

## **Employee and Student COVID-19 Vaccination Policy**

Updated: 2021-10-01

### **Policy Statement**

GENESIS is committed to ensuring a safe environment for Employees and Students. The risk of infection with COVID-19 poses a significant threat to GENESIS Employees and Students. In order to appropriately mitigate this risk and meet the school's obligation under the Private Career Colleges Act to take every precaution reasonable in the circumstances to protect the health and safety of its Employees and Students, GENESIS is implementing mandatory measures and protocols.

### **Purpose**

This policy outlines:

- The requirement for all Employees and Students to provide proof of being Fully Vaccinated against COVID-19
- Acceptance of approved Health Canada vaccines as well as alternative vaccine regimes approved by the Province of Ontario as "fully vaccinated" status
- The validation process for proof of vaccination
- The process to request an exemption under the Ontario Human Rights Code for medical and/or creed grounds for Employees and Students
- The process for current employees and active students, as of October 18th, 2021, to participate in regular testing, including the frequency, test type and responsibility for the cost
- The ongoing safety requirements and responsibilities for all Employees and Students

### **Scope**

This policy applies to all GENESIS Employees and Students, as defined in the Definitions section of this policy.

## Definitions

For the purposes of this policy:

"Creed Exemption" refers to an exemption from receiving a COVID-19 vaccine, including based on the Employee's or Student's religious beliefs and practices, as required by the Ontario Human Rights Code.

"Dispatcher" means the Employee responsible for administering office and aircraft dispatch functions.

"Employee" means all employees (full time, part time, probationary, temporary/contract/seasonal, those on an internship program, and any employee candidate not yet hired), including those performing the majority of their work remotely.

"Fully Vaccinated" is defined by the Province of Ontario and currently means 14 days have passed since receiving:

- the second in a two-dose series of a Health Canada approved COVID-19 vaccine (Pfizer, Moderna and AstraZeneca or a combination of any two), or
- A single-dose of the Health Canada approved Janssen (Johnson & Johnson) vaccine

"Fully Vaccinated Confirmation" means confirmation that you are Fully Vaccinated from the Province of Ontario.

"GENESIS" means Fly Genesis Inc. operating as Genesis Flight College and Genesis Flight Centre.

"Medical Exemption" means an exemption from receiving a COVID-19 vaccination for medical reasons approved by Employee Health Services, as required by the Ontario Human Rights Code.

"Student" means individuals utilizing GENESIS resources for ground training, flight training, or aircraft rental. This includes anyone attending the facility for an aircraft rental, an introductory flight lesson, and any candidate applying for a program.

"Facility" means any place where employees and students interact that is outside of their home, such as but not limited to GENESIS buildings, offices, classrooms, simulators, aircraft, shops, yards, and hangars.

## Background

Establishing a Facility vaccination policy is a key action that employers, including GENESIS, can take to keep Employees and customers safe. At this time, full vaccination against COVID-19 remains the single most important intervention in reducing the transmission of the COVID-19 virus, including new variants, and protecting vaccinated individuals from severe consequences of COVID-19. Full vaccination also provides indirect protection to others, including fellow Students. Ensuring Employees and Students are vaccinated will reduce the likelihood that they contract the virus and, if they do, reduces the likelihood that they pass it along to other Employees and Students, and that they suffer significant health effects from the virus. These measures are key to avoiding and containing any outbreak of COVID-19 in the Facility.

