

Part 1: Background & Context

As vaccine supply increases and becomes more accessible, provinces across the country are preparing to vaccinate the general public. Ensuring adequate vaccine uptake will support a near-return-to-normal, which would facilitate the reopening of the economy and improved public health outcomes. Unfortunately, a significant proportion of the population remains hesitant about COVID-19 vaccines. Recent polling suggests that ~28% of Canadians (and a higher proportion of Albertans) would not get a vaccine as soon as it was available to them¹.

Public health experts say we may need ~85% of the population immunized to reach herd immunity. We are unlikely to reach this high a coverage rate without concerted societal action to increase vaccine uptake. **Companies have a critical role to play in increasing vaccine uptake.** Repeated surveys have shown that **employers are a highly trusted source of information**, and employees are frequently going to their employer with questions about COVID-19 and vaccinations.

In this context, it is important for employers to consider various workplace policies and strategies to enable vaccination.

Part 2: Introduction to employer COVID-19 immunization policies

Most, if not all employers have policies around COVID-19 and COVID-19 vaccination. In formulating a COVID-19 vaccination policy, it is important to recognize that:

- Employers have an important role to play in increasing vaccine uptake;
- Employees will come to their employer with vaccine-related questions – and employees have far more touchpoints with their employer than they would be with healthcare system; and
- Vaccination uptake can be encouraged and enabled, but not mandated.

Given the above, it is important for employers to have **immunization policies that are scientifically sound (and informed by the science) and that also reflect the unique needs of their employees.** While all employers want high vaccine uptake for their employees, approaches will be different – encouraging uptake among agricultural workers who are primarily newcomers to Canada who do not have English as their first language will be different than for a financial services firm based in downtown Toronto.

Benefits of high vaccine uptake

There are multiple benefits to any organization for having as many of its employees immunized as possible. Some of these benefits include:

1. Improved health and well-being of employees from being protected from COVID-19
2. Reduced workplace transmission (to both other employees and other stakeholder groups like customers, vendors, etc.)
3. Better employee health (physical and mental) as vaccinations allow for 'return-to-normal' activities such as in-person social interactions
4. Near-term operational benefits through better business continuity via fewer outbreaks, sick days, etc.
5. Longer-term operational benefits through company, sector, and societal re-opening

¹ <https://angusreid.org/vaccine-astrazeneca-johnson/>

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Legal considerations of COVID-19 immunization policies

While there is a limited body of case law around COVID-19 immunization policies (see attached May 2021 opinion from Fasken Martineau Dumoulin), the current legal landscape around COVID-19 vaccines suggests that:

- (1) Employers can collect anonymized data on their employees' intention to get vaccinated, so long as this information is used to increase uptake (and not to take punitive action).
- (2) Employers can facilitate, enable, and encourage vaccine uptake, so long as it is not coercive.
- (3) Employers generally cannot mandate that employees be immunized.
- (4) Employers are allowed to restrict activities of unimmunized employees – but what these restrictions could actually be vary on a case-by-case basis.

Part 3: How to create an immunization policy and increase vaccine uptake

There are multiple drivers of vaccine hesitancy – a useful framework for thinking about the issue is the World Health Organization's 3 C's (confidence, concern, convenience).

- **Confidence:** Questions & concerns around the safety or efficacy of the vaccine
- **Concern:** The extent to which people are worried about the underlying disease (COVID-19) – the more concerned they are about health and other deleterious impacts of COVID-19, the likelier they are to be vaccinated
- **Convenience:** Broadly can be thought of as 'access' – e.g., having on-site clinics tends to increase uptake because it becomes easier to get vaccine than having to make an appointment and find transport to a public health vaccine clinic

Extensive research has demonstrated that **level of trust in government, institutions, etc. is a huge driver of uptake for COVID-19 vaccine specifically**. Measures that **build trust** will increase uptake. Fortunately, across multiple surveys, employers are generally highly trusted, which positions them well to encourage vaccine uptake. Employers can **increase uptake by creating an 'enabling environment for uptake' by addressing** the following areas:

