

# Communicable Disease Prevention Plan

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<b>Company Information:</b>
<b>First Nations Education Steering Committee</b>
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## What is a Communicable Disease?

A communicable disease is an illness caused by an infectious agent or its toxic product that can be transmitted in the workplace from one person to another. Examples of communicable diseases that may circulate in the workplace include COVID-19, norovirus and seasonal influenza.

## Why Does FNEESC Have a Communicable Disease Prevention Plan?

FNEESC is committed to providing a safe and healthy workplace for all of our staff, and we strive to keep each other safe and healthy by “looking out for ourselves and each other”. This plan provides us with measures and tools to help us look out for ourselves and each other through preventative measures, practices or protocols, and policies. These are the actions that all of us take to help reduce the risk of communicable disease in the workplace.

## FNEESC’s Communicable Disease Prevention Plan

FNEESC’s Communicable Disease Prevention Plan is a four-step plan that includes both ongoing measures to reduce the risk of communicable diseases and additional measures that will be put in place when there is an elevated risk of communicable disease. The four steps of the plan are:

1. Understanding the risk of communicable disease;
2. Implementing measures, practices or protocols, and policies that reduce the risk of communicable disease;
3. Communicating our measures, practices or protocols, and policies to everyone who works for FNEESC;
4. Monitoring our workplace and updating our plan as necessary.

## What Are Each of Our Responsibilities Related to Communicable Disease Prevention?

FNEESC will:

- Ensure that the materials (soap, cleaning supplies, facilities, etc.), communications and training required to implement and maintain this plan are available when and where they are required;
- Select, implement and document the appropriate organizational wide, site specific, and off-site activity control and prevention measures;
- Ensure that managers and employees are educated and trained as required to implement and support this plan;
- Conduct periodic reviews of the plan’s effectiveness. This includes a review of latest information and best practices to ensure that control and prevention measures are effective and practical, and to ensure that additional measures are implemented when there is an elevated risk of communicable disease;

- Maintain records of training, communications and activities;
- Ensure a copy of this plan is available to employees on SharePoint, and on the Health and Safety bulletin board.

Managers will:

- Ensure that employees that report to them are adequately instructed on the control and prevention measures outlined in this plan. This includes ensuring that new employees receive training, and all employees receive an annual refresher training;
- Direct work in a manner that minimizes risk to employees and maximizes the effectiveness of control and prevention measures;
- Follow up with employees who are not working in accordance with this plan.

Employees will:

- Understand the hazards of communicable diseases and cooperate with managers and FNEESC to control and prevent transmission at work;
- Follow established safe work procedures as directed by managers;
- Report any potential exposures or lack of compliance to managers.

All staff will:

- Inform guests, visitors, or others entering the FNEESC offices or participating in FNEESC events of FNEESC's communicable disease safety measures, practices or protocols, and policies.

## **Part 1: Understanding the Risk - Identification and Assessment**

There are three primary routes of transmission of communicable disease, all of which need to be controlled. These include contact, droplet, and airborne transmission.

### **1. Contact transmission, both direct and indirect**

Direct contact involves skin-to-skin contact, such as patient care or emergency response activity that requires direct personal contact (for example, providing first aid to a person with a communicable disease). Indirect contact involves a worker touching a contaminated intermediate object such as a table, doorknob, telephone, or computer keyboard, and then touching the eyes, nose, or mouth.

Contact transmission is important to consider because some viruses, like the influenza virus can persist for minutes on hands and hours on surfaces.

### **2. Droplet transmission**

Large droplets may be generated when an infected person coughs or sneezes. Droplets travel a short distance through the air, and can be deposited on inanimate surfaces or in the eyes, nose, or mouth.

### **3. Airborne transmission**

Airborne (inhalable) particles can be coughs and sneezes. Coughs and sneezes produce both large droplets and smaller airborne particles. The smaller particles remain suspended in air for longer periods, and can be inhaled. The large droplets can also evaporate quickly to form additional inhalable particles. As the distance from the person who is coughing or sneezing increases, the risk of infection from airborne exposure is reduced; but it can still be a concern in

smaller, enclosed areas, especially where there is limited ventilation. As the number of infected people in a room increases, the risk of infection can increase.

The following risk assessment table is adapted from WorkSafe BC regulations. Using this guideline as a reference, we have determined that the risk level of our workers is low to moderate. FNEESC employees work in a variety of environments (office, schools, meetings, workshops, travel, etc.), and have varying degrees of contact with the general public. The main areas of risk for employees are when employees attend meetings, workshops or events, travel by air, or are working in the office or in a classroom.