## The Law that Applies to GENESIS

1. GENESIS must comply with Schedule 1 and Schedule 4 of Reg. 364/20 under the Reopening Ontario Act, 2020 (ROA). Specifically, every school must establish, implement, and ensure compliance with a COVID-19 vaccination policy requiring its employees, staff, contractors, volunteers, and students (herein referred to as “Required Individuals”) who attend campus to provide:
  - a) proof of full vaccination against COVID-19; or
  - b) written proof of a medical reason, provided by a physician or registered nurse in the extended class that sets out: (i) a documented medical reason for not being fully vaccinated against COVID-19, and (ii) the effective time-period for the medical reason; or
  - c) proof of completing an educational session approved by the school about the benefits of COVID-19 vaccination prior to declining vaccination for any reason other than a medical reason. The approved session must, at minimum address:
    - i. how COVID-19 vaccines work;
    - ii. vaccine safety related to the development of the COVID-19 vaccines;
    - iii. the benefits of vaccination against COVID-19;
    - iv. risks of not being vaccinated against COVID-19; and
    - v. possible side effects of COVID-19 vaccination.
2. Every school’s vaccination policy shall require that where a Required Individual does not provide proof of being fully vaccinated against COVID-19 in accordance with paragraph 1(a), but instead relies upon the medical reason described at paragraph 1(b) or the educational session at paragraph 1(c), the Required Individual shall:
  - a) submit to regular antigen point of care testing for COVID-19 and demonstrate a negative result, at intervals to be determined by the school.
  - b) provide verification of the negative test result in a manner determined by the school that enables the school to confirm the result at its discretion.

## **Proof of Vaccination**

To support a safe and healthy work environment, now that a number of COVID-19 vaccines are approved and readily available, all Employees and Students must confirm their Fully Vaccinated status to the Dispatcher.

Employees and Students who were vaccinated outside of Ontario or through another agency will have their proof of vaccination reviewed by GENESIS (with direction from the Ontario health agency) for approval; Employees/ Students may be subject to further evaluation.

All Employees and Students must show proof of COVID-19 vaccinations to their manager/dispatcher in the form of a Fully Vaccinated Confirmation.

Employees and Students who are not yet Fully Vaccinated but intend to do so must ensure this requirement is met by October 31, 2021. To meet the October 31 deadline, the second COVID-19 dose must be administered by October 17, 2021. This allows for the two week period for the vaccine to take effect.

Beginning on October 1st, 2021 all Employees/Students must submit their Fully Vaccinated Confirmation or apply for and receive confirmation of a Creed or Medical Exemption from GENESIS before October 18<sup>th</sup>.

Note 1: Fully Vaccinated Employees and Students can log onto the provincial portal and download or print their electronic COVID-19 receipt for each dose administered.

Note 2: Employees/Students who have been vaccinated outside of Ontario or Canada, are to submit their vaccination records for review through their local health unit so that it is included in provincial database.

## **Employees and Students - Requesting an Exemption**

Beginning October 1st, 2021 Employees or Students who are unable to be Fully Vaccinated may request an exemption. Where possible, requests should be made by October 8, 2021.

Employees/Students requesting an exemption will be required to submit official documentation to GENESIS to support their claim.

All requests for accommodation are reviewed on a case-by-case basis in accordance with GENESIS policies and the Ontario Human Rights Code. Documentation satisfactory to GENESIS will be required in all circumstances.

## **Employees and Students - Unvaccinated by Choice or Refusing Disclosure**

Effective October 18<sup>th</sup>, 2021, Employees and Students who choose not to disclose their vaccination status or who have chosen to remain unvaccinated against COVID-19 must:

- Supply proof of completing an educational session about the benefits of COVID-19 vaccination. This will typically be accomplished by a letter from the family doctor stating the required topics have been discussed.
- Submit to COVID-19 rapid antigen test with each visit to the Facility, or as determined by GENESIS, at their own cost.
  - All negative test results must be documented by the Employee/Student by sending a picture of the negative result to the dispatch email address ([dispatch@flygenesis.ca](mailto:dispatch@flygenesis.ca)).
    - Proof of test results, including the test's identifier and the date administered, must be retained by the Employee/Student for any future auditing conducted by GENESIS.
  - The negative test result must be disposed of by the dispatcher on duty to ensure it can not be reused.
- Should the Employee or Student have a positive COVID-19 rapid antigen test, they will:
  - Initiate self- isolation
  - Advise their manager/dispatcher that they are unable to attend work or their student schedule
  - Immediately seek a polymerase chain reaction (PCR) test e.g. through a COVID-19 test centre
    - As soon as the PCR results are known, they must be shared with the manager/dispatcher. An employee/student who remains well, receives a negative PCR test and passes daily COVID-19 screening questions, may resume work/school. Those who test positive will continue to follow COVID-19 absence protocols and may seek further direction by EHS

