

Park Lawn Preschool Inc.	<b>COVID-19 Immunization Disclosure Policy</b>	Approved: September 15, 2021  B. Leung
Policy Number(s):	PLP HS 219 J	

### **Policy**

Park Lawn Preschool Inc. (PLP Inc.) is committed to providing a safe and healthy environment for children, families and employees. PLP Inc. will take every reasonable precaution to prevent the risk of communicable diseases within all our centres.

The Policy is subject to change, including based on official public health and government requirements, and TDSB and TCDSB policies. It will be discontinued when advised by the appropriate authorities that COVID-19 is no longer a risk to public health and operations can resume as normal.

### **Purpose**

To provide guidelines pertaining to the expectations and requirements of staff with respect to COVID-19 immunization disclosure, and comply with the guidance and requirements set out by Toronto Public Health and the TDSB and TCDSB.

Contingent upon vaccine availability, and in order to ensure health and safety and align with applicable requirements (e.g., the TDSB’s vaccination policy), all eligible individuals are required to receive a COVID-19 vaccine by the applicable date below, unless exempted under the *Human Rights Code*.

PLP Inc.’s expectations and current policies/guidelines related to COVID-19 are still in force (masking, completion of daily screening form, physical distancing, etc).

### **Background**

Park Lawn Preschool Inc. recognizes the importance of immunization of individuals interacting and providing services to children due to the nature of their work and potential for exposure in the community. This COVID-19 immunization policy aims to protect the child care program’s population including children, staff, volunteers, students on educational placements and any person providing child care or other services to a child in care.

COVID-19 is an acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). It may be characterized by fever, cough, shortness of breath, and several other symptoms. Asymptomatic infection is also possible. The risk of severe disease increases with age but is not limited to the elderly and is elevated in those with underlying medical conditions.

### **Application**

The Immunization Disclosure Policy will apply to the following groups of individuals:

- Employees;
- Contractors (including people on contract, and people employed by an employment agency or other third party);
- Students on an educational placement;
- Volunteers;
- Any licensee who regularly interacts with children, staff or providers; and
- Any person who provides child care or other services to a child who receives child care (e.g. special needs resourcing consultant)

## Policy

### A. Mandatory Vaccination

Having reviewed the applicable Ministry of Health, Ministry of Education and School Board (TDSB & TCDSB) policies, Park Lawn’s policy is that all individuals covered by this policy must provide one of the following:

1. Proof of all required doses of a COVID-19 vaccine approved by the World Health Organization as soon as possible and by no later than October 31, 2021.
2. Written proof of a medical reason, provided by either a physician or nurse practitioner, as soon as possible any by no later than October 31, 2021, that sets out:
  - a. that the person cannot be vaccinated against COVID-19; and
  - b. the effective time period for the medical reason (i.e., permanent or time-limited).
3. A statement that the individual is exempt from vaccination under any other human-rights protected ground (e.g., religion/creed) with appropriate proof/documentation, which will be reviewed by PLP Inc.

All individuals must submit a formal attestation of vaccination disclosure (vaccinated, partially vaccinated, or unvaccinated) by September 7, 2021. Those who have not yet submitted a formal attestation should proactively take steps to do so immediately.

In accordance with public health and school board guidance, all Park Lawn Preschool Inc. employees are required to be fully vaccinated with a COVID-19 vaccine series by October 31, 2021, and must provide proof of same in the form of the Ministry of Health’s official vaccination receipt/record(s) by this date. Proof of vaccination must be submitted to the Centre Supervisor or Assistant Supervisor.

After October 31, 2021, only those who are fully vaccinated will be permitted to attend at the physical workplace (with an exception for those who are validly exempted in accordance with the *Human Rights Code*, in which case testing procedures will apply).

Up to and including October 31, 2021, employees who fail to provide proof of vaccination, and those who are not fully vaccinated for any reason, will be required to submit to the testing procedures outlined below.

### **Educational Session**

Employees who are declining vaccination for any reason other than a medical reason, must complete the [Toronto Public Health COVID-19 Vaccination Understanding the Benefits and Risks Educational Module](#) . A Completion Certificate must be submitted prior to attesting to not receiving a COVID-19 vaccination.

The educational session has been approved by Toronto Public Health and addresses all of the following learning components:

- How COVID-19 vaccines work;
- Vaccine safety related to the development of the COVID-19 vaccine;
- Benefits of vaccination against COVID-19;
- Risks of not being vaccinated against COVID-19; and
- Possible side effects of COVID-19 vaccination.

