

Title:	COVID-19 Vaccination		
Document Type:	Policy	Document #:	UHT0001584
Program:	Corporate Health, Safety and Wellness	Effective Date:	September 7, 2021
Executive Sponsor:	Vice President People and Transformation	Last Reviewed:	
Owner/Lead:	Director Corporate Health, Safety & Wellness	Last Revised:	
Approval Body:	Executive Committee	Review Cycle:	1 year
Applicable Sites:	<input checked="" type="checkbox"/> Unity Health <input type="checkbox"/> Providence <input type="checkbox"/> St. Joseph's <input type="checkbox"/> St. Michael's		
Keywords:	COVID-19, vaccination, vaccine policy		

1.0 INTRODUCTION

COVID-19 is a respiratory disease caused by a newly discovered coronavirus (SARS-CoV-2) that emerged in December 2019. The virus is released into the air when an infected individual breathes, coughs, sneezes etc. In some cases, infected individuals do not have any symptoms. Symptoms begin within two to 14 days of exposure to the virus. A person infected with COVID-19 is considered contagious starting from 48 hours prior to symptoms onset until 10 to 20 days depending on the severity of their illness and their immune system.

Multiple variants (genetic mutations in the SARS-CoV-2 virus) have been identified and some of these variants are known to be highly transmissible and infectious.

Although COVID-19 can affect anyone, certain populations are at increased risk such as those with preexisting medical conditions. The COVID-19 pandemic has had significant social and economic impacts as well as causing morbidity and mortality around the world.

Vaccination is one of the most effective ways to control transmission along with other public health measures. Currently, there are four authorized vaccines in Canada: Pfizer BioNTech COVID-19 vaccine, Moderna COVID-19 vaccine, AstraZeneca COVID-19 vaccine, and Johnson & Johnson (Janssen) COVID19 vaccine. All COVID-19 vaccines have been shown to be safe and effective against symptomatic laboratory-confirmed COVID-19 in clinical trials. Furthermore, all the authorized COVID-19 vaccines in Canada have been shown to be effective in preventing severe disease, hospitalization and death.

On August 17, 2021, the [Chief Medical Officer of Health issued Directive 6](#). The Directive makes it mandatory for hospitals to have a vaccination policy by no later than September 7, 2021 and sets out minimum requirements. Individuals to which the policy applies must provide:

- a) Proof of full vaccination, or
- b) Written proof of a medical reason, provided by a physician or registered nurse in the extended class that set out: (i) a documented medical reason for not being fully vaccinated against COVID-19 and (ii) the effective time-period for the medical reason; or

c) Completion of a vaccination education session.

The Directive further sets out the provision for the organization requiring all employees, physicians, contractors, students and volunteers who are not fully vaccinated to submit to regular antigen point of care testing for COVID-19 and demonstrate a negative test at intervals determined by the employers which must be at minimum once every seven (7) days.

2.0 PURPOSE

The purpose of the policy is to outline the procedure and vaccination requirements for Unity Health Toronto employees, physicians, contractors, researchers, students and volunteers of the COVID-19 vaccination requirements.

3.0 APPLICATION

This policy applies to all Unity Health Toronto employees, physicians, researchers, contractors, students and volunteers who are working or may be required to report on site. For the purpose of this policy only, reference to "Covered Individuals" shall also be read to include all employees, physicians, researchers, contractors, students and volunteers.

4.0 POLICY

In keeping with our Mission and Values, Unity Health Toronto prioritizes the safety and wellbeing of our patients and all persons who provide service to our organization. Utilizing the best available evidence, we are committed to ensuring the highest standard of care for the patients and communities we serve. We are further committed to taking every precaution reasonable in the circumstances for the protection of the health and safety of all Covered Individuals from the hazards of COVID-19. Vaccination is a key element in the protection of Covered Individuals against the hazard of COVID-19. This policy is designed to maximize COVID-19 vaccination rates among Unity Health Toronto Covered Individuals as one of the critical control measures to prevent serious disease, hospitalization, morbidity resulting from COVID-19 for patients, families, staff, physicians, volunteers and learners.

To this end Covered Individuals are required to be fully vaccinated against COVID-19, subject to valid exemptions granted in accordance with Directive #6 and the accommodation process at Unity Health Toronto.

Staff and Physicians joining Unity Health are required to provide evidence to support that they have been fully vaccinated against COVID-19 as a condition of employment or obtaining privileges at Unity Health Toronto. Such evidence must be furnished in advance of the start

date with Unity Health and failure to provide the required documentation will be grounds for a delay of the start date or revocation of the offer of employment or engagement.