- **Education and information for employees:** Information on vaccine logistics and science is changing extremely quickly, so ensuring that employees have the most current information is critical
- **Incentives and behavioral interventions:** Financial (e.g., gift card for those who receive vaccine, food at on-site immunization clinic and non-financial (e.g., vaccine challenges, pledges, etc.) can be used to increase uptake
- **Building trust in the employee population:** This will be employer and employee specific, but examples include having different types of 'vaccine ambassadors' representing different types of employee population, having vaccine / public health experts deliver education sessions, etc.
- **Enabling policies:** Ensuring that policies such as paid time off to get vaccinated, to recover from vaccine side effects, and to see a medical professional to learn more about vaccines will remove barriers to uptake. Depending on the employee population, other policies can be helpful

1. Specific considerations in creating an immunization policy

- **Stakeholders:** Who will be involved in the creation – e.g., executive leadership, risk management team, legal team, COVID-19 response team, employees, union representative, etc.
- **Geographic variation:** Different jurisdictions have differences in the below categories that may lead to differential policies per geography. These considerations should be balanced against the benefits of having employer-wide policies
 - i. COVID-19 epidemiology
 - ii. COVID-19 vaccine rollout parameters
 - iii. Overall social, cultural, and legal milieu
- **Understanding the employee population:** Understanding the employee population (e.g., income, education, type of work, baseline attitudes towards vaccination) is critical as a tailored approach towards vaccine education & uptake is likelier to lead to higher employee coverage
- **Tracking vaccine uptake / proof of immunization:** How, if at all, will uptake of vaccine in employees be measured?
- **Policies for those who are immunized vs those who are not:** Questions for consideration centre around if immunized employees be allowed to do 'more' (e.g., travel) and if unimmunized employees face

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'restrictions' (e.g., slower return to office compared to immunized peers)? In making these assessments, some factors to consider include:

- i. Specific operational needs (e.g., how important is in-person travel?)
- ii. Prevailing public health advice (e.g., US CDC has loosened restrictions for fully immunized people while Canada has not yet done this)
- iii. COVID-19 risk of certain activities (e.g., jobs that require significant in-person contact like an assembly line worker are higher risk than those that can primarily be done from home)
- iv. Management, employee, and union attitudes towards this approach
- v. Legal implications
- vi. What peer employers are doing with respect to these issues

2. Developing vaccine education programs

- A strong foundation can be laid by understanding employee attitudes through internal interviews, focus groups, surveys, etc. to understand willingness to take vaccine, barriers, and how to overcome them
- Potential 'channels' of vaccine education include
 - i. Employee town halls
 - ii. FAQs and other easily understandable information sheets on vaccines
 - iii. Hosting vaccine materials on organization intranet, health and safety pages, etc.
 - iv. Directing to trusted external sources like PHAC, 19 To Zero (www.19tozero.ca), local public health jurisdictions, etc.)
- It is important that presenters of this information are trusted sources, which will vary by employer but generally include healthcare providers, trusted management, union representatives, etc.

3. Incentives and behavioral interventions to encourage uptake

- Employers can increase uptake by providing incentives (e.g., gift cards, food, 'points' via internal rewards system) and through behavioural interventions (e.g., vaccine pledges, friendly competition in the same vein as Corporate challenge, etc.)
- In determining which incentives and behavioral interventions to adopt, tailoring to employee desires will be more effective and can be elucidated through existing knowledge of employees and primary data collection (e.g., interviews, focus groups, surveys)

4. Making vaccines more accessible for employees

- **On-site immunization** is an excellent way to improve uptake and can contribute to significantly higher rates of vaccine uptake. Arranging for this requires government / public health authorization and the ability to do on-site vaccines – which can be done via an employer's internal occupational health staff or in partnership with public / private sector vendors that have the ability to run vaccination clinics.
- **If on-site immunization are not feasible**, employers can improve accessibility by identifying and removing barriers (e.g., paid leave to get vaccinated, support with transportation, sick days for vaccine side effects, assistance navigating vaccine booking systems, etc.)

Employers have a critical role to play in increasing vaccine uptake and are well-equipped to do so. **If you have any questions or require any assistance with increasing vaccine uptake for your employees, please feel free to connect with 19 To Zero (www.19tozero.ca) by email at info@19tozero.ca.**