

Policy Name:	COVID-19 Mandatory Vaccination Policy
Originating/Responsible Department:	Office of the General Counsel
Approval Authority:	COVID-19 Steering Committee
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Mandatory Revision Date:	August 2022
Contact:	Office of the General Counsel

PURPOSE

The COVID-19 pandemic has greatly impacted post-secondary institutions and their surrounding communities. The risk of COVID-19 has been highlighted by outbreaks, both on and off campus. As a result, the post-secondary sector has received a [strong recommendation](#) from the Council of Ontario Medical Officers of Health (COMOH) to require mandatory vaccination for all individuals (including but not limited to students, staff, faculty, contractors, and visitors) involved in any in-person University activities.

COMOH strongly recommends that:

- a. Full vaccination against COVID-19 be required for all individuals involved in any in-person activities on campus (students, staff, faculty, contractors, and visitors), with the rare exception of those individuals who cannot be vaccinated due to permitted exemptions (medical and other protected grounds under the *Ontario Human Rights Code*). Individuals are required to submit proof of vaccination.
- b. All individuals who are unvaccinated due to permitted exemptions or who are awaiting their second dose be required to adhere to additional health and safety measures, up to and including serial and frequent rapid testing.
- c. Individuals involved in any in-person activities on campus (students, staff, faculty, contractors, and visitors) should be fully vaccinated as soon as operationally feasible.

In addition, the University has received instructions from the Office of the Chief Medical Officer of Ontario requiring the University to implement a mandatory COVID-19 vaccination policy with proof of full vaccination to attend campus.

This Policy fulfills several legal obligations of the University to keep the campus and the Carleton community safe and healthy. While not an exhaustive list of legal obligations, Universities are required under the *Reopening Ontario Act* to implement the recommendations of public health authorities, and under the *Occupational Health and Safety Act* to maintain a safe work environment.

This Policy outlines the mandatory vaccination requirements that will be required of those attending University property or in-person activities on- or off-campus, and are in addition to existing and future control measures such as mandatory masking, physical distancing, personal hygiene practices, and ongoing cleaning and sanitization protocols and any other requirements necessary to comply with public health requirements.

POLICY STATEMENT

Full vaccination against COVID-19 is required for all individuals (including, but not limited to, students, staff, faculty, contractors, and visitors) prior to participating in any in-person activities on- or off-campus, with the rare exception of those individuals who cannot be vaccinated due to permitted exemptions (medical and other protected grounds under the *Ontario Human Rights Code*). Individuals are required to submit Proof of Vaccination in a form acceptable to the University. Individuals who request an exemption

must complete the [applicable form\(s\)](#) specified by the University and submit them to the University as indicated on those forms.

Effective October 15, 2021, all individuals who wish to access University activities must be Fully Vaccinated and provide Proof of Vaccination to the University. Individuals who cannot be vaccinated due to an approved permitted exemption will be subject to additional public health measures, including mandatory rapid testing and disclosure of test results pursuant to the University's testing procedures and policies.

No later than October 29, 2021, all University employees, including, but not limited to, faculty, contract instructors, staff, teaching/research assistants, postdoctoral researchers, and casual staff are required to submit their attestation of vaccination status (and, if vaccinated, their proof of vaccination) in cuScreen. This requirement applies to all employees, whether or not their employment duties currently require them to be on campus and whether or not they intend to attend University property or in-person University activities now or in the future. This information is required to allow the University to plan appropriately for its operational requirements.

From time to time, this Policy may be updated, as warranted by new public health guidance or other changing circumstances. At all times, the University will be guided by public health information, legislative requirements, and its existing obligations under, among others, the *Occupational Health and Safety Act* and the *Human Rights Code*.

The University reserves the right to implement further health and safety measures, including, but not limited to, measures in respect of mandatory masking and physical distancing.

It is a violation of this Policy:

- a. to attend University campus or activities without fully complying with this Policy;
- b. to fail to report to any required COVID-19 testing;
- c. to provide any false, misleading, or otherwise dishonest information or documents to the University in relation to this Policy; or
- d. To otherwise fail to comply with any COVID-19 health or safety precaution requirement put in place by the University, whether or not such requirement is expressly set out in this Policy.

