

GBEC-APM – COVID-19 Hazard Control

Administrative Procedure

BACKGROUND

Peace Wapiti Public School Division (PWPSD) has closely monitored the hazard of COVID-19 since the onset of the pandemic, and has continued to review and adjust its preventative, safety and hazard control measures in response to emerging science, workplace data and public health directives.

PWPSD has a commitment and statutory obligation to take all reasonable steps to provide safe and healthy working and learning environments. Public health authorities state that vaccination is one of the most effective ways of reducing COVID-19 transmission and protecting against severe outcomes relating to COVID-19.

This Administrative Procedure falls under [Policy GBE – Health & Safety](#), and supports the ongoing measures PWPSD has implemented to date and our continued commitment in ensuring all schools and workplaces remain as safe as possible in the context of COVID-19

APPLICATION

This Administrative Procedure applies to all Division employees, practicum students, contractors, user groups and volunteers.

Employees hired after the implementation of this Administrative Procedure must be in compliance.

Employees on an approved Leave of Absence must comply with this Administrative Procedure prior to returning to work.

This Administrative Procedure **does not** apply to PWPSD students or parents/guardians unless a parent/guardian is acting in a position of volunteer.

DEFINITIONS

Contractors refers to individuals or organizations that have been retained by the Division to provide services in Division buildings (e.g., health care providers, guest speakers).

COVID-19 is the disease caused by the SARS-CoV-2 coronavirus (including any variant).

COVID-19 Vaccine is a vaccine authorized by Health Canada (e.g., Pfizer-BioNTech Comirnaty; Moderna Spikevax; Janssen (Johnson & Johnson); COVISHIELD; AstraZeneca Vaxzevria).

Division is the Peace Wapiti Public School Division.

Employee is any individual employed by the Division on any basis, including full-time, part-time, permanent, temporary, on-call and casual. Trustees are considered an employee of the Division for the purposes of this Administrative Procedure.

GBEC-APM – COVID-19 Hazard Control

Administrative Procedure

Full Vaccination, as defined by Alberta Health Services (AHS) and as may be amended from time to time, means having received all required doses of a COVID-19 vaccine, including any required waiting period to achieve full vaccine status (e.g., two week period).

Practicum Student means any individual who engages in Division related activities and who has direct contact with Division employees and/or students through 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, behavior therapists, speech language pathologists etc.), or any internship, co-op placement or apprenticeship program.

Proof of Vaccination means the vaccine record with a QR code.

Rapid Test refers to a rapid antigen test approved by Health Canada or a lab accreditation body of Alberta.

User Group refers to one or more persons accessing any Division building outside of school hours for personal reasons.

Volunteer is a member of the community, including parents and guardians, who, without compensation, commits to assist the Division or a school with a designated task under the direction and supervision of a Division staff member.

ADMINISTRATIVE PROCEDURE

1. Vaccination and Testing Requirements – Employees

As of January 31, 2022, all Division Employees will be required to either:

- a) have submitted acceptable proof of Full Vaccination against COVID-19; or
- b) submit acceptable proof of a negative COVID-19 test twice per week, with no more than 72 hours between tests. In general, for employees who work Monday to Friday, this would be Monday and Thursday mornings. For employees who work part-time or irregular hours, alternate schedules may be approved by the employee's direct supervisor.

2. Proof of Vaccination

On or before January 14, 2022, Employees who have elected to submit proof of Full Vaccination must provide Human Resources (by email to kellielewis@pwpsd.ca or in-person, by appointment only, at Central Office) with a QR code that verifies their COVID-19 vaccine record.

Effective January 31, 2022, Volunteers and Practicum Students who have elected to submit proof of Full Vaccination to comply with this Administrative Procedure must provide the school or appropriate department head with a QR code that verifies their COVID-19 vaccine record.

Effective January 31, 2022, Contractors and User Groups who have elected to submit proof of Full Vaccination to comply with this Administrative Procedure will be responsible for ensuring compliance of their employees or participants and will be required to provide the Division with written assurance of such compliance.

A QR code can be obtained at <https://covidrecords.alberta.ca/home>.

Employees, Contractors, Volunteers, User Groups and Practicum Students must update their vaccination status with the Division if changes occur.

