

4.18 Covid-19 Vaccination Status & Data Collection Policy

Overview

The COVID-19 pandemic has given rise to significant health and safety risks for employees and the people and families BACI serves. Vaccination plays a critical role in preventing the workplace transmission of COVID-19 and protects not only BACI staff and the people we serve but also members of the public with whom we interact.

As of November 18, 2021, BC's Public Health Officer ordered that all employees in the Community Living Sector be fully vaccinated against COVID-19, unless they have an authorized exemption.

This Policy sets out BACI's expectations regarding vaccination and the collection of vaccination status information. Our aim 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 laws. This Policy is intended to be a part of, or supplement, our communicable disease prevention protocols.

Vaccination Requirements

As an organization, BACI has expectations that all current employees have full and up-to-date COVID-19 vaccinations as mandated by BC's Public Health Officer. As per our Employee Hire Policy and Interviewing Employees Policy, all external job applicants must also have full and up-to-date COVID-19 vaccinations, as mandated by BC's Public Health Officer, in order to be considered for employment.

All exemptions are considered, evaluated and followed based on BC's Provincial Health Officer's Orders. Employees without authorized exemptions who choose not to become vaccinated against COVID-19 will not be permitted to work. Job applicants without full and up-to-date vaccinations will not be deemed qualified for positions.

Reporting of Information

All employees and job applicants are required 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 vaccination.

Staff may be requested to provide (for inspection only) documentation verifying their vaccination status.

The purpose of collecting information about vaccination status is to ensure our compliance with BC Provincial Health Officer Orders, and to ensure we have sufficient information to address any health and safety risks in the workplace and to persons served. Staff who have routine contact with co-workers and persons served will be expected to comply with this Policy by supplying information about their vaccination status.

Employees who do not report their vaccination status under this Policy will be deemed to be unvaccinated and will not be permitted to work.

Use of Information

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

- Comply with BC Provincial Health Officer Orders;
- Better understand the risk of infection in the workplace;
- Help mitigate the risk of infection in the workplace, and for those at the greatest risk;
- Plan for operational continuity in the event of an outbreak;
- Support the continuity of services to people served in community settings where admission is available only to those who confirm their vaccination status;
- Support risk mitigation and contact tracing efforts in the event that an exposure occurs within the workplace.

Protection and Access of Information

Vaccination or immunity status information will be used only as described in this Policy. Disclosures will be made by employees to BACI's Quality Assurance and Human Resources department. All information will be protected as per BACI's Privacy Protection for Employees Policy.

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.

Any person breaching the confidentiality of this information, or misusing it in any way, will be subject to disciplinary action.

Please note: This policy is subject to change, given the rapid developments related to COVID-19.

Linking Policies:

- 1.1 Vision & Mission
- 1.2 Guiding Principles
- 1.3 Quality Assurance
- 1.8 Code of Ethics
- 1.15 Volunteers Policy
- 4.1 Employee Hire Policy
- 4.2 Interviewing Employees Policy
- 4.3 Job Descriptions Policy
- 8.3 Privacy Protection for Employees
- 8.4 Records Management Policy
- 8.6 IT Plan Policy