**Risk Assessment for Communicable Disease at FNEESC**

	<b>Low risk</b> Employees who have little contact with others (i.e. rarely attend meetings or events, or travel).	<b>Moderate risk</b> Employees who may be exposed to infected people from time to time due to meetings, events and travel.	<b>High risk</b> Employees who may be exposed to infected people regularly due to meetings, events and travel, and school visits.
<b>Examples of FNEESC Employees</b>	Administrative, Human Resources, Finance, ICT, Policy Analysts.	Director and Managers in the Communications and Policy, and the Executive Services and Community Support Departments; Some Managers in other departments.	Executive Director, and all Out-of-Office staff (Instructional Services, Special Education, Secondary Graduation and Adult Education, and Languages and Culture).
<b>Hand hygiene</b>	Yes (washing with soap and water, using an alcohol-based hand rub, or using hand wipes that contain effective disinfectant)	Yes (washing with soap and water, using an alcohol-based hand rub, or using hand wipes that contain effective disinfectant)	Yes (washing with soap and water, using an alcohol-based hand rub, or using hand wipes that contain effective disinfectant)
<b>Cleaning, and disinfecting,</b>	Recommended – disinfect high touch surfaces such as telephones, keyboards, door handles, and shared equipment regularly.	Recommended – disinfect high touch surfaces such as telephones, keyboards, door handles, and shared equipment regularly.	Recommended – disinfect high touch surfaces such as telephones, keyboards, door handles, and shared equipment regularly.
<b>Disposable gloves</b>	Not required	Not required	Not required
<b>Inhalation protection – face masks or face shields</b>	Not required	Not required	Not required
<b>Aprons, gowns, or similar body protection</b>	Not required	Not required	Not required
<b>Eye protection— goggles or face shield</b>	Not required	Not required	Not required
<b>Airway protection— respirators</b>	Not required	Not required	Not required

## **Part 2: Measures, Practices or Protocols and Policies to Reduce Risk**

FNESC has implemented the following ten measures to reduce the risk of exposure to and transmitting communicable disease:

### **1. Supporting staff who have symptoms of communicable disease.**

Symptoms of communicable disease may include, but are not limited to fever or chills, coughing, diarrhea, sneezing, congestion, runny nose, or nausea. Staff who have symptoms of a communicable disease should avoid being at the workplace or attending work at other sites.

FNESC supports both salary and hourly staff who have symptoms of communicable disease by:

#### **Salary Staff:**

Salary staff are entitled to fifteen (15) paid sick days per year, and accrue paid sick days at a rate of 8.75 hours per month. Staff are strongly encouraged to use their paid sick leave if they have symptoms of a communicable disease. If salary staff come to the office, or attend work at other locations while exhibiting symptoms of communicable disease, they may be asked by their Manager to go home and use their paid sick leave. Salary staff may be required to provide a doctor's note if sick leave is taken for three (3) or more consecutive days and/or there is a pattern of usage of paid sick time.

#### **Hourly Staff:**

Hourly staff have greater ability to reschedule work and be flexible with schedules. If hourly staff are exhibiting symptoms of communicable disease, they are strongly encouraged to reschedule travel, school visits or meetings. If rescheduling meetings is not a viable option, hourly staff should speak to their Manager for assistance. Managers will work with hourly staff to find options that ensure that staff are not attending work while exhibiting symptoms of communicable disease and will limit the loss of hours for hourly staff. If options are not available, Managers will consult with Human Resources to determine extraordinary options.

