



A Guide on How to Create a Workplace Vaccination Policy

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Ottawa Public Health strongly recommends businesses and employers develop and implement workplace vaccination policies for their employees and workforce, and that all those eligible receive a complete series of the COVID-19 vaccine. Supporting employees to get fully vaccinated is the best way to help protect them from the risks of COVID-19, prevent outbreaks and build confidence in the health and safety of the workplace as we face a Delta variant-fuelled resurgence in our community.

Employers have a responsibility to maintain a safe work environment for their employees. To help reduce the risk of COVID-19 transmission, a vaccine policy is an important measure employers should implement. Below are some aspects that should be considered as businesses and employers develop a COVID-19 vaccination policy for their workplace.

Please note: While strongly encouraged, these recommendations are voluntary, and are not intended to be legally enforceable under the [Reopening Ontario \(A Flexible Response to COVID-19\) Act, 2020](#). The information provided in this document does not contain legal advice and should not be relied on or treated as legal advice. Workplaces should seek their own legal advice to address their specific circumstances.

Organizations do not need to submit their vaccination policies to OPH for approval and will also not be reviewing individual vaccine policies. A workplace policy should be in writing and adhere to applicable laws including those related to occupational health and safety, human rights and privacy.

Developing a workplace vaccination policy:

To best protect workers and the community, employers should continuously assess the risk of transmission at the workplace by considering the following:

- Are workers required to be in close contact with others in their place of work or while performing their work duties?
- Can workers keep at least two metres apart while performing their work?
- How long and how often are workers in close contact with other workers or customers?
- Does your workplace have physical barriers when workers cannot keep distance from each other, good ventilation, and personal protective equipment (PPE) such as masks to protect workers or patrons?
- What is the size of your workforce and does your workforce have a high vaccination rate?

- Does the workplace have workers or clients who may be at risk for severe illness from COVID-19 or unable to be vaccinated? Some people may have reduced immunity due to age, pre-existing health conditions or medical treatments.
- Is the workplace able to offer alternative work for people who require accommodation, for example remote work?

Key components in a vaccination policy:

There are many components to a workplace vaccination policy, included below are points which should be considered and discussed during the development and implementation of the policy:

1) Continued adherence to COVID-19 prevention measures and local public health guidelines

- The vaccines prevent against serious illness and death, they reduce but do not fully prevent individuals from transmitting or becoming sick with the virus.
- Vaccines do not replace the need for strict adherence to established COVID-19 public health measures, especially when interacting with others whose vaccination status may be unknown. Employers must continue to implement all COVID-19 prevention measures for their sector, as outlined in [provincial guidelines](#) and [Ottawa Public Health](#) guidance including, but not limited to: COVID-19 screening, physical distancing, wearing of masks, hand hygiene, infection prevention and control measures, and having an up-to-date [COVID-19 safety plan](#).
- There are those few individuals who cannot receive the vaccine due to a medical exemption. Most individuals are able to safely receive the vaccine series, and a vaccinated workplace helps to protect those who are medically unable to be vaccinated.

2) Determine the scope and purpose

- Outline the reasoning of the policy including the risks of COVID-19. Vaccination against COVID-19 is one of the best ways to protect workers and patrons from becoming seriously ill or transmitting the virus to others. Studies show that the Delta variant is more contagious, with greater risk for severe outcomes and hospitalization.
- Explain who the policy applies to. Consider if the policy will apply to all workers, in addition to contractors or agency staff, students, or volunteers and if there's a separate policy for customers. In addition, whether the policy will apply to any workers who are working from home to reduce the risk of workplace transmission and limit absences.
- Explain that the policy may evolve as the pandemic situation changes or legislation and public health advice is altered.
- Develop a clear communications plan to inform workers about the policy.

3) List actions workers must take

- Workplace policies should require workers to provide proof of vaccination status, with vaccines approved by Health Canada or the World Health Organization [as outlined by provincial guidance](#). The policy should indicate where employees can provide proof of vaccination while also addressing privacy concerns.
- A policy should also include documentation requirements for unvaccinated employees. For example, they must provide the following to the employer:
 - Indicate that they have a legitimate medical exemption, including if the reasons are temporary or permanent. The medical exemption should be from a licenced medical doctor or nurse practitioner and does not need to include the reason for the exemption

4) Set deadlines for when actions must be taken

- Determine a reasonable date when workers must demonstrate compliance with the entirety or elements of the vaccination policy. For example, this can include a set date for when first and second doses are required.

