

Formal Recommendation

Original Issued: September 9, 2021

Revised: October 13, 2021

TO: All Employers and Persons Responsible for businesses and organizations located in the City of Peterborough and County of Peterborough

RE: Peterborough Public Health Recommendation for all Workplaces in the City and County of Peterborough to have COVID-19 vaccination policies

On Friday, July 16, 2021 the Province of Ontario entered Step Three of Ontario's Roadmap to Reopen.¹ The expectation was that the province of Ontario would exit the Roadmap and have fewer Public Health restrictions at such a time when:

- 80% of the eligible provincial population (aged 12 and over) received one dose,
- 75% of the eligible provincial population (aged 12 and over) received two doses, and
- No public health unit has less than 70% of their eligible population aged 12 and over fully vaccinated.

The delta variant of coronavirus, however, which is highly transmissible and has had a devastating effect on other jurisdictions, has prompted the government to pause the provincial plan to exit the Roadmap, leaving the province in Step 3 for the foreseeable future.² In addition, new provincial targets of 90% of eligible Ontarians with two doses of vaccine have now been adopted.

Likewise, case counts while currently stable, are always at risk for increases with the right conditions. Further, in a report published by Public Health Ontario, the rate of COVID-19 cases in unvaccinated individuals is consistently higher from December 20, 2020 to August 7, 2021, compared to fully vaccinated individuals.³ Plainly, this pandemic has become a pandemic of the unvaccinated.⁴

The vaccine to protect against COVID-19 is safe and effective⁵, and in combination with other public health measures it remains the best chance to end this pandemic. The COVID-19 vaccines will save lives, reduce illness, and ensure that businesses remain open; we've come too far and sacrificed too much to allow a fourth wave to send us into another lockdown.

In an effort to save lives, to reduce illness, and to keep the economy strong, **I am strongly recommending that all workplaces in the City and County of Peterborough develop or enhance their workplace policies to include a requirement that all employees receive two doses of a COVID-19 vaccine, and boosters as may be recommended in the future, unless otherwise medically exempt.**

I urge employers to establish workplace COVID-19 vaccination policies that require, at a minimum:

- Workers to provide proof of being fully immunized as defined by the [Ontario Ministry of Health](#)
- Unvaccinated employees to provide written proof of a medical exemption from a physician or nurse practitioner that includes information on whether the reason for exemption is permanent or time-limited
- Unvaccinated workers to complete a vaccination education course on the risks of being unvaccinated in the workplace

Employers should also identify how workers' vaccination status information will be collected and protected in accordance with privacy legislation and should explain the level of risk posed by COVID-19 in each unique workplace setting.

Additional workplace precautions recommended to help to reduce viral spread include:

- [COVID-19 testing](#) for the unimmunized
- Strict adherence to physical distancing and other [public health measures](#)
- Wearing [personal protective equipment](#) as needed or required
- Ensuring that appropriate [ventilation](#) (negative pressure and replacement with outside air) is in place

I would like to take this opportunity to thank all businesses and organizations for your efforts to date; your efforts are very much appreciated and they have made a difference in protecting both the lives and livelihoods of those who live, learn, and work in the area served by Peterborough Public Health.

This recommendation is being issued to provide clarity and direction to workplaces looking to implement their own policies, but are unsure about the processes to do so. The key components of a workplace COVID-19 vaccination policy are outlined below. Tools and resources to assist with implementation of this recommendation can be found here: www.peterboroughpublichealth.ca/workplacecovidvaccination.

Thank you in advance for your compliance and cooperation. PPH's staff are available to support your workplace. If you have questions or concerns related to implementation, or would like to book a mobile vaccine clinic to attend your workplace, please contact our office at: (705) 743-1000.

Please note that this Letter of Recommendation will be posted on PPH's website at: www.peterboroughpublichealth.ca/public-health-orders

Sincerely,

Original signed by

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Acting Medical Officer of Health

Appendix: Key Components in a Vaccination Policy

1. Identify the scope and purpose.

- Explain the purpose of the policy including the risks of COVID-19. Vaccination against COVID-19 is one of the best ways to protect workers. The delta variant of the coronavirus is more contagious, with greater risk for severe illness and hospitalization.
- Explain to whom the policy applies. Will the policy apply to all workers, contractors, and agency staff? Is there a separate policy for customers?
- Have a clear communication plan to inform workers about the policy.

