

COMMUNITY LIVING TORONTO
COVID-19 IMMUNIZATION DIRECTIVE – STAFF AND ESSENTIAL VISITORS
Effective March 1, 2023¹

PURPOSE:

The purpose of this Directive is to take every precaution reasonable to protect our staff from the risk of COVID-19 in the workplace and to ensure operational stability and continuity and the health, safety and wellbeing of the people we support.

Based on the recommendations from the Ministry of Health (MOH), **CLTO requires that all prospective staff show proof of a primary series of COVID-19 vaccination (typically 2-doses) plus a booster, or at least one dose of COVID-19 vaccine in the last six (6) months. CLTO strongly encourages but does not require all existing staff to be Up-to-Date with vaccination against COVID-19** and will provide information and support to employees to be Up-to-Date. CLTO will consider additional precautionary measures that are reasonable in the circumstances for staff who are not **Up-to-Date**.

CLTO reserves the right to update this Directive in the future, including to require all staff to be Up-to-Date with COVID-19 vaccination based on changes in our operational circumstances, community risk, scientific data, legal developments and health and safety considerations. This Directive will be reviewed and updated regularly.

SCOPE:

The responsibilities set out in this Directive apply to all Staff, Students, Volunteers, Third Party Contractors and Essential Visitors (excluding families). Responsibilities for Individuals Supported are included in a separate Directive.

EFFECTIVE DATE:

This Updated Directive will take effect March 1, 2023.

DEFINITIONS:

Staff means all CLTO staff (full-time, part-time, relief and/or on contract), Volunteers, Students, and any person who performs work for CLTO are all collectively referred to herein as **Staff**. This includes a Staff who is currently employed by CLTO or has, at the time this Directive comes into effect, already accepted a position with CLTO (**Existing Staff**); and any person applying to be a Staff (i.e., a **Prospective Staff**).

Essential Visitors includes third-party contractors, healthcare providers, and other visitors with a specific purpose for individuals served or their environment (e.g., cleaning, maintenance). This does not include family for purposes of this Directive.

¹ **UPDATE NOTICE: This Directive has been updated effective March 1, 2023 based on changes to circumstances in the community and within CLTO. CLTO maintains that all previous versions of this Directive have been reasonable and justified in the circumstances and that all measures implemented for non-compliance with this Directive to date have also been reasonable and appropriate.**

Third-party Contractors means people or businesses who have been hired as part of a service agreement with CLTO to provide a specific service (e.g., cleaning, maintenance, agency staff).

Up-to-Date means having provided proof to CLTO of having received either (a) or (b) below:

(a) A **Primary Series** consisting of either:

- (i) the full primary series of a COVID-19 vaccine authorized by Health Canada, or any combination of such vaccines (two doses of Moderna, Pfizer-BioNTech, Novavax, Medicago, AstraZeneca, including COVISHIELD) in any combination or one dose of Janssen (Johnson & Johnson); or,
- (ii) a full or partial primary series of a non-Health Canada authorized vaccine plus any additional recommended doses of a Health Canada authorized COVID-19 vaccine to complete the primary series;

AND at least one (1) booster.

OR

(b) One (1) dose of COVID-19 vaccine in the past six (6) months.

GENERAL PRINCIPLES:

1. **Mandatory Vaccination for Prospective Staff:** All Prospective Staff will be mandated to demonstrate that they are Up-to-Date with COVID-19 vaccination as a pre-condition for becoming an employee, subject to legally required accommodation as described below.
2. **Vaccination for Existing Staff:** All Existing Staff are strongly encouraged to be Up-to-Date with COVID-19 vaccination and to provide proof of any vaccination doses they have received to CLTO as soon as possible after receiving such doses.
3. **Third Party Contractors and Essential Visitors:** CLTO will determine based on the nature of contracted services being purchased and the circumstances what types of vaccination requirements will apply, if any, to third party contractors and essential visitors.
4. **Respect for Human Rights:** CLTO will provide accommodation up to the point of undue hardship where required by the Ontario *Human Rights Code (OHRC)*.

