

## Formal Recommendation

**Original Issued:** September 9, 2021

**Revised:** March 7, 2022

**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 March 1, 2022, the Province of Ontario entered the [Roadmap Exit Step of Ontario Regulation 364/20](#).<sup>1</sup> Moving to this step allows for the easing of public health restrictions as healthcare system capacity is stabilizing across Ontario despite the surge of Omicron transmission. Wastewater data surveillance suggests,<sup>2</sup> COVID-19 transmission remains relatively high in the Peterborough region, but improved from the highest levels in January. Most evidence indicates that infection with the Omicron variant causes less severe disease compared to Delta; however, Omicron infections can still be severe, in particular in older age groups and especially older people with other health conditions.<sup>3</sup> This is consistent with the high mortality rate the Peterborough Public Health Region has experienced through the Omicron wave. The future trajectory of COVID-19 is uncertain, but there is potential for new variants of concern and increased COVID-19 activity in the fall-winter months.

Given the changes with provincial policy with respect to public health measures, and the continued presence of COVID-19 in our community, vaccination will remain a very important defense against COVID-19 for the foreseeable future. Further to this, employers have an obligation to maintain a safe work environment for their workers and also consider the need to maintain continuity of their operations.

Initially, two doses of a Health Canada approved vaccine were all that was required to reduce transmission of COVID-19. However, the Ontario Science Table notes that “vaccines protect against hospitalization and severe illness, but two doses are not enough against getting infected with Omicron.”<sup>4</sup> With a 3<sup>rd</sup> dose (or booster), the protection increases back to over 60%.<sup>5</sup>

**As such, I am continuing with my recommendation that all workplaces in the City and County of Peterborough develop or enhance their workplace policies to ensure all employees are vaccinated against COVID-19.** As of March 2022, a primary series of COVID-19 vaccination followed by a booster or third dose is recommended for consideration in vaccination policies for optimal protection for individuals who are eligible. Further doses may be recommended in the future based on the emerging scientific evidence, unless otherwise medically exempt.

A workplace policy should consider:

- A 2-dose vaccination policy may not decrease infection risk to individuals and others around them against Omicron. It may, however, it may continue to provide staff protection against severe disease and decrease the operational burden or insurance burden of staff illness;
- A vaccination policy that requires 2-doses, plus a booster or a third dose would provide enhanced protection and protect against workplace transmission in the context of continued Omicron transmission;
- Organizations may also require a variety of vaccinations or health measures to ensure protection against a number of infections (e.g. Influenza, Measles, etc.) and these policies do make for safer workplaces;
- Require 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;

- Require unvaccinated workers to complete a vaccination education course on the risks of being unvaccinated in the workplace;
- 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;
- Adhere to the Occupational Health and Safety Act, the Ontario Human Rights Code and other applicable laws;
- Workplaces are encouraged to seek their own legal advice with respect to their specific workplaces and circumstances as it relates to vaccination policies;

The vaccine to protect against COVID-19 is safe and effective<sup>6</sup>, and in combination with other public health measures, it remains our best chance to end this pandemic. Regardless of vaccination policy, other strategies such as continued mask use, screening, [ventilation improvements](#) and staying home when sick are also important in preventing the spread of COVID-19 in workplaces. The COVID-19 vaccines will save lives, reduce illness, protect our healthcare capacity, and ensure that businesses remain open; we've come too far and sacrificed too much to allow this disease to continue to ravage our community.

The key components of a workplace COVID-19 vaccination policy are outlined in Appendix A to this letter. Tools and resources to assist with implementation of this recommendation can be found here:

[www.peterboroughpublichealth.ca/workplacecovidvaccination](http://www.peterboroughpublichealth.ca/workplacecovidvaccination).

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. Our staff continue to be available to support your workplace. If you have questions or concerns related to the implementation of vaccination policies, 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](http://www.peterboroughpublichealth.ca/public-health-orders)

Sincerely,

***Original signed by***

Dr. Thomas Piggott, MD MSc CCFP FRCPC  
 Medical Officer of Health and CEO  
 Peterborough Public Health

<sup>1</sup> Peterborough Public Health. Ontario Easing Proof of Vaccine Requirements, Indoor Capacity Limits for Public Settings. March 1, 2022. Retrieved from: <https://www.peterboroughpublichealth.ca/ontario-easing-proof-of-vaccine-requirements-indoor-capacity-limits-for-public-settings/>

<sup>2</sup> Jüni P, da Costa BR, Maltsev A, Katz GM, Perkhun A, Yan S, Bodmer NS. Ontario dashboard. *Science Briefs of the Ontario COVID-19 Science Advisory Table*. 2021. <https://doi.org/10.47326/ocsat.dashboard.2021.1.0>

<sup>3</sup> Ibid

<sup>4</sup> Ontario Science Table. Ask Ontario's Science Table: Omicron Edition. December 23, 2021. Retrieved from: [https://covid19-sciencetable.ca/wp-content/uploads/2021/12/Slide-Deck\\_Ask-the-SAT\\_20211223-3.pdf](https://covid19-sciencetable.ca/wp-content/uploads/2021/12/Slide-Deck_Ask-the-SAT_20211223-3.pdf)

<sup>5</sup> Sarah A. Buchan et al. Effectiveness of COVID-19 vaccines against Omicron or Delta symptomatic infection and severe outcomes. January 28, 2022. Retrieved March 3 from, <https://www.medrxiv.org/content/10.1101/2021.12.30.21268565v2>

<sup>6</sup> Government of Canada. COVID-19: Vaccine safety and side effects. November 26, 2021. Retrieved from: <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19/vaccines/safety-side-effects.html>

## Appendix A: Key Components in a Vaccination Policy

The workplace policy should adhere to the Occupational Health and Safety Act, the Ontario Human Rights Code and applicable privacy laws. The information provided in this PPH resource is for general information purposes. It does not contain legal advice and should not be relied on or treated as legal advice. Businesses or organizations are encouraged to seek their own legal advice with respect to their own specific workplaces and circumstances.

### 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 Omicron 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. As of March 2022, a primary series of COVID-19 vaccination followed by a booster or third dose is strongly recommended for optimal protection for most adults. 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. Remember to consider current recommended timelines for vaccination following COVID-19 infection. As for March 2022, this is 8 weeks following infection if prior to dose 2, and three months following infection if prior to booster dose.

### 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
- 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 13, 2021

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

January 11, 2022

- Update to the Recommendation based on current provincial situation in light of Omicron

March 2, 2022

- Update to the Recommendation based on current provincial situation in light of Omicron, updated data around three doses, and provincial vaccine POV systems being repealed