

ADMINISTRATIVE PROCEDURE 491

COVID-19 RISK REDUCTION

PREAMBLE

- COVID19 is a dangerous respiratory disease caused by the SARS-CoV-2 virus (Severe Acute Respiratory Syndrome Coronavirus 2). It represents an identifiable workplace hazard.
- The Conseil scolaire du Nord-Ouest (CSNO) is committed to taking reasonable measures to ensure the health and safety of students, employees, volunteers, service providers and visitors in order to limit the spread of COVID-19.
- Despite the numerous past, present and ongoing COVID-19 risk mitigation and health and safety measures in place, both in our Division and within our communities, the COVID-19 pandemic continues to put strain on our education and health care system as the entire community. COVID-19 presents a health risk for staff and students, and it is the responsibility of all school divisions to provide a safe working and learning environment for both staff and students.
- Provincial Government and Health Officials have consistently advised that immunization against COVID-19 is the most effective means to prevent the spread of COVID-19, prevent outbreaks and preserve in person learning.
- The Conseil scolaire du Nord-Ouest recently received a joint letter from the Ministers of Health and Education encouraging a mandatory proof of vaccination or negative test policy be implemented by all School Divisions.
- The CSNO recognizes and will act at all times in accordance with its obligations under the *Education Act*, the *Alberta Human Rights Act*, the *Occupational Health and Safety Act*, the *Regulations and Code*, and the advice of the Office of the Chief Medical Officer of Health.

1. SCOPE OF APPLICATION

1.1 Due to our responsibilities to the people we serve and employ, including our students under the age of 5 who cannot be immunized at this point, this administrative procedure applies to the following people:

- Employees: All employees, regardless of their status (full-time, part-time, occasional, continuous contract, probationary contract, temporary contract, letter of employment);
- Substitute teachers;
- Professional service providers;
- Visitors over 15 minutes;
- Practicum Students and;
- Volunteers.

1.2 This administrative procedure **does not apply** to CSNO bus drivers, or to CSNO students or their parents / guardians unless they act as volunteers.

2. DEFINITIONS

For the purposes of this administrative procedure, the following terms mean:

2.1 **COVID19** is a dangerous respiratory disease caused by the SARS-CoV-2 virus (Severe Acute Respiratory Syndrome Coronavirus 2). The term COVID-19 in this guideline refers to both the COVID-19 virus and its mutations / variants.

2.2 **Fully vaccinated:** means

- a. having received two doses of a vaccine considered valid by Health Canada in a two-dose COVID-19 vaccine series, or one dose of a vaccine considered valid by Health Canada in a one dose COVID-19 vaccine series; and,
AND
- b. having fourteen days elapsed since the date upon which the person received the second dose of the COVID-19 vaccine considered valid by Health Canada of a two-dose series, or one dose of the COVID-19 vaccine considered valid by Health Canada in a one-dose vaccine series.

2.3 **Partially vaccinated** means:

- a. having received one dose of a vaccine considered valid by Health Canada in a two-dose COVID-19 vaccine series; or,
OR
- b. having received the dosage series (typically two doses) but fourteen days have not elapsed since the date upon which the person received the second dose of the COVID-19 vaccine considered valid by Health Canada of a two-

dose series, or one dose of the COVID-19 vaccine considered valid by Health Canada in a one-dose vaccine series.

- 2.4 Unvaccinated:** refers to not being in compliance with either Definition 2.2 or 2.3 as noted above (an individual who has not received a dose of COVID-19 vaccine).
- 2.5 Employee:** refers to any individual employed by the Conseil scolaire du Nord-Ouest (the CSNO).
- 2.6 Practicum Students :** refers to any person who participates in activities related to the CSNO and who has direct contact with CSNO employees and / or CSNO students within the role of:
- a. Any kind of educational placement or practicum provided through an agreement between the CSNO and a post-secondary educational institution (i.e., student teachers, educational assistants, nurses, psychologists, behavioural therapists, speech-language pathologists, etc.);
- OR,
- b. Any internship, co-op or apprenticeship program.
- 2.7 Volunteer:** refers to any person who, without being employed or remunerated by the CSNO, participates in activities related to the CSNO and who has direct contact with employees and / or students of the CSNO. Please refer to administrative procedure 481.
- 2.8 Service providers and partners:** designate any third party whose employees participate, in premises shared with CSNO employees and / or students, and who have direct contact with employees and » or CSNO students.
- 2.9 Rapid Test:** Refers to any testing devices authorized by Health Canada and approved by the CSNO, the result is usually available within 15-20 minutes.
- 2.10 Visitor over 15 minutes:** refers to any person who enters in a CSNO site and stays more than 15 minutes. The term visitor in this administrative procedure **does not refer to parents.**
- 2.11 Medical exemption:** Medically supported reasons for exemption from COVID-19 vaccination based on health status and risk of serious complications or disability.