5.0 DEFINITIONS

Term/Acronym	Definition
Full Vaccination	Having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by WHO (e.g. two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series; and having received the final dose of the COVID-19 vaccine at least 14 days ago.
Contractor	Any businesses or entities operating on Unity Health Toronto sites.
Covered Individuals	All employees, physicians, researchers, volunteers, students, contractors.

6.0 PROCEDURE

COVID-19 Vaccination Requirements

All Unity Health Covered Individuals are required to be fully vaccinated with a COVID-19 vaccine series by November 4, 2021.

For a two dose vaccine series, to comply with this policy Covered Individuals must receive one dose of a COVID-19 vaccine by October 4, 2021 and the second dose of a COVID-19 vaccine by November 4, 2021.

For a single dose vaccine series (e.g. Johnson and Johnson), to comply with this policy, Covered Individuals must receive the dose by October 4, 2021.

As outlined by the Federal Government of Canada for vaccines that are not Health Canada approved, an additional dose of a mRNA vaccine will be required by October 4, 2021.

6.1 EMPLOYEES AND PHYSICIANS

Validation COVID-19 Vaccination Data

For the period of August 25 to August 31, 2021 Leaders provided letters to employees and physicians for whom Unity Health did not have record of full vaccination information.

Employees and physicians with unknown full vaccination status were required to provide proof of full vaccination to Corporate/Occupational Health by September 2, 2021.

Testing

All staff and physicians who do not provide proof of full vaccination or who have a valid exemption by September 7, 2021 and will be present at any Unity Health site, will be required

to perform regular antigen point of care testing starting September 7, 2021. The interval of testing will be established by Unity Health Toronto and must be at a minimum of once every seven (7) days on an ongoing basis. As of September 7, 2021 the testing interval will be two (2) times per week.

Testing will be provided by Unity Health Toronto for employees, researchers, physicians, and students who are not fully vaccinated prior to November 4, 2021 and who thereafter remain unvaccinated with a valid exemption confirmed by Corporate Health, Safety and Wellness or Human Resources as applicable.

Education

All Covered Individuals who have not provided proof of full vaccination and those with a valid exemption will be required to complete the LMS module titled "COVID-19 Vaccination Module" within the designated timelines.

Proof of Vaccination

Proof of vaccination means documentation verifying receipt of a vaccination series approved by Health Canada or the World Health Organization. Employees and physicians must disclose their vaccination status to Corporate Health, Safety and Wellness with the established process completed no later than November 4, 2021.

Exemptions

Employees who are not able to obtain a COVID-19 vaccine due to contraindications for medical reasons must provide Corporate Health, Safety and Wellness with written proof of the medical reason(s), provided by a physician or registered nurse in the extended class that set out: (i) a documented medical reason for not being fully vaccinated against COVID-19 and (ii) the effective time-period for the medical reason.

Physicians who wish to submit a medical exemption request with respect to COVID-19 vaccination must provide the Medical Affairs office with written proof of the valid exemption as outlined above.

Based on the information received additional information or clarification may be required on a case by case basis in an effort to substantiate the request for accommodation. Employees and physicians must re-submit medical documentation for review when the effective time period of the medical reason is over.

For any other form of accommodation under the Ontario Human Rights Code, outside of disability/medical condition, employees must inform their manager and human resources; and physicians must inform their Chief of Department and Medical Affairs. Human Resources/Medical Affairs will require evidence appropriate to the type of accommodation and

will work with the employee/physician to determine the appropriate accommodation, if required.

Those Covered Individuals with a valid exemption to COVID-19 vaccination will be required to undergo regular antigen point of care testing (rapid testing) for COVID-19 until further notice. The interval of testing will be established by Unity Health Toronto and must be at a minimum of once every seven (7) days on an ongoing basis. As of September 7, 2021 the testing interval will be two (2) times per week.

Obtaining COVID-19 Vaccination

Vaccination may be obtained Corporate Health, Safety and Wellness departments. Please refer to the COVID Microsite to schedule an appointment (<https://covid.unityhealth.to/vaccine-clinics/>).

After receiving a vaccination at either Unity Health Toronto or at a location within the community please submit proof of your COVID-19 vaccination via:

- Email to Corporate.Health@unityhealth.to; or
- In person to the Corporate Health, Safety and Wellness Department.
- access to COVID-19 vaccine receipts are available through the provincial portal (<https://covid19.ontariohealth.ca/>). A green health card, date of birth and postal code are required. For those who do not have a green health card OR the provincial system is not pulling up your information, please contact the Ministry of Health health-care provider helpline at 1-866-212-2272.

