



## COVID-19 VACCINATION DIRECTIVE

### Subject

The Waterloo Regional Police Service (WRPS) is committed to providing a healthy and safe work environment for its members in addition to protecting the health of the community that we serve. This commitment includes taking every precaution reasonable in the circumstances for the protection from COVID-19 including encouraging all members to be fully vaccinated, which is a key component in the protection of members against the hazard of COVID-19. This Directive is designed to maximize COVID-19 vaccination rates among WRPS members as one of the critical control measures for the hazard of COVID-19 while ensuring health and safety precautions for those who are not able, or elect not to be fully vaccinated.

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### References

1. [The Occupational Health and Safety Act](#)
2. [The Ontario Human Rights Code](#)
3. [The Personal Health Information Protection Act](#)

### Definitions

4. For the purpose of this Directive:
  - a. *fully vaccinated* - means a member who has received the full series of a COVID-19 vaccine or a combination of vaccines accepted by the Government of Canada with fourteen (14) days having elapsed since their last dose. A member will be considered to be fully vaccinated only after they have provided proof of their full vaccination status to the WRPS.
  - b. *partially vaccinated* - means a member who has received one (1) dose of a COVID-19 vaccine, or a member who is *fully vaccinated* but less than fourteen (14) days has elapsed since their last dose.

- c. *proof of vaccination status* - means acceptable electronic vaccination receipts include those received at the time of vaccination as well as a PDF receipt copy that can be downloaded at the COVID-19 online vaccination portal issued by the Provincial Government that verifies a member's vaccination status. The provincial vaccine confirmation app will not be acceptable for the purpose of this Directive.
- d. *unvaccinated* - means a member who has not received any doses of a COVID-19 vaccine, or those members who have not provided proof of their vaccination status to the WRPS.
- e. *current member* – means all current employees, students and volunteers of the WRPS, including temporary, contract, part-time staff and auxiliary officers as at the date of this Directive.
- f. *new member* – means any new employee, students or volunteer of the WRPS including temporary, contract, part-time staff and auxiliaries hired following the approval of this Directive.

## Forms

- 5. TBD

# Procedure of the Chief

## General

- 6. All current members are expected to provide proof of full COVID-19 vaccination to Abilities Management at [HRCovid@wrps.on.ca](mailto:HRCovid@wrps.on.ca) as soon as they are vaccinated. Any current member who cannot or elects not to provide proof of full COVID-19 vaccination will be deemed to be unvaccinated for the purpose of this Directive.
- 7. All new members are required to provide proof of full COVID-19 vaccination prior to commencing employment with the WRPS. Proof of full COVID-19 vaccination will be a condition of employment for all new members, except for those new members who request and are approved for an accommodation as per 4 (a)(b).
- 8. All proof of vaccination information for current and new members will be securely stored with other employee health information in the WRPS confidential health records management system, in accordance with the WRPS' obligations under the *Personal Health Information Protection Act*.
- 9. Any member making a request for accommodation pursuant to a specified ground under the *Ontario Human Rights Code* is required to do so in writing.
  - a. A member seeking a medical accommodation will be responsible for providing supporting documentation to Abilities Management, as required, to substantiate their request for accommodation. The Occupational Health Nurse will be responsible for adjudicating and approving any medical accommodation request in accordance with the guidance provided by the Ontario Ministry of Health and/or the College of Physicians.
  - b. A member seeking an accommodation for other grounds (e.g. religious belief) specified in the *Ontario Human Rights Code* will be responsible for providing supporting documentation to the Human Resources Branch substantiating the accommodation need. The Manager, Labour Relations, or designate, of the Human Resources Branch will be responsible for verifying and approving non-medical accommodation requests.

Requests for accommodation will be considered in accordance with the WRPS' obligations under the *Ontario Human Rights Code* and the applicable Collective Agreement, up to the point of undue hardship.

- 10. Any member who is unvaccinated will be subject to additional infection prevention control measures as deemed appropriate by the WRPS. These measures shall include but are not limited to:

