

## COVID-19 IMMUNIZATION DIRECTIVE – INDIVIDUALS SERVED

### **Purpose**

The purpose of this Directive is to reduce the risk of exposure to and transmission of COVID-19 to individuals served and those who support them. This Directive is based on the significant risk factors for COVID-19 infection that are present in CLTO's congregate living environments given the nature of support and as described in Ontario's Response Framework, including closed spaces, crowded places, forceful exhalation, and prolonged exposure, with the most serious risk factor being close contact.

Community Living Toronto (CLTO) is applying reasonable and necessary measures to prevent, respond to, and alleviate the outbreak of COVID-19 and the associated risk to the people we support.

CLTO strongly encourages all individuals served and their families and/or regular visitors to receive the COVID-19 vaccination. Vaccination for COVID-19 is both safe and effective in preventing COVID-19.

Vaccination is a choice, however, the choice not to be vaccinated could put individuals' lives at risk. Not being vaccinated means the person could catch COVID-19 or could give COVID-19 to other people. Families and/or an individual's substitute decision maker are encouraged to review this Directive with their loved one.

Individuals in service who are not fully-vaccinated may be expected to participate extra enhanced screening measures and additional precautions to keep that person and other people safe. This may include Rapid Antigen Screening including. **Scope**

This Directive applies to all individuals served by CLTO who:

- Intend to be or have been fully vaccinated
- Cannot be vaccinated due to substantiated medical or religious grounds
- Choose not to be vaccinated for other reasons

This Directive outlines considerations for:

- Individuals entering into a new service relationship with CLTO,
- Individuals already receiving service in a congregate living setting with CLTO, and
- Individuals participating in day programs, community services and other programs.

This Directive is in addition to all other policies and procedures that are in place for infection prevention and pandemic response for individuals served and their families, and CLTO Staff and Essential Visitors. It will be updated regularly to reflect any changes in the degree of risk and any advice or recommendations from public health authorities.

### **General Principles**

1. Individuals in service have the right to make informed and voluntary choices about vaccination. They can choose to consent to be vaccinated or they can refuse.

2. Should an individual not be fully-vaccinated CLTO may have to implement enhanced screening measures and additional precautions to keep that person and other people safe. That could mean that:
  - 2.1. the individual won't be admitted into a CLTO program and/or allowed to start a new type of service or support;
  - 2.2. the individual may have their supports changed to keep them and others safe;
  - 2.3. the individual may be required to participate in Rapid Antigen Testing; and
  - 2.4. a visitor might be subject to enhanced precautions to keep them and others safe.
3. If a person cannot be vaccinated for health reasons or because of their religious beliefs, CLTO will try to accommodate them and their needs.
4. CLTO will require proof of vaccination as a condition for individuals entering into a new service relationship with CLTO that includes direct in-person supports. This requirement will be subject to accommodations to the point of undue hardship for people unable to vaccinate for human rights-related reasons.
5. What CLTO can do to keep people safe depends on the risk of COVID-19 to the person, to others and in the community. When the general public health risk and/or risk to the vulnerability of people we support is determined to be high based on a risk assessment, CLTO may implement additional measures to better support the health and safety of individuals in care.

## **Collection and Disclosure of Information**

### **A. Consent to Immunization**

CLTO will act in accordance with existing consent forms signed by individuals served or their substitute decision maker (SDM) and will seek consent for any matter not covered by these forms. For the current Pandemic Period, CLTO has asked people supported to sign a consent form relating to COVID-19 testing and test outcomes.

If a person supported or their SDM withholds consent to be tested or to disclose test outcomes, CLTO will address these circumstances on a case-by-case basis. As a result, and depending on the circumstances, CLTO may consider temporarily withdrawing the provision of services and supports.

For people supported who are under the age of 16, CLTO will act in accordance with existing consent forms and will continue to seek consent from parents (or other authorized persons) and liaise with them when necessary.

Consistent with its legal obligations, CLTO will only collect, use and disclose personal information that is reasonably necessary in the circumstances. Information may be collected directly from the person supported or disclosed without their consent for the purpose of reducing or eliminating a risk of serious harm to people supported and staff.

## B. Access and Collection of Personal Information

To ensure the health and safety of individuals supported and our staff, the COVID-19 vaccination status of individuals served is collected for the following purposes:

- To guide the implementation of isolation and outbreak prevention and response measures as necessary (including screening, contact tracing, and testing).
- To meet reporting obligations to Toronto Public Health and the Province of Ontario.
- To monitor and track cases and hospitalizations.
- To track impact on services.

Information accessed and collected may include details about:

- Symptoms of a person supported (including the person's temperature).
- Location where individual supported lives.
- Any underlying medical or health conditions, medications being taken.
- Any treatment and/or hospitalizations relating to COVID-19.
- Test dates and results disclosed to CLTO by Toronto Public Health.

In accordance with the CLTO's Privacy Principles and confidentiality policy, access to this information will be restricted to CLTO staff, individuals supported and/or their designate (a SDM and/or a person identified by the individual in service to receive their personal information), and as required, to individuals who maintain the computerized information systems and public health officials.

## C. Disclosure of Information

During the Pandemic Period and any subsequent infectious disease outbreak, there is a greater risk of disease outbreak and a greater health risk to people supported and staff. CLTO has a legal obligation to report suspected and positive cases of COVID-19 to public health officials.

Where possible, CLTO will limit disclosure of personal information and disclosure of sensitive information will be communicated through a secure medium. Where it is reasonably necessary for health and safety reasons, personal information about a person supported may be disclosed to their SDM and/or an individual authorized by the person supported to receive their personal information, health professionals, and other people supported who live in the same residence and staff that work in the same residence.

To align with the Reopening Ontario (A Flexible Response to COVID-19) Act and relevant regulation/orders, public health directives and common practice in the developmental services sector, information about immunization status, suspected and/or positive COVID-19 cases may be shared with CLTO staff, people supported and their families and other agencies/businesses.

### **Related Documentation**

06-25-02 Rights and Responsibilities

06-27-01 Privacy of Information

COVID-19 Immunization Directive for Staff and Essential Visitors

Reopening Ontario (A Flexible Response to COVID-19) Act