Compliance

Failure to provide evidence of at least the first dose of the COVID-19 vaccination being received by October 4, 2021 or subsequent failure to provide evidence of full vaccination by November 4, 2021 without a valid exemption as determined by Corporate Health, Safety and Wellness or Human Resources/Medical Affairs will mean that the employee or physician has failed to make themselves fit for work as required as a condition of their employment or engagement. As a result employees will be placed on a temporary unpaid leave of absence and physicians will be placed on a leave of absence. Continued failure to comply with this policy may impact ongoing employment/privileges at Unity Health Toronto.

6.2 CONTRACTORS

All contractors will be held accountable for ensuring their staff or representatives who perform work at any of Unity Health sites are fully vaccinated by November 4, 2021 and meet the provisions outlined in this policy and Directive #6.

Contractors will be responsible for the implementation and management of Directive #6 including, but not limited to, proof of vaccination, COVID-19 vaccination for their employees, medical exemptions, educational session on the benefits of COVID-19 vaccination and rapid antigen testing provisions. Contractors will confirm vaccination status and maintain record to ensure that their employees and agents who attend on site at Unity Health Toronto premises are fully vaccinated or have a valid exemption and have received testing within two (2) days of attending on site at Unity Health Toronto premises.

Contractors will be responsible for the collection, maintenance and disclosure of statistical data as outlined in Directive #6. This information will be made available to Unity Health Toronto when requested.

6.3 STUDENTS

All affiliated academic institutions are accountable for ensuring all learning placements at any of Unity Health Toronto site are fully vaccinated by November 4, 2021 and meet the provisions outlined in this policy and Directive #6.

Affiliated academic institutions will be responsible for the implementation and management of Directive #6 including, but not limited to, capturing proof of vaccination, COVID-19 vaccination, medical exemptions, educational session on the benefits of COVID-19 vaccination and rapid antigen testing provisions. Students will disclose their vaccination status to their affiliated academic institution, which will confirm to Unity health Toronto that only students who are fully vaccinated are permitted to attend on site at Unity Health Toronto premises.

Rapid antigen testing may be made available to students for valid medical exemptions only. Affiliated academic institutions will be responsible for the collection, maintenance and disclosure of statistical data as outlined in Directive #6. This information will be made available to Unity Health Toronto when requested.

6.4 VOLUNTEERS

Volunteers who are volunteering at any Unity Health Toronto site are required to be fully vaccinated prior to commencement of their placement.

7.0 REFERENCES

Chief Medical Officer of Health, Directive #6, August 2021

https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/directives/vaccination_policy_in_health_settings.pdf

Resource Guide for Directive #6, August 2021

https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/directives/directive_6_policy_resource.pdf

National Advisory Committee on Immunization (NACI), July 2021

<https://www.canada.ca/en/public-health/services/immunization/national-advisory-committee-on-immunization-naci/recommendations-use-covid-19-vaccines.html>

Canadian Nurses Association (CNA), 2021

<https://www.cna-aicc.ca/en/coronavirus-disease/covid-19-vaccinations>

Registered Nurses' Association of Ontario, July 2021

[https://rnao.ca/sites/default/files/2021-07/RNAO%27s Open Letter to Premier Hon. Doug Ford re Mandatory Vaccination for H CW July 20%2C 2021.pdf](https://rnao.ca/sites/default/files/2021-07/RNAO%27s%20Open%20Letter%20to%20Premier%20Hon.%20Doug%20Ford%20re%20Mandatory%20Vaccination%20for%20H%20CW%20July%2020%2C%202021.pdf)

Government of Canada, August 2021

[COVID-19: Recommendations for those vaccinated with vaccines not authorized by Health Canada for those staying in Canada to live, work or study - Canada.ca](https://www.canada.ca/en/health-services/public-health/services/covid-19/recommendations-for-those-vaccinated-with-vaccines-not-authorized-by-health-canada-for-those-staying-in-canada-to-live-work-or-study.html)

Version	Approval/Sub-approval body	Approval date
01	Executive Committee (EC) Joint Health and Safety Committees (JHSC) Medical Advisory Committee (MAC)	September 3, 2021
02		
03		

This document is the property of Unity Health Toronto. This material has been prepared solely for internal use. Unity Health Toronto does not accept responsibility for the use of this material by any person or organization not associated with Unity Health Toronto. No part of this document may be reproduced in any form for publication without permission from Unity Health Toronto.