
HORIZON SCHOOL DIVISION**Policy Code:**

GBA

Policy Title:COVID Harm
Reduction**POLICY HANDBOOK****Cross Reference:****Legal Reference:**Freedom of Information and Protection
of Privacy Act, Occupational Health and
Safety Act, Alberta Human Rights Act.**Adoption Date:****Amendment or Re-
affirmation Date:****November 29, 2021**

POLICY

THE BOARD OF TRUSTEES OF HORIZON SCHOOL DIVISION IS COMMITTED TO PROVIDING A SAFE AND HEALTHY LEARNING AND WORK ENVIRONMENT. THE DIVISION COMMITS TO PROTECTING STUDENTS AND EMPLOYEES FROM INJURY, ILLNESS, AND ACCIDENTS AS REQUIRED BY OCCUPATIONAL HEALTH AND SAFETY LEGISLATION, THE EDUCATION ACT, AND COMMON LAW. TRANSMITTABLE DISEASES, INCLUDING COVID-19 ARE IDENTIFIABLE WORKPLACE HAZARDS. SUCH HAZARDS CAN HAVE A DETRIMENTAL EFFECT ON HEALTH AND SAFETY, DIVISION OPERATIONS, STUDENT LEARNING, EMPLOYEE PRODUCTIVITY, DIVISION COSTS, AND EMPLOYEE MORALE. THE DIVISION HAS LEGAL OBLIGATIONS TO TAKE ALL REASONABLE STEPS TO IDENTIFY, ELIMINATE, AND CONTROL WORKPLACE HAZARDS LIKE COVID-19. THIS POLICY AND ANY RELATED PROCEDURES OUTLINE THE REQUIREMENTS FOR ALL EMPLOYEES AND ADULTS WORKING WITH STUDENTS IN HORIZON SCHOOLS TO MITIGATE THE RISK OF SPREAD OF COVID-19 INFECTION IN ALL DIVISION FACILITIES TO PROTECT, EMPLOYEES, STUDENTS, AND THEIR FAMILIES FROM THE HIGHLY CONTAGIOUS ILLNESS DURING A GLOBAL PANDEMIC.

DEFINITIONS

For the purposes of the Policy and Procedure, the following terms have the following meanings:

- **COVID-19:** The disease caused by the SARS-CoV-2 coronavirus (including any variant).
- **COVID-19 Vaccine:** A COVID-19 vaccination authorized by Health Canada (e.g. Pfizer-BioNTech/Comirnaty; Moderna/Spikevax; Janssen (Johnson & Johnson); AstraZeneca/COVISHIELD/Vaxzevria).
- **Employee(s):** All individuals who are employed by the school division on any basis, including full-time, part-time, permanent, temporary, and casual, and also includes those working with students in schools such as classroom volunteers and volunteer coaches.
- **Fully Vaccinated:** Having obtained all required doses of a COVID-19 Vaccine considered valid by Health Canada in a two dose COVID-19 vaccine series or a one dose of a COVID-19 vaccine considered valid by Health Canada, including having observed a two (2) week period (or longer where required) following the final dose.
- **School:** means all Horizon School Division owned, operated or leased spaces and properties, including but not limited to offices, classrooms, libraries, study areas, recreational and sports facilities and fields, cafeterias, buildings, school division vehicles.

- **Other individuals:** those adults who work with school division students while they are in the Horizon School Division's schools whether or not the school is owned by the school division:
 - a) trustees
 - b) adult students of a post-secondary educational institution of any kind who are on educational placements or practicums (i.e. student teachers, educational assistants, nurses, psychologists, behavioral therapists, speech language pathologists etc.);
 - b) any individual who is on an internship, co-op placement or apprenticeship program with the school division;
 - c) volunteers;
 - d) independent contractors and the employees of independent contractors
 - f) any person providing professional services of any kind to a school division student at a school division facility or on school division property; and
 - g) any other member of an organization who may not be an employee of the school division but who provides services to students within school or on school division property.
- **Proof of Vaccination:** means a paper or electronic vaccination record of an individual's COVID-19 vaccination date(s) and status in a form acceptable to the Division, as communicated by the school division from time to time, which may include any government-implemented proof of vaccination system. Self-produced documentation is not sufficient evidence.
- **COVID Test:** means a COVID-19 testing device that is listed in Health Canada's Authorized medical devices for uses related to COVID-19 including rapid tests and PCR tests.

GUIDELINES

1. The Horizon School Division has legislated obligations to provide a safe and healthy workplace. This policy outlines the actions Horizon is taking to protect the health and safety of workers at the work site; protect the health and safety of all members of the school community; and enable educational programming and other school activities to be in-person wherever reasonable in the circumstances.
 - 1.1. The school division manages the risks related to COVID-19 through the hierarchy of hazard controls (engineering controls, administrative controls and personal protective equipment). When a hazard cannot be managed by a single method, such as an engineering control, a combination of controls are used.
 - 1.2. Having a maximally vaccinated workforce is an effective engineering control to further protect against the hazards of COVID-19. Vaccinations help reduce the risk of spread within schools and lowers the risks of severe outcomes.
 - 1.3. The school division recognizes its duties and responsibilities under the Alberta Human Rights Act. The school division will continue to consider and pursue reasonable workplace accommodations for those persons who are unable to be vaccinated due to reasons protected by the Alberta Human Rights Act.
 - 1.4. Scientific and medical evidence has shown that immunization against COVID-19 is the most

effective way to protect communities from the severe outcomes of COVID-19. Therefore, the Horizon School Division has determined negative tests and vaccinations to be another layer to the school division's controls against the hazard of COVID-19 and a critical part of the school division's safety plan.

2. Subject to applicable legislation, this policy will not be interpreted or applied to limit or amend the provisions contained in any collective agreement or employment contract entered into between the school division and its Employees.
3. These principles are effective upon the passing of this policy and will be reviewed by the school division on a regular basis at the school division's discretion in consideration of all surrounding circumstances and any recommendations that may be made by the provincial and federal governments, public health officials, and other experts consulted by the school division from time to time.
 - 3.1. The school division is closely monitoring government health guidelines related to COVID-19 and will review, revise, and adjust its hazard controls in response to changes in public health directives.
 - 3.2. The school division has the right to modify or revoke these principles at any time, or to implement supplementary principles that may apply to specific matters impacted by these principles.
 - 3.3. This policy is temporary. Rates of transmission in Alberta at the start of the 2021-2022 school year indicate rapidly increasing numbers of individuals are exposed to COVID-19. The school division will reevaluate the need for this policy when the government and medical authorities no longer support the identification of COVID-19 as a workplace hazard. The Board of Trustees will review this policy for amendment or elimination a minimum of every 6 months, or as deemed necessary.
4. School division COVID-19 information is available on the school division's website.

