

Policy:	COVID-19 Vaccination Program		
Policy Owner:	Director, Health Safety and Wellness Director, People Services Integrated Director, Medical Affairs		
ELC Sponsor:	Chief Human Resource Officer and VP, People & Culture IVP, Medical Affairs		
Approval By:	Directors Committee Medical Advisory Committee Executive Leadership Committee	Approval Dates:	2021-08-27 2021-08-27 2021-09-02

Original Effective Date:	2021-07-05	Reviewed Date:	2021-09-03	Revised Date:	2021-09-03
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POLICY

London Health Sciences Center (LHSC) is committed to ensuring a safe and healthy environment for staff, [affiliates](#), patients and visitors/care partners and recognizes the importance of [immunization](#) for staff and affiliates. The COVID-19 vaccination program is supported by LHSC to meet requirements of the [Public Hospitals Act 1990, R.S.O., Regulations 965](#).

LHSC supports the public health recommendations that all staff and affiliates receive the correct number of doses of COVID-19 vaccine unless medically contraindicated. LHSC acknowledges staff and affiliates have the right to make an informed personal healthcare choice as it relates to vaccination programs and is committed to providing all staff and affiliates with information about the risks and benefits of the vaccine, as needed.

LHSC staff and affiliates will:

- Complete a COVID-19 Vaccination e-learning program
- Provide documentation of all required COVID vaccination doses to [Occupational Health and Safety Services](#) (OHSS) or
- Provide valid documentation of a medical exemption to [Occupational Health and Safety Services](#) or
- Provide documentation for an exemption under Human Rights to [People Services](#)
- Conduct a self-administered COVID-19 rapid antigen test and document results prior to attending work, if an approved exemption is documented. This testing is not a replacement for being fully vaccinated but may play a role in the accommodation process. **Beginning October 22, 2021, only those with a valid medical exemption or those with exemption under the Human Rights code will be provided this accommodation.**

For affiliates who are not supported by OHSS and therefore have no health records at LHSC; their employer or academic institution is expected to ensure the affiliate is in full compliance with this policy if they are attending any LHSC site.

To be considered immunized/vaccinated, all vaccinated staff and affiliates must provide proof of vaccination to Occupational Health and Safety Services (OHSS) as applicable. Staff and Affiliates will be given the option to withhold this information; however, staff and affiliates who choose not to declare their status will be considered to be **not** vaccinated. Documentation of vaccine status will be kept in the OHSS files.

1. Staff and Affiliates who are deemed to be not vaccinated may be accommodated per this policy due to: A confirmed medical contraindication (from an attending Physician / Nurse Practitioner reviewed by OHSS), or
2. A reason that is verified as applicable under the Ontario Human Rights Code

Only Staff and affiliates who are not vaccinated under point 1 or 2 above, will be accommodated and provided with rapid testing kits that must be self-administered at home. Staff and affiliates who are

working on-site will be required to perform antigen testing three times a week on Mondays, Wednesdays and Fridays. A negative test within Monday – Wednesday - Friday of coming to work on-site and to document this with a dated photo, to be submitted to Occupational Health and Safety Services. For period of absences from working on-site, a negative result within 48 hours prior to resuming work on-site is required. After which, the 3x a week (M, W, F) testing will resume.

All other staff and affiliates who are deemed not vaccinated per this policy will NOT be accommodated and will not be allowed to report to work. They will be placed on an unapproved, unpaid leave of absence until they are 14 days past being fully vaccinated.

These tests are meant for required testing of **asymptomatic** staff and affiliates that are being accommodated only. This is to identify those who may be infectious and at risk of infecting others before coming to work on-site. The tests are not to be used by anyone **with symptoms** or who has a known exposure to someone with COVID-19. Symptomatic and exposed staff must follow current guidelines to be tested in an assessment centre with a polymerase chain reaction (PCR) test.

Note: Tests are for the exclusive use of the staff or affiliates of LHSC who are accommodated and are to be used only for asymptomatic screening. Educational materials will be provided on how to use the home rapid testing and the documentation that will be required to be provided for each test.

Staff and affiliates coming to work on-site will be required to be asymptomatic and have a negative test within the timeframe in this policy to enter the workplace.

Staff and affiliates who test positive on the rapid test must contact OHSS and arrange for a confirmatory diagnostic PCR test at a Community Access Center or approved testing site. They will need to self-isolate at home pending the result of the confirmatory test.

All staff and affiliates will be required to attest during entry screening that either they have been vaccinated or to have completed a rapid test with a negative test result within the previous 48 hours when coming on-site to work.

