

## Administrative Procedure 193

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# COVID-19 VACCINATION STATUS (SUSPENDED)

### Background

In support of the Division's commitment to provide a healthy, safe and caring environment for all students, staff, volunteers, independent contractors, tenants, guests and visitors to Division properties, and in light of the ongoing challenges faced by the Division to protect the continuation of in-person learning posed by the COVID-19 pandemic, the Division will continue to assess, and if appropriate, implement reasonable measures that it believes will have a positive impact on health and safety in our schools and administrative sites.

Immunization against COVID-19 is the most effective means to prevent the spread of COVID-19, prevent outbreaks and preserve in-person learning. As a result of our responsibilities to those we serve and employ, including our students under the age of 12 to whom vaccines have only recently been made available, the Division will require all employees, volunteers, independent contractors, tenants, guests and visitors to be fully vaccinated against COVID-19, or alternatively, comply with testing requirements as provided in this Administrative Procedure. This Administrative Procedure does not apply to Division students. This Administrative Procedure will not apply to parents and guardians if they are visiting their child's school for a purpose related to their child's education and programming. The Division recognizes and will act at all times in accordance with its obligations pursuant to the *Education Act*, the *Alberta Human Rights Act*, the *Occupational Health and Safety Act, Regulation and Code* and advice from the Office of the Chief Medical Officer of Health.

### Definitions

1. 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
- b. having fourteen (14) 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. 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
- b. having complied with Article 1(a) but fourteen (14) 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.

3. Unvaccinated means not being in compliance with either Articles 1 or 2 as noted above.
4. Employee means any individual employed by the Edmonton Catholic Separate School Division (the “Division”).
5. Independent Contractor means any individual employed by another organization retained by the Division to provide services, or any individual with whom the Division has entered into a contractual relationship and identified therein as an independent contractor.
6. Practicum Students means any individual who engages in Division related activities and who has direct contact with Division employees and/or students within the role of:
  - a. any kind of educational placement or practicum provided through an agreement between the Division and a post-secondary educational institution (i.e. student teachers, educational assistants, nurses, psychologists, behaviour therapists, speech language pathologists etc.); or
  - b. any internship, co-op placement or apprenticeship program.
7. Tenant means any person who has entered into a contract or lease agreement with the Division to occupy space in any capacity in a Division property.

## **Procedures**

### **Disclosure of Vaccination Status**

8. Employees shall disclose their vaccination status to the Division by October 22, 2021 by way of a formal attestation of their vaccination status as Fully Vaccinated, Partially Vaccinated or Unvaccinated.
9. Employees who are Fully Vaccinated or Partially Vaccinated shall concurrently provide proof of full vaccination status by providing the Division a copy of their Alberta Health Covid-19 Immunization Record, or when available, a QR code that verifies their COVID-19 vaccine record, as part of their formal attestation of their vaccination status. An Alberta Health Covid-19 Immunization record or a QR code can be obtained at <https://covidrecords.alberta.ca/home>.
10. Employees must update their vaccination status with the Division if changes occur.
11. Subject to the exemptions set out below, all new Employees hired on or after October 25, 2021 will be required to be Fully Vaccinated prior to their first day of work and show proof thereof through the provision of an Alberta Health Covid-19 Immunization Record or when available, a QR code that verifies their COVID-19 vaccine record.

### **Employee Covid-19 Testing – October 25 – December 17, 2021**

12. As of October 25, 2021, any Employee who:

- a. is Partially Vaccinated;
- b. is Unvaccinated; or
- c. has not disclosed their vaccination status in accordance with Article 8 by October 22, 2021;

shall submit to a mandatory COVID-19 Rapid Antigen Screening test as directed by the Division and test negative in order to attend a Division property until such time as they become fully vaccinated and provide proof thereof in a form agreeable to the Division. Subject to further direction from the Division, COVID-19 Rapid Antigen Screening tests must be undertaken two times per week with a minimum of 48 hours between tests during which the Employee is subject to testing requirements.

13. In the event that an Employee tests positive in response to a mandatory COVID-19 Rapid Antigen Screening test, the Employee must:

- a. submit to mandatory COVID-19 PCR testing as soon as possible but no more than 48 hours following confirmation of the results of the Rapid Antigen Screening test, and as directed by the Division;
- b. inform the Division through Employee Health Services;
- c. isolate until the results of the COVID-19 PCR test are confirmed; and
- d. provide proof of a negative COVID-19 PCR test prior to attending at any Division property.

14. COVID-19 Rapid Antigen Screening tests will be at the direction of and expense of the Division.

### **Employee Covid Testing – After December 17, 2021**

15. Subject to the exemptions set out below, Employees must be Fully Vaccinated by December 17, 2021.

16. Subject to the exemptions set out below, any Employee who is not Fully Vaccinated by December 17, 2021 shall:

- a. provide evidence in a form acceptable to the Division of a negative COVID-19 Rapid Antigen Screening test or PCR test being undertaken two times per week with a minimum of 48 hours between tests during which they are subject to testing requirements in order to attend any Division property; or
- b. be placed on leave without pay until such time as they are Fully Vaccinated. In order to be returned to duties with pay, the Employee must provide an Alberta Health Covid-19

Immunization Record or when available, a QR code that verifies their COVID-19 vaccine record, Rapid Antigen Screening test to the Division that allows the Division to determine that the Employee is Fully Vaccinated. Upon doing so, the Employee will be returned to full duties with pay as soon as administratively feasible.