- a. providing proof of a negative COVID-19 rapid antigen test, as supplied or approved by the WRPS. Unvaccinated members will be required to submit confirmation of a negative rapid antigen test result on their own time and prior to attending the workplace at regular intervals as prescribed under the WRPS Rapid Antigen Testing Program. All results (positive, negative or invalid) of a rapid antigen test must be submitted to member's immediate supervisor who will forward the information to the Human Resources Branch for tracking, reporting and auditing purposes. Unvaccinated members will be required to provide proof of a negative COVID-19 rapid antigen test, beginning in early November 2021;
  - b. ongoing compliance with current public health guidelines/requirements for the prevention of COVID-19;
  - c. requirements to self-isolate if exposed to COVID-19.
11. In addition to enhanced infection control measures, any member who is unvaccinated may be subject to additional restrictions or limitations to attend certain facilities within the workplace as a result of provincial restrictions (e.g. recreational fitness classes or sports).
  12. Members must be fully vaccinated in order to participate in paid duty assignments.
  13. Current members who are unvaccinated for reasons other than a specified ground under the *Ontario Human Rights Code*, (e.g. personal preference) will be required to participate in one or more sessions of a COVID-19 education program offered by the WRPS or through an approved vendor. This COVID-19 education will contain key learning outcomes, including:
    - a. How COVID-19 vaccines work;
    - b. Vaccine safety related to the development of the COVID-19 vaccines;
    - c. Benefits of vaccination against COVID-19;
    - d. Risks of not being vaccinated against COVID-19;
    - e. Possible side effects of the COVID-19 vaccination.

Enrolment of unvaccinated members in the COVID-19 educational program will occur at a future specified date.

14. Effective as of the date of this Directive current members who are unvaccinated for reasons other than a specified ground under the *Ontario Human Rights Code* and who are required to self-isolate as a result of an exposure to COVID-19 will cease to have access to administrative leave pay from the WRPS. Those unvaccinated members will be required to draw from their personal sick leave bank/family leave bank, as applicable and as entitlements permit, for the approved period of isolation. Consistent with current practice and at the continued discretion of the Service, fully vaccinated members, and those with an approved accommodation under this Directive, who are required to self-isolate as a result of an exposure to COVID-19 will have access to administrative leave with pay for the approved period of isolation and will not be required to draw from their sick leave credits. A confirmed COVID-19 diagnosis stemming from a workplace exposure will continue to be managed through regular WSIB processes.
15. **Consequences of non-compliance:** In accordance with the WRPS procedures, collective agreements, and applicable legislation, directives, and policies any non-compliance with this COVID-19 vaccination Directive will be placed on a leave of absence without pay and will not be permitted to attend the workplace until such time as compliance is achieved. Repeated failure or refusal to comply with this Directive will also result in a member being subject to discipline up to and including the suspension or termination of employment in accordance with the disciplinary provisions of the applicable collective agreement. Examples of non-compliance include, but are not limited to, a failure to participate in an identified education program, not adhering to rapid antigen testing requirements, or a failure to cooperate in the request for accommodation process.

## **Member**

16. A Member shall:
  - a. Follow all existing health and safety procedures and protocols;
  - b. Comply with all elements of this Directive;
  - c. If unvaccinated, ensure that they have sufficient COVID-19 rapid antigen tests to comply with testing requirements, as supplied or approved by the WRPS;
  - d. Fully cooperate in any request for accommodation process arising under this Directive including completing any required document or supplying any information required to support an accommodation request, as specified by the WRPS.

## **Supervisor**

17. A Supervisor shall:
  - a. Ensure all health and safety procedures and protocols are adhered to;
  - b. In consultation with Human Resources ensure members complete any required education or training regarding COVID-19 as outlined in this Directive;
  - c. Ensure that members required by this Directive to have rapid antigen test results do so prior attending the workplace and as required by this Directive;
  - d. Collect rapid antigen test results from members and forward them to Human Resources;
  - e. Consult with the Human Resources Branch regarding non-compliance with this Directive.

## **Abilities Management**

18. Representatives within Abilities Management will:
  - a. Ensure that all proof of vaccination information is received and inputted into the confidential employee health record system;
  - b. Receive and adjudicate medical accommodation requests arising under this Directive for new or current members. Track and notify members of the outcome of their accommodation request;
  - c. Collect and track and store rapid antigen testing confirmation from unvaccinated members;
  - d. Report results of rapid antigen tests to the Ministry of Health on a weekly basis or as required.

## **Health and Safety**

19. Representatives within Health and Safety will:
  - a. Provide guidance and support to WRPS members regarding COVID-19 health and safety precautions;
  - b. Ensure an adequate supply and distribution of rapid antigen testing kits for use by unvaccinated members in accordance with this Directive;
  - c. Provide direction to supervisors and members regarding self isolation requirements for those members who report to have been exposed to COVID-19;
  - d. Ensure that COVID-19 educational programming complies with this Directive.

## **Manager of Labour Relations**

20. The Manager of Labour Relations, or their designate, will:

- a. Receive and verify non-medical accommodation requests arising under this Directive for other reasons specified under the Ontario Human Rights Code (e.g. religious belief). Track and notify members of the outcome of their accommodation request.
- b. Support supervisors in addressing the non-compliance of members with this Directive.

## **Human Resources Director**

21. The Human Resources Director, or their designate will:

- a. Provide regular reports to the Executive Leadership Team regarding vaccination rates and rapid antigen testing program compliance in the WRPS.