PROCEDURES

1. This policy and procedure are in addition to other employee requirements mandated by government authorities and by the Board with respect to COVID-19 (e.g., mask wearing requirements) and does not supersede or replace any other measures or policies in place to address the hazard posed by COVID-19. The policy imposes two alternatives for compliance, semi-weekly rapid testing or vaccination against COVID-19.
2. COVID-19 Vaccination
 - 2.1. Employees must provide to the Human Resource Department acceptable proof of a negative COVID test before attending School or be Fully Vaccinated against COVID-19 by December 18, 2021.
 - 2.2. Employees who cannot be Fully Vaccinated on the basis of a protected legal ground (e.g. medical, religious) may request an exemption.

Individuals must provide written reasons for their inability to comply with this procedure using appropriate forms (see Appendix A). If the reason an individual cannot comply with this procedure is related to a medical condition the school division will require medical documentation from an authorized physician or nurse practitioner, including whether the medical reason is permanent or temporary and confirm that the individual cannot safely receive the COVID-19 vaccine.

Requests for exemptions or accommodation will be reviewed on an individual basis and a decision regarding approval or rejection will be provided to the individual. This review may include a request for additional information.

- 2.3. Employees hired after the approval date of this Policy will be required to be Fully Vaccinated, have an approved exemption before beginning work with the school division, or provide regular proof of negative COVID tests.
- 2.4. All employees are entitled to paid leave to obtain a COVID-19 vaccination to the extent provided under s. 53.982 of the *Employment Standards Code* (Alberta).

3. Providing Proof of COVID-19 Vaccination

- 3.1. By December 1, 2021, Employees must provide proof of his/her Fully Vaccinated Status (i.e. all COVID-19 vaccine doses received to date) in a form satisfactory to the school division, with 14 days having passed since the second vaccination as administered, and in any event, in accordance with this AP.
- 3.2. Employees will provide a copy of their COVID-19 immunization record (that shows their name) along with their employee ID number electronically or by mail or facsimile to the human resource department. The date of vaccination, type and dose will be recorded and kept on file in accordance with retention and disposition schedules.
 - 3.2.1. All information regarding an individual's vaccination status will be secured in a confidential location and will only be retained for a period of 1 year or as long as the information is deemed relevant to the school division's response to the COVID-19 pandemic, whichever is longer.]
- 3.3. Employees providing proof of vaccination are confirming that they have read, acknowledged, and accepted the information found in this administrative policy.

4. Accommodation Exemptions

- 4.1. An Employee may request an exemption from the requirement to be Fully Vaccinated by submitting a written request for vaccination exemption (see Appendix A) to the Human Resource Department on the basis of a protected legal ground, which may include:
 - 4.1.1. a sincerely held religious belief which prohibits the Employee from receiving a COVID-19 Vaccine (accompanied by a sworn or affirmed declaration of that belief declaring an identifiable denomination of faith and not a personal spiritual belief); or

- 4.1.2. a medical condition which prevents the Employee from safely receiving a COVID-19 Vaccine (accompanied by medical documentation from a physician licensed to practice in Alberta confirming that the Employee cannot safely receive a COVID-19 Vaccine and the anticipated duration of the required exemption and whether the medical reason is permanent or temporary).
 - 4.2. Employees submitting a request will be required to provide support for the basis of the request, evidence as to why they are unable to comply with this policy, including providing any information reasonably requested by the school division.
 - 4.3. Any employee with an approved exemption, who is unable to comply with this policy (e.g. be vaccinated due to a medical reason, or for another protected ground under the *Alberta Human Rights Act*, will be reasonably accommodated where possible, as per legal requirements under the *Alberta Human Rights Act* up to the point of undue hardship.
 - 4.3.1. Employees seeking information about accommodations should contact the Associate Superintendent of Human Services for accommodation information.
 - 4.4. Any employee requesting workplace accommodation shall make a request for the accommodation as soon as possible (Individuals who are employees as of the affirmation date of this policy are required to submit their written request for accommodation by December 8, 2021. Employees hired after the affirmation date of this policy seeking accommodations are required to submit their request prior to commencing work). Employees who are seeking accommodation must discuss their needs with the Associate Superintendent of Human Services and seek a verified accommodation. Employee accommodations for medical reasons will require a medical confirmation from a licensed physician and may require employee responses to further inquiry from the school division to determine whether accommodations are possible, and what they will be. Accommodations based on a protected grounds will also require verification, including an explanation of various circumstances surrounding the request and response to school division inquiries.
 - 4.5. Arrangements for remote work for an employee will not be granted based on an employee's decision not to receive a COVID-19 vaccination. As well, personal preference will not be considered as grounds for an exemption and requests citing personal preference will be declined. All employees are expected to be able to attend School at any time in order to fulfill their work responsibilities because COVID-19 is an occupational health and safety hazard, regardless of location of work.
5. COVID-19 Vaccination Discussion
- 5.1. The school division strongly encourages any employee who is not Fully Vaccinated to meet with a physician to have a full and frank, two-way dialogue about the benefits and risks of a COVID-19 Vaccine.
6. Unvaccinated Employees Without an Exemption and Employees Opting to not Disclose Vaccination Status
- 6.1. Unvaccinated Employees and Employees who prefer not to disclose vaccination status will

be required to submit to approved ongoing COVID-19 testing up to twice per week or as required by the school division in its discretion, at the Employee's own cost in accordance with this administrative procedure. Proof of report demonstrating a negative result of a Health Canada approved rapid antigen, rapid PCR or lab-based PCR test completed within the previous 72 hours of work attendance shall be submitted to school administration/site supervisor, or the human resource department; said report must clearly state the type of test, time of sample collection, clear indication of a negative result and laboratory or pharmacy that completed the test, if applicable.