17. After December 17, 2021, COVID-19 Rapid Antigen Screening tests and PCR tests will be at the expense of the Employee.

**Disclosure and Testing Requirements - Non-Employees (Volunteers, Independent Contractors, Visitors, Guests, Practicum Students, Tenants)**

18. Unless a Division student is acting in the capacity of a volunteer or independent contractor, Division students are not subject to this Administrative Procedure. Parents or guardians will not be required to disclose their vaccination status or be subject to COVID-19 testing of any kind if they are attending their child's school for the purpose of addressing matters related to their child's education and programming. Parents and guardians will be required to be Fully Vaccinated and provide a QR code that verifies their COVID-19 vaccine record, or proof of a negative COVID-19 Rapid Antigen Screening test or PCR test completed no more than 72 hours prior if the parent or guardian:

- a. is visiting a Division property that is not their child's school;
- b. is visiting their child's school for any reason other than to address matters related to their child's education and programming, including extra-curricular events, sporting events, assemblies, concerts, school club-related events, school council and fundraising society meetings and events, performances or open houses; or
- c. if the parent or guardian is visiting a Division property and acting in the capacity of a volunteer or independent contractor, irrespective of whether they are acting in this capacity at their child's school.

19. With respect to volunteers, Independent Contractors, visitors and guests to Division properties:

- a. as of October 25, 2021, any volunteer, Independent Contractor, visitor or guest attending at any Division property and who has direct contact with Employees and/or Division students must be Fully Vaccinated. If not Fully Vaccinated, the volunteer, Independent Contractor, visitor or guest must provide proof of a negative COVID-19 Rapid Antigen Screening test or PCR test completed no more than 72 hours prior to the time the individual is attending at the Division property; and
- b. in the event that a volunteer, Independent Contractor, visitor or guest attests to be Fully Vaccinated, the individual shall provide evidence thereof through the provision of the individual's Alberta Health Covid-19 Immunization Record or when available, a QR code that verifies their COVID-19 vaccine record to the Principal, or with respect to any non-school property, to the appropriate supervisor of that property.

20. Practicum Students must provide proof of vaccination to their educational institution, who in turn shall provide a declaration of compliance to the Division which indicates that the Practicum Student:
  - a. is Fully Vaccinated; or
  - b. as of October 25, 2021, has provided proof of a negative COVID-19 Rapid Antigen Screening test or PCR test completed no more than 72 hours prior to the time the Practicum Student is attending at a Division property.
21. Tenants shall provide a declaration of compliance to the Division which indicates that the Tenant and all employees thereof who are attending at any Division property:
  - a. are Fully Vaccinated; or
  - b. as of October 25, 2021, have provided proof of a negative COVID-19 Rapid Antigen Screen test or PCR test completed no more than 72 hours prior to the time the Tenant and/or their employees are attending at a Division property.
22. Costs of all testing shall be paid by the individual required to produce the test results. For further clarity, the Division shall not be responsible in any way for the costs of testing.

### **Exemptions**

23. The Division recognizes its responsibilities and duties pursuant to the *Alberta Human Rights Act*. If an Employee is unable to be vaccinated due to a protected ground as defined by the *Act*, the Division will consider requests for exemption and reasonable accommodation to the point of undue hardship.

### **Non-compliance**

24. Any failure to comply with this Administrative Procedure by an Employee, including the refusal to disclose vaccination status, the provision of proof of vaccination status, compliance with applicable testing requirements, or the provision of false or misleading information in any regard, may result in administrative or disciplinary action up to and including termination of employment.
25. With respect to any non-Employees to which this Administrative Procedure is applicable, any individual, tenant, employer or organization who fails 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. This will result in a request to immediately leave Division property and may further result in the termination of contract or participation in Division activities. With respect to any Practicum Students, any event of non-compliance may result in reporting the event of non-compliance to the appropriate post-secondary institution.

### **Support for Vaccination**

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

### **Continued Compliance with all Health and Safety Precautions**

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

### **Protection of Privacy**

28. 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”).
29. Information regarding any individual’s vaccination status, including but not limited to any individual’s Alberta Health Covid-19 Immunization Record will be kept confidential, stored in a secure location, and access and disclosure limited to that permissible by *FOIP*.

### **Prevention of Harassment, Bullying or Discrimination**

30. Harassment, bullying or discrimination of any type against individuals based on their vaccination status, compliance with this Administrative Procedure or any other reason will not be tolerated. Employees experiencing harassment, bullying or discrimination are encouraged to review [Administrative Procedure 171 – Respect in the Workplace](#).

### **Administrative Procedure Review**

31. Due to the evolving nature of this public health matter, and ongoing direction from public health officials and the Minister of Education, this Procedure will be updated as required from time to time.

Adopted: October 5, 2021  
Revised: October 15, 2021, November 30, 2021  
Suspended: March 3, 2022

Reference: Education Act, Sections 3, 33, 52, 53  
Alberta Human Rights Act  
Occupational Health and Safety Act, Regulation and Code  
Freedom of Information and Protection of Privacy Act  
[Government of Alberta, COVID-19 Information, Considerations for Rapid Asymptomatic COVID-19 Screening](#)

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