***Individuals undergoing the education program are still required to meet the full vaccination requirement by October 31, 2021, subject to any applicable exemptions.***

### **Support for Vaccination**

Park Lawn Preschool Inc. will provide the following supports for people subject to this policy to receive a vaccine:

- paid up to 3 hours for their vaccine appointment, and
- Assistance with booking vaccine appointment.

### **Testing Requirements**

Up until October 31, 2021, individuals subject to the policy who fail to provide proof of vaccination, or who are not fully vaccinated, must regularly complete antigen point of care testing for COVID-19. Individuals are expected to report their test results on the Thrive App or other reporting tool as directed.

**To be clear, after October 31, 2021, in order to protect public health and align with applicable requirements (e.g., the TDSB vaccination policy), employees who are unvaccinated and not exempted under the Human Rights Code will not be able to undergo the testing procedures as an alternative to vaccination in order to attend at the physical workplace** (i.e., testing procedures will only be available as an alternative to those with substantiated *Human Rights Code* exemptions after this date).

Rapid Antigen testing must be completed prior to the start of working on Monday and Thursday. Entry into Park Lawn Preschool Inc. child care centres or participation in work events or activities will only be permitted for those who test negative.

The Ministry of Education has provided the following instructions for testing:

- Testing is to take place at an individual's residence prior to attending work.
- Testing should not take place more than 48 hours before attending work.

This handout explains how an individual can self-administer a COVID-19 rapid test kit:

### [COVID-19 Self-Testing Instructions](#)

A positive result on a rapid antigen test is considered a preliminary positive and requires confirmation with a PCR test.

Any individual that receives a preliminary positive result on a COVID-19 rapid antigen test, is required to:

1. Seek a confirmatory PCR test immediately (within 48 hours) at a testing centre.
2. Isolate Immediately until the result of their confirmatory test is known.
3. Safely return to work only after they receive a negative result on a confirmatory test at a designated testing centre.

Park Lawn Preschool Inc. must verify and submit screening tests weekly to the Ministry of Health (MOH). The Thrive app allows Park Lawn Preschool Inc. to fully meet this requirement and will provide MOH the following information:

1. the type of rapid test used
2. number of rapid antigen tests used
3. number of invalid rapid antigen tests results
4. number of individuals who tested positive with a rapid antigen test
5. number of individuals who tested negative with a rapid antigen test. '

Identifiable data is not collected.

## **B. Accommodations**

PLP Inc. will comply with its legal obligations under applicable legislation at all times, including but not limited to the duty to accommodate under the Ontario *Human Rights Code*.

## **C. Confidentiality**

Information relating to an individual's proof of vaccination and/or the reason(s) for not receiving a COVID-19 vaccination will remain in a confidential Human Resources file in a locked

cabinet for the purposes of ensuring the safety of the PLP’s employees, contractors, and local communities, in the event of a COVID-19 outbreak.

As per s. 77 of O. Reg 137/15 made under the Child Care and Early Years Act, 2014, Park Lawn Preschool Inc. is required to report such statistical information to the Ministry of Education as may be required. No identifying information will be provided to the ministry in relation to this policy; all statistical information will be provided in aggregate form.

The Operations Manager or Designate will be responsible for submitting statistical to the Ministry of Health, Ministry of Education and the Chamber of Commerce.

**Violation of Policy**

In general (and absent exceptional circumstances), where an employee is not fully vaccinated by the applicable date or declines to undergo COVID-19 tests (where applicable), the employee will be placed on unpaid leave/Infectious Disease Emergency Leave (“IDEL”) pursuant to the provisions of the *Employment Standards Act, 2000*. Such leave will continue until the employee is in compliance with this policy, or a safe return to work is otherwise assured by reference to the best publicly available health advice.

Notwithstanding the above, PLP Inc. reserves the right to discipline employees up to and including termination of employment for violation of this Policy, depending on the specific circumstances and subject to application legislation.

**Policy and Procedure Review**

This procedure will be reviewed and signed off by all employees before commencing employment/unpaid placement in a PLP Inc. centre, and at any time where a change is made.

**Link(s) to Resources:**

**Videos**

- 

**CHANGE LOG**

POL #	REV #	Date	Summary of Changes	Revised By	Approved By
PLP HS219 J	1	Sept 23, 2021	Changes to reflect TDSB COVID-19 Vaccination Procedures for Employees, Trustees and other Individuals	B. Leung & B. Hassibi	