Residence

Students living in residence are also required to comply with any additional health requirements and vaccination timelines set out by Housing and Residence Life Services, or be approved for an exemption. Students living in residence who are exempted, who are awaiting a decision from the University with respect to an exemption request, or who have not submitted Proof of Vaccination that they are Fully Vaccinated must comply with the testing requirements of this Policy. Failure to comply with these requirements may result in a termination of the residence contract and/or not being permitted to attend University campus or activities.

SCOPE

The Policy applies to:

All individuals (including, but not limited to, staff, students, faculty, contractors, and visitors) who intend to access any University property, indoors and outdoors, or in-person activities organized by, or otherwise affiliated with, the University, whether or not on University property.

DEFINITIONS

Fully Vaccinated: An individual is Fully Vaccinated if they have received the full series of a vaccine or a combination of vaccines approved by Health Canada and they received their last dose at least 14 days before the date of their attestation. For Individuals who have received a complete one or two-dose series of a COVID-19 vaccine that is not authorized for use by Health Canada, the individual will be fully vaccinated if

- a) they receive one additional dose of an mRNA vaccine; or
 - b) three doses of non-Health Canada vaccine; and
- they received their last dose at least 14 days before the date of their attestation.

Given the changing nature of the pandemic, if the applicable public health authorities announce a different meaning of “Fully Vaccinated”, that definition will take precedence.

Proof of Vaccination: A written vaccination record of an Individual’s COVID 19 immunization date(s) issued by the government of the province, territory or country in which they were immunized. Vaccination documents in languages other than in English or French must receive a certified translation into English.

ROLES AND RESPONSIBILITIES

Reasonable care and diligence shall be exercised to prevent contravention of the laws of Ontario and this Policy. The University has identified roles and responsibilities as follows:

- a) The Office of Risk Management is responsible for:
 - i. ensuring that the parties or party responsible for the day-to-day implementation and enforcement of this Policy fulfill those responsibilities accordingly; and
 - ii. monitoring this Policy and for ensuring compliance.
 - iii. ensuring education efforts are undertaken with respect to supports for employees and students;
 - iv. providing direction to support services when requested by employees and students; and
 - v. addressing issues of a Policy violation in accordance with established policies and procedures and/or by the terms of existing contracts or collective agreements, where applicable
- b) Supervisors will:
 - i. ensure their employees are notified of the Policy;
 - ii. provide the resources and support necessary to ensure compliance with this Policy; and;
 - iii. take appropriate administrative action for non-compliance with the Policy.

CONSEQUENCES

Employees

Any employee found to be in violation of this Policy will be prohibited from accessing University property and in-person activities and will be subject to remedial and disciplinary action, in accordance with any applicable collective agreement.

Students

Any Student found to be in violation of this Policy will be prohibited from accessing University property and in-person activities and will be subject to outcomes and/or sanctions under the *Student Rights and Responsibilities Policy*.

Others

Any contractor, visitor, or other person found to be in violation of this Policy will be prohibited from accessing University property and in-person activities, and may not be permitted to return.

PRIVACY

Personal information under this Policy is collected under the authority of the *Carleton University Act, 1952*. All Proof of Vaccination, requests for accommodation, supporting documents, and proof of negative COVID-19 test results will be collected, used, and stored in accordance with the University's obligations pursuant to the Freedom of Information and *Protection of Privacy Act*, R.S.O. 1990, c. F.31 and the *Personal Health Information and Protection Act*, 2004, S.O. 2004, c. 3, Sch. A, as applicable.

This information will be used to determine and address whether there has been a breach of this Policy, whether an Individual is permitted to attend on Campus or in person activity as set out above and to address health and safety concerns, including whether additional or enhanced safety protocols are necessary in the event of an outbreak or otherwise, and for related administrative and statistical purposes.

RELATED POLICIES AND PROCEDURES

This Policy is to be read in conjunction with the following statutes, University policies and practices or collective agreement provisions. Any question of the application of this Policy or related policies shall be determined by the General Counsel, in conjunction with the administrator of the other policy or policies. The University reserves the right to amend or add to the University's policies and statements from time to time. The below is not a comprehensive list.

- Students Rights and Responsibilities Policy
- COVID-19 Mask Policy
- Environmental Health and Safety Policy
- Access to Information and Privacy Policy