2. List action steps workers must take.

When necessary to prevent the spread of COVID-19, workplace policies should require workers to provide proof of vaccination, with vaccines approved by Health Canada or the World Health Organization. Alternatively, workers may need:

- to indicate that they have a medical exemption, including an indication of whether the reasons are temporary or permanent. The medical exemption should be written by a licenced doctor or nurse practitioner and does not need to include the reason for the exemption.
- to complete a vaccination education course, with a signed declaration stating that they understand the risks of COVID-19 and the benefits of vaccination. The vaccination education course should 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; and
 - Possible side effects of COVID-19 vaccination.

3. Set deadlines for when the actions must be taken.

Specify a reasonable date when workers must demonstrate compliance with the workplace policy.

4. List available supports for vaccination.

Demonstrate your commitment to supporting workers to be vaccinated. Ways to support workers to be vaccinated include:

- Providing [vaccine information](#) from [credible sources](#) or translated resources
- Supporting vaccine champions to [initiate conversations](#) with their peers
- Providing paid leave to be vaccinated
- Reminding workers that they are entitled to up to [three paid sick days](#), if they have side effects from the vaccine
- Offering incentives such as gift cards, prizes or company swag
- Hosting an on-site vaccination clinic
 - For more information, please contact PPH at 705-743-1000, ext. 468
- Attending a [Peterborough Public Health Vaccine “Walk in” Clinic](#)

5. Provisions for Unvaccinated Workers

Your policy should list alternative options for workers who decline to be vaccinated for reasons protected by the Human Rights Act, or who are unable to complete their vaccination series for medical reasons. Some options to consider include:

- Use of additional PPE, [frequent COVID-19 \(rapid antigen\) testing](#), worker relocation, and modified work or reassignments.
- [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) are not permitted to work in the outbreak area. Workers without vaccination records should be assumed to be unvaccinated.
- If reassignment is not possible, consider if unvaccinated workers may use vacation or unpaid leave until it is safe for them to return to the workplace.

6. Non-Compliance

- Outline the potential consequences for workers who do not fulfill the requirements of the policy.

7. Privacy considerations

The policy should specify how individual vaccination status of employees will be used by employers to mitigate the health-related risks of COVID-19.

Information about workers' vaccination information must be protected in accordance with applicable privacy legislation. Knowing your workers' vaccination status may be important to help you take appropriate action quickly, in the event of COVID-19 cases in your workplace, to protect employees, their families, and the general public.

When collecting information about a worker's vaccination status:

- Identify ways to safeguard workers' personal health information.
- Limit information collected to the worker's name, gender, date of birth and date of vaccination for each dose.
- Keep worker vaccination information separate from their personnel file.
- Ensure that personal health and vaccination information is kept in a secure manner and used only when required.

8. Staff contact

- Identify who at your organization that staff should contact with questions about the policy, to request accommodation, or for more information how to comply with the policy. The policy should also indicate the person to whom workers should provide proof of vaccination.

History of revisions:

October 6, 2021

- Update to "fully immunized" to align with the Ministry of Health
- Medical Officer of Health details

¹ Province of Ontario. Reopening Ontario. August 17, 2021. Retrieved from: <https://www.ontario.ca/page/reopening-ontario>

² Province of Ontario. Ontario Makes COVID-19 Vaccination Policies Mandatory for High-Risk Settings. August 17, 2021. Retrieved from: <https://news.ontario.ca/en/release/1000750/ontario-makes-covid-19-vaccination-policies-mandatory-for-high-risk-settings>

³ Ontario Agency for Health Protection and Promotion (Public Health Ontario). Confirmed cases of COVID-19 following vaccination in Ontario: December 14, 2020 to August 7, 2021. Toronto, ON: Queen's Printer for Ontario; 2021. Retrieved from: <https://www.publichealthontario.ca/-/media/documents/ncov/epi/covid-19-epi-confirmed-cases-post-vaccination.pdf?la=en>

⁴ The Peterborough Examiner. 'A pandemic of the unvaccinated': Those who caught COVID-19 in July in Peterborough were either unvaccinated or partially vaccinated. August 5, 2021. Retrieved from: <https://www.thepeterboroughexaminer.com/news/peterborough-region/2021/08/05/a-pandemic-of-the-unvaccinated-those-who-caught-covid-19-in-july-in-peterborough-were-either-unvaccinated-or-partially-vaccinated.html>

⁵ Government of Canada. COVID-19: Vaccine safety and side effects. August 13, 2021. Retrieved from: <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19/vaccines/safety-side-effects.html>