2021 deadline. Effective **September 27** team members are required to be fully vaccinated or follow the rapid antigen testing procedures outlined in the Policy and complete the COVID-19 vaccination e-learning session.

If I have my second vaccination scheduled after September 27, do I still have to do the rapid antigen testing?

Yes. Until October 25th, if you are not fully vaccinated you will be required to follow the rapid antigen testing procedures outlined in the Policy and complete the COVID-19 vaccination e-learning session. Once you have had your second vaccination and 14 days has passed, you will no longer be required to do the rapid antigen testing.

If I am not fully vaccinated, how does the testing work?

Between **September 27 – October 25** non-compliant staff will be required to follow the rapid antigen testing procedures outlined in the Policy and complete the COVID-19 vaccination e-learning session. This includes picking up home test kits of rapid antigen tests from the CMHA Toronto office, and performing at home self-test two (2) times per week on Mondays, Wednesdays, taking a photo of the test for submission. More details on the process will be provided shortly.

Why can't we just submit to regular testing if we don't want to be vaccinated?

Testing is only another screening tool and has its limitations. Mandatory vaccines focus on primary prevention by focusing on eliminating the risk. Testing does not reduce your chances of getting or spreading COVID-19. Vaccination does.

What does the COVID-19 vaccination e-learning session cover for those who are not fully vaccinated by September 27?

The mandatory e-learning education session for those not fully vaccinated by September 27th, will include information on how vaccines work, vaccine safety related to the development of the COVID-19 vaccines, the benefits of vaccination against COVID-19, risks of not being vaccinated, and possible side effects of COVID-19 vaccination.



Who sees my medical information and who will know my vaccination status?

CMHA Toronto takes employee confidentiality very seriously and will maintain this information in accordance with all privacy legislation. This information will only be used as necessary for the implementation of this policy, health and safety protocols and infection and prevention control measures in the workplace. Only staff required to review this information for the purposes of determining policy compliance will see this information.

People can get still get COVID even with the vaccine so why does mandatory vaccination help?

With the 4th wave upon us, every new infection risks a new and even more virulent variant, including the Delta variant which is a growing concern within Ontario due to its increased transmissibility and severity compared to previous COVID-19 virus strains. The science is telling us that this variant has an effective reproduction rate between 5 and 9, whereas the original virus had a rate of 2 to 3. The rapid development of this variant poses a risk to patients, especially those who are more vulnerable to infection and severe outcomes from COVID-19. Although we know that this disease can sometimes breakthrough in fully vaccinated people, the vaccine has proved effective to a great extent in preventing serious illness, hospitalization, and death. Further, the potential for breakthrough infections in fully vaccinated people is rare. This mandatory vaccination policy is the best way to keep our staff and clients safe – this is why we are implementing mandatory vaccination policy at CMHA Toronto.

Will I lose my job if I don't comply with this policy?

We are providing time for everyone to get vaccinated in advance of the deadline or to determine whether a medical or other Human Rights Code exemption would apply to you. We are committed to supporting you with information, education and helping you get access to vaccines including providing resources on where to obtain a vaccination in the City of Toronto as well as information to a walk in CAMH clinic. Once we have exhausted all the options to support you, we will determine next steps if you are not fully vaccinated by the November 8, 2021 deadline. This may include an unpaid leave of absence, disciplinary actions or other sanctions by CMHA Toronto.

If I have chosen not to get vaccinated, isn't this Policy a violation of my human rights?

Our foremost priority is the health and safety of our organization and providing a safe workplace for all of our employees and clients. Vaccination is an essential element in the protection of individuals from the full effects and transmission of COVID-19. CMHA Toronto will comply with its human rights obligations and accommodate employees who are legally entitled to an accommodation through the provision of validated documentation.

If I have a medical or other Human Rights Code exemption for the vaccines, will I be able to come to the workplace freely?

You will be required to take rapid antigen COVID-19 tests and receive and submit negative results two times/week and possibly other requirements as directed by Public Health. More information will be provided when/if the accommodation is granted.



How we will know how to do self-testing?

A video demonstration will be circulated shortly on how to conduct the test.

I had COVID-19. Do I still need to vaccinate?

Yes. CMHA will require full vaccination against COVID-19 for all employees. Vaccination helps to protect you even if you have already had COVID-19.

I am currently on leave (maternity, parental, or any other approved leave), expected to return at a later date, post October 25, 2021. When do I need to be vaccinated?

All staff on leave and returning after October 25, 2021, will have to be fully vaccinated before their first day back.

I am pregnant and have chosen not to get the vaccine. Does the policy still apply to me?

Health Canada has provided [guidance](#) for vaccinations for special populations. Specifically, they state that all pregnant individuals in the authorized age group are eligible and recommended to be vaccinated as soon as possible, at any stage in pregnancy, as COVID-19 infection during pregnancy can be severe (increased risk for hospitalization, ICU admission, mechanical ventilation and death compared to non-pregnant individuals) and the benefits of vaccination outweigh the risks.

If you have questions regarding your pregnancy and the vaccination, please contact People and Culture.

Where can I get support if I am nervous about the vaccine and have anxieties about needles?

The CAMH Vaccine Clinic supports people with fear of needles or other medical anxieties. More information about the clinic can be found [here](#). Additionally, clinic locations in Toronto can be found [here](#).