

Policy Title	Contractor Vaccination for COVID-19 Policy
Date Created	December 15, 2021
Date of next Review	December 15, 2022 (may be reviewed before the scheduled review date depending on public health circumstances)
Cross references/sources	Occupational Health & Safety Act Personal Information Protection Act Schedule A Contractor Vaccination Attestation Form

1.0 Policy Statement

The Contractor Vaccination for COVID-19 Policy (The “Policy”) sets the controls to reduce the risk of COVID-19 in the CPSA workplace to support the health and safety of our workplace.

The wellness of all College of Physicians and Surgeons of Alberta (CPSA) employees is a priority and CPSA, as an employer, has an obligation under the [Alberta Occupational Health and Safety Act](#) to take every reasonable precaution within the circumstances to create a safe workplace. To support the health and safety of our workplace and our community, as well as the wellness of our employees, CPSA has determined it necessary to implement a mandatory COVID-19 vaccination policy to act as another layer in addition to the current workplace controls to mitigate against COVID-19 and its transmission.

CPSA recognizes formal public health research which shows vaccination is effective in protecting against severe outcomes and the transmission of COVID-19.

To support the health and safety of our workplace and our community, this policy on Contractor Vaccination for COVID-19 outlines CPSA’s expectation that all contractors will be fully vaccinated against COVID-19.

This policy is in alignment with the *Vaccination for COVID-19 Policy* in effect for CPSA employee and CPSA Council vaccination policies and is in addition to, and not a substitute for CPSA’s other COVID-19 health and safety controls.

2.0 Definitions

- a) “Contractors” include partners, collaborators, assessors, and vendors, both paid and unpaid for the purpose of this policy.
- b) “Fully vaccinated” means the individual is considered fully vaccinated by the public health authority in Alberta, which currently requires that the individual has received all required doses of an accepted COVID-19 vaccine, in all cases with a 14-day period having passed since the individual received their final dose of the applicable COVID-19 vaccine.

- c) "Workplace" includes all facilities and/or worksites used for the purpose of performing CPSA business, including third-party premises on which business is carried out on behalf of CPSA.

3.0 Background

Considering the data around the COVID-19 situation in Alberta, CPSA has determined it necessary to implement a mandatory COVID-19 vaccination policy to act as another layer, in addition to the current workplace controls including CPSA's vaccination policy, to mitigate against COVID-19 and its transmission. Formal public health research shows vaccination is effective in protecting against severe outcomes and the transmission of COVID-19.

CPSA is continually monitoring COVID-19 in the community and continues to implement controls in response to science, data and public health directives.

4.0 Purpose

The purpose of this policy is to mandate all contractors entering the CPSA workplace or a third-party workplace on behalf of CPSA, be fully vaccinated against COVID-19, to ensure the health and safety of the workplace.

5.0 Scope

This policy applies to all existing and future contracts and contractors, including subcontractors, where the contractor is:

- providing services or attending work at CPSA offices, or
- providing services or attending work at third party locations where there is work or service provided on behalf of CPSA.

CPSA reserves the right to revise, amend, supplement, or rescind all or a portion of this policy or the related procedures at any time and without prior notice. This Policy will be updated with any such changes as they become effective and posted on the CPSA website.

For greater certainty, CPSA reserves the right to require that contractors receive vaccine boosters and provide proof of same, if such boosters are authorized and recommended by the Public Health Agency of Canada and/or the provincial health authority.

6.0 Application

- 6.1** By January 4, 2022, where this policy applies, all CPSA contractors are required to assign only individuals who are fully vaccinated with a COVID-19 vaccine series to perform contract requirements. CPSA requires contractors to [complete and sign a written attestation \(schedule A\)](#) that the individuals assigned to any CPSA related service or work have been fully vaccinated.

- 6.2** Non compliance with this policy or providing false or misleading information on the attestation form may be considered a fundamental breach of contract and may be subject to CPSA exercising its available contract remedies, up to and including termination of the contract.
- 6.3** Confirmation a contractor is fully vaccinated is to be provided to CPSA Main Reception upon each entry when working at CPSA offices. Acceptable proof of vaccination includes an Alberta provincial vaccination record with QR code or other provincial vaccination records and photo ID, First Nation vaccine records, Canadian Armed Forces vaccine records, or other vaccine records accepted in Alberta plus government issued identification with name and birthdate matching that of vaccination record.
- 6.4** Contractors are responsible for managing their employees in accordance with their operational procedure, and if necessary, consult with their own legal counsel or advisors for issues related to non-compliance by contracted employees/subcontractors, human rights concerns, employment law, or related matters.

7.0 Guiding Principles

- 7.1** As a leader in Alberta’s health care system, CPSA has the obligation to support public health recommendations and encourage their business partners (contractors) to do the same.
- 7.2** Under the [Alberta Occupational Health & Safety Act](#), CPSA has legislated obligations to provide a safe and healthy workplace. CPSA considers the wellness of all employees a priority and is committed to protecting the health and safety of employees and others.
- 7.3** Formal public health research indicates high vaccination rates against COVID-19 are an effective measure in reducing the spread and severity of the virus. CPSA will continue to monitor COVID-19 in the community and will continue to implement controls in response to science, data and public health directives.
- 7.4** Given the current situation of COVID-19, the data demonstrating a higher incidence of COVID-19 among the unvaccinated population and the increasing levels of contact between individuals as businesses and services resume activities, it is important for the safety of CPSA employees and partners to work alongside fully vaccinated individuals performing work on behalf of CPSA, in order to protect CPSA employees and partners in their respective work places.

8.0 Privacy

CPSA will keep confidential any medical and personal information obtained in connection with this policy. Subject to the [Personal Information Protection Act](#) ("PIPA") and CPSA's [Privacy and Confidential Information Policy](#), contractors' personal information shall be collected, used, disclosed and stored only in accordance with CPSA's [Privacy Policy](#), and only to the extent necessary to meet the objectives of and administer this policy, except where the contractor has otherwise consented or as required or permitted by law.

9.0 Responsibilities

CPSA Leadership Team Responsibilities:

- Communicate this policy to any contractor they are currently under contract with and any future contractor they will be entering into a contract with, whether that be incidental or repeating and ongoing.
- Ensure that contractors have provided the completed attestation form confirming of full vaccination of the individuals sent to perform the work.
- Ensure the contract is managed in accordance with the contract terms and conditions.
- Communicate to contractor that under this policy, proof of vaccination and identification from the individual(s) who will be entering the CPSA workplace will need to be presented to CPSA main reception upon each entry.
- Ensure proper application of this policy and monitor contractor compliance in accordance with this policy.
- Ensure COVID-19 safety processes comply with corporate standards and current government regulations, orders and directives.

Contractor Responsibilities:

- Review and abide by this policy.
- Follow health and safety protocols to prevent the spread of COVID-19 as designed by CPSA, including (but not limited to) physical distancing and wearing approved Personal Protective Equipment (PPE), including an approved face mask.
- Complete and sign [Schedule A Contractor Vaccination Attestation Form](#) and forward to their CPSA designate in advance of performing services.