



NCC COVID-19 Vaccination Policy – Programs and Services

Classification: Programs & Services	Effective Date: October 4, 2021
Approval Authority: Board of Directors	Latest Revision: October 4, 2021
Implementation Authority: Executive Director	

1.0 Purpose

The purpose of this policy is to enable enhanced protections for staff, volunteers and participants in NCC’s in-person programming during the COVID-19 pandemic. The purpose of this policy is also to encourage vaccination amongst those groups that have cause to interact with the New Canadians Centre.

2.0 Scope

This policy covers all programs and services offered by NCC and all clients who access those services.

3.0 Definitions

Clients

Individuals receiving services from NCC or participating in NCC programming. Some clients may also be volunteers, employees, or contract workers; but, not all volunteers, employees and contract workers are clients. In the context of proof of vaccination for participation in a program, an individual is considered a client if they are participating in the NCC program.

Day-to-Day Client Services

Day-to-day client services are those services that are offered on a daily or regular basis, as distinct from programs and services that are only offered at or over certain periods of time. Day-to-day client services are generally offered one-to-one or to one family at a time.

Fully Vaccinated

In Ontario, an individual is considered fully vaccinated if they have received:

- The full series of a COVID-19 vaccine authorized by Health Canada, or any combination of such vaccines,
- 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, or
- Three doses of a COVID-19 vaccine not authorized by Health Canada; and



- They received their final dose of the COVID-19 vaccine at least 14 days ago.

Proof of vaccination

Documentation issued by the Ontario Ministry of Health, another Canadian province or territory, or another country indicating individual immunization status against the COVID-19 virus. Ontario vaccine documentation can be obtained from the Ministry of Health by visiting <https://covid19.ontariohealth.ca/>.

4.0 Background

The New Canadian Centre (“NCC”) is committed to providing and maintaining a safe environment for both our staff and the public with whom we interact. The New Canadians Centre maintains a range of safety protocols recommended by public health experts to prevent the spread of COVID-19 and these remain the organization’s priority and first line of defense.

The New Canadians Centre is committed to sharing up to date information from medical experts with our employees, volunteers, clients and other stakeholders about the COVID-19 virus and how to prevent its transmission.

The New Canadians Center recognizes the advice of medical experts and public health officials that “vaccines are very effective at preventing severe illness, hospitalization and death from COVID-19.”¹ NCC also recognizes that experiences of systemic racism in the medical system in Canada and in individuals’ countries of birth can lead to distrust and hesitancy towards vaccination. At the same time, we hold the health and safety of our employees, volunteers and clients as our highest priority.

NCC aims to provide programming and services that are accessible to people from diverse backgrounds and that are responsive to the needs of the community we serve. We are aware of the significant barrier to accessing programs and services that is posed alternate delivery methods (e.g. online, phone, and text), and the importance of maintaining in-person programs and services.

5.0 Policy Statement

NCC is implementing a COVID-19 Vaccination Policy for Programs and Services that requires all participants in NCC’s indoor programming to be fully vaccinated against COVID-19. NCC will not require clients to provide proof of vaccination for access to any day-to-day client services.

¹ <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19/vaccines/effectiveness-benefits-vaccination.html>



In all cases, NCC will ensure that client vaccination information is kept private and confidential. Requested accommodations are allowed on medical and human rights grounds with the appropriate documentation.

6.0 Guidelines

Proof of vaccination information provided by clients may not be retained in any format. Proof of vaccination will be required to be provided at each instance of a recurring program for which proof of vaccination is required.

Individuals who are not yet eligible to receive a COVID-19 vaccine (e.g. under the age of 12) will not be required to demonstrate proof of vaccination.

Promotional material for indoor programs should clearly indicate that proof of vaccination is required for participation. Program registrants cannot be asked about their vaccination status as part of the registration process, but they should be made aware that proof of vaccination will be requested upon arrival at the program.

7.0 Procedures

7.1 Verifying Proof of Vaccination

Proof of vaccination has two components: verifying identity and verifying vaccination status. Photo identification is not required to verify identity. Examples of acceptable documents to verify identity include the following:

- Birth certificate
- Citizenship card
- Driver's license
- Government (Ontario or other) issued identification card, including health card
- Indian Status Card/Indigenous Membership Card
- Passport
- Permanent Resident card

Vaccination status is verified/accepted when the person provides a digital or printed vaccination record demonstrating that they are fully vaccinated (definition of "fully vaccinated" above).

Proof of vaccination will be accepted and the person allowed entry if the person's name and date of birth on their identification document matches the vaccination receipt with name and date of birth and if the person is fully vaccinated.

For more information visit this link: [Proof of Vaccination Guidance for Businesses and Organizations under the Reopening Ontario Act.](#)



7.2 Exemptions

NCC recognizes its obligations under the Ontario *Human Rights Code* (the “Code”). If an individual is unable to be vaccinated due to a protected ground, as defined by the Code, NCC has a duty to accommodate to a point of undue hardship. In assessing whether there will be “undue hardship”, the duty to accommodate will be balanced against NCC’s staffing needs, and its obligations to protect the health and safety of its staff and the public with whom we interact.

If an individual cannot be vaccinated because of a protected ground under the Code, the request for an exemption will fall into one of the following categories:

1. Medical Condition
2. Religion

Medical Condition Exemption

An individual who is requesting an exemption from the Policy based on a medical condition must provide NCC with a document from a physician or nurse practitioner that clearly indicates why the individual cannot be vaccinated against COVID-19 (i.e., clear medical information that supports the exemption).

The document from the physician or nurse practitioner must include the following:

- Name and contact information of the physician or nurse practitioner;
- Logo or letterhead identifying the physician or nurse practitioner;
- Statement that there is a medical reason for the individual’s exemption from being fully vaccinated against COVID-19; and
- The expected time period for the exemption, if the medical exemption is temporary in nature.

Religious Exemption

The Ontario Human Rights Tribunal has defined “religion” as “the practices, beliefs and observances that are part of a faith or religion. It does **not** include personal moral, ethical or political views.” There is no requirement under the Code to accommodate a bald refusal to be vaccinated arising from a political belief and/or principles. To be clear, an objection to receiving a vaccination because of a personal belief or principle is **not** a protected ground under the Code.

An individual who is requesting an exemption from the Policy based on religion must provide the NCC with a COVID-19 Religious Exemption Form that has been completed by a religious



**NEW
CANADIANS
CENTRE**
PETERBOROUGH

221 Romaine Street
Peterborough, ON K9J 2C3

Tel (705) 743.0882
Fax (705) 743.6219

info@nccpeterborough.ca
www.nccpeterborough.ca

leader. Please contact the Executive Director if you require a copy of the COVID-19 Religious Exemption Form.

Process to Receive an Accommodation

The individual seeking an accommodation under the Code must notify the Executive Director in writing, and include a copy of the applicable letter supporting the request for an exemption from the Policy (email is acceptable for this communication). If additional information is required from the individual, the Executive Director will follow up.

Possible accommodation requirements may include enhanced PPE and/or physical distancing, rapid antigen testing, or PCR testing.

8.0 Related Policies

COVID-19 Vaccination Policy (Employees)
Anti-Racism and Anti-Oppression Policy
Protection of Information Policy #1 Client Information