

# Mandatory Vaccination Practice

Approval date: October 22, 2021

## 1. Practice statement

Further to the Health and Safety Policy, Canada Post is committed to creating and maintaining a healthy and safe environment for all employees, contractors, visitors, and customers. Vaccination has been shown to be effective in reducing the transmission of COVID-19 and protecting individuals from severe consequences of this virus. At the direction of the Government of Canada, Canada Post has prepared this COVID-19 Vaccination Practice that mirrors the Policy on COVID-19 Vaccination for the Core Public Administration. Accordingly, this Practice sets out the COVID-19 vaccination requirements applicable to Canada Post employees, contractors, and visitors to protect against the spread of COVID-19.

## 2. Application

This Practice applies nationally to:

1. all Canada Post employees;
2. contractors, while providing a service to Canada Post in Canada Post Facilities;
3. visitors while in Canada Post Facilities.

## 3. Scope

Canada Post will continue to closely monitor its COVID-19 risk mitigation strategy and the evolving relevant public health information to ensure that it protects the health and safety of its employees in the workplace. This Practice will be reviewed periodically in this context and may be amended accordingly. This Practice will come into effect on October 29, 2021, and will remain in effect until it is no longer required for health and safety purposes.

## 4. Definitions

**Actively at Work** means an employee is attending at work, including remotely, or is on one of the leaves listed in Appendix "A."

**Canada Post Facilities** means any building, vehicle or property controlled by Canada Post whether indoors, open or closed to the public.

**Fully Vaccinated** means an individual who, at least 14 days prior has:

- Received both doses of a Health Canada authorized COVID-19 vaccine that requires 2 doses to complete the vaccination series (as of September 16, 2021): Pfizer-BioNTech Comirnaty COVID-19 vaccine, Moderna Spikevax COVID-19 vaccine, or AstraZeneca Vaxzevria COVID-19 vaccine.
- Received a mixed dose COVID-19 vaccination series aligned with the National Advisory Committee on Immunization (NACI) recommendations on the use of COVID-19 vaccines;
- Received 1 dose of a Health Canada authorized COVID-19 vaccine that only requires 1 dose to complete the vaccination series (as of September 16, 2021): Janssen (Johnson & Johnson) COVID-19 vaccine; or
- For current residents of Quebec only, has had a laboratory-confirmed COVID-19 infection followed by at least 1 dose of a Health Canada authorized COVID-19 vaccine.

This definition will be adjusted if and as required when the NACI makes any future recommendations.

**Partially Vaccinated and intends to become Fully Vaccinated** means an individual who has received 1 dose of a 2-dose Health Canada authorized COVID-19 vaccine, but who has not received a full vaccination series, and does not meet the definition of Fully Vaccinated, but who intends on becoming vaccinated as described in section 5.1 below.

**Unable to be Vaccinated** means an individual who cannot be Fully Vaccinated due to a prohibited ground of discrimination as defined in the *Canadian Human Rights Act*.

**Unwilling to be Fully Vaccinated** means an individual who refuses to disclose their vaccination status (whether they are vaccinated or not); for whom accommodation for a prohibited ground of discrimination is not granted and where the individual is still unwilling to be vaccinated; who is partially vaccinated but is not willing to become Fully Vaccinated; and who has attested that they are not vaccinated.

**Visitor** means anyone other than an employee, contractor, or customer.

## 5. Expectations

### 5.1 Employees

All employees hired before the date this Practice comes into effect will be required to attest to their vaccination status, as defined above, as:

1. Fully Vaccinated;
2. Partially Vaccinated and intends to become Fully Vaccinated;
3. Unable to be Vaccinated; or
4. Unwilling to be Vaccinated.

All employees hired after the date this Practice comes into effect will be required to confirm their vaccination status, as defined above, as:

1. Fully Vaccinated; or
2. Unable to be Vaccinated.

Employee attestations are required by the following applicable deadlines:

- Employees Actively at Work and hired before the date this Practice comes into effect: November 12, 2021;
- Employees not Actively at Work: prior to returning to work; and
- Employees Actively at Work hired after the date this Practice comes into effect: prior to commencing any work for, or training with, Canada Post (these employees will have already been required to confirm their vaccination status prior to being offered employment).

Employees who attest to being Partially Vaccinated and intending to become Fully Vaccinated will be required to:

- conduct COVID-19 testing twice per week if the employee is attending at the workplace, until such time as they are Fully Vaccinated, or are placed on Leave Without Pay; or
- if working remotely, conduct COVID-19 testing twice per week, the first test being done prior to attending at the workplace for any duration, until such time as they are Fully Vaccinated, or are placed on Leave Without Pay.

All employees Actively at Work who are Partially Vaccinated and intend to become Fully Vaccinated must attest to being Fully Vaccinated no later than January 29, 2022. All employees not Actively at Work must attest to being Fully Vaccinated no later than 10 weeks from the date they attest to being Partially Vaccinated. If a Partially Vaccinated employee does not attest to being Fully Vaccinated within these time frames, they will be considered Unwilling to be Vaccinated and placed on Leave Without Pay.