- 6.2. Employees who do not comply with this administrative procedure and who are not the subject of a bona fide accommodation to the point of undue hardship may be disciplined up to and including termination as set out in further detail at paragraph 7 below.
- 6.3. If an employee has been placed on leave without pay and subsequently becomes Fully Vaccinated and has provided Proof of Vaccination, the employee is eligible to return to work. The employee will need to arrange with the human resource department to start the process to return to work. The employee should give notice to the Associate Superintendent of Human Services requesting a return to work..
- 6.4. As Health Canada updates its requirements for full vaccination protection, the school division will update this administrative procedure and communicate requirements for maintaining Fully Vaccinated status accordingly.
- 6.5. The school division reserves the right to modify the application of this administrative procedure based on operational needs, including any requirement or processes relating to testing.

7. Non-Compliance

- 7.1. Except where an approved accommodation applies, failure to comply with this AP, shall result in:
 - 7.1.1. A meeting being held with the employee to discuss the policy, the reasons for their failure to comply with the policy, division expectations, and implications for failing to comply with this AP.

If the employee remains non-compliant with these principles as of December 18, 2021, including, but not limited to refusal to disclose vaccination status, refusal to comply with applicable testing requirements or the provision of false or misleading information, it may result in the employee being subject to disciplinary action, up to and including termination of employment pursuant to the Education Act (where applicable), applicable collective agreement or employment contract and school division policies and practices.
 - 7.1.2. Notwithstanding the commencement of a leave under this Policy and Procedure, the school division reserves the right to terminate the employment of an Employee who is away from work on a non-culpable basis or on a culpable basis where warranted.

8. Submitting Fraudulent Information

- 8.1. Any Employee who submits fraudulent Proof of Vaccination, fraudulent documentation supporting an accommodation, or any other fraudulent or misleading information regarding any issue arising under these principles will be deemed, during this period, to have been trespassing on school division property and shall be removed from school. Employees may also be subject to discipline up to and including termination of employment.
9. Employees can take paid time during the work day to get a COVID-19 Vaccine dose. Employees must provide advance notice to their supervisor of their appointment time.
 - 9.1. To book a COVID-19 Vaccine dose, contact Alberta Health Services online or call 811.
 - 9.2. The time required for unvaccinated employees to complete a COVID test will be the sole responsibility of the employee. Such a test shall not be completed during work time.
10. The information being collected under this Policy and Procedure is collected pursuant to Section 33(c) of the *Freedom of Information and Protection of Privacy Act* (FOIP) and is managed and protected in accordance with FOIP. If you have any questions about the collection and use of your information under FOIP, please contact the Associate Superintendent of Finance and Operations, in writing (by mail to 6302 56 Street, Taber, AB T1G 1Z9), email, or by phone (403-223-3547).
 - 10.1. Vaccination information, including but not limited to proof of vaccination, vaccination status, and requests for accommodation, is collected, used, and stored in accordance with the school division's obligations pursuant to applicable privacy legislation. Such information will only be used and disclosed in accordance with privacy legislation, including but not limited for the purposes of the school division (or its designated administrators or managers who have a need to know) determining and addressing whether there has been a breach or satisfaction of these principles, whether an employee is permitted to attend a school as set out herein, and to address health and safety concerns at school including whether additional or different safety protocols are necessary in the event of a COVID-19 outbreak or otherwise.
 - 10.2. The school division makes reasonable security arrangements to protect information against unauthorized access, collection, use, disclosure or destruction pursuant to Section 38 of FOIP. The information will be retained to achieve the purposes stated above and will be securely destroyed in accordance with retention and disposition schedules.
11. The school division has support available if employees are feeling stress, anxiety, or overwhelmed by COVID-19. Keep in mind that reaching out for support and assistance is not a sign of weakness, but a sign of strength and your commitment to your health and well being.
 - 11.1. For more information, please contact the school division's Human Services Department.

**COVID-19 COVID Harm Reduction Policy
Frequently Asked Questions
November 29, 2021**

This document is continuously updated - please see questions marked ***UPDATED*** or ***NEW***

POLICY BACKGROUND

As an employer with a strong commitment to health and safety, the Horizon School Division has enhanced control measures to mitigate the hazard of COVID-19 and protect the health, safety and welfare of its employees, students, and school communities.

Policy GBA: COVID Harm Reduction Policy outlines the requirements for employees and those adults who work with school division students in school division schools to be provide a negative COVID tests or proof of vaccination against COVID-19.

QUESTIONS ABOUT THE POLICY

Who does this policy apply to?

All school division employees including full-time, part-time, permanent, regular, temporary, casual, and individuals, whether employed via a collective agreement or an individual employment contract and any adult who works with school division students in school division schools whether or not the school division owns the school.

It also includes all adults who work with students in school division schools in any capacity, including volunteers. This includes, but is not limited to trustees, contractors, coaches, and service providers who enter school division schools when such adults work with or interact regularly with students.

School divisions schools includes all 39 of Horizon's schools including all Hutterite colony schools (while colony students are engaged in "English" school), Taber Christian School, and Taber Christian High School, Lomond community multipurpose facility, and public libraries operating within Horizon's schools during school hours, including but not limited to the Barnwell public library.

This policy does not include adults involved in transporting students to and from school or to and from extra-curricular activities when these are not Horizon owned vehicles or employees.

Will the school division provide rapid tests, or will I have to go to a pharmacy to get tested?

NEW

Although the cost of testing is normally paid by the employee, in order to limit the burden of such costs and out of care and concern for all employees and volunteers, Horizon will provide individuals with the option to utilize division supplied Rapid Testing kits at no charge. This measure will be reviewed monthly to determine if Division supply of rapid testing kits at Division cost continues to be a feasible and appropriate approach despite the Division's lack of legal obligation to provide the rapid testing kits at its cost. Employees wishing to access this option shall:

1. Make arrangements with their principal/site supervisor to partake in this option.
2. Provide written confirmation that
 - a. they have watched the training video about administering and processing the tests.
<https://www.youtube.com/watch?v=LEDib8tjhrI>
 - b. they acknowledge and agree that Horizon will report testing results to the province as

required under the provision of accessing the Rapid tests.

3. Arrive at school early enough to take a Rapid Test at school.
4. Comply with school administration regarding supervision expectations.

Individuals who do not wish to access Horizon supplied Rapid tests, must access COVID tests at authorized pharmacies at their own cost, and provide proof of a negative test as per this AP.