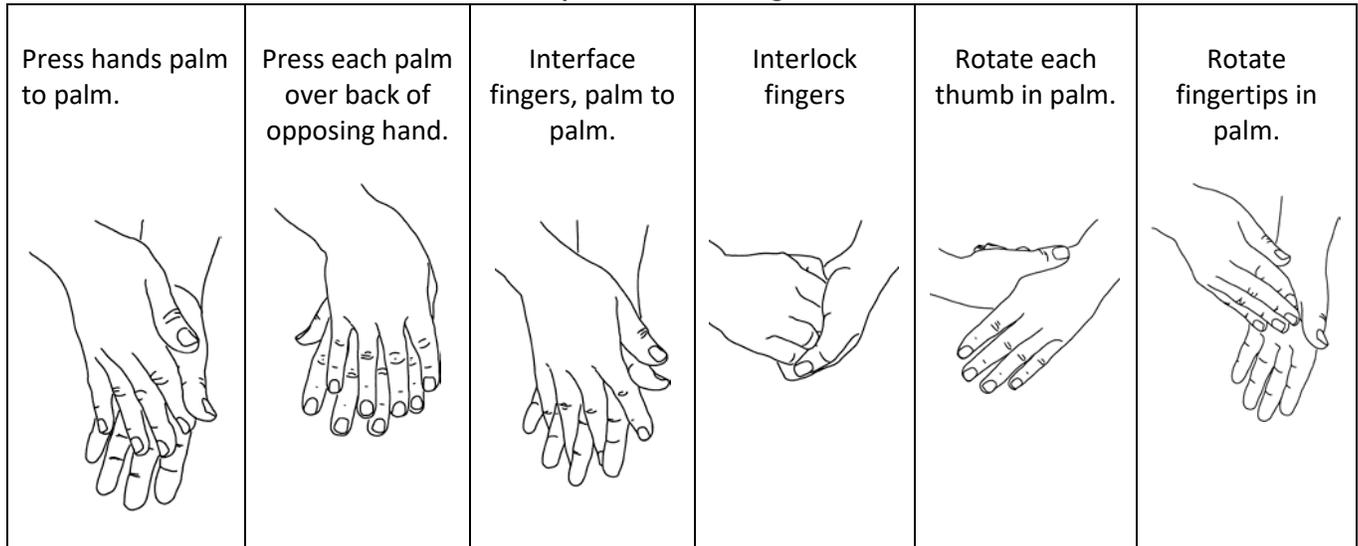
### **2. Hand Washing and Hygiene.**

Hand washing or disinfecting is believed to be one of the most effective ways to minimize the risk of infection of communicable disease. Proper hand washing and/or disinfecting helps to prevent the transfer of viruses from infected surfaces to the hands to other parts of the body – particularly the eyes, nose and mouth.

FNESC employees are encouraged to wash their hands regularly, such as:

- Before returning to the office (after signing in) at the beginning of the day, after meetings or other work tasks that take them away from the office, and after returning from lunch;
- After handling materials or touching surfaces that may be contaminated, such as the interior of an airplane, taxis, ride hails, or rental cars;
- Before entering and after leaving a First Nations school;
- Before eating, drinking, smoking, handling contact lenses or applying make-up.

### Proper Hand Washing Procedures



Use soap and warm running water (it doesn't have to be hot to do the job). If water is unavailable, use a waterless hand cleanser that has at least 70% alcohol. Follow the manufacturer's instructions on how to use the cleanser. For the duration of a COVID-19 outbreak, alcohol-based cleansers will be located throughout the FNEESC office. Out-of-Office staff will be reimbursed for the purchase of alcohol-based cleansers as communicated.

### 3. Cough and Sneeze Etiquette

Employees are expected to follow cough/sneeze etiquette while at work, regardless of whether they are in the office, at meetings or events, in a classroom, or traveling. This etiquette minimizes transmission of communicable disease via droplets and airborne routes. Cough/sneeze etiquette includes the following:

- Cover your mouth and nose with your sleeve or a tissue whenever you cough or sneeze. Do not cover your mouth and nose with your hand;
- Use tissues to contain secretions and dispose of them immediately in a waste container;
- Turn your head away from others when coughing or sneezing;
- Wash your hands regularly;
- Politely, remind others of proper cough/sneeze etiquette if you notice them not following the proper etiquette.

### 4. Regular Office or Workstation Cleaning/Disinfecting

All employees will clean or disinfect high touch surfaces in their office space or workstation at least once a week. All employees are required to use alcohol wipes to disinfect their keyboards, telephones, desktop, desk and cabinet handles, door knobs, light switches, and other commonly touched surfaces in their office or workspace.

FNEESC will be proactive and ensure that all necessary disinfecting items, such as wipes, are available.

## **5. Out-of-Office Staff Disinfecting and Preventative Measures**

While working, Out-of-Office staff will use alcohol wipes to wipe-down and disinfect the following:

- Airplane seats, table tops, arm rests, seatbelts, head rests, fans, and the general seating area of their seat on airplanes when traveling;
- Rental car steering wheels, gear shifts, window handles, seat head rests, keys, visors, and dashboard controls;
- Desk/table tops, seat handles and other commonly touched areas while at meetings or in classrooms;
- Hands after leaving classroom/school or meetings.

FNESC will reimburse Out-of-Office staff for the costs of a reasonable supply of disinfectant wipes.

## **6. First Aid Attendants**

First Aid Attendants will take precautionary measures when treating injured staff. This includes:

- Wearing gloves while performing first aid;
- Wearing face masks or face shields when necessary or appropriate;
- Washing hands immediately after providing treatment;
- Cleaning and disinfecting any areas that may have come in contact with bodily fluids or contents.

## **7. Vaccination for COVID-19**

Vaccination for COVID-19 plays a critical role in preventing transmission of COVID-19 in our workplaces (offices, meeting spaces, etc.) and in First Nations communities. Vaccinations help to protect FNESC staff and the people we work with and serve. There is clear scientific indication that those who are vaccinated are less likely to become ill or hospitalized. Public health officials have repeatedly stated that vaccines are the most effective means to reduce the risk of COVID-19 transmission and of serious illness or death resulting from COVID-19.

