

ASHBURY COLLEGE COVID-19 VACCINATION POLICY

1. Policy Statement

- a) Ashbury College (“Ashbury”) is committed to providing and maintaining a safe, healthy and productive school and work environment for all its Students, Staff, Board Members (all as defined below) and visitors in accordance with the applicable occupational health and safety legislation and otherwise required by law. Ashbury recognizes and acts upon its responsibility to maintain a safe and healthy school, residential community and workplace including, taking every precaution reasonable in the circumstances to protect the health and safety of Students, Staff, Board Members and visitors attending at the Ashbury Campus (as defined below). As part of this commitment, Ashbury adopts this COVID-19 Vaccination Policy (this “Policy”) to reduce the risk of infection and transmission of the COVID-19 virus and severity of infection, which in turn:
 - i) Makes the Ashbury Campus healthier and safer for Students, Staff, Board Members and visitors;
 - ii) Is a responsible measure implemented to keep everyone, and their families, healthy and safe; and
 - iii) Supports and protects the health and safety of our local and global community.
- b) As a further demonstration of this commitment and responsibility, Ashbury wholly endorses all applicable public health measures aimed at protecting our community at large from the COVID-19 virus, including the belief that all individuals, who are eligible to receive a vaccine, should become and remain fully vaccinated as directed by the applicable public health authorities.

2. Purpose

The purpose of this Policy is to provide clear guidance with respect to COVID-19 vaccination requirements for all Students, Staff, Board Members and visitors accessing the Ashbury Campus.

3. Definitions

Accommodation: means the reasonable measures Ashbury will provide to Students, Staff or Board Members as a result of a valid Exemption under applicable human rights legislation.

Approved Vaccine: means a COVID-19 vaccine that has been approved for use by Health Canada¹.

Board Member: means a member of the Board of Governors of Ashbury.

Ashbury Campus: means Ashbury’s school and residences as well as any place or event where activity relating to Ashbury is being conducted, such as a school trip.

Exemption: means a valid reason for a Student, Staff or Board Member not being Fully Vaccinated, which is limited to certain and specific medical or religious/creed reasons under applicable human rights legislation.

Fully Vaccinated: means a state of being, after the time period prescribed by Health Canada or the applicable provincial health authority and after having received the completed series of an Approved Vaccine or combination of Approved Vaccines (e.g., two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series) **and**, as applicable, after having received any additional doses of an Approved Vaccine (i.e., booster shots) - if and when such additional doses are required and approved by Health Canada and the applicable provincial health authority.

¹ <https://www.canada.ca/en/health-canada/services/drugs-health-products/covid19-industry/drugs-vaccines-treatments/vaccines.html>

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Independent Contractor: means an individual who provides independent contractor services to Ashbury at the Ashbury Campus.

Proof of Vaccination: means the required documentation (whether written or in electronic form) from the relevant federal and/or provincial health authority confirming the Student, Staff, Board Member or visitor is vaccinated (including but not limited to Fully Vaccinated) as well as the date of receipt of the vaccination (i.e., The BC Vaccine Card for British Columbia, VaxiCode for Quebec, the COVID-19 Proof of Vaccination for Ontario or Nova Scotia) and other applicable documentation required by the applicable federal or provincial health authority.

Staff: means the teaching faculty, staff, residential staff, Independent Contractors and volunteers working at Ashbury.

Student: means both boarding and off-campus students attending at Ashbury.

4. Scope

This Policy is applicable to all Students, Staff, Board Members and visitors who wish to access the Ashbury Campus.

5. Validity

This Policy shall be effective from June 2, 2022 until further notice.

6. Policy Requirements

6.1 Mandatory Vaccination

- a) Effective June 2, 2022, all Students, Staff, Board Members and visitors must be Fully Vaccinated:
 - i) In order to access the Ashbury Campus;
 - ii) As a condition of enrollment in and residency (as applicable) at Ashbury for the 2022/2023 academic year for any Student;
 - iii) As a condition of employment for any teaching faculty, staff and residential staff;
 - iv) As a condition of membership to the Board of Governors; and
 - v) As a condition of the applicable contract for services for all Independent Contractors working at Ashbury,

unless an Exemption has been sought by the Student, Staff or Board Member and such Exemption has been explicitly approved and granted by Ashbury in writing.