I'm not an employee, how do I submit rapid test results or proof of vaccination? *UPDATED*

The human resource department will not collect or store proof of vaccination or rapid test results for non-employees, unless the rapid test is provided by Horizon. Adults who work with students in schools should have their rapid test results or proof of vaccination readily available and are required to show them to school administration upon arrival at school and/or upon request by those tasked with enforcing this policy. Individuals wishing to access Horizon supplied Rapid tests should make arrangements with school administration prior to arrival. Individuals without such proof are in non-compliance of this policy and must leave division schools immediately.

I'm a substitute, do I also submit my negative COVID test or proof of vaccination to the Human Resource department? *UPDATED*

Substitute teachers (and casual support staff who sub for absent support staff) should submit their proof of vaccination to the human resource department. Those required to provide proof of a negative rapid test (e.g. have not provided proof of vaccination) should have their rapid test results readily available and are required to show proof to school administration upon arrival at school and/or upon request by those tasked with enforcing this policy. Substitutes wishing to access Horizon supplied Rapid tests should make arrangements with school administration. Individuals without such proof are in non-compliance of this policy and must leave division schools immediately. Unvaccinated staff showing up without proof of a negative test, or refusing to complete Horizon supplied Rapid tests (with a negative result) will not be paid for the day as they did not arrive fit for work (were not in compliance with this policy).

The school I work at is not owned by the division, does this policy still apply?

Employees whose worksites are located in buildings owned by organizations external to the Division are required to follow this regulation and requirements of the external organization. Other organizations may choose to impose additional, more stringent vaccination requirements. Employees must comply with the more stringent requirements.

Why is the school division introducing a COVID-19 vaccination policy?

Since the launch of the Provincial vaccination program, the school division has encouraged employees to make an informed choice on vaccination and strongly encouraged participation by all employees and students who are able to be vaccinated. At the same time, the school division has maintained a number of layered workplace controls to minimize the spread of COVID-19 in the workplace.

Alberta continues to see waves of cases during the COVID-19 pandemic and hospitals across Alberta face unprecedented capacity. The Government of Alberta has declared a state of public health emergency. Given COVID data, the circumstances in Alberta, and the information gathered on the vaccination rates of Albertans via Alberta Health Services, and the October 5, 2021 joint letter from the Premier and the Minister of Health strongly recommending school divisions implement a vaccination policy the Board of Trustees passed a motion to add another layer to the school division's workplace controls to further minimize the hazard of COVID-19.

Are contractors required to follow this policy?

The COVID-19 Vaccination Policy applies only to Horizon School Division employees and adults who work with students in school division schools. The school division will communicate with contractors whose staff work with school division schools and/or who regularly interact with school division students in school divisions schools to inform them of this policy and administrative procedure. The school division will not be requiring proof of vaccination or negative COVID test results from its contractors, suppliers or partners at this time, unless they work with students or regularly interact with students in school division schools (e.g. caretakers who are working during the school day), but we expect that all workers on our sites continue to adhere to all legislated public health restrictions including physical distancing, masking and not attending the worksite while experiencing symptoms of COVID-19. Contractors who work with students or who interact with students should have their rapid test results or proof of vaccination readily available and are required to show them to school administration upon arrival at school and/or upon request by those tasked with enforcing this policy. Individuals without such proof are in non-compliance of this policy and must leave division schools immediately.

Do employees on short term, long term or extended leaves (e.g. parental) leave need to comply with this policy?

All employees regardless of leave status will be required to adhere to the COVID-19 Harm Reduction Policy and will be required to provide proof of being fully vaccinated prior to their start date of work returning from their leave. If the employee is not fully vaccinated as of the time their respective leave has expired, they will be required to participate in the school division's rapid testing program at their own cost or seek an accommodation as per this AP.

What does it mean to be fully vaccinated?

An employee is fully vaccinated within the meaning of the Policy once they have received all required doses of a COVID-19 vaccine series and at least two (2) weeks have passed following receipt of the final dose.

Does the school division have the authority to collect my personal information?

All public bodies, including the Horizon School Division, can collect personal information where that information relates directly to and is necessary for an operating program or activity. The school division has determined that it is necessary to require employees to provide proof of a negative COVID status or be vaccinated in order to protect the workplace and mitigate the hazard of COVID-19. Once collected, the school division has a statutory duty to protect the confidentiality of that information and to disclose and dispose as permitted by the *Freedom of Information and Protection of Privacy Act* (FOIP Act).

Do you have to comply with the *Health Information Act* when collecting this information?

The school division is not subject to the *Health Information Act* and will maintain this information in accordance with the FOIP Act. The personal information collected will be managed and protected in accordance with the FOIP Act. This information will only be used to the extent necessary for implementation of this Policy, health and safety protocols, and infection and prevention control measures in the workplace. Only those staff required to review this information for the purposes of determining policy compliance will see this information.

How long will this policy be in effect for?

This policy is temporary. The Division will reevaluate the need for this policy when the government and medical authorities no longer support the identification of COVID-19 as a workplace hazard. The Board

of Trustees will review this policy for amendment or elimination a minimum of every 6 months, or as deemed necessary.

I am vaccinated but I don't feel I should have to provide my immunization record. Do I have to submit it? *UPDATED*

This Policy requires all employees to provide proof of a negative COVID test or provide proof of vaccination. The school division requires this information to determine whether the policy and administrative procedures are being adhered to. If an employee does not submit proof of vaccination they will be required to comply with COVID-19 rapid antigen testing requirements at their own cost. The school division may at its sole discretion provide individuals with the option to utilize division supplied Rapid Testing kits at no charge.

For unionized employees, did you engage with the unions when developing this policy?

The school division discussed its intention with local presidents of the Alberta Teachers' Association (ATA) and Canadian Union of Public Employees (CUPE). A copy of the policy was also shared with employees and stakeholders prior to final reading. If you have questions regarding your union's position on the Policy, please speak with your union representative.

What happens if I am not fully vaccinated by December 1, 2021? *UPDATED*

Employees are required to submit their proof of vaccination by December 1, 2021. Those who are not fully vaccinated by December 18, 2021 will need to comply with ongoing COVID-19 rapid antigen testing up to twice per week (frequency to be determined at the school division's discretion) at the employee's own cost. The school division may at its sole discretion provide individuals with the option to utilize division supplied Rapid Testing kits at no charge.

What happens if I am not vaccinated and do not intend to get tested for COVID-19 rapid?

Employees who are not fully vaccinated by December 18, 2021 and do not provide rapid antigen testing results through the school division's designated process will be placed on leave without pay. The placement of an employee on leave without pay in accordance with the policy and administrative procedure does not prevent the school division from ending the employment relationship on a non-culpable or culpable basis where individual circumstances warrant.

