# 4.18 Vaccination Status and Data Collection Policy

#### Overview

Vaccination plays a critical role in preventing the workplace transmission of illness and protects not only BACI staff and the people we serve but also members of the public with whom we interact.

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**

BACI complies with the requirements of BC's Public Health Officer. As such, all employees must disclose their immunization status at the time of hire. In the event of a disease outbreak, this information will be used to determine if and how the employee can safely be deployed.

# **Reporting of Information**

As previously mentioned, all employees are required upon hire to report their vaccination status. Consistent with applicable privacy laws, management will collect the minimum amount of personal information required to address workplace health, safety and staffing deployment issues. Accordingly, employees will be asked to report only:

- If they have been fully vaccinated;
- The dates of the vaccinations.

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's 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.

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### Use of Information

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

- Comply with WorkSafeBC Communicable Disease Prevention as well as with BC's Provincial Health Officer;
- Better understand and 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 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, dependant on Public Health Orders.

### **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

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