

## Policy

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**Title:** Employee Immunization Policy

**Reference number:** P1.42.0

**Department:** Ottawa Public Health

**Service Area:** Immunization

**Approved by:** Senior Management Team (SMT)

**Approval Date:** July 2015

**Effective Date:** July 2015

**Revisions Approved by:** Executive Senior Leadership Team – Operations (ExSLT-Ops)

**Last Revision Date:** September 1, 2021

**Last Review Date:** August 31, 2021

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### Policy Statement

Ottawa Public Health (OPH) is committed to taking precautions to protect employees, volunteers, contractors, learners and clients from vaccine-preventable infectious diseases.

OPH requires all employees, volunteers, contractors and learners to be fully vaccinated against COVID-19 to support the health and safety of our workplaces and our community.

OPH highly recommends employees in designated positions, who are at risk for exposure to or at risk for transmitting specific vaccine-preventable infectious diseases in the normal performance of their duties, to be immunized against specific vaccine-preventable diseases and must provide status of immunization or immunity or a statement declining immunization.

Employees whose duties involve activities in a public or private facility (e.g., hospital, long term care facility, retirement home, child care centre, school) will comply with any requirement for immunization, and/or testing that exist at that time at that facility.

### Purpose

To ensure that all employees, volunteers, contractors and learners are adequately immunized to minimize their risk of infection and to reduce the risk of transmission to others.

### Application

This policy applies to all OPH employees, volunteers, contractors and learners completing placements.

## Policy Description

The following sections describe the policy as it applies to different employee positions.

### a) **Required vaccine for all employees - COVID-19**

As part of the Ottawa Public Health's commitment to develop and implement workplace controls to reduce the risk of COVID-19, all existing and future OPH employees, volunteers, contractors, and learners must provide proof of full vaccination against COVID-19. New employees, volunteers, contractors and learners are required to be fully vaccinated prior to their start date.

Timelines:

Dose One is required by September 15, 2021.

Dose Two is required by October 15, 2021.

Employees must disclose their vaccination status in accordance with the established process as outlined by the employer.

Employees who are unable to be vaccinated must provide written proof of a medical reason from a physician or nurse practitioner that sets out the medical reason for not being fully vaccinated against COVID-19 and the effective time-period for the medical exemption.

Employees without a medical exemption and not fully vaccinated against the hazard of COVID-19 will be provided with information and an education course regarding COVID-19 vaccines to promote compliance with this policy. OPH will comply with its obligations under human rights legislation. Employees who advise they are unable to comply with this policy because of a human rights ground will have their situations individually assessed based on all relevant information.

Employees without an approved accommodation plan and not fully vaccinated against the hazard of COVID-19, in accordance with the implementation requirements of this policy, may elect to request vacation leave, time off in lieu of overtime (if available), or a leave of absence without pay.

### b) **Highly recommended vaccine for all employees - influenza**

All employees are highly recommended to receive annual seasonal influenza immunization.

All OPH employees are required to submit the Seasonal Influenza Immunization Decision Form annually.

Additional details on employee influenza immunization are found in the Employee Immunization - Influenza Procedure (#1.42.1) and related forms (Seasonal Influenza Immunization Decision Form, Medical Exemption for Influenza Immunization Form and Confirmation of Taking Antiviral Medication Form).

Vaccination status information will be collected, maintained, and disclosed as outlined in this policy and in accordance with privacy legislation.

**c) Highly recommended vaccines for designated positions**

Maintenance of immunization is an important preventative and infection prevention and control (IPAC) strategy, which safeguards employees and protects clients. All OPH employees will be informed of the benefits of immunization and be encouraged to maintain their immunizations up to date according to [Publicly Funded Immunization Schedules for Ontario](#).

Employees in designated positions, whose work or potential work-related activities put them at occupational risk of infection, and/or those who work with populations at high risk of complications from vaccine-preventable diseases, are **highly recommended** to receive specific vaccines as described in Table 1 – Highly Recommended Vaccines for Designated Positions. New employees who are in designated positions are required to meet the immunization requirements prior to their start date.

New and incumbent employees in designated positions are required to provide documentation of immunization or other evidence of immunity to specific diseases as described in **Table 1 – Highly Recommended Vaccines for Designated Positions** or provide a signed Statement to Decline a Highly Recommended Vaccine (this is not valid for COVID-19 or influenza vaccination).

New hires in designated positions are required to meet the immunization requirements (including COVID-19) prior to their start date.