Note: Following a positive rapid antigen test, if an employee/student does not seek PCR testing as soon as possible, and the self-isolation period is potentially prolonged as a result of not having timely PCR test results, pay, where applicable, may be impacted.

Employees/Students must have access to rapid antigen tests at all times in order to come into the Facility, at their own cost.

GENESIS will maintain vaccination disclosure information, including documentation verifying receipt of a COVID-19 vaccination, in accordance with privacy legislation. Information will only be disclosed to the extent necessary to comply with the purposes of this policy and applicable legislation.

## **Health and Safety Procedures**

Health and safety requirements related to COVID-19 remain in place for all Employees and Students, regardless of their vaccination status and include:

- Active screening prior to entering the Facility (e.g. answering COVID-19 related questions)
- Physical distancing when in the presence of other individuals when possible (i.e. maintaining a distance of 6 feet)
- Wearing of a mask, when and where required by GENESIS policy, City by-law, protocol, public health directive or provincial regulation, and

- Wearing of additional personal protective equipment (PPE) as required (e.g. gloves; eye protection)

These requirements are subject to change based on Public Health guidance and legislative changes.

In addition, Employees and Students who are not Fully Vaccinated must:

- Wear a medical grade mask in the Facility, even if the indoor masking requirement is lifted, and
- Maintain a distance of at least 6 feet from other individuals while removing their mask to eat or drink

## **Roles and Responsibilities**

### GENESIS Management

- Communicating all health and safety requirements related to COVID-19 vaccinations and related health and safety measures to all Employees/Students
- Maintaining confidentiality of all Employee/Student personal health information, in accordance with the Private Career Colleges Act and any other applicable legislation, and only disclosing as much as is reasonably necessary for the purposes of this policy and any applicable legislation, and
- Approving an exemption to provisions of this policy, in accordance with the Ontario Human Rights Code for Medical and Creed Exemptions
- Ensuring compliance with all health and safety requirements, policies and procedures
- Ensuring their staff are educated on this policy
- Accurately reporting Employee/Student vaccination status as directed by Ministry of Education or any other government regulator
- Ensuring that all Employees/Students who choose not to be vaccinated, or choose not to share their vaccination status, comply with additional safety measures
- Promoting, monitoring and ensuring a respectful Facility free of harassment for Employees and Students, regardless of vaccination status

### GENESIS Dispatch

- Confidentially obtaining from Employees or Students their Fully Vaccinated status or requests for an exemption and proof that Employees and Students are Fully Vaccinated in accordance with this policy
- Checking the results of regular rapid antigen tests for all Employees/Students, as required, and directing Employees/Students to PCR testing, if required, and

### All Employees and Students

- Following all health and safety policies and procedures
- Disclosing their Fully Vaccinated status to their manager/dispatcher, as requested
- Providing proof of vaccination to their manager/dispatcher

- Requesting an exemption to provisions of this policy, in accordance with the Ontario Human Rights Code for Medical and Creed Exemptions
- Participating in regular COVID-19 testing, as directed by their manager/dispatcher and reporting results of testing, as required by this policy, and
- Following directions from managers/dispatchers, as required, if rapid antigen and/or PCR tests are positive

### **Disciplinary Action**

Any Employee who violates this policy will be subject to appropriate disciplinary action, up to and including termination of employment. Students who fail to comply with this policy will no longer be eligible to fly with GENESIS.

### **Exceptions to the Policy**

Exceptions to this policy must be approved by the GENESIS management, in consultation with the Ontario health agency.