3. Proof of Negative COVID-19 Test

Employees who do not provide acceptable proof of Full Vaccination are required to comply with this Administrative Procedure by providing notice on or before January 14, 2022 that they will be providing proof of negative COVID-19 tests twice per week, with no more than 72 hours between tests. In general, for employees who work Monday to Friday, this would be Monday and Thursday mornings. For employees who work part-time or irregular hours, alternate schedules may be approved by the employee's direct supervisor.

Until April 29, 2022, for Employees who elect to provide proof of a negative COVID-19 test result, the Division will provide access to Rapid Tests at the work site at no cost to the Employee that can be self-administered by the Employee under supervision. These tests must be self-administered outside of the Employee's working schedule (i.e. before or after their "shift").

Employees who elect to provide proof of a negative COVID-19 test result to comply with this Administrative Procedure, but choose not to take part in the work site testing option outlined above, must provide Human Resources with a COVID-19 test report demonstrating a negative result of a Health Canada approved:

- a) rapid antigen screening test,
- b) rapid polymerase chain reaction (PCR) test; or
- c) laboratory-based PCR test.

The COVID-19 test report must clearly state the type of test, the time and date of sample collection, a negative or positive result, and the name and address of the pharmacy or laboratory that completed the test. The COVID-19 test report must be from a test completed within 72 hours prior to the commencement of each of the Employee's scheduled workdays or shifts. The tests shall be procured by the Employee at their own expense and on their own time. Self-produced documentation of a negative result from a test not administered by a pharmacy or laboratory is not sufficient and will not satisfy the requirements of this Administrative Procedure.

A positive Rapid Test result is considered a preliminary or presumptive positive test result for COVID-19. Anyone who receives a preliminary positive result from a Rapid Test must:

- a) immediately make an appointment for an AHS approved lab-based PCR test; and
- b) immediately isolate until the AHS approved lab-based PCR test results are confirmed negative.

Anyone who has received a positive AHS PCR test result or a positive private PCR test result must:

- a) advise their supervisor of the positive PCR test result and the date of the PCR test,
- b) immediately isolate as per AHS directives, and
- c) is exempt from the Division's rapid testing program under this Administrative Procedure for the 90-day period after the date of the positive PCR test.

4. Requests for Accommodations

The Division recognizes its responsibilities and duties pursuant to the *Alberta Human Rights Act*. If an Employee is unable to either be vaccinated against COVID-19 or submit to regular testing for COVID-19 due to a protected ground under the *Alberta Human Rights Act*, the Division will consider requests for exemption from the application of this Administrative Procedure and reasonable accommodation to the point of undue hardship.

Any Employee seeking an exemption from compliance with this Administrative Procedure due to a protected ground under the *Alberta Human Rights Act* should notify Human Resources as soon as possible. The Division will be required to evaluate any Employee's request for an exemption.

5. Vaccination Leave

As per *Alberta Employment Standards*, full and part-time Employees can access up to three hours of paid leave to get each dose of the COVID-19 vaccine.

The Division encourages supervisors and Employees to work together on scheduling appointments, minimizing the impact on Employees, as well as on the education environment when taking the leave.

To book a COVID-19 vaccine appointment, contact AHS online or call 811.

6. Vaccination and Testing Requirements - Contractors, Practicum Students, User Groups, and Volunteers

As of January 31, 2022, any Contractor, Practicum Student, User Group or Volunteer for a Division activity, who may have direct contact with Employees

and/or Division students, must be fully vaccinated or provide proof of a negative COVID-19 test completed no more than 72 hours prior to the time they will have contact with Employees or Division students in their capacity as a Contractor, Practicum Student, User Group or Volunteer. Acceptable proof of negative COVID-19 test result requirements are outlined in Section 3.

Costs of all COVID-19 testing for Contractors, Practicum Students, User Groups or Volunteers shall be paid by the individual(s) required to produce the test results. For further clarity, the Division shall not be responsible in any way for the costs of testing for Contractors, Practicum Students, User Groups or Volunteers.

7. Privacy/Confidentiality

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)*.

Information regarding any individual's vaccination status, including proof thereof, or COVID-19 test results will be kept confidential, stored in a secure location, and access and disclosure will be limited to that permissible under *FOIP*. The information is collected and retained pursuant to Section 33(c) of *FOIP* for the purposes of administering this procedure and will be securely destroyed in accordance with the applicable retention and disposition schedules.