3. PROCEDURES

3.1 PROOF OF VACCINATION FOR CSNO EMPLOYEES

All employees who work in CSNO buildings **must declare** their vaccination status to the Human Resources Manager before December 17, 2021, as Fully vaccinated, Partially vaccinated or Unvaccinated.

- a. Employees who are fully vaccinated or partially vaccinated must concurrently provide proof of their vaccination status by providing the Human Resources Manager with a copy of the QR code that verifies their Alberta Health COVID-19 Immunization Record. Certification that an employee is fully vaccinated must be provided via [the COVID-19 Vaccine Declaration Form](#). A QR code can be obtained at <https://covidrecords.alberta.ca/home>.
 - i. For substitutes, proof of vaccination against COVID-19 must be provided via this [COVID-19 vaccine declaration form](#).
- b. Employees must update their vaccination status with the CSNO if any changes occur.
- c. Where applicable, equivalent proof of vaccination documents from another Canadian Province or Territory or the Canadian Armed Forces will be accepted.

3.2 REQUIREMENTS FOR EMPLOYEES FROM January 1, 2022

3.2.1 Acceptable proof of complete immunization: no later than January 1, 2022, and before entering CSNO workplaces as of that date, all employees must submit to the Human Resources Department **evidence confirming that the individual is fully vaccinated against COVID-19.**

3.2.2 NEW HIRE

Unless otherwise stated, compliance with this administrative procedure is a condition of hiring for all **new employees.**

3.3 REQUIREMENTS FOR EMPLOYEES WHO ARE NOT FULLY VACCINATED

As of January 1, 2022, any employee who is not fully immunized within the meaning of this administrative procedure must provide:

3.3.1 Acceptable proof of COVID-19 test completed within 72 hours of the commencement of a “workday” or “shift” of the employee. The proof of the COVID-19 rapid test result must be provided via [this COVID-19 rapid test declaration form](#).

For substitutes, the proof of the COVID-19 rapid test result must be provided via this [rapid screening test declaration form](#).

- i. Proof of a negative COVID-19 test consists of a report demonstrating a negative result of a Health Canada approved rapid antigen test, rapid PCR test, or lab-based PCR test. The report must clearly state the employee's first and last name, type of test, time of sample collection, a clear indication of a negative result and the laboratory or pharmacy that completed the test, if applicable.
- ii. The cost of the test will be the responsibility of the CSNO for the months of January and February. As of March 1st, the Superintendent will evaluate the costs and will decide who will be responsible for the cost of the tests for the following months. The time required to complete a test will be the sole responsibility of the employee.
- iii. The tests should normally take place on Saturday and Tuesday to give the employee the option to work Monday through Tuesday, if the Saturday test is negative, and to work Wednesday, Thursday and Friday if the Tuesday test is negative. Tuesday's test must be submitted no later than 7:00 p.m. on Tuesday. Saturday's test must be submitted no later than 5:00 pm on Sunday.
- iv. If an employee's test result is positive, they are required to submit a sick leave request in Bellamy and follow-up for a substitute.
- v. In the event an employee tests positive in response to a mandatory COVID-19 rapid test, the employee must:
 - Isolate immediately, take a second rapid test in 24 hours. If negative, isolation can end unless you develop symptoms. If positive, continue isolating as outlined above and [following public health guidelines](#).
 - Inform the CSNO through the Human Resources Manager and inform their school Principal;
 - Return to work only after the self-isolation if they have not developed symptoms.

vi. An individual who has been a confirmed COVID-19 case could test positive on the rapid test for an indeterminate period. In this case, the individual should provide a doctor's note confirming that there is no need for a rapid screening test and the duration of the exemption.

3.3.2 The Human Resources Manager will review proof of vaccination and proof of COVID-19 rapid test but will not keep any documents (electronic or physical) submitted by the employee unless the Human Resources Department is unable to determine the authenticity or veracity of proof of rapid test or vaccination. In this case, the human resources department will retain the proof of rapid test or vaccination until the file is verified. Once verified, the HR department will immediately destroy all copies of this information.

4. EMPLOYEE NON-COMPLIANCE ACTION

4.1 Any employee who fails to provide proof of full vaccination or acceptable proof of a negative COVID-19 test is considered non-compliant. The CSNO will review each non-compliant circumstance in its own context and circumstances, and at its discretion, will determine the available options, including, but not limited to:

- a. Leave of absence without pay or benefits;
- b. Reassignment or modification of duties that would involve no or minimal in-person contact with students and colleagues, with the understanding that the CSNO's ability to consider such alternative arrangements is likely to be very limited in most cases; and
- c. Termination of employment.

4.2 Any breach of this administrative procedure by any employee, including refusal to disclose vaccination status and / or provide proof of vaccination status or refusal to comply with applicable COVID testing requirements or providing false or misleading information in any respect whatsoever, may result in administrative or disciplinary measures up to and including termination of employment.

5. EXEMPTIONS

The CSNO recognizes its responsibilities and duties under the *Alberta Human Rights Act*.