FNESC's goal is to advance quality First Nations education. In person support in First Nations and First Nations schools is a necessary aspect of quality education. In addition, in person collaboration through meetings, workshops, seminars, and conferences are very important to create the strong understanding and strong relationships necessary to advance First Nations education in BC. As a result, all FNESC staff, as well as consultants and volunteers who attend First Nations, FNESC workplaces, and in-person meetings are required to be fully vaccinated for COVID-19. This communicable disease prevention measure, specifically related to COVID-19 is necessary in order for FNESC to take reasonable and appropriate measures to prevent the spread of COVID-19 to staff, First Nations, our Board of Director, and others that FNESC staff come into contact with, and to able FNESC staff to continue the important and necessary work with First Nations.

FNESC's Vaccination Policy is attached in Schedule D.

## 8. Other Preventative Measures or Elevated Risk Situations

In the event of an elevated risk of communicable disease or the availability of new prevention practices, other communicable disease prevention measures and decisions will be driven by information from, and the actions, recommendations and directives of various other organizations such as:

BC Public Schools	BC Public Health Authorities	Canadian Travel Advisories
First Nations and First Nations Schools	BC Provincial Medical Health Office	WorkSafe BC
BC Government	First Nations Health Authority	First Nations Summit
Federal Government	Centre for Disease Control	

The Human Resources Department will be responsible for monitoring guidance, notices, orders and recommendations from the above sources and adjusting the FNEESC Communicable Disease Prevention Plan as necessary.

## 9. Special Measures Related to COVID-19

While COVID-19 is still a concern, FNEESC employees will be required to use the FNEESC COVID Exposure Control Checklists when participating in the following work-related activities:

1. Work Related Travel
2. Off-Site Meetings
3. Community or School Visits

FNEESC's COVID Exposure Control Checklists are attached in Appendix A, B and C.

## **Part 3: Education, Communications and Record Keeping**

### 1. Education of New Employees

The Human Resources Department will provide all new employees with information related to FNEESC's Communicable Disease Prevention Plan in the orientation program for new employees.

### 2. Education of Current Employees

All FNEESC employees who were hired prior to September 7, 2021 will receive training on the new FNEESC Communicable Disease Prevention Plan. In addition, all employees will receive an annual refresher training.

The Human Resources Department will create, coordinate and lead the first Communicable Disease Prevention Plan training for all current FNEESC staff. This will occur in August and September 2021.

The Human Resources Department will support Managers by providing resources to assist with annual refresher training for all employees and maintain records of annual refresher training.

Managers will ensure that annual Communicable Disease Prevention Plan refresher training is conducted with all staff who report to them.

### **3. Communications**

The Human Resources Department will be responsible for determining and developing communications regarding communicable disease prevention in the workplace. The Human Resources Department will also support the FNEC Occupational Health and Safety Committee, with communications or other actions that arise out of monthly health and safety committee meetings that are related to communicable disease prevention.

Managers will communicate information, directives, updates, or provide training with regards to communicable disease prevention information to their staff as directed, advised or guided by the Human Resources Department and the FNEC Occupational Health and Safety Committee

### **4. Record Keeping**

All employees will be required to sign an acknowledgement form indicating that they have received FNEC's Communicable Disease Prevention Plan training in August or September 2021, upon their onboarding/ orientation as a new employee, and/or as an annual refresher training.

## **Part 4: Monitoring Our Workplace and Updating Our Plan as Necessary**

### **1. Annual Review**

The FNEC Communicable Disease Prevention Plan and the FNEC workplace risk level will be reviewed annually by the FNEC Occupational Health and Safety Committee. The Occupational Health and Safety Committee will:

- Monitor FNEC's workplace risk level;
- Monitor guidance, notices, orders, and recommendations from BC Public Health Authorities;
- Recommend changes to FNEC's communicable disease prevention measures, practices or protocols, and policies, as necessary;
- Recommend changes to FNEC's Communicable Disease Prevention Plan, including changes to the workplace, work processes, staff and premises, as necessary;
- Recommend communications, reminders or training related to communicable disease prevention, as necessary; and,
- Make sure employees know how to raise health and safety concerns, including concerns related to communicable disease.