How long can I be placed on leave without pay?

The policy will be in place for the duration of the COVID-19 pandemic. A date for review of the policy is scheduled to take place in six months. This means that an employee could be placed on leave without pay for at least six months at this time.

Can I collect Employment Insurance (EI) or get a second job while on leave without pay?

An employee cannot receive EI payments when on leave without pay as Employment and Social Development Canada's [eligibility requirements](#) consider it to be the same as "if you voluntarily left your job without just cause." As for a second job, the employer has no right to limit an employee's activity if they respect the rules and policies concerning conflicts of interest and/or any provisions in a collective agreement that would limit the type of outside work an employee may perform.

Will I still receive health & welfare benefits if I am placed on a leave without pay?

ASEBP has existing provisions for members of the Horizon School Division who are on leave without pay. If a benefit plan member goes on authorized leave without pay, they are responsible for both the employee and the employer share of contributions for themselves, and their eligible dependents. It is important that the employee contact the Human Resources department before the leave starts, to

ensure they have communicated their choice to avoid unintentional discontinuation of their benefits coverage.

What happens to my pension during a leave without pay?

Employees who are on unpaid leaves do not accrue pensionable service. Employees who return to work may be able to purchase the leave of absence period upon their return. Payment of the employer share of the premiums is subject to Alberta Teachers' Retirement Fund or Local Authorities Pension plan regulations. Employees are encouraged to contact Human Resources to discuss their circumstances.

When do I have to provide proof of COVID-19 vaccination? *UPDATED*

Current employees are required to submit proof of vaccination to Human Resources by December 1, 2021. New employees are required to submit proof of vaccination to Human Resources upon being hired.

What if my rapid test comes back positive?

A positive rapid test result is considered a preliminary or presumptive positive. Anyone who receives a preliminary positive result must submit to mandatory AHS approved 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. The employee must immediately isolate until the AHS approved lab-based test results are confirmed negative. Absences during this time period should be recorded as sick.

What if my rapid test comes back inconclusive? *NEW*

An inconclusive is not a negative. As such, the individual has not met the fit for duty requirement and would not be able to work. They would be placed on personal leave until a negative test is provided.

What if I have taken a COVID test but have not received my results, am I able to come to work?

No, you are required to provide proof of a negative test to be able to come to work. It is your responsibility to ensure you have scheduled the test at a time that gives you appropriate time to get your results. While you await your results you would be on a personal leave. Whether you are paid or not for a personal leave will depend on your collective agreement or employment contract provisions.

How do I provide proof of vaccination and who do I provide it to?

Employees provide Human Resources with proof of vaccination by either submitting a physical copy to the human resource department or an electronic copy by email (covid.info@horizon.ab.ca).

Note that casual support staff (replacement staff), substitute teachers, and nonemployees provide proof of a negative COVID-19 rapid test result directly to school administration when they enter the building or make arrangements with school administration to take a rapid test upon entering the building, if applicable.

If school administration or Human Resources is unable to determine the authenticity or veracity of proof of rapid testing or proof of vaccination, the employee will not be able to work until the issue is resolved.

HUMAN RESOURCES DUTIES

1. Human Resources department is generally responsible to ensure the confidentiality of information obtained in this policy. Human Resources shall be responsible for taking all prudent and reasonable steps to protect the confidentiality and security of all personal information disclosed to

- the Division under this policy.
2. Human Resources, under the direction of the Associate Superintendent (Human Resources) or designate may designate an individual to assist with the collection and management of compliance with this policy and administrative procedure.
 3. Where the Division has a legal obligation under the *Alberta Human Rights Act* to modify the requirements or expectations of this policy, the Associate Superintendent shall do so on behalf of the school division.
 4. In regard to *proof of vaccination*, the designated individual shall be responsible for:
 - 4.1. Collecting information from employees regarding proof of vaccination.
 - 4.2. Verifying proof of vaccination prior to approving employees to work. The designated individual will retain physical or electronic copies of records from employees as per this policy.
 - 4.3. To protect employee private information, the designated individual will not openly provide proof of vaccination in the school division's human resource database. The designated individual will record employee proof of vaccination by making a coded notation in a secured file.
 - 4.4. Ensuring that information gathered under this policy is only used for the purpose of ensuring compliance with this policy. Such information will not be shared with any other person except when required to manage the employee's employment relationship with the Division or as otherwise permitted under the *Freedom of Information and Protection of Privacy Act*.
 - 4.5. Destroying any notation or record in their possession gathered from the proof of vaccination at the appropriate time.
 - 4.6. Questions from employees with respect to the use, collection, and storage of information gathered under this policy should be addressed to the Associate Superintendent of Human Resources and or the division's FOIP coordinator (Associate Superintendent of Finance and Operations).
 5. In regard to *proof of rapid testing*, the designated individual shall be responsible for:
 - 5.1. Collecting information from employees (except casual support staff and substitute teachers) regarding proof of testing.
 - 5.2. Verifying proof of twice-weekly testing prior to approving employees to work. The designated individual will retain physical or electronic copies of records from employees as described in policy.
 - 5.3. Determining that the proof of rapid testing is authentic and relates to the employee submitting the proof of rapid testing.
 - 5.4. Advising the employee that the proof of rapid testing is valid only for a period of 72 hours, and that another test and proof will be required prior to commencing work after that 72 hour period. Should the test not be approved, the individual and school administration will be informed.
 - 5.5. Recording the date the rapid test was provided.
 - 5.6. Ensuring that information gathered under this policy is only used for the purpose of ensuring compliance with this policy. Such information will not be shared with any other person except when required to manage the employee's employment relationship with the Division or as otherwise permitted under the *Freedom of Information and Protection of Privacy Act*.
 - 5.7. Destroying any notation or record in their possession gathered from the proof of vaccination at the appropriate time.
 - 5.8. Questions from employees with respect to the use, collection, and storage of information gathered under this policy should be addressed to the Associate Superintendent of Human Resources and or the division's FOIP coordinator (Associate Superintendent of Finance and

Operations).

Will I be expected to provide a negative COVID test upon a return to work from having COVID or is there an exemption for natural immunity?

