

## Council Policy

Policy Title	Council Vaccination for COVID-19 Policy
Date Created	March 2022
Date of next Review	March 2024 (may be reviewed before the scheduled review date depending on public health circumstances)

### 1.0 POLICY STATEMENT

As an organization, the College of Physicians and Surgeons of Alberta (CPSA) has an obligation under the *Occupational Health and Safety Act* to take every reasonable precaution within the circumstances to create a safe workplace.

CPSA recognizes formal public health research which shows vaccination is effective in protecting against severe outcomes and the transmission of COVID-19 and has determined it necessary to implement a mandatory COVID-19 vaccination policy for Council members to act as another layer in addition to the current workplace controls to mitigate against COVID-19 and its transmission.

This policy and the procedure contained outlines CPSA’s expectation that Council members will be *fully vaccinated* against COVID-19 unless they have obtained an approved exemption from this policy as an accommodation or otherwise.

This policy is in alignment with the *Vaccination for COVID-19 Policy* in effect for CPSA employees, as well as the [Contractor Vaccination Policy](#) in effect for CPSA contractors. This policy is in addition to, and not a substitute for CPSA’s other COVID-19 health and safety controls.

### 2.0 DEFINITIONS

- a) “Fully vaccinated” means the individual is considered fully vaccinated by the public health authority in Alberta.
- b) “Workplace” includes all facilities and worksites used for the purpose of performing CPSA business, including third-party premises on which CPSA business is carried out or at which CPSA social activities are conducted, but excludes a council member’s home.

### **3.0 BACKGROUND**

- 3.1** CPSA is continually monitoring COVID-19 in the community and continues to implement controls in response to science, data and public health directives.
- 3.2** Considering the data, the COVID-19 situation in Alberta, and CPSA's future plans to have a hybrid working model (which would require all employees to spend some percentage of their time in the office), CPSA has determined it necessary to implement a mandatory COVID-19 vaccination policy for Council members, to act as another layer, in addition to the current workplace controls, to mitigate against COVID-19 and its transmission and ensure the health and safety of the workplace.

### **4.0 PURPOSE**

The purpose of this policy is to mandate that effective February 28, 2022 all CPSA Council members must be fully vaccinated against COVID-19, to ensure the health and safety of CPSA's workplace.

### **5.0 SCOPE**

This policy applies to all existing and future Council members, including those appointed, elected or sitting as recognized non-voting members.

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. Council members will be notified of any such changes as they become effective, and a revised policy will be posted on the CPSA website under [Policies and Policy Statements](#).

For greater certainty CPSA reserves the right to require that vaccine boosters be received 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** As part of CPSA's commitment to the continued development and implementation of workplace controls to reduce and mitigate the risk of COVID-19, CPSA requires all Council members be fully vaccinated against COVID-19 and provide proof of vaccination in accordance with this policy.

- 6.2** Confirmation a Council member is fully vaccinated (including the type of COVID-19 vaccine(s) received and the date of such dose(s)) is to be provided to the Program Manager, Governance by March 31, 2022. **Acceptable proof of vaccination** includes an Alberta vaccine record plus photo identification, other official provincial vaccination records, First Nation vaccine records, Canadian Armed Forces vaccine records, or other vaccine records accepted in Alberta.
- 6.3** Council members who cannot be vaccinated for medical reasons or on the basis of any other reason protected by the *Alberta Human Rights Act* may request a reasonable accommodation in accordance with this policy.
- 6.4** A newly appointed Council member must be fully vaccinated or have an approved accommodation upon appointment.

## **7.0 ACCOMMODATIONS**

- 7.1** Council members who cannot be fully vaccination for medical reasons or on the basis of any other reason protected by the *Alberta Human Rights Act* may request a reasonable accommodation through CPSA's People & Culture. Accommodation requests will be considered on a case-by-case basis and CPSA will engage in an interactive process with the Council member to determine whether a reasonable accommodation can be provided that does not pose a direct threat to the health or safety of others in the workplace, and/or to the Council member, and/or otherwise create an undue hardship for CPSA.
- 7.2** Council members who wish to request a **medical exemption** must have their physician or a nurse practitioner complete the Alberta Health Medical Exemption form (available to physicians on the physician portal), which should indicate whether the medical reason for the inability to become fully vaccinated is temporary or permanent and if temporary, specify the end date. CPSA retains the right to follow up with the physician or nurse practitioner for additional information if necessary. All forms will be reviewed by CPSA People & Culture.
- 7.3** Council members who wish to request a **religious exemption** must complete the [Request for Religious Accommodation form](#), attesting in detail the reasons for which they believe they are exempt from

vaccination based on religious grounds. CPSA retains the right to follow up for additional information if necessary. All forms will be reviewed by the CPSA People & Culture.