### **2. Monitoring our Workplace and Developments with Communicable Disease in our Workplace**

The Human Resources Department will be responsible for monitoring guidance, notices, orders, legislation, and recommendations from the sources listed below, and for adjusting the FNEC

Communicable Disease Prevention Plan as necessary. The Human Resources Department will monitor information from the following organizations and sources:

BC Public Schools	BC Public Health Authorities	Canadian Travel Advisories
First Nations and First Nations Schools	BC Provincial Medical Health Office	International, Canadian, and local news sources
BC Government	First Nations Health Authority	First Nations Summit
Federal Government	Centre for Disease Control	WorkSafe BC

**Who Do I Contact for More Information?**

<b>Questions From:</b>	<b>Answers From:</b>
FNESC Employees	Their direct supervisor/Manager
FNESC Managers or Directors	Human Resources (Pedro Lozano, Rob O’Hearn, or Mike Costello) <a href="mailto:pedrol@fnesc.ca">pedrol@fnesc.ca</a> <a href="mailto:robo@fnesc.ca">robo@fnesc.ca</a> <a href="mailto:mikec@fnesc.ca">mikec@fnesc.ca</a>
Questions from External Sources	Mike Costello <a href="mailto:mikec@fnesc.ca">mikec@fnesc.ca</a>

**Attached Appendices**

Appendix A: FNESC COVID Exposure Control Checklists for Work Related Travel

Appendix B: FNESC COVID Exposure Control Checklist for Off-Site Meetings

Appendix C: FNESC COVID Exposure Control Checklist for Community or School Visits

Appendix D: FNESC Vaccination Policy

## **APPENDIX A:**

### **FNESC COVID EXPOSURE CONTROL CHECKLIST FOR WORK-RELATED TRAVEL**

- Pack disinfectant wipes, hand sanitizer and face masks in your carry-on luggage or briefcase so you have them available at all times;
- Do not travel if you're not feeling well or exhibiting signs of a cold, the flu, or COVID 19;
- If you have to cough or sneeze, do it into your sleeve.

#### **At the airport:**

- Wear your mask when in crowded or close-contact areas, or when required;
- Avoid crowded areas if possible;
- Wash or sanitize your hands after touching commonly touched surfaces (door handles or push bars, using restrooms, etc.);
- Pack your own meals or snacks when possible, in order to avoid busy food services;
- Disinfect seat backs and handles in waiting areas;
- Select a seat in the waiting area that is away from crowds;
- Get on the plane after most passengers have boarded.

#### **On the plane:**

- If possible, confirm your seat 24-hours prior to your flight – select a seat in an empty row or where no one is sitting beside you;
- If possible, book the first flight of the day – planes will have a more thorough cleaning overnight;
- If possible, select a window seat, closest to the front of the plane is best for minimizing exposure – you won't have to traverse the entire cabin to get on or off the plane;
- Disinfect your seating area including armrests, tray, seatbelt buckle, screen, headrest, window blind handle, fan mechanism, etc.). Carry an extra zip lock bag to dispose of your used wipes;
- Wear your mask if you are comfortable doing so, or if it is required;
- Wash or sanitize your hands after disinfecting your area and after deplaning.

#### **At your hotel or billet:**

- Avoid check in lines. Use online Check-In or wait until Check-in is less busy;
- Avoid other crowded areas whenever possible;
- Wear your mask in public areas if required;
- Disinfect commonly touched surfaces in your room (door knobs, door locks, light switches on walls and on lamps, TV remote, bedside table, sink and bathtub taps, telephone handles and buttons, etc.);
- Wash or sanitize your hands after disinfecting and whenever you return to your room;

- Use in-room dining, if possible;
- Minimize the use of business-centres. Use your own laptop and printers;
- Ask for a copy of and follow the hotel's exposure control protocols.

#### **At restaurants:**

- Wear your face mask until you reach your table or whenever you are not sitting at your table (i.e. walking to the restroom);
- Choose a booth or a table along a wall or window, if possible;
- Use digital/touchless menus using the QR code on the table, rather than shared menus;
- Disinfect the table area around you, including the table edges;
- Disinfect shared condiments and spices (ketchup, salt, pepper, etc.) on your table prior to using;
- Use cashless payment methods when possible;
- Avoid touching walls, booths or chair backs when moving through the restaurant;
- Wash or disinfect your hands after disinfecting your table area and shared items;
- Avoid peak-times, if possible.

#### **In rental cars, taxis or ride shares:**

- Wear your face mask if you're sharing the ride, or have a driver;
- Disinfect your hands after entering the vehicle and securing your seatbelt;
- Disinfect door handles, window buttons, and seatbelt buckles;
- If you're sharing the ride or have a driver, have your window open (even a little bit) to get better air circulation;
- If you're in a taxi or ride share alone, sit in the back, passenger side seat, so that you're socially distanced from the driver;
- In rental cars, disinfect all commonly touched surfaces in the driver area including gear shift, steering wheel, turn signal and windshield wiper mechanisms, radio knobs, seatbelt buckles, door handles (inside and outside), window buttons, air conditioning buttons and fans, head rests, etc.;
- Use cashless payment methods when possible;
- Disinfect your hands after disinfecting commonly touched surfaces.