Recent infection with COVID-19 may interfere with test effectiveness. Screening results in these individuals should be interpreted with caution. AHS does not recommend screening someone if they have been diagnosed with COVID-19 within the last 6 weeks. Individuals who have recently had COVID are not exempt from providing proof of a negative COVID test, however for 6 weeks following a COVID infection they will be excluded from COVID test expectations. Proof of a positive COVID test and the date of the positive test are required to be submitted to the Human Resource department (employees) and to school administration (nonemployees upon enter the building).

I'm not an employee of the school division, but volunteer with students to support the school and am not vaccinated, will I be required to provide a negative result on a rapid antigen test?

*** UPDATED***

Yes, but the school may opt to provide an honorarium for your volunteer services that covers the cost of the test, or provide a Rapid test provided by the school division.

The HR department will not track proof of a negative test or vaccination status of nonemployees given that there is no regular schedule, unless the test is provide by Horizon. As such, nonemployees are required to show a negative COVID test or proof of vaccination to school administration as they enter the school. Individuals without such proof are in non-compliance of this policy and must leave division schools immediately.

What does a negative result on a rapid antigen test mean?

A negative rapid antigen test result does not guarantee that the individual is not infected with COVID-19 or will not spread it to others. In asymptomatic individuals, false negatives are common. As such, the individual is required to continue to adhere to public health rules such as masking, physical distancing, hand hygiene, etc

Who is collecting and will have access to employee vaccination records? *UPDATED*

The Human Resource Department is collecting the vaccination records of all employees except casual employees and school administration will be reviewing proof of negative COVID tests and vaccination status of casual employees and nonemployees. Access to employee records is limited to those performing the verification of proof of vaccination and reporting functions. Employee records will be updated in the school division's database as part of the verification and reporting process. Those opting to utilize school division supplied Rapid tests will also have their results collected as per government requirements.

What if I am currently partially vaccinated? How do I update my submission to include my second dose?

To update your employee vaccination record, please submit proof of your second dose by contacting the Human Resource Department.

How do I access my COVID-19 vaccination record?

Access your record through the [Alberta Vaccine Record Service](#). You will need to have your personal health care number, but do not need an account to access your record.

I've lost the documentation for my first dose. What if I can only find proof of my second dose?

Access your record through the [Alberta Vaccine Record Service](#). You will need to have your personal

health care number, but do not need an account to access your record.

Can I show my supervisor my vaccination record instead of submitting the document to the Human Resource Department

For employees, vaccination records must be submitted to the Human Resource department and verified. The vaccination information will be verified and retained on your employment. Casual support staff, substitute teachers, and other adults who work with students in schools (nonemployees) provide proof of a negative test or vaccination to school administration upon entering the building.

How can I get vaccinated?

Visit the Government of Alberta's [COVID-19 vaccines and records page](#) where you can find information on booking an appointment with Alberta Health Services or a pharmacy, find a walk-in clinic, or find a doctor's office.

Am I able to take time off work to be vaccinated?

Employees have provisions in their collective agreement or employment contract that may allow them to take time off to get a COVID-19 vaccine dose. Employees must provide advance notice to their supervisor via ATRIEVE. COVID testing is not considered a medical procedure and staff are expected to take COVID tests outside of work hours.

Where can I find more information on vaccinations?

Alberta Health Services' recommends that people who may have hesitations in receiving a COVID-19 vaccine to visit their family physician or call 811. Employees may also learn more about vaccine safety and effectiveness at this [Alberta Health Vaccine myths and facts site](#).

What if I have tested positive for COVID-19 in the past? Is this the same as being vaccinated?

Employees are required to show regular negative COVID tests or be vaccinated regardless of a past positive COVID-19 test. Advice from public health agencies is that eligible individuals who have had the virus should get immunized to provide the best possible protection.

Do I stop coming to work prior to December 18, 2021 if I am not vaccinated?

No. Employees continue to attend work in advance of December 18, 2021. For those who are not vaccinated, they are given the time to gather the information they may need to get vaccinated and understand how it will help protect themselves and others in the workplace.

Can I work from home so I do not have to be vaccinated?

The school division's workforce is unable to work remotely due to the nature of the work. All employees, therefore, are required to comply with this policy and administrative procedure.

What if there is a reason I am not able to be vaccinated and am not able to comply with this policy? *UPDATED*

An employee may request an exemption from the requirements of this policy by submitting a written request for exemption (see Appendix A) on the basis of a protected legal ground, which may include:

- a sincerely held religious belief which prohibits the employee from receiving a COVID-19 vaccine (accompanied by a sworn or affirmed declaration of that belief); or
- a medical condition which prevents the employee from safely receiving a COVID-19 Vaccine (accompanied by medical documentation from a physician licensed to practice in Alberta containing the required information as per CMOH Order 43-2021, or as may

be updated form time to time, and confirming that the employee cannot safely receive a COVID-19 vaccine and the anticipated duration of the required exemption).

Request for exemption forms should be submitted ASAP to minimize employee costs, and must be submitted prior to December 8, 2021.

Does being vaccinated exempt me from daily screening, wearing a mask and/or physical distancing while in my workplace?

No. Employees who are fully vaccinated or who have an approved exemption are still required to adhere to all other school division workplace COVID-19 hazard controls.

I am feeling stressed. What supports are available to help me?

The COVID-19 pandemic is an unprecedented challenge that we are all facing together. There have been many changes in both our personal and work lives that have been stressful and require us to adapt and manage as best we can. The school division has supports available if you are feeling stress, anxiety, or overwhelmed due to COVID-19. Reaching out for support and assistance is not a sign of weakness, but a sign of strength and a commitment to your health and wellbeing. For more information contact the Human Resources department or reach out to the:

- Employee and Family Assistance Program (EFAP) - 1-800-663-1142

Is a Notice of Liability/Informed Consent letter relevant to this Policy?

Organizations such as AHS and pharmacies that administer COVID-19 vaccinations are responsible to ensure that they receive informed consent. As such, the school division is not responsible for and will not be responding to requests alleging further information be provided to employees before they provide informed consent to vaccination or compliance with this Policy. Should employees require further information about the COVID-19 vaccines including benefits and risks, the school division strongly encourages employees to consult their physician.

Do I need to submit my vaccination record with the QR code Alberta Health released?

Yes, you are required to submit your vaccination record using the most recent copy of your vaccination record which includes a QR code.

If government COVID-19 protocols are removed, do employers continue to have any obligation to their employees with respect to the possible spread of COVID-19?