PROCEDURE:

A. PROSPECTIVE STAFF – Proof of Immunization and/or Consideration for Accommodation

1. During the recruitment process, Prospective Staff will be informed that anyone applying to be a CLTO Staff member will be asked to show proof of Up-to-Date vaccination against COVID-19 as a condition of hire/placement. Prospective Staff will not be permitted to begin work until a copy of their vaccination record has been submitted to Occupational Health and Safety.
2. Prior to their employment start date a Prospective Staff will be expected to produce satisfactory proof of being Up-to-Date, and proof uploaded to the CLTO Vaccination tracker upon hire and prior

to starting work, subject to accommodation for a *bona fide* human rights need where possible without undue hardship.

3. Where accommodation is requested, an assessment will be conducted in consultation with Occupational Health and Safety using the **Risk Assessment Framework**, which will take into consideration the reason the Prospective Staff is unable to show proof of Up-to-Date vaccination, the nature of work to be performed, and the risk to the work environment. Based on this, CLTO will consider whether an accommodation is legally required and/or possible without undue hardship.
4. Where accommodation is not legally required or is not possible without undue hardship to CLTO, the offer of employment/placement will be rescinded.

B. EXISTING STAFF – Proof of Immunization and/or Consideration for Accommodation

1. Vaccination for Existing Staff

All Existing Staff are strongly encouraged to be Up-to-Date with COVID-19 vaccination and to upload proof of any vaccination doses to the CLTO Vaccination tracker as soon as possible after receiving any doses.

CLTO will provide information and instructions to all Existing Staff on how to provide proof of being Up-to-Date with COVID-19 vaccination.

CLTO reserves the right to revise this Directive and to require Existing Staff to show proof of being Up-to-Date with COVID-19 vaccination in the future based on changes in our operational circumstances, community risk, scientific data, legal developments and health and safety considerations.

2. Additional Precautionary Measures

All Existing Staff will be required to follow precautionary measures established by CLTO for the protection of themselves, their co-workers, and the people we support as prescribed in IPAC modules as updated from time to time. CLTO will consider additional precautionary measures for staff who have not submitted proof of being Up-to-Date for COVID-19 vaccination, where reasonable in the circumstances. For staff supporting people who may be infected with COVID-19 or whose workplaces are in outbreak, these additional measures may include reassignment or unpaid leave.

3. Accommodation

In the event that an Existing Staff requires accommodation in relation to this Directive, CLTO will provide accommodation to the point of undue hardship. Existing Staff seeking an accommodation are required to contact Occupational Health and Safety or designate and, where requested to E-mail completed accommodation forms to occhealthnurse@cltoronto.ca .

C. THIRD PARTY CONTRACTORS AND ESSENTIAL VISITORS

CLTO will determine based on the nature of contracted services being purchased and the circumstances what types of vaccination requirements will apply, if any, to third party contractors and essential visitors. Any such requirements will be outlined in the service contract or memorandum of understanding with the third party or essential visitors in question.

D. REPORTING AND RECORD KEEPING

Information about vaccination status will be collected by CLTO as such information is reasonably necessary to assess risk to people supported, employees, and other stakeholders as well as to ensure compliance with relevant government mandated vaccination policy requirements. Any records of vaccination status will be maintained in a secure manner and will only be collected, used, or disclosed as may be necessary for legitimate operational purposes or as directed or requested by governmental authorities.

CLTO will collect, maintain, and disclose to the Ministry of Children, Community and Social Services, the Ministry of Health and Public Health Officials as required, in aggregate form and in a manner set out by government requirements, statistical information related to this Directive.

Related Documentation

Toronto Public Health – Eligibility for Third Dose

[COVID-19: Vaccine Eligibility & Doses – City of Toronto](#)

Privacy of Information

06-27-01 Privacy of Staff Information 09-01-01 Code of Conduct

Infectious Disease Risk Assessment Framework Staff COVID-19 Vaccination Declaration Form

Guidelines for Visitors and Pre-Screening Questions

Ontario makes COVID-19 vaccination policy mandatory for high-risk settings – news release

<https://news.ontario.ca/en/release/1000750/ontario-makes-covid-19-vaccination-policies-mandatory-for-high-risk-settingsmandatory- for-high-risk-settings>

[Risk Assessment Related to Routine Practices and Additional Precautions](#)