5) List available supports for vaccination

- It is important for employers to demonstrate and be committed to supporting workers to get vaccinated. Ways to support workers to get vaccinated may include:
 - Providing vaccine information from credible sources or translated [resources](#).
 - Supporting vaccine champions to initiate conversations with their peers.
 - Encouraging workers to discuss their concerns with their healthcare provider.
 - Providing paid leave to get vaccinated and highlighting support (e.g. transportation) for those who may need help getting to and from a vaccination clinic.
 - Reminding workers that they are [entitled to up to three paid sick days](#), if they have side effects from the vaccine.
 - Helping employees [locate a community clinic](#) or [neighbourhood vaccine hub](#) near them for drop-in vaccinations.
 - Hosting an [on-site vaccination clinic](#) in partnership with Ottawa Public Health.
 - Engage Employees – Consider hosting listening sessions for Q&As, to gather feedback and answer basic questions from staff. OPH has prepared a guide on [How To Talk Vaccines](#) to help you increase vaccine confidence.

6) Non-compliance

Employers should develop a policy for those who voluntarily choose not to get vaccinated. This could include but not limited to:

- Completing a vaccination education course, with a signed declaration stating that they have reviewed and understood the content. The vaccination education course should at a minimum include information on:
 - How the COVID-19 vaccines work.
 - Vaccine safety related to the development of the COVID-19 vaccines.
 - The benefits of vaccination against COVID-19.
 - Risks of not being vaccinated against COVID-19.
 - Possible side effects of COVID-19 vaccination.
 - Outline the potential consequences for workers who do not fulfill the requirements of the policy.

7) Provisions for unvaccinated workers

- The policy should list alternative options for workers who decline to get vaccinated for reasons protected by applicable laws, such as the Human Rights Code or who are unable to complete their vaccination series for medical reason. Options may include:
 - Consider if workers can be relocated and modified work or reassignments may be possible. If this is not possible, consider if unvaccinated workers may use vacation or unpaid leave until it is safe for them to return to the workplace.
 - In the event of a COVID-19 outbreak, unvaccinated and partially vaccinated workers (who have only received one dose of a two-dose COVID-19 vaccine series and less than 14 days since their second dose) should not be permitted to work in the outbreak area. Workers without vaccination records should be assumed to be unvaccinated.

8) Privacy considerations

- The policy should reflect that information about employee's vaccination status is subject to applicable privacy law.
- The policy should outline how vaccination status of employees may be used by their employer to mitigate the health-related risks of COVID-19. To help protect workers, their families and the community, knowing the status of vaccination for employees will be important to help take appropriate action quickly, in the event of COVID-19 transmission in the workplace. This can include sharing the information with Ottawa Public Health.
- Limit the collection, use, disclosure and retention of information to what is reasonably necessary. Keep worker vaccination information separate from their personnel file.
- Develop a plan to safeguard employee's personal information and ensure vaccination status records are retained, accessed and disposed of in a secure manner.

9) Staff contact

- Identify an individual in your organization that employees may contact with questions about the policy, privacy concerns, to request accommodations, or for information on how to comply with the policy.

10) Other Considerations

- Workplaces can partner with Ottawa Public Health to host a vaccination clinic to ensure easy and convenient access for vaccination for their employees.
- Regular and up to date communications with employees will help support and sustain the policy.
- Routine asymptomatic testing is not an equivalent substitute for a completed series of a COVID-19 vaccine. Ensuring that employees are fully vaccinated and continue to follow all public health measures in the workplace remains the best way to protect individuals and our community against COVID-19.

Other resources:

- [COVID-19 Vaccine Toolkit for Employers](#)
- [OPH's Business and Workplaces web page](#)
- [Reporting Exposures to COVID-19 in Workplaces](#)
- [COVID-19 vaccines for Ontario](#)
- [Ottawa Public Health Vaccine Policy](#)