



NCC COVID-19 Vaccination Policy	
Classification: Human Resources	Effective Date: October 4, 2021
Approval Authority: Board of Directors	Latest Revision: February 25, 2022
Implementation Authority: Executive Director	

1.0 Policy Statement

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. In keeping with this commitment, NCC is implementing a COVID-19 Vaccination Policy (the “Policy”) that requires all NCC staff to be fully vaccinated against COVID-19.

The Policy has been made necessary by several factors, which include our legal obligations to protect the health and safety of our staff, the increased risk of the more transmissible Delta variant of COVID-19, recent mandates by the Ontario government with respect to mandatory vaccination, and the formal recommendation from Peterborough Public Health that all employers in the region implement vaccination policies with respect to COVID-19.

This Policy was developed in accordance with existing guidelines from the Ontario government and Peterborough Public Health, the *Occupational Health & Safety Act*, the *Human Rights Code*, and applicable privacy laws. The Policy is consistent with the direction taken by other not-for-profit organizations in the Peterborough area and throughout the province.

2.0 Scope

The Policy applies to all NCC employees, contract workers, placement students, volunteers, Board Members, and anyone else doing work on behalf of NCC, whether full-time, part-time, temporary, or casual.

3.0 Definitions

Fully Vaccinated

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 OR
- 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



- A booster dose of a COVID-19 mRNA vaccine authorized by Health Canada.

Partially Vaccinated

The individual has at least one dose of a COVID-19 vaccine but is not fully vaccinated.

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/>

Vaccine Education Module

An education program approved by NCC, consistent with the Ministry of Health recommendations, which explains the benefits of vaccination against COVID-19.

4.0 Vaccination Requirements

Effective immediately, all new personnel will be required to be Fully Vaccinated as a condition of working at NCC in any capacity, unless the individual has a valid human rights exemption.

Further, all existing personnel will be required to meet each of the deadlines set out below in order to continue working at NCC:

March 20, 2022	<p>On or before this date, individuals must provide proof of being Fully Vaccinated, or evidence of a valid human rights exemption.</p> <p>Failure to meet this deadline will result in the individual being prohibited from entering any NCC premises or carrying out any work on behalf of NCC until such time as they satisfy the above requirement. Employees who miss this deadline will be placed on an unpaid leave of absence.</p>
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5.0 Privacy Protection

Each individual's vaccination information will be safeguarded and maintained by the Executive Director. This information will be kept in a confidential file in a secure location. An employee's vaccination record will *not* be maintained in their personnel file. Vaccination records will only be used when required to verify vaccination status.

In the event of an outbreak, the vaccination status of an individual may determine, among other things, their need to test and/or self-isolate. At no point will NCC disclose personal



information, identify and/or confirm the vaccination status for any specific individuals, unless required to do so by law.

6.0 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 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, frequent rapid antigen testing, PCR testing, work-from-home arrangements, unpaid leaves of absence, and/or restructured duties and responsibilities.

7.0 Continued Adherence to Existing COVID-19 Policies

This Policy is not intended to replace the existing COVID-19 measures NCC has put in place to control the spread of COVID-19. Regardless of vaccine status, individuals must continue to adhere to the NCC’s health and safety protocols at all times while in the workplace, including health screening, face coverings, handwashing, physical distancing where possible, and the use of PPE as required.

8.0 Consequences of Non-Compliance

Individuals who do not comply with the Policy will be subject to disciplinary action, up to and including the termination of their employment.

9.0 Related Policies

Human Resources Policy #2 – Terms and Conditions of Employment (File Retention)

Human Resources Policy #6 – Health and Safety

Protection of Information Policy #2 Employee Information, Policy #3 Volunteer Information