**7.4** CPSA People & Culture will work with Council members to develop and implement an appropriate accommodation up to the point of undue hardship. CPSA encourages Council members to suggest specific reasonable accommodations. However, CPSA is not required to make a specific accommodation requested by a Council member and may provide an alternative effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on CPSA (including threatening the health and safety of employees or the public in the workplace).

**7.5** Council members who choose not to become fully vaccinated for reasons that are not protected by the *Alberta Human Rights Act* must notify CPSA's Program Manager, Governance or designate in writing by March 31, 2022. In such cases, CPSA will review the information provided by the Council member and reserves the right to decide on possible corrective or accommodation measures.

## **8.0 NON COMPLIANCE**

**8.1** CPSA reserves the right, in its sole discretion, to take corrective measures, including in respect to any non-compliance of this policy.

**8.2** False attestations or false documents provided as proof of full vaccination or as support for a request for accommodation will be subject to corrective measures.

**8.3** CPSA prohibits any form of discipline, retaliation, reprisal or intimidation for reporting a violation of this policy, in accordance with our [Council Safe Disclosure Policy](#), or any other good faith health and safety concern, or requesting an accommodation under this policy. Council members have a responsibility to disclose/report all serious, suspected or actual improper behavior in order to create a safe environment without retaliation

**8.4** All parties will act in accordance with CPSA's [Council Code of Conduct](#).

## 9.0 PRIVACY

- 9.1** CPSA will keep confidential any medical and personal information obtained in connection with this policy, including vaccination status and information provided in respect of any request for a reasonable accommodation. Subject to the *Personal Information Protection Act* (“PIPA”), Council members’ 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 Council member has otherwise consented or as required or permitted by law.
- 9.2** Only a Council member’s status, as fully vaccinated will be recorded by CPSA to determine continued eligibility for in-person attendance at CPSA workplaces, to ensure the health and safety of all individuals through appropriate health and safety planning.
- 9.3** Access to all medical and personal information obtained in connection with this policy, including in respect of any request for a reasonable accommodation will be limited to CPSA designates who require such information to fulfill their responsibilities in relation to the policy. All medical and personal information collected in accordance with this policy will be destroyed when no longer required for the purposes of this policy or for legal or business reasons.

## 10.0 PROCEDURE

### 10.1 COVID-19 Vaccination Requirements

- Effective March 31, 2022, all Council members must be *fully vaccinated* against COVID-19 and provide CPSA proof of vaccination, as per the policy.
- Newly appointed Council members must be fully vaccinated or have an approved exemption by their first Council meeting.

### 10.2 Proof of Vaccination for COVID-19

- By no later than **March 31, 2022**, all Council members must present proof of their COVID-19 vaccination to the Program Manager, Governance or designate.
- Any new Council members must present their proof of vaccination upon appointment.
- Acceptable proof of vaccination includes Alberta vaccine record plus photo identification, other provincial vaccination records, First Nation vaccine records, Canadian Armed Forces vaccine records, or other vaccine records accepted in Alberta.

## **11.0 RESPONSIBILITIES**

### **CPSA Governance representative responsibilities:**

- Review this policy and procedure with all Council members

### **Council member responsibilities:**

- Review and abide by this policy
- Submit proof of COVID-19 vaccination or requests for accommodation to the Program Manager, Governance in accordance with this policy
- Continue to follow health and safety protocols to prevent the spread of COVID-19 as designated by CPSA's Health & Safety team and the C-Team, including (but not limited to) physical distancing and wearing approved Personal Protective Equipment (PPE), including an approved face mask

### **Program Manager, Governance or designate responsibilities:**

- Collect, maintain and store vaccination status information and forms in accordance with PIPA and CPSA's [Privacy & Confidential Information policy](#)
- Forward any requests for medical or religious accommodation to CPSA People & Culture for review.
- Ensure future Council members are aware of and meet the requirements of this policy

### **CPSA People & Culture**

- Ensure Council members who wish to request an accommodation have submitted the required accommodation request forms
- Review requests for medical or religious accommodation
- Address noncompliance of this policy through use of Council bylaws

## **12.0 APPROVAL**

This policy requires approval by CPSA Council.

## **13.0 AUTHORITY DOCUMENTS**

Initial approval of this policy was through Council Motion on March 18, 2022.

See also [Health Professions Act](#)

## 14.0 SUPPORTING DOCUMENTS

[Alberta Human Rights Act](#)

[Council Bylaws](#)

[Council Code of Conduct](#)

[Council Safe Disclosure Policy](#)

## 15.0 DOCUMENT HISTORY

VERSION NO.	Version Date	DESCRIPTION OF CHANGE
1	March 2022	Initial Policy
APPROVAL	DATE	Signature
Council Motion #C19-22	March 18, 2022	