8. Non-Compliance

Compliance with this Administrative Procedure is mandatory. The Division will review each instance of non-compliance considering the context and circumstances, including any requests for accommodation due to a protected ground under the *Alberta Human Rights Act*.

Failure to comply with this Administrative Procedure, including but not limited to, refusing or failing to provide acceptable proof of Full Vaccination, refusing or failing to provide acceptable proof of COVID-19 testing, or the provision of false or misleading information, will be considered non-compliance and may result in the employee being subject to:

- a) administrative action including, but not limited to, being placed on a leave of absence without pay and benefits,
 - i) Any employee placed on a leave of absence without pay and benefits under this section is required to provide a minimum of 30 days' written notice that they are compliant or intend to be compliant with this Administrative Procedure before returning to work; or
- b) disciplinary action up to and including termination of employment.

Any Contractors, Practicum Students, User Groups or Volunteers who fail to comply with this Administrative Procedure, including but not limited to, refusing or

failing to provide acceptable proof of Full Vaccination, refusing or failing to provide acceptable proof of COVID-19 testing, or the provision of false or misleading information, will be considered to be in non-compliance and must immediately leave Division property and cease performance of all duties as a Contractor, Practicum Student, User Group or Volunteer. With respect to any Practicum Student, any event of non-compliance may result in reporting the event of non-compliance to the appropriate post-secondary institution.

9. Other Safety Protocols

All Employees, Contractors, Practicum Students, User Groups or Volunteers including those Fully Vaccinated or those with negative COVID-19 test results, are still required to adhere to all other PWPSD COVID-19 safety preventative measures and protocols in place, including but not limited to:

- compliance with daily screening protocols before attending the workplace,
- wearing a mask (when applicable),
- using provided PPE, and
- maintaining appropriate physical distancing.

10. Supports Available

The COVID-19 pandemic is an unprecedented challenge that has caused economic and psychological uncertainty and distress for many people.

If you are uncertain or have questions about COVID-19 Vaccines, please refer to the AHS website related to COVID-19. AHS has also published an open letter to Albertans, it can be found [here](#).

The Employee and Family Assistance Program (EFAP), available to ASEBP members, is also available 24/7, at no cost, by calling 1-800-663-1142.

Additional mental health resources are available for ASEBP members at <https://mentalhealth.asebp.ca/>.

11. Prevention of Harassment, Bullying or Discrimination

The Division requires all Employees to conduct themselves in accordance with [Policy GBEA – Protection of Staff](#). The Division will not tolerate any harassment, bullying or discrimination of any type against employees based on their vaccination status. Employees experiencing harassment, bullying or discrimination are encouraged to discuss their concerns with their supervisor or the Director of Human Resources and Labour Relations.

12. Subject to Review

Given the evolving and dynamic nature of COVID-19, this Administrative Procedure is considered temporary and will be reviewed regularly as determined by the Superintendent of Schools or as circumstances warrant ensuring

alignment with ongoing direction, recommendations and advice from public health officials and Alberta Education.

13. Employee Communication

This Administrative Procedure will be communicated to all staff via a global email. In addition, supervisors and/or principals will present the Administrative Procedure to staff at the next available staff meeting or other similar medium. Human Resources will mail a paper version to all casual employees and substitute teachers.

REFERENCES

Cross References:

[Policy GBE – Health and Safety - https://www.pwpsd.ca/policies/GBE.pdf](https://www.pwpsd.ca/policies/GBE.pdf)

[Policy GBEA - Protection of Staff - https://www.pwpsd.ca/policies/GBEA.pdf](https://www.pwpsd.ca/policies/GBEA.pdf)

[Alberta Employment Standards](#)

[Alberta Human Rights Act](#)

[Freedom of Information and Protection of Privacy Act](#)

[Occupational Health and Safety Act](#)

[Alberta Human Rights Commission on COVID-19 and Vaccines](#)

[Office of the Information & Privacy Commissioner of Alberta-Proof of Vaccination](#)

Owner: Superintendent/Human Resources

Date Last Reviewed:

Next Review: April 6, 2022 or as required