**Table 1 – Highly Recommended Vaccines for Designated Positions**

Disease	Designated Positions	Acceptable Documentation
Hepatitis B	<ul style="list-style-type: none"> <li>All employees who are at-risk of blood/body fluid exposure (i.e., employees who give injections or immunizations, healthcare providers who provide clinical services in the OPH Sexual Health Centre or dental clinics, any other employees handling sharps or blood-contaminated items)</li> </ul>	Complete series of hepatitis B-containing vaccine <u>and</u> positive post-immunization serology  OR Serologic proof of immunity

Disease	Designated Positions	Acceptable Documentation
Measles	<ul style="list-style-type: none"> <li>All employees with face-to-face client contact</li> </ul>	Two doses of measles-containing vaccine received after 12 months of age OR serologic proof of immunity
Mumps	<ul style="list-style-type: none"> <li>All employees with face-to-face client contact</li> </ul>	Two doses of mumps-containing vaccine received after 12 months of age OR serologic proof of immunity
Pertussis	<ul style="list-style-type: none"> <li>All employees with face-to-face client contact</li> </ul>	One dose of acellular pertussis-containing vaccine as an adult (18 years of age or older)
Rubella	<ul style="list-style-type: none"> <li>All employees with face-to-face client contact</li> </ul>	One dose of rubella-containing vaccine OR serologic proof of immunity
Varicella	<ul style="list-style-type: none"> <li>All employees with face-to-face client contact</li> </ul>	Two doses of varicella-containing vaccine OR serologic proof of immunity OR self-reported history of chickenpox ( <a href="#">if the disease occurred prior to the year that the one-dose varicella vaccine program was implemented</a> ) or herpes zoster (shingles)
COVID-19 Required	<ul style="list-style-type: none"> <li>All OPH employees</li> </ul>	Documented series of accepted vaccine: <ul style="list-style-type: none"> <li>Pfizer-BioNTech</li> <li>Moderna</li> <li>AstraZeneca/COVISHIELD</li> <li>Johnson &amp; Johnson</li> <li>Or other vaccines products in accordance with the latest Provincial guidance.</li> </ul>

Disease	Designated Positions	Acceptable Documentation
Influenza	<ul style="list-style-type: none"> <li>All employees who visit hospitals, long term care facilities, retirement homes or child care centres</li> <li>All employees with face-to-face contact with clients at high risk of complications from influenza, including pregnant women, children aged under 5 years, person aged 65 year or older, and persons of any age with chronic medical conditions <a href="#">as defined by NACI</a></li> </ul>	See Employee Immunization - Influenza Procedure for details

Employees in designated positions with valid medical contraindications to immunization are required to provide healthcare provider documentation of this; this is required only once. Employees in designated positions who have not received the immunizations listed in Table 1 (or who do not have laboratory evidence of immunity) may have their duties reassigned.

Employees whose duties involve activities in a public or private facility (e.g., hospital, long term care facility, retirement home, child care centre, school) are expected to comply with any requirement for immunization and/or chemoprophylaxis that exist at that time at that facility.

OPH Employee Immunization Coordinator will help coordinate serology testing and/or immunization of employees for whom it is indicated.

### Requirements for Learners

All learners are required to meet the immunization requirements specified in this Policy prior to the start of their placements. The OPH Student Placement Coordinator ensures that educational institutions provide written confirmation for each learner indicating they meet OPH immunization requirements.

### Responsibilities

#### Medical Officer of Health/Associate Medical Officer of Health:

- May declare outbreaks or levels of community transmission of vaccine-preventable diseases that require modifications to work of non-immune employees; institutional outbreaks are typically declared by the affected institutions.

**Service Area Directors/Program Managers/Supervisors:**

- Provide employees, volunteers, contractors, and learners with access to information about COVID-19 health and safety protocols and COVID-19 vaccines
- Ensure employees are following health and safety protocols including being vaccinated against COVID-19
- Ensure employees who are not fully vaccinated have provided required medical proof of exemption or have received information regarding the COVID-19 educational course
- Review and manage accommodation requests, in consultation with Human Resources and in accordance with the City's Accommodation Policy
- Identify the positions in their program areas to which the recommendations in Table 1 apply
- Inform candidates, at the time of interview, of the requirements for documentation of immunization status
- For new hires, ensure that the requirements for immunization are received prior to start date
- In outbreak situations, ensure that non-immune employees are not assigned work in situations where transmission is likely

**City of Ottawa Human Resources:**

- Collect, maintain vaccination status information
- Prepare vaccination status reports as required
- Ensure COVID-19 education course is available to employees
- Provide guidance and support to managers and supervisors to assist with developing and managing employee accommodation plans
- Ensure all future hires are aware of and meet the requirements of this policy

**OPH Employee Immunization Coordinator:**

- Confidentially assesses immunization records of OPH employees as required including those in designated positions, requests serology if indicated, and advises employees of immunizations that are not up-to-date
- Ensures documentation of immunization or immunity (or signed Statement to Decline a Highly Recommended Vaccine) has been received for all employees in designated positions
- Ensures proof of medical exemption
- Ensures annual documentation of influenza immunization (or signed Seasonal Influenza Immunization Decision Form) has been received for all employees, and notifies the immediate supervisors of those employees who have not submit the forms after the deadline has passed
- In the case of an outbreak of one of the diseases in Table 1 (except seasonal influenza, see Employee Immunization - Influenza Procedure for detail), notifies the immediate supervisors of those employees who are not immune
- Ensures information is entered into the Employee Immunization database as required

