

COVID-19 VACCINATION REQUIREMENT POLICY

1. PURPOSE OF THE POLICY

LutherCare Communities (“LCC”) is committed to providing a safe and healthy environment for the protection of residents and employees, and is fully committed to the safety, health, and well-being of all those entering our communities.

This commitment includes the responsibility to implement the necessary measures to protect residents, directors, employees, consultants, contractors, volunteers, learners, and visitors of LCC from known dangers. *The Saskatchewan Employment Act* and *The Occupational Health and Safety Regulations, 2020* also requires LCC to take reasonable precautions to maintain a safe working environment. This duty includes taking reasonable and justifiable measures to protect employees from the spread of COVID-19 in the workplace, as well as protection of members of the public who attend upon LCC premises.

Given the recent surge of COVID-19 infection rates driven by the Delta variant, particularly among individuals who are not fully vaccinated, it is critical that we use all available tools at our disposal to ensure that our premises are as safe as possible. In that regard, federal and provincial health authorities have indicated that the COVID-19 vaccines approved for use in Canada are a safe and effective way to reduce the chances of acquiring and spreading COVID-19 in the workplace and the community.

LCC strongly encourages all residents, directors, employees, consultants, contractors, volunteers, learners, and visitors to obtain a COVID-19 vaccination at their first opportunity.

As a result of the COVID-19 pandemic, individuals who are not vaccinated pose a greater risk to their personal health and safety, as well as the safety of those around them at LCC. Accordingly, this COVID-19 Vaccination Requirement Policy (the “**Policy**”) implements certain requirements regarding the COVID-19 vaccination, such that the risk of transmission on our premises is reduced.

As a result, LCC is implementing this Policy to encourage all residents, directors, employees, consultants, contractors, volunteers, learners, and visitors to be vaccinated. With respect to employees, this Policy is being implemented in accordance with LCC’s COVID-19 Regulations.

This Policy will be reviewed and updated in the event that provincial legislation and public health orders regarding vaccination are amended.

2. SCOPE AND APPLICATION

This Policy applies to all of LCC's residents, directors, employees, consultants, contractors, volunteers, learners, and visitors that are required to attend LCC's premises (collectively, the "Designated Personnel"). Employees of consultants and contractors (along with any sub-contractors) who are required to attend LCC's sites are also considered Designated Personnel.

LCC has determined that the nature of the work at LCC's sites necessitates the implementation of COVID-19 control measures, including vaccination.

For the purposes of this policy, "vaccination" or "vaccinated" means:

- 2 weeks after either:
 - the receipt of a single dose of an approved single dose COVID-19 vaccination; or
 - where multiple doses of the particular COVID-19 vaccination are required, the receipt of the most advanced vaccination dose that the Designated Personnel is eligible for; and
- where a future COVID-19 booster vaccination is required, the receipt of any future COVID-19 booster vaccination that the Designated Personnel is eligible to receive.

Where a Designated Personnel becomes eligible for a further dose of a particular COVID-19 vaccination or any future COVID-19 booster, the Designated Personnel has a 10-day grace period (or such longer period as may be determined reasonable by the Senior Leadership Team at LCC) to make arrangements to obtain the dose/booster.

LCC is distributing the COVID-19 VACCINATION STATUS FORM as found in Appendix B of this policy to residents and employees, and requires the form to be completed and returned to LCC by **October 26, 2021**.

Designated Personnel that are required to attend LCC's premises other than residents and employees, are required to disclose their COVID-19 vaccination status and, where applicable, to present proof of their fully vaccinated status.

As of, **November 2, 2021**, Designated Personnel who are not vaccinated or choose not to disclose their vaccination status to LCC will be required to present LCC with a negative COVID-19 test result that was taken within an approved time frame and from an approved testing source, wear additional personal protective equipment, and submit a daily health screening questionnaire.

Designated Personnel are required to be vaccinated by **November 2, 2021**.

3. COVID-19 VACCINATION

As outlined above, vaccination/vaccinated within the meaning of this policy includes the receipt of the most advanced vaccination dose/booster that the Designated Personnel is eligible for.

LCC will continue to support Designated Personnel throughout Canada's COVID-19 Immunization Plan including attending vaccination appointments, respecting individual privacy, and exercising proper collection, storage, and destruction of personal information.