Employers have a general obligation to provide employees with a safe workplace. This obligation does not translate into employers guaranteeing that an employee will not contract COVID-19 at work, or any other illness for that matter. If an employer did not cause the illness to be in the workplace, it would be difficult to foresee a fact circumstance where an employer would be held liable for an employee bringing COVID-19 to work and infecting other employees. An employer does not have a positive obligation to prevent every possible risk of COVID-19 entering the workplace, nor is it reasonable to expect employers to guarantee safety from COVID-19. Employers do have an obligation to identify hazards in the workplace and take reasonable steps to manage and reduce those hazards.

When will I need to be vaccinated by?

Within the current policy and administrative procedure, employees and adults who work with students in the school do not need to be fully vaccinated against COVID-19, as they are able to continue with providing negative COVID tests twice per week effective December 18, 2021.

Can my employer ask me for my vaccination status?

Yes, Horizon's COVID Harm Reduction policy states that employees and adults who work with students in schools are responsible for disclosing their testing status and/or vaccination status accurately as required. Mandatory vaccination policies have previously been implemented by other employers. In those cases, the collection and disclosure of vaccination status was permitted by arbitrators as a means of enforcing the policy. Employees have the right to medical privacy and any personal health information that is collected, used, or disclosed must comply with applicable privacy laws. Horizon limits the questions to gather only the information that is strictly necessary.

Can my employer require me to be vaccinated?

No, one can be physically forced to get a vaccine against their will. However, according to the limited case law available, grievors must live with the consequences of refusing to get vaccinated, which may include being placed on unpaid leave and termination. Employers have an obligation to keep workplaces safe and, in the context of a global pandemic. Horizon requires that employees and adults who work with students in schools provide a negative COVID test or be vaccinated.

I'm an employee and have COVID symptoms but don't want to get tested? Do I just stay home for a minimum of 10 days, or until I feel better whichever is longer?

Employees with core COVID symptoms are required to get tested via AHS within 48 hours. Given that individuals who test negative via AHS are only legally required to stay home until they feel better, employees who feel better before the 10 day period would be legally required to return to work if they were negative. An employee's decision to not get tested is therefore potentially costing the division. Employees opting to not get tested who are symptom free within 10 days should record "sick" in ATRIEVE while they are sick and "personal leave" for the remaining days of the 10 day isolation period. If they opted to get tested and the test was positive, they are required to stay home for 10 days and should enter "sick" for the entire period.

If I'm not vaccinated and am required to show proof of a negative COVID test, when should I get the test? *UPDATED*

Acceptable proof of a negative COVID test is a negative test that has been completed within the previous 72 hours of the commencement of a "workday" or "shift" of the employee. Testing should normally occur on Sundays and Wednesday or Saturday and Tuesday.

Can I submit the cost of the rapid tests to my Health Spending Account? *New*

ASEBP has communicated that when prescribed by a health care provider, COVID-19 diagnostic testing is an eligible expense and can be submitted to your Health Spending Account, if applicable.

What COVID tests can I use to prove I'm COVID negative? *NEW*

Tests must be approved by Health Canada <https://www.canada.ca/en/health-canada/services/drugs-health-products/covid19-industry/medical-devices/authorized/list.html> Horizon requires employees to submit a negative COVID test from an authorized testing facility (e.g. pharmacy) or conduct a Rapid test at their school facility prior to commencing their work schedule using a Rapid test supplied by the school division.

Can I administer the rapid test myself at home or do I have to go to a recognized testing facility? *UPDATED*

Tests must be performed at an accredited laboratory or testing facility (e.g. pharmacy) and must be used in compliance with testing guidelines issued by Health Canada and the Chief Medical Officer of Health. Our understanding is that the following pharmacies within Horizon provide COVID testing.

- Taber Johnson's Mon-Fri 1:00am to 5:00pm - \$40 (walk-in and wait for available pharmacist)
- Taber Walmart Mon-Sat (pharmacy hours) - \$20 (required to book appointment online)

Individuals may also conduct the Rapid test at school/school facility when accessing Rapid tests supplied by the

division.

According to the policy, casual support staff, substitute teachers, and other individuals show their proof of vaccination status and or proof of a negative COVID test to school administration upon arrival at school. When does that take effect? *NEW*

December 18, 2021

Our school is out for Christmas effective December 17, 2021. When would I need to start showing proof of a negative test? *NEW*

If employees enter the school over the Christmas holidays they would need to provide proof of vaccination or proof of a negative test as the policy takes effect December 18, 2021.

I do not consent to providing my medical information, will not disclose my status, and will not comply with testing. *NEW*

Employees with such a position will be placed on unpaid leave effective December 18, 2021.

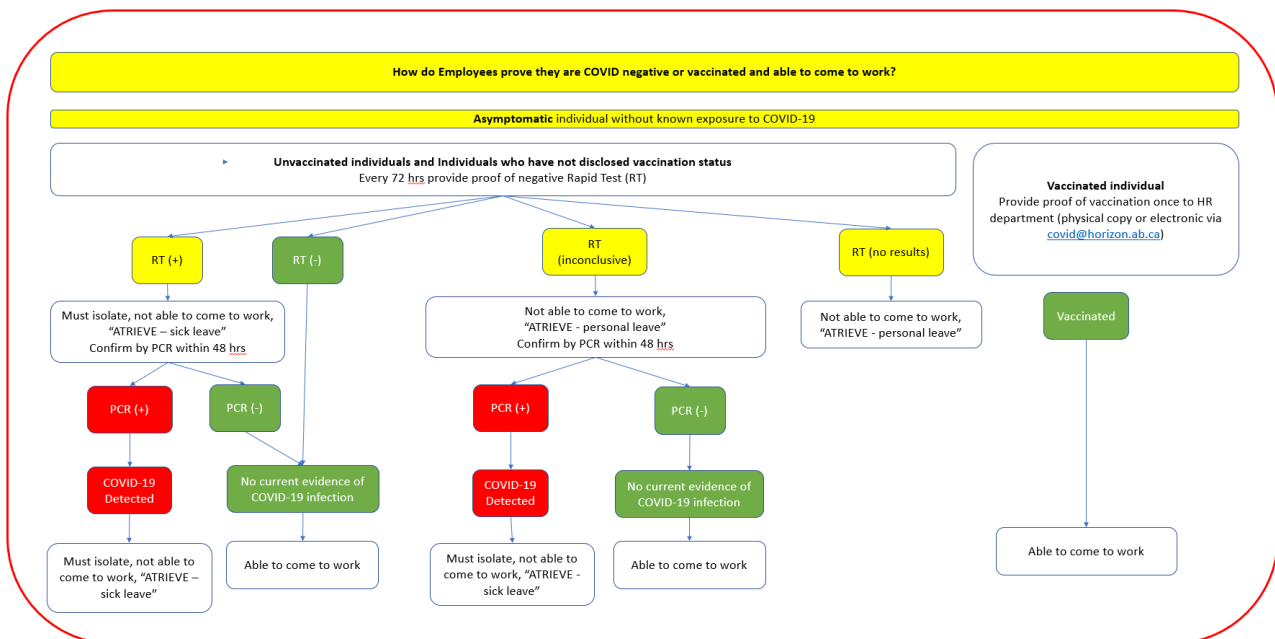
I plan to resign, when should I provide my notice? *NEW*