- Ensures consistent implementation of the policy across the department
- Prepares/reviews vaccination reports as required

**Employees in designated positions:**

- Provide documentation of the immunizations in Table 1 – Highly Recommended Vaccines for Designated Positions, a valid medical exemption, or a Statement to Decline a Highly Recommended Vaccine as required in this policy
- In an outbreak and if not immune, accept alternate work arrangements as directed by immediate supervisor and/or program manager

**All employees:**

- Submit the Seasonal Influenza Immunization Decision Form annually
- Provide proof of being fully vaccinated against COVID-19
- Provide proof of medical exemption if they are not fully vaccinated against mandatory COVID-19 vaccine and other recommended vaccines
- Complete COVID-19 educational course if proof of vaccination was not provided
- Educate themselves about COVID-19 and COVID-19 vaccinations
- Continue to follow health and safety protocols to prevent the spread of COVID-19 before and after vaccination
- Advise their manager or supervisor of the need for accommodation in accordance with the City's Accommodation Policy
- Maintain their vaccination status including obtaining boosters as they are required and providing proof of full vaccination in accordance with this Policy

**Information and Reporting**

Vaccination status information collected regarding employees, volunteers, contractors and learners will only be used and disclosed as required for:

- the reasonable purpose of implementing reasonable controls to ensure the health and safety of all individuals in the workplace through appropriate health and safety planning based on vaccination rates and status
- reporting requirements to government, Board of Health and Council, or to respond to public information and media requests for statistical information regarding the City's vaccination rates, using non-identifiable/aggregate data.

Departments with specific ministry or government reporting requirements are responsible to ensure reporting requirements for their operations are met.

Vaccination status information will be collected, maintained, and disclosed as outlined in this policy and in accordance with privacy legislation.

## Monitoring/Contraventions

Managers and supervisors are responsible for monitoring compliance with this policy.

Employees who do not comply with this policy may be subject to discipline, up to and including termination.

Consequences for contravention of this policy by learners will be as outlined in the Student Placement Agreements between the Academic Institutions and the City of Ottawa.

## References

- OPH Employee Immunization - Laboratory Requisitions Policy and Procedure (Reference Numbers 1.57.0 and 1.57.1)
- OPH Employee Immunization - Venipuncture Policy and Procedure (Reference Numbers 1.58.0 and 1.58.1)
- OPH Employee Immunization - Specimen Labeling, Storage and Transportation Policy and Procedure (Reference Numbers 1.59.0 and 1.59.1)
- OPH Employee Immunization - Influenza Procedure (#1.42.1)
- OPH Ethical Decision-Making Worksheet for COVID-19, August 2021 (on file)
- Public Health Agency of Canada. Canadian Immunization Guide, Evergreen Edition - <http://www.phac-aspc.gc.ca/publicat/cig-gci/index-eng.php>
- Publicly Funded Immunization Schedules for Ontario - January 2021 [https://www.health.gov.on.ca/en/pro/programs/immunization/docs/Publicly\\_Funded\\_ImmunizationSchedule.pdf](https://www.health.gov.on.ca/en/pro/programs/immunization/docs/Publicly_Funded_ImmunizationSchedule.pdf)
- City of Ottawa COVID-19 Health and Safety Controls Policy
- City of Ottawa Leave of Absence Policy
- City of Ottawa Workplace Accommodation Policy

## Legislative & Administrative Authorities

- [Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11](#)
- [Canada Labour Code Part II -Occupational Health and Safety, 2021](#)
- [Canadian Human Rights Act \(R.S.C., 1985 C. H-6\)](#)
- [Health Protection and Promotion Act, R.S.O. 1990, c. H.7](#)
- [Occupational Health and Safety Act, R.S.O. 1990, c. O.1](#)
- [Ontario Human Rights Code, R.S.O 1990, C.H.19](#)
- [Personal Health Information Protection Act, 2004, S.O. 2004, c. 3, Sched. A](#)

## Definitions

**Contractor:** Any individual who is hired to perform work on a contract basis.

**Designated positions:** positions and/or programs listed in Table 1, which have been designated to have immunization requirements.

**Outbreak:** Occurrence of a disease in excess of expected, as determined by the institution or the Medical Officer of Health or Associate Medical Officer of Health.

**Immune:** For the purposes of this policy, having received immunization in accordance with the requirements in Table 1 or having immunity demonstrated by a laboratory test.

## Keyword Search

COVID-19, immunization, influenza, transmission, vaccine preventable diseases

## Contact

For more information on this policy, contact the Chair, OPH Infection Prevention and Control Committee or the Manager of the Immunization Unit.