#### **On ferries:**

- Wear your mask when in crowded or close-contact areas, or when required;
- Avoid crowded areas and lines if possible. If you need to use the dining area, wait for the line to disappear and for many people to leave the dining section before you use it;
- Select a chair or table near a window or away from crowds. If you can find an empty row of chairs, or a table in the dining area where no one is sitting beside you, that is best;
- Disinfect your seating area and implements including armrests, table tops and sides, food trays, head rests, etc.);
- Sit outside if weather and temperature permit, or stay in your car if it is safe and you are permitted to do so;

- Wait a few minutes when getting out of your car and return to your car a little bit early to avoid crowds in stairwells;
- Avoid touching door knobs, hand rails, etc. if possible and safe.
- Wash or sanitize your hands after disinfecting your seating area and implements, and before getting into your car;

**In water taxis:**

- Wear your face mask if you're sitting inside;
- Sit outside or near an open window, if possible;
- Remember social distancing when selecting your seat. Try to avoid close contact with others;
- Wear your FNEC provided lifejacket/PFD;
- Wash or disinfect your hands after deboarding;
- Use cashless payment methods, or exact change when paying.

***FNEC has/will provide you with re-usable face masks, and will reimburse you, as explained, for the purchase of hand sanitizer and disinfectant wipes.***

## **APPENDIX B:**

### **FNESC COVID EXPOSURE CONTROL CHECKLIST FOR OFF-SITE MEETINGS**

- Pack disinfectant wipes, hand sanitizer and face masks in your briefcase so you have them available at all times;
- Do not attend in-person meetings if you're not feeling well or exhibiting signs of the flu or COVID 19;
- If you have to cough or sneeze, do it into your sleeve.

#### **At the meeting:**

- Ask the host if there are any Exposure Control protocols that you need to be aware of and/or follow;
- Wear your face mask when walking to/from the meeting in common-areas, or when required by the host's Exposure Control protocols;
- If possible, appropriate and culturally sensitive, avoid hand-shaking, hugging or other very close contact;
- Select a seat at the end of the table or in another location that minimizes close contact with others. Try to avoid sitting face-to-face with other participants. And, try to use the same seat for the entire meeting;
- Disinfect the area around you including, table top and edges and chair handles;
- Avoid shared items like pens, documents, microphones, slide clickers, water jugs or coffee urns, tongs, etc.;
- Minimize the use of business-centres or other sharing of equipment. For example, have your documents printed before you go to the meeting, using your own printer;
- Remember social distancing when socializing;
- Bring and use your own water container and/or coffee cup;
- Avoid crowds and line-ups (i.e. for food that is being served at the meeting);
- Throw away all of your used/unwanted items after the meeting (e.g. water bottles or plastic cups, plastic cutlery, napkins, unwanted documents, etc.);
- Be respectful, careful and considerate. Remember that you not only need to look out for yourself, but you need to also look out for those in the meeting who may have compromised immunity, or are particularly or uniquely at risk (such as elders);
- Wash or disinfect your hands after leaving the meeting.

#### **In taxis or ride shares:**

- Wear your face mask if you're sharing the ride, or have a driver;
- Disinfect your hands after entering the vehicle and securing your seatbelt;
- Disinfect door handles, window buttons, and seatbelt buckles;

- If you're sharing the ride or have a driver, have your window open (even a little bit) to get better air circulation;
- If you're in a taxi or ride share alone, sit in the back, passenger side seat, so that you're socially distanced from the driver;
- Use cashless payment methods when possible;
- Disinfect your hands after disinfecting commonly touched surfaces.

***FNESC has/will provide you with re-usable face masks, and will reimburse you, as explained, for the purchase of hand sanitizer and disinfectant wipes.***

## APPENDIX C:

### FNESC COVID EXPOSURE CONTROL CHECKLIST FOR COMMUNITY OR SCHOOL VISITS

- Pack disinfectant wipes, hand sanitizer and face masks in your briefcase so you have them available at all times;
- Do not visit communities or schools if you're not feeling well or exhibiting signs of the flu or COVID 19;
- If you have to cough or sneeze, do it into your sleeve.

#### **Before you go:**

- Confirm with your Manager that FNESC has received official permission from the community that they are ready for FNESC representatives to enter the community and/or school;
- If you are not vaccinated, confirm that the community is allowing non-vaccinated people to enter;
- Ask your community/school contact for a copy of, or a list of Exposure Control protocols that you need to be aware of and follow during your visit.