Employees who attest to being Unable to be Fully Vaccinated will be required to:

- provide complete and accurate information as required by Canada Post to evaluate their accommodation request and identify appropriate accommodation;
- cooperate in the accommodation process; and
- notify their team leader if their accommodation needs change.

Employees who attest to being Unwilling to be Fully Vaccinated will be:

- restricted from attending at work, including remotely, and placed on Leave Without Pay after November 26, 2021, or, if the employee is not Actively at Work when they provided such an attestation, on the expected date of return to work.

An employee who has been placed on Leave Without Pay and who later attests to being Partially Vaccinated and intends to become Fully Vaccinated will then resume work and be subject to the requirements outlined above, "Employees who attest to being Partially Vaccinated and intend to become Fully Vaccinated."

If an employee is required to undergo COVID-19 testing pursuant to this Practice and tests positive, they cannot attend at the workplace and must immediately contact Public Health for direction and notify their team leader.

## **5.2 Contractors and Visitors**

Contractors are expected to be Fully Vaccinated when entering a Canada Post Facility and develop their own vaccination plan which mirrors the principles of this Practice.

Visitors who are not Fully Vaccinated will not be permitted to attend at a Canada Post Facility.

Accommodations will be made with Visitors where required based on grounds outlined under the *Canadian Human Rights Act*.

## 5.3 Other

Compliance with this Practice does not exempt persons from any other Canada Post COVID-19 safety protocol (i.e. face coverings, physical distancing, screening, etc.).

## 6. More about the Practice

### 6.1 Proof of vaccination

Proof of vaccination, such as a government issued electronic or printed vaccination record which indicates the date(s) on which the individual received a COVID-19 vaccine, may be required. Proof of vaccination may be collected by a National audit team or through electronic submission.

### 6.2 Proof of negative COVID-19 test result

Proof of a negative COVID-19 test result may be required. Proof of negative COVID-19 test results may be collected by Disability Management, a National audit team or through electronic submission.

### 6.3 Failure to complete attestation

Employees who are:

- Actively at Work and do not provide their attestation by November 26, 2021; and
- not Actively at Work and do not provide their attestation by the business day prior to their expected date of return to work;

will be considered Unwilling to be Fully Vaccinated and will be placed on Leave Without Pay.

### 6.4 Privacy

Information collected pursuant to this Practice will be handled and protected in accordance with Canada's *Privacy Act* and Canada Post's Employee Privacy Policy and Customer Privacy Policy. All information collected, including attestations, proof of vaccination or proof of negative COVID-19 test results will be retained for the time this Practice is in effect, unless an employee requests it be retained for longer or it is required by law.

## 7. Roles and responsibilities

Employees, contractors, and Visitors are responsible for complying with this Practice.

Canada Post is responsible for:

- promoting awareness of this Practice through communications and signage;
- providing training as may be required by this Practice and tracking records of attendance when applicable;
- collecting and storing attestation information;
- conducting audits on attestations;
- responding to employees' requests for accommodation;
- ensuring a respectful, productive, inclusive, and equitable environment, including ensuring employees are aware that harassment or other prohibited conduct directed toward an individual for any reason, including based on their vaccination status, will not be tolerated;
- ensuring that personal information is collected and managed in accordance with the *Privacy Act* and all other legislation, or applicable Canada Post policies or practices; and
- collecting, validating and retaining relevant information for accommodation requests.

All team leaders are responsible for:

- ensuring employees have access to the information in this Practice;
- responding to concerns raised by employees or raising them to the attention of the Practice Owner;
- enforcing compliance with this Practice as requested by Canada Post; and
- managing a respectful, productive, inclusive and equitable environment.

Employees are responsible for:

- providing truthful information required under this Practice;
- raising concerns related to the application of this Practice to team leaders;
- informing Canada Post of the need for accommodation based on any of the prohibited grounds of discrimination as defined under the *Canadian Human Rights Act*;
- providing complete and accurate information required by Canada Post to support their accommodation request and identify appropriate accommodation; and
- refraining from directing harassment or any other prohibited conduct toward an individual for any reason, including their vaccination status or accommodation measures.

## 8. Consequence of Practice breach

Breach of health and safety rules can have significant consequences. A breach of this Practice is considered major misconduct and will therefore result in discipline up to and including termination.

**Practice Owner:** General Manager, Health and Safety.

## APPENDIX “A”

### Absence Type

- |                       |                                |                                   |
|-----------------------|--------------------------------|-----------------------------------|
| • Vacation            | • Other Union – CP Paid        | • Personal Day Urgent             |
| • Late – Paid         | • Discipline/Suspension – Paid | • Family-Related Responsibilities |
| • Compensatory Leave  | • Pre-Retirement               | • Birth/Adoption Leave            |
| • Night Workers Leave | • Court Leave                  |                                   |
| • Bereavement Leave   | • Other Paid Leave             |                                   |
| • Special Paid Leave* | • Personal Day Planned         |                                   |

\*Note: Absence type Special Leave-Pandemic is not considered Actively at Work.