Employees who intend to resign are required to comply with provincial legislative requirements. The Employment Standards Code states, “to terminate employment an employee must give the employer a written termination notice of at least (a) one week, if the employee has been employed by the employer for more than 90 days but less than 2 years, or (b) 2 weeks, if the employee has been employed by the employer for 2 years or more.

- Employees deciding to resign will be required to submit written notice to the Human Resource department by either December 3, 2021, or December 10, 2021 depending on the length of their employment.

Can you provide an infographic that summarizes rapid testing expectations?

Rapid testing is only used for asymptomatic individuals. Individuals with core COVID-19 symptoms should stay home and get tested by AHS. The images below give a good summary of the expectations but may not describe every scenario outlined in the policy.



Appendix A: Request of Accommodation

All questions must be answered in full and all answers must be legible. Failure to meet these requirements may jeopardize the review and any approval of the accommodation request. Please contact the Associate Superintendent of Human Services if there are questions regarding form completion.

Employee Name:	Employee ID #:		
School:	Position:		
Home Address:	Home Phone:		
City/Town:	Prov:	Postal Code:	Alt. Phone:

The Horizon School Division has implemented a COVID-19 harm reduction policy for its employees and adults that work with/regularly interact with students in horizon schools that requires employees and adults to provide a negative COVID test or proof of vaccination by December 18, 2021.

If further information or clarification is required after the request form is submitted, Human Resources will make reasonable attempts to contact you by telephone and/or email to discuss the information required, which may include collecting additional documentation or obtaining consent for the school division to contact such persons necessary to obtain further information which is relevant to your request.

It is important you understand that by submitting a request for exemption, this does not automatically entitle you to an exemption. Your request will be reviewed and a determination will be made based on an individualized assessment conducted by the school division. You are required to facilitate the process by cooperating with the school division's assessment of your accommodation request. Failure to cooperate in the process could jeopardize the review and any approval of the accommodation request.

Employee Signature

Date

submit completed form to:

Associate Superintendent of Human Services
Human Resource Department

Email: Robbie.charlebois@horizon.ab.ca

** The cost of completing this form is the sole responsibility of the employee.*



All questions must be answered in full and all answers must be legible. Failure to meet these requirements may jeopardize the review and any approval of the accommodation request. Please call 403 223-3547 or email Associate Superintendent of Human Services if there are questions regarding form completion.

STEP A - This page must be completed by the Employee.

1. Which Human Rights ground(s) is your accommodation request related to?

- Medical (If selected, please complete the questions below and complete Step B)
- Religion (If selected, please complete the questions below and complete Step C)
- Other protected ground(s) under the *Alberta Human Rights Act* (Please specify: _____)
(If selected, please complete only the questions below)

2. Please outline why you feel you require an accommodation and why you are unable to comply with this policy.

3. Please outline the accommodation you are requesting.

4. Please provide any additional information that may be useful in reviewing your accommodation request.

Employee Signature

Date



All questions must be answered in full and all answers must be legible. Failure to meet these requirements may jeopardize the review and any approval of the accommodation request. Please call 403 223-3547 or email Associate Superintendent of Human Services if there are questions regarding form completion.

STEP B - This page must be completed by the Physician.

The Horizon School Division has implemented a COVID19 harm reduction policy for its employees that requires all employees to provide proof of a negative test or be fully vaccinated by December 18, 2021. Your patient has requested an accommodation with respect to a disability which would prevent them from being vaccinated. Please complete the following questions to assist us in understanding the need for accommodation.

Patient Name:	Date of First Visit:
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Nature of Disability:

Describe why the Disability is impeding your ability to comply with this policy?
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Is there a treatment plan in place that may change your patient's ability to be vaccinated and to comply with this policy? Is your patient compliant with the treatment plan? <i>(Note: the Horizon School Division has a variety of programs/services in place that may help in your patient's recovery (for example: Employee Family Assistance Program, etc). Should you wish for the school division to assist, please provide the service(s) that may be required.</i>

Prognosis: Permanent / Temporary (circle one). If temporary, please outline anticipated duration of exemption.
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Any additional information to consider:

Physician Signature:	Date:
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Physician Name:	Phone:	Fax:
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* The cost of completing this form is the sole responsibility of the employee.



All questions must be answered in full and all answers must be legible. Failure to meet these requirements may jeopardize the review and any approval of the accommodation request. Please call 403 223-3547 or email Associate Superintendent of Human Services if there are questions regarding form completion.

STEP C - This page must be completed by the Employee and witnessed by a Commissioner for Oaths

Employee Name:	Date:
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Please specify the religious organization, belief, practice, or observance that is the basis for your request for accommodation.

Please explain how the requirement to be fully vaccinated and/or engage in regular testing conflicts with the religious organization, belief, practice, or observance described above.

I, _____, of the _____ of _____, in the Province of Alberta, make oath and say:

1. The school division's COVID Harm Reduction Policy, COVID-19 vaccination requirement, and regular testing conflicts with my sincerely held convictions based on my religious organization, belief, practice or observance.
2. I understand that if my request is successful, the Horizon School Division will still require me to follow other health and safety measures, including, testing, physical distancing, masking, pre-shift screening, and/or alternative working arrangements.

Commissioner for Oaths:

Sworn (or affirmed) before me in the _____ of _____ in the Province of Alberta, this _____ day of _____, 20____.

Commissioner for Oaths in and for the Province of Alberta

Print Name and Expiry Date

Signature

* The cost of completing this form is the sole responsibility of the employee.