- b) Notwithstanding any Exemption, Ashbury reserves the right to restrict access to the Ashbury Campus if the Student, Staff or Board Member is not Fully Vaccinated.
- c) Ashbury may, at its sole and unfettered discretion, waive or suspend the application of this Policy to one or more individuals in certain circumstances, which Ashbury deems reasonable and appropriate.

6.2 Vaccination Requirements

- a) Upon request by Ashbury, all Students, Staff, Board Members and visitors must provide Ashbury with Proof of Vaccination in order to prove they are Fully Vaccinated.

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- b) All Students, Staff, Board Members and visitors must always provide truthful and accurate information and documentation as it relates to this Policy and in particular, all individuals are strictly prohibited from misrepresenting their vaccination status, Proof of Vaccination or any applicable PCR or Rapid Antigen test result.
- c) Ashbury will provide paid time off to Staff to attend a local clinic or vaccination centre to become or remain Fully Vaccinated. Students, Independent Contractors, Board Members and visitors must become and remain Fully Vaccinated on their own time.

6.3 COVID-19 Testing

- a) Ashbury may request Students, Staff, Board Members and visitors to undergo PCR or Rapid Antigen testing, even if the Student, Staff, Board Member or visitor is already Fully Vaccinated, under the following circumstances:
 - i) After domestic or international travel;
 - ii) In advance of attendance at the Ashbury Campus where risk of transmission may be a concern to Ashbury; or
 - iii) On an as needed basis, if increased health and safety protocols are deemed necessary.
- b) The cost of such testing of Students, Staff and Board Members shall be borne by Ashbury. Visitors and Independent Contractors are responsible for the costs of their own individual testing.

6.4 Exemptions and Accommodation for Staff

- a) All requests for an Exemption and any related Accommodation from Staff must be submitted:
 - i) Directly to the Director of Human Resources of Ashbury;
 - ii) As soon as practicable and by no later than June 30, 2022, unless otherwise permitted by Ashbury; and
 - iii) Using the **Request for Exemption and Accommodation Form** set out in **Schedule "A"** to this Policy, which must be accompanied by appropriate documentation as determined by Ashbury.
- a) Ashbury shall consider each request for an Exemption and any related Accommodation on a case-by-case basis.
- b) If an Exemption is granted, Ashbury will attempt to accommodate such Staff based on:
 - i) The health and safety of all Students, Staff, Board Members and visitors;
 - ii) A risk assessment;
 - iii) Job requirements (as applicable); and
 - iv) Applicable laws and regulations as well as public health authority orders, directives, guidelines and recommendations.
- c) Accommodation may include, where practicable, the requirement that the Student, Staff or Board Member attend remotely or provide Ashbury with PCR or Rapid COVID-19 Antigen test results at a frequency as determined by Ashbury, having regard for access and availability of such tests as well as the advice, recommendations, guidelines and directions of the applicable federal and provincial ministries of health as well as the applicable federal, provincial and local public health authorities. Students, Staff and

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Board Members shall provide such test results to Ashbury, as directed by Ashbury, prior to the Student, Staff or Board Member attempting to access the Ashbury Campus.

6.5 Documentary Proof

- a) Students, Staff, Board Members and visitors are required to provide to Ashbury with the necessary documentary evidence, as applicable and as required by Ashbury, in order to establish:
 - i) Vaccination status, including whether they are Fully Vaccinated;
 - ii) In the case of a Student, Staff, Board Member, an Exemption and the need for Accommodation;
 - iii) The results of a PCR or Rapid COVID-19 Antigen Test; and
 - iv) Any other relevant information concerning precautions necessary to maintain the health and safety of all Students, Staff, Board Members and visitors as well as the Ashbury Campus.
- b) All of the above information shall be considered personal information.