#### **When in the community/at the school:**

- Adhere to all Exposure Control protocols outlined by the community *and* the school;
- Wear your face mask if required or if in crowded indoor areas;
- Wear your face mask if working with particularly or uniquely vulnerable people (elders, immune deficient, etc.);
- Wash and/or disinfect your hands often (every 90-minutes is a good guideline);
- Remember social distancing whenever possible, including when socializing;
- If possible, appropriate and culturally sensitive, avoid hand-shaking, hugging or other very close contact;
- Avoid shared items like pens, white board pens, documents, water jugs or coffee urns, tongs, etc. When possible, avoid sharing your items (i.e. tablets or other therapy tools). If items must be shared, disinfect after each use;
- Bring and use your own water container and/or coffee cup;
- Bring and use your own paper, pens, white board pens, stapler, scissors, etc.;
- Be respectful, careful and considerate. Remember that you not only need to look out for yourself, but you need to also look out for those in the community and in the school that you are working with or coming into contact with. Be particularly considerate of those who may be immune compromised or have a particular or unique vulnerability, such as elders. You are the outsider and may have had more contacts than those you are working with in the community/school.

***FNESC has/will provide you with re-usable face masks, and will reimburse you, as explained, for the purchase of hand sanitizer and disinfectant wipes.***

## **APPENDIX D:**

### **FNESC VACCINATION INFORMATION POLICY**

#### **6.0: COVID-19 VACCINATION POLICY**

##### **Policy:**

The First Nations Education Steering Committee (“FNESC”) is committed to ensuring the health, welfare and safety of all employees through providing safe working environments. Despite vaccination efforts, COVID-19 continues to circulate in BC communities. The intent of this policy is to safeguard the health and safety of our employees, volunteers, and independent contractors by reducing the transmission of COVID-19 within our building, workplace, the First Nations we serve, and respectively, the surrounding community.

The COVID-19 pandemic has created significant health and safety risks for everyone. Vaccination plays a critical role in preventing the transmission of COVID-19 in our workplaces and helps protect our staff and the members we serve. There is a clear indication that those who are vaccinated are less likely to become ill or hospitalized. Public health officials have repeatedly stated that vaccines are the most effective means to reduce the risk of COVID-19 transmission and of serious illness or death resulting from COVID-19.

This policy sets out FNESC’s expectations regarding vaccination and the collection of vaccination status information. The purpose of this policy is to implement a vaccination program in a manner that balances our need to safeguard the health of our employees and the community we serve from COVID-19, while ensuring that the process for collecting and using vaccination information is compliant with applicable personal information protection laws. This policy takes into account the particular risks of transmission in our workplaces and in the communities we serve, which will be significantly reduced by vaccination.

This policy will also have additional ancillary benefits, including reduced absenteeism, improved contact tracing and safety plan implementation in the event of an outbreak of COVID-19, and enhanced employee and public confidence in returning to our worksites.

##### **Scope:**

This policy applies to all FNESC employees. It also applies to individual contractors and volunteers who are required to have in-person attendance in the FNESC offices, at FNESC events, or in First Nations communities.

## Definitions:

1. **Approved Vaccine:** A COVID-19 vaccine that has been approved for use by Health Canada.
2. **Employees:** Means all employees of FNEC
3. **Fully Vaccinated:** An individual is considered Fully Vaccinated under this policy seven days after they have received the full series (at least 2 shots) of an Approved Vaccine or a combination of Approved Vaccines as determined by public health officials in British Columbia.
4. **Individual Contractors:** Means all individuals contracted directly by FNEC to provide services for FNEC, its clients and the individuals it serves.
5. **Proof of Vaccination:** The following constitute “Proof of Vaccination” for the purposes of this policy:
  - BC vaccination card,
  - BC Health Gateway’s electronic Vaccination Card,
  - BC’s digital vaccination card QR code that properly displays the individual’s correct legal name / identity and vaccination status;
  - proof in writing issued by the government for the purpose of showing proof of vaccination in accordance with orders made under the Public Health Act; or
  - a type of proof, whether electronic or in writing, that is issued by the government of Canada or of a province or territory of Canada for the purpose of showing proof of vaccination for public health or travel purposes.

## Vaccination Requirement

- All current FNEC employees, as well as individual contractors and volunteers who are required to be fully vaccinated must be Fully Vaccinated by April 18, 2022, subject to the accommodation provisions set out in this policy.
- Any employee in the process of vaccination (i.e., having received first dose prior to April 18, 2022) must provide a clear rapid test result on any entry into the building, at their expense.
- Employees on a leave of absence prior to this policy coming into effect are required to be Fully Vaccinated prior to returning to the workplace.
- Any individuals hired or engaged on or after April 18, 2022 are required to be Fully Vaccinated as a condition of employment, being hired or engaged, subject to the accommodation provisions set out in this policy.