Rapid test kits distributed to those staff members by LHSC are to be used only by the staff affiliates who receive them. The rapid tests may not be given or sold to any other person. Failure to comply with the terms of this policy, including falsifying test results, the prohibition on distributing the rapid tests, may result in discipline, up to and including termination of employment or revocation of privileges.

PROCEDURE

1. Offering and Promotion of Vaccination

- 1.1. All staff and affiliates will be offered the COVID-19 vaccination by any agent authorized via the COVID-19 Provincial vaccination program.
- 1.2. Educational and promotional materials will be made available to staff and affiliates.

2. Roles and Responsibilities

2.1. Area Leaders will:

- 2.1.1. Support the vaccination program by promoting vaccination and ensuring all staff and affiliates have access to resources to help inform their decision; including completion of any educational packages such as iLearn.
- 2.1.2. Review compliance reports issued by LHSC to verify COVID-19 Vaccination Program has been completed. Note: OHSS will not provide information related to which component of the program staff and affiliates have complied with (i.e. medically exempted).

2.2. Staff and affiliates will:

- 2.2.1. Make themselves familiar with the information regarding the COVID-19 vaccine and seek out additional answers to their questions so they can make an informed decision.
- 2.2.2. Complete the following and submit proof to OHSS by a date determined annually, as needed.

- 2.2.2.1. Receive the COVID-19 vaccine according to dosing schedules as approved by the Middlesex London Health Unit, or
- 2.2.2.2. Submit appropriate medical certification confirming that the vaccine is medically contraindicated, or
- 2.2.2.3. Apply for Accommodation under Human Rights to People and Culture.
- 2.2.2.4. Decline to be vaccinated, after completing the mandatory e-learning/training module.
- 2.2.3. If they are identified as needing accommodation per this policy they will take the self-test every Monday, Wednesday and Friday or within 48 hours prior to their next scheduled attendance at work and provide a dated photo to Occupational Health and Safety Services.
- 2.2.3.1. Tests are for asymptomatic staff and affiliates on accommodation as per this policy only.
- 2.2.4. Complete their self-screening and attest to being vaccinated or complete their rapid test with negative test results within the 48 hours prior to every shift on site.
- 2.2.4.1. Staff and affiliates with a positive test result will not attend work and will self-isolate and contact OHSS for a confirmatory diagnostic PCR test at an approved testing site.
- 2.2.5. If they are deemed not vaccinated will be placed on an unapproved, unpaid leave of absence until they are 14 days past being fully vaccinated.

2.3. Occupational Health and Safety Services will:

- 2.3.1. Promote the vaccination program and assist as needed in providing information to ensure all individuals have the information they need to make an informed decision.
- 2.3.2. Provide data to generate compliance reports to verify COVID-19 Vaccination Program has been completed.
- 2.3.3. Document staff and affiliate proof of COVID-19 vaccination in their Occupational Health File.
- 2.3.4. Provide test kits to all staff and affiliates who are either medically exempt; or are deemed to be not vaccinated per this policy.

DEFINITIONS

Affiliates - Individuals who are not employed by the organization but perform specific tasks at or for the organization, including:

- Credentialed Professional Staff with a hospital appointment (e.g. physicians, midwives, dentists),
- Students,
- Contractors or contracted workers who may be members of a third-party contract (i.e. Sodexo) or under direct contract with the organization, and
- Individuals working at the organization but funded through an external source.

COVID-19 - is an acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) virus and asymptomatic infection is possible. It is primarily transmitted person to person through respiratory droplets. The risk of severe disease increases with age and is elevated in those with underlying medical conditions. It is characterized by:

- Fever,
- Cough,
- Shortness of Breath, and
- [Number of other Symptoms](#)

Immunization – The process of inducing immunity to an infectious organism or agent in an individual through vaccination.

REFERENCES

Legislation

[Public Hospitals Act 1990, R.S.O., Regulations 965](#)

Corporate

[Influenza Immunization Program](#)

[Influenza Vaccination for Professional Staff](#)

Resources

[COVID-19 Fully Vaccinated Individuals: Case, Contact and Outbreak Management Interim Guidance](#)

[CNO – COVID -19 Vaccination Information](#)

[CNA – Coronavirus Disease \(COVID-19\)](#)

[National Advisory Committee on Immunization COVID-19](#)

[National Advisory Committee on Immunization – Recommendations on the use of COVID-19 Vaccines](#)

[LHSC COVID-19 Intranet](#)

[Middlesex London Health Unit](#)

[COVID-19 Vaccination Program iLearn](#)

[COVID-19 and Ontario's Human Rights Code – Questions and Answers](#)

Appendix

Appendix A – [Medical Exemption to Decline COVID-19 Vaccination](#)