All Designated Personnel who are employees of LCC will be paid for time taken to receive COVID-19 vaccinations in accordance with *The Saskatchewan Employment Act*, *The Occupational Health and Safety Regulations, 2020*, and associated regulations, as may be amended from time to time. Employees are to work with their managers or supervisors to schedule appropriate times for a vaccination appointment to comply with this Policy.

4. DUTY OF DESIGNATED PERSONNEL

- a. Designated Personnel who are residents or employees, are required to complete the COVID-19 VACCINATION STATUS FORM as found in Appendix B of this policy by **October 26, 2021**. This information will be kept confidential and only accessed by Assigned Employees, Human Resources, and Senior Leadership Team, if required. Designated Personnel that are required to attend LCC's premises other than residents and employees, are required to disclose their COVID-19 vaccination status and, where applicable, to present proof of their fully vaccinated status. An individual will only be considered "vaccinated" where satisfactory verification (in the opinion of LCC) is provided.
 - b. Designated Personnel have a duty to follow all applicable COVID-19 protocols, screening procedures, and testing requirements. While vaccinations may reduce the risk to the workplace, they are not a substitute for continued safe practices and other measures to reduce the spread of COVID-19.
 - c. Fully vaccinated Designated Personnel are still permitted and encouraged to continue to utilize personal protective equipment as authorized by LCC on a voluntary basis.
 - d. Even after being vaccinated, Designated Personnel must not attend LCC sites if they have any symptoms of COVID-19. Designated Personnel who are residents, must self isolate and follow public health recommendations if they have any symptoms of COVID-19. Designated Personnel who are employees, must inform their immediate supervisor if they have any symptoms of COVID-19, and follow any reasonable screening, isolation, or testing requirement imposed by LCC or required by public health order prior to returning to work.
5. Designated Personnel who are not vaccinated or choose not to disclose their vaccination status to LCC will be required to present LCC with a negative COVID-19 test result that was taken within an approved time frame and from an approved testing source, wear additional personal protective equipment, and submit a daily health screening questionnaire.

5. Proof of Vaccination

The preferred method of proving vaccination status is by presenting LCC a government-issued QR code confirming vaccination status. However, the following methods may also be considered valid proof of vaccination status:

- A photo of a government-issued vaccination card or vaccination certificate;
- A copy of a government-issued digital immunization record (including MySaskHealthRecord from eHealth Saskatchewan);
- A copy of a government email confirmation of Vaccination Status (where applicable).

A valid government issued photo ID is required to be presented with any method of proving vaccination status.

6. TESTING

Designated Personnel may provide any of the following COVID-19 tests administered at a testing site approved by the Minister of Health:

- 1) a polymerase chain reaction (PCR) test for SARS-CoV-2;
- 2) a point-of-care antigen test for SARS-CoV-2; or
- 3) any other test for SARS-CoV-2 approved by the minister of Health

Please note that a self-administered take-home rapid antigen test will not be accepted as valid proof of a negative COVID-19 test result.

Please note that at the time of drafting this policy, the Government is not providing free COVID-19 testing for asymptomatic people. LCC will not accept any COVID-19 test result improperly obtained from the Government, and may discipline employees who abuse Government testing resources to comply with the policy.

Designated Personnel who are required to provide a negative COVID-19 test, are responsible for obtaining the negative COVID-19 test on their own time and at their own expense.

LCC will provide a letter to unvaccinated Designated Personnel who are residents or employees, that identifies the required frequency of testing and who the negative test result must be presented to prior to attending LCC premises.

Employees on vacation, on employment leave, or a leave granted by LCC will not be required to provide a negative COVID-19 test for the duration of the leave. Employees who are not vaccinated or choose not to disclose their vaccination status will be required to provide a valid negative COVID-19 test upon their return to the workplace.

7. ACCOMMODATION

LCC will accommodate to the point of undue hardship as required by human rights legislation. Please note that accommodation may not always be possible.

Designated Personnel requesting an accommodation will be required to provide appropriate documentation to support their request.

8. CONFIDENTIALITY

All information relating to a Designated Personnel's receipt of a COVID-19 vaccine will be maintained by LCC in a secure and confidential manner. Please see the COVID-19 VACCINATION STATUS FORM as found in Appendix B of this policy for more details.

9. CONSEQUENCES OF NON-COMPLIANCE

Designated Personnel who attend LCC's sites in violation of this policy will be subject to corrective measures. Designated Personnel who are employees of LCC, such corrective measures include disciplinary action up to and including termination of employment. Designated Personnel that are not employees of LCC, such corrective measures may include a permanent ban from LCC's premises.