6.6 Personal Information

- a) Ashbury takes the privacy of its Students, Staff, Board Members and visitors seriously and shall take all appropriate measures to comply with applicable privacy laws. Ashbury will only collect, use, disclose and retain personal information under this Policy for:
 - i) Health and safety purposes;
 - ii) To establish the vaccination status of a Student, Staff, Board Member or visitor;
 - iii) To establish an Exemption and the need for an Accommodation (if applicable); or
 - iv) Other related purposes, including as part of statistics shared by Ashbury (e.g., the percentage of the workplace that has been vaccinated or Fully Vaccinated).
- b) The personal information of the Worker or visitor will be collected, used, disclosed and retained in accordance with Ashbury privacy policy and standard practices for collecting, using, disclosing and retaining personal information in accordance with applicable legal requirements.
- c) Ashbury shall keep all personal information confidential. Only those individuals responsible for administering this Policy will have access to this personal information.
- d) This personal information will not be disclosed to any third parties (unless required by law), and will not be collected or used for any purpose other than the administration of this Policy.
- e) This information will not form part of a Student, Staff, or Board Member file. The information will be retained for the later of:
 - i) A period of one year;
 - ii) Until such time as the information is no longer necessary; or
 - iii) Until such time as required by law or regulation.

6.7 Other COVID-19 Health and Safety Protocols

- a) In addition to all of the above, all Students, Staff, Board Members and visitors shall continue to comply with all COVID-19 health and safety protocols established by:

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- i) Ashbury existing “**COVID-19 Return to Campus Safety Plan.**”, including daily screening, which can be accessed at: <https://covid-19.ontario.ca/screening/worker/>;
 - ii) Applicable health and safety laws and regulations within Canada; and
 - iii) Applicable orders, directives, guidelines and recommendations issued by federal, provincial and local public health authorities within Canada.
- b) All Students, Staff, Board Members and visitors shall also comply with all COVID-19 health and safety protocols established by:
- i) The local community, stakeholders and any location where Ashbury business or activity is occurring including, but not limited to, health care institutions, events and conference centres, restaurants, and hotels;
 - ii) Ride share and taxi companies, local public transit, airline and train companies, and any other form of transportation;
 - iii) Applicable health and safety laws and regulations outside of Canada if travelling abroad; and
 - iv) Applicable orders, directives, guidelines and recommendations issued by federal, provincial/state and local public health authorities outside of Canada if travelling abroad.
- c) When travelling outside of Canada, if the applicable health and safety laws and regulations and/or the applicable orders, directives, guidelines and recommendations issued by federal, provincial/state and/or local public health authorities outside of Canada are less onerous or less prescriptive than those within Canada, the Student, Staff, Board Member or visitor shall continue to comply with all Canadian and Ashbury COVID-19 health and safety protocols.

6.8 Non-Compliance with Policy

Failure to comply with this Policy, including, but not limited to knowingly providing inaccurate or false information or misrepresenting vaccination status, Proof of Vaccination, test results, or answers to screening questions, shall result in:

- a) Being denied access to the Ashbury Campus;
- b) For Students being suspended or expelled from Ashbury;
- c) For Staff, disciplinary consequences or sanctions, which include being placed on an unpaid leave of absence up to and including termination of employment;
- d) For Board Members, being suspended or expelled from the Board of Governors; and
- e) For all Independent Contractors, the suspension or cancellation of the contract for services.

6.9 No Medical Advice

- a) The COVID-19 vaccine is a medical procedure. This Policy does not contain medical advice.
- b) For additional information on the COVID-19 vaccines, Staff may consult federal², provincial³ and local public health authorities and ministries of health or their personal health care provider.

² <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19/vaccines/how-vaccinated.html>

³ <https://covid-19.ontario.ca/Covid-19-vaccine-safety>

6.10 Right to Amend and Terminate Policy

- a) This Policy shall be reviewed by the Head of School every six months from its effective date, or as often as deemed necessary. In doing so, Ashbury reserves the right to, at any time, amend, suspend or terminate this Policy, at the sole and unfettered discretion of Ashbury, and as a result of the evolving pandemic situation and/or changes in legislation, regulations and/or the applicable orders, directives, guidelines and recommendations issued by federal, provincial and/or local public health authorities.
- b) This Policy shall remain in effect until suspended or terminated by Ashbury, in the absolute discretion of Ashbury.