

## **COVID-19 procedure**

### **Parent policy**

COVID-19 Policy

### **Purpose**

Vaccination is a key element in the protection of the College's employees against the hazard of COVID-19. This Policy is designed to maximize COVID-19 vaccination rates among employees as one of the critical control measures for the hazard of COVID-19. Vaccinations are required regardless of the location of work.

### **Scope**

This procedure applies to employees, independent contractors, Board members, volunteers and other individuals associated with Bow Valley College (e.g., vendors, suppliers and campus visitors).

Employees, contractors, volunteers, or any other individuals associated with Bow Valley College, are required to ensure that any visitors, event guests, or members of the public, whether on college campuses, or at college sponsored activities at external locations, are in compliance with this procedure.

### **Compliance**

Employees, contractors, and learners are responsible for knowing, understanding, and complying with Bow Valley College policies, procedures, and any other attached documentation that relate to their position, employment, or enrolment at the College.

Individuals who make false attestations about, or provide false documents related to, being vaccinated will be subject to disciplinary actions, up to and including termination for employees, voiding of contracts for clients and independent contractors and removal/restriction from campus for visitors and/or any other attendees.

### **Procedures**

#### **1. Support for Vaccinations**

11. The College supports employees and independent contractors in obtaining their COVID-19 vaccinations operationally feasible and with the permission of their immediate supervisor, employees can be released on work time to be vaccinated while on work time, without loss of compensation or the requirement to use sick leave, to a maximum of three (3) hours for each dose.
12. Employees are encouraged to speak with a medical professional about COVID-19 vaccinations for additional information on this subject.

#### **2. Continued Compliance with all Health and Safety Precautions**

21. Unless a legislated or regulatory exemption applies, all employees and independent contractors are expected and required to continue to comply with applicable health and safety measures to reduce the hazard of COVID-19, including but not limited to compliance with established workplace access

controls, wearing a mask, using provided personal protective equipment, maintaining appropriate physical distancing where possible and when necessary and self-monitoring of potential COVID-19 symptoms when at work or otherwise engaged in College business.

### **3. Proof of Vaccination**

- 3.1. As of October 22, 2021 the College requires proof of vaccination from all employees, independent contractors, visitors, event guests, or members of the public, whether on college campuses, or at college sponsored activities at external locations. Employees approved for a remote flexible work arrangement will still be required to provide proof of vaccination as of October 22, 2021.
- 3.2. Proof of vaccination means providing documentation verifying receipt of a vaccination series approved by Health Canada or the World Health Organization, and requires a government issued immunization record(s) demonstrating the Employee as being Fully Vaccinated.
- 3.3. Those employees, independent contractors, Board members, volunteers and other individuals associated with Bow Valley College (e.g., vendors, suppliers and campus visitors) who become part of the College community after the date of implementation of this policy will be required to be Fully Vaccinated (and provide proof of same to the College) or have an approved exemption before attending campus.
- 3.4. The College will verify documentation showing receipt of a vaccination series approved by Health Canada or the World Health Organization, as applicable. This information will only be used to the extent necessary for implementation of this policy, for administering health and safety protocols, and infection and prevention control measures in the workplace.
- 3.5. Any information that is necessary to be collected will be pursuant to Section 33(c) of the *Freedom of Information and Protection of Privacy Act* (FOIP) and is managed and protected in accordance with FOIP.
- 3.6. An employee is considered fully vaccinated immediately after receiving one dose of Janssen or both doses of a Health Canada or World Health Organization (WHO) approved vaccine with proof.
- 3.7. Employees do not have to wait for the 14 day immunity period – this requirement has been waived and we recognize employees as fully vaccinated as soon as they have received two doses of a Health Canada or WHO approved vaccine or one dose of Janssen and can provide proof.

### **4. Accommodations in Accordance with the Human Rights Legislation**

- 4.1. Employees who are not able to obtain a COVID-19 vaccine for a reason related to a protected ground set out in the applicable human rights legislation can request accommodation from the College's human resources (HR) department.
- 4.2. Only those employees or independent contractors with a proven basis for exemption will be considered for an accommodation to this Policy.
- 4.3. To continue to protect the health and safety of the campus community, at the sole discretion of the College, the options for accommodating employees with an approved exemption to being vaccinated will be considered on a case by case basis. In some cases, this may be through measures other than being granted access to campus.
- 4.4. Individuals who receive an approved exemption and are legally required to be accommodated will be accommodated to the point of undue hardship.

**5. Ongoing Monitoring and Assessment of COVID-19 Workplace Safety Measures**

- 5.1 The College will continue to closely monitor its COVID-19 risk mitigation strategy and the evolving public health information and context, to ensure that it continues to optimally protect the health and safety of its employees and independent contractors in the workplace. To that end, the College may decide to deploy new measures and may amend this policy accordingly and/or communicate the required precautions to impacted employees and independent contractors.

**6. Violations**

- 6.1 Employees, independent contractors, Board members, volunteers and other individuals associated with Bow Valley College (e.g., vendors, suppliers and campus visitors) who fail to comply with this Policy and do not have an approved exemption/ accommodation, will be considered in violation of this Policy.
- 6.2 Submission of a fraudulent, forged, or materially altered vaccination record or providing false or misleading information is considered a violation of this Policy.
- 6.3 Any individual in violation of this Policy will have their access to campus revoked. Reinstatement of campus access will require, at minimum, compliance with this Policy.
- 6.4 Bow Valley College employees who violate this Policy will be subject to discipline or sanctions, up to and including termination, in accordance with applicable collective agreements and/or other applicable College policies.

**7. Collection of Proof of Vaccine Process:**

- Employees will be asked to email their proof of vaccination to [HRHealth@bowvalleycollege.ca](mailto:HRHealth@bowvalleycollege.ca) only.
- Employees are not to cc: their supervisors or anyone else. This inbox is for confidential information and is aligned with FOIP requirements. No proof of vaccination data will leave this inbox.
- A member of the HR team will review the proof of vaccination against their legal name and date of birth.
- Deans and Directors (Supervisors) will follow-up with each of the employees to let them know that they need to provide their proof of vaccination to [HRHealth@bowvalleycollege.ca](mailto:HRHealth@bowvalleycollege.ca).
- HR will contact Deans and Directors (Supervisors) if an employee has not submitted their records.

## Data sheet

### Responsible officer

Executive responsible for Human Resources

### Relevant dates

Approved	Executive Team: EXT202109-21-05
Effective	September 21, 2021
Next review	September 2024
Modification history	
Verified By	Office of the President, October 2021

### Related policy

COVID-19 Policy 200-2-11

### Associated policy(ies)

Code of Conduct Policy  
Electronic Communications Policy  
Respectful Workplace Policy

### Related legislation

Alberta Occupational Health & Safety Act  
Alberta Human Rights Act