## **Proof of Vaccination**

- All employees are required to report their vaccination status.
- Consistent with applicable privacy laws, FNEESC will collect the minimum amount of personal information required to address workplace health and safety issues raised by COVID-19.
- Individuals will be requested to provide (for inspection only) documentation verifying their vaccination status. This documentation can be provided in-person or electronically to the Coordinator, Human Resources. Individuals must provide this documentation no later than April 18, 2022. No copies of this documentation will be maintained in employee files.
- If further doses of the COVID-19 vaccine are recommended by public health officials, employees will be required to provide documentation of their receipt of these additional doses.
- Employees who choose not to report their vaccination status will be treated as though they are unvaccinated under this policy.

## **Use of Vaccination Status Information**

There is strong evidence to establish that those who have been vaccinated are less likely to contract and transmit COVID-19. Those who have been vaccinated are also at a much lower risk to develop serious health complications if they do contract COVID-19.

We are seeking to collect information about the vaccination status of our employees, individual contractors and volunteers in order to:

- Reduce transmission of COVID-19 in our workplace;
- Properly evaluate and assess the risk of infection of COVID-19 within our workplace;
- Help mitigate the risk of infection for employees, contractors, visitors and members of the public;
- Make plans for operating in the event of an outbreak; and
- Support risk mitigation and contact tracing efforts in the event that an exposure occurs within the workplace.

## **Human Rights Accommodations**

We will take reasonable steps to accommodate employees who are not able to be vaccinated against COVID-19 due to medical, religious, or other grounds protected by the British Columbia *Human Rights Code*, or other applicable human rights legislation. These employees may be subject to certain restrictions, such as the use of additional personal protective equipment, routine COVID-19 testing, or limiting access to the workplace. Any such measures will be based on medical, scientific, workplace safety and public health guidance. Please note that accommodating unvaccinated individuals may not be possible in every case or may involve changes in work assignments.

All accommodation requests require written proof of the need for accommodation to be submitted along with the accommodation request (e.g. in the case of a request for a medical accommodation, medical documentation from a physician or nurse practitioner, including whether a medical reason is permanent or time-limited). Requests for accommodation must be submitted to the Employee's

direct supervisor prior to March 30, 2022, or must be requested upon an acceptance of an offer of employment with FNEESC.

### **Consequences of Non-Compliance**

Employees who choose not to report their vaccination status, or who choose not to become Fully Vaccinated as required by this policy, can apply in writing for an exemption from the policy. Exemption requests are to be assessed by the Senior Director Human Resources FNEESC and the Executive Director. Exemptions may be granted in the sole discretion of FNEESC if it is determined that the employee can perform their duties remotely or in a way that does not place any other employees or members of the public at risk of transmission. The employee will be placed on an unpaid administrative leave while the exemption request is being evaluated if a decision has not been made by April 18, 2022.

If an exemption is not granted, the employee will be placed on an unpaid administrative leave of absence effective April 18, 2022. Employees will not be eligible to return to work unless and until they provide proof of Fully Vaccinated status, provided their employment has not been terminated. Employees who remain on unpaid administrative leave after 45 days will have their employment status reviewed by FNEESC, and continued non-compliance with this policy may result in termination of employment.

Individual Contractors and Volunteers who are required to be Fully Vaccinated under this policy but choose not to report their vaccination status, or who choose not to become Fully Vaccinated as required by this policy by April 18, 2022 will not be eligible to continue in their capacity with FNEESC, unless an exemption has been granted by FNEESC in writing. Individual contractors' engagements will be ended according to their contract terms.

Employees, individual contractors and volunteers who do not provide proof of being Fully Vaccinated by April 18, 2022, and are not granted an accommodation or exemption under this policy, are not permitted to attend at the FNEESC work site.

### **False Disclosures and Failure to Comply**

Employees who falsify their Proof of Vaccination or otherwise fail to comply with this Policy may be subject to disciplinary action, up to and including termination.

Individual Contractors and volunteers who falsify their Proof of Vaccination or otherwise fail to comply with this policy will be ineligible to continue in their capacity with FNEESC.

### **Protection of Personal Information**

Vaccination status information will be used only as described in this policy. Disclosures should be made confidentially to the Coordinator, Human Resources at FNEESC, who will maintain that information confidentially and securely. This information will be kept separately from other employment records, and will be destroyed as soon as possible if there is no business, legal or operational need to retain them.

Access to vaccination data will be shared internally on a strictly need-to-know basis and only for the purposes described above. This information will be shared externally only where permitted or required under applicable laws, such as where it is requested or required by public health officials or other government agencies.

### **Changes to the Policy**

It is expected that the level of workplace risk posed by COVID-19 may change as new outbreaks, developments and scientific discoveries unfold. Accordingly, changes to this policy may be made from time to time to respond to these developments.