Any employee requesting a human rights exemption (i.e. medical or religious) from compliance with this administrative procedure must notify the Human Resources Manager as soon as possible. The Human Resources Manager will provide any employee who requests an exemption with the information required to do so. All employees who are considering requesting an exemption should understand that this administrative procedure is designed to provide an alternative for employees not able or wishing to be fully vaccinated, to remain compliant with this administrative procedure, by providing the required regular COVID-19 negative test result.

6. DISCLOSURE AND TESTING REQUIREMENTS - NON-EMPLOYEES (SERVICE PROVIDERS, VOLUNTEERS, PRACTICUM STUDENTS AND VISITORS OVER 15 MINUTES)

6.1 CSNO Students and their parents or guardians are not subject to this administrative procedure except if they act as volunteers.

6.2 As of January 1, 2022, any individual, other than an employee of CSNO (volunteer or service provider, practicum students, visitors over 15 minutes) which will have direct contact with CSNO employees and / or students must provide the school principal with proof of vaccination status by providing a copy of the QR code that verifies their COVID-19 vaccination record. A QR code can be obtained at <https://covidrecords.alberta.ca/home>. **Please submit proof in this [submission form](#).**

6.3 If the individual is not fully vaccinated, they must provide the school principal with proof of a negative rapid COVID-19 test or PCR test performed no later than 72 hours before the time at which the individual will have contact with CSNO employees and / or students. **Please submit proof in the [submission form](#).**

6.4 If the individual receives a positive COVID-19 result, they will not be allowed to enter the CSNO premises. The individual will have to pass a screening test administered by the health authorities to confirm their status and must obtain a negative result and have provided the required proof to the school principal.

6.5 Practicum students must provide proof of vaccination to their educational institution, which in turn must provide a declaration of compliance to the CSNO indicating that the practicum student:

- a. is fully vaccinated; or
- b. as of January 1, 2022, provide proof of a negative Covid-19 rapid screening test or PCR test performed at least 72 hours before the time at which the student is entering CSNO property and / or has direct contact with CSNO employees and / or students.

6.6 The COVID-19 rapid test is carried out at the individual's expense and the individual will not be paid to perform the screening test. For clarity, the CSNO is in no way responsible for the costs of the tests.

7. NON-COMPLIANCE MEASURES FOR NON-EMPLOYEES (SERVICE PROVIDERS, VOLUNTEERS, AND PRACTICUM STUDENTS)

7.1 All volunteers, service providers, visitors of more than 15 minutes or practicum students to which this administrative procedure is applicable, who fail to comply with any part of this administrative procedure, including being found to have falsified vaccination or test results, will be considered to be in non-compliance with this administrative procedure and must immediately leave CSNO property and cease performance of all duties as a practicum student or as a volunteer interacting with the CSNO's staff or students.

7.2 With respect to practicum students, any event of non-compliance may result in the reporting of the non-compliance event to the appropriate post-secondary institution.

8. IMMUNIZATION SUPPORT

If operationally possible and with the permission of their immediate supervisor, employees may be released on work time to be vaccination without any loss of pay or the requirement to use sick leave banks, to a maximum of three (3) hours for each dose.

9. CONTINUED COMPLIANCE WITH ALL HEALTH AND SAFETY MEASURES

All employees are expected to continue to comply with all applicable health and safety measures to reduce the risk of COVID-19, including, but not limited to, compliance to screening protocols, wearing a mask or face covering, using provided PPE, maintaining appropriate physical distancing, and daily self-monitoring for potential COVID -19 symptoms prior to attending the workplace.

10. PROTECTION OF PRIVACY

- i. The Division will only collect, use and disclose any personal information regarding any individual subject to this Administrative Procedure in accordance with the Freedom of Information and Protection of Privacy Act (“FOIP”).
- ii. Information regarding any individual’s vaccination status, including but not limited to any individual’s Alberta Health COVID-19 Immunization Record has been collected pursuant to Section 33(c) of FOIP, will be kept confidential, stored in a secure location, and access and disclosure limited to that permissible by FOIP.
- iii. Information disclosed by a volunteer or practicum student pursuant to this Administrative Procedure will be held by the Division for the minimum amount of time necessary to confirm their compliance with this Administrative Procedure.

11. PREVENTION OF HARASSMENT, BULLYING OR DISCRIMINATION

Harassment, bullying or discrimination of any kind against individuals based on their vaccination status, compliance with this administrative procedure or any other reason will not be tolerated. Employees who are experiencing harassment, bullying or discrimination are encouraged to consult administrative procedure 190.

12. REVISION OF THE ADMINISTRATIVE PROCEDURE

Pursuant to the current background and context set out at the beginning of this Administrative Procedure, this Administrative Procedure is considered temporary due to the evolving and dynamic nature of this public health matter, and ongoing direction, recommendations and advice from public health officials and the Alberta Education. Therefore, this administrative procedure will be reviewed periodically (at least every 2 months) and updated / amended as deemed necessary.