



Interim Policy for Accessing CMA Enterprise Premises	
<b>Document owner:</b> People & Culture	
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<b>Last Approval date:</b> June 2022	<b>Next periodic review date:</b> As required based on the evolving COVID-19 pandemic (“the pandemic”)
<b>Applicable to:</b> <sup>1</sup> All CMA Enterprise employees, contractors, students, and visitors (collectively “CMA Participants”)	

## Overview Statement

The CMA and CMA Group of Companies (“the Enterprise”) is committed to providing and maintaining a safe, healthy, and productive work environment in accordance with the applicable occupational health and safety legislation, including taking every precaution reasonable in the circumstances for protecting its employees from COVID-19.

## Policy Statement

Maintaining a safe and healthy work environment is a priority. As an organization that represents physicians, we must do our part to minimize the impact of COVID-19 on our colleagues and the community at large.

The prevalence of the virus that causes COVID-19 and its variants continues to pose health and safety risks in Canada and globally. Vaccination has been scientifically shown to be one of the best ways to protect against COVID-19 and its variants, from becoming seriously ill, or transmitting the virus to others. Vaccines are widely available, free, safe and highly effective against illness, hospitalization and death. CMA considers vaccination to be a key element in protecting the capacity of the health care system and maintaining workplace health and safety at the Enterprise.

The Enterprise will continue to monitor the evolving pandemic and workplace risk mitigation measures to ensure optimal protection of the health and safety of CMA Participants. CMA reserves the right to make any changes to related policies and procedures, at its sole discretion, in accordance with health and safety laws, legislation, and public health guidelines.

## Purpose

The purpose of this Policy is to:

- Ensure the continued health and safety of all Enterprise employees during the COVID-19 pandemic;
- Limit the risk of COVID-19 transmission in the workplace;
- Set out the updated expectations regarding access to a CMA place of business;
- Provide details on how and why we may request, collect, and use personal information relating to the vaccination status of certain independent contractors and visitors (see “[Independent contractors and visitors](#)” under Procedures), for the purposes of protecting the health and safety of everyone in the workplace, as well as maintaining the continuity of our business operations; and
- Provide direction regarding accommodation to employees who are unable to receive the COVID-19 vaccine for medical reasons or other reasons protected under the applicable Human Rights legislation.

<sup>1</sup> CMA Enterprise means the Canadian Medical Association, the CMA Foundation, and CMA Impact Inc.



## Scope

This Policy applies to any person (i.e., CMA Participants) entering a CMA place of business.

## Definitions

CMA place of business: 1410 Blair Towers Place or any indoor space where the CMA is conducting business in person.

Employee: full-time, part-time, temporary, and casual staff, including students, paid directly through Enterprise payroll.

Independent contractor: a company or an individual (other than an employee) engaged under a contract of service by a company in the CMA Enterprise, including an employee or subcontractor engaged by an Independent Contractor.

Designated Facilities personnel: Manager, Finance Services and Facilities, Facilities Advisor, or Facilities Assistant

Up to date with vaccines: having received a complete series of a COVID-19 vaccination that has been authorized for use by Health Canada, and 14 days have passed since administration of the final dose of the recommended schedule, and, as applicable, after having received any additional doses of an accepted vaccine (i.e., booster shots), if and when such additional doses are required by the applicable provincial health authority.

Proof of identity: identification issued by an institution or public body that includes the individual's name and date of birth.

Proof of Vaccination: a copy of documentation verifying your name and indicating your vaccine status is up to date according to public health authorities.

Exemption: a valid reason for not being fully vaccinated, which is limited to certain and specific medical reasons or other valid reasons protected under the applicable Human Rights legislation.

Accommodation: the reasonable measures the Enterprise is legally obligated to provide to an individual as a result of a valid exemption to this Policy.

## Procedures

### Enterprise Employees:

All Enterprise employees (including full-time, part-time, temporary, and casual staff, including students) and independent contractors with records in People and Culture's Human Resources Management System (HRMS) are required to review, acknowledge and abide by a one-time [attestation](#) **before** entering CMA's place of business. The Enterprise's HRMS, [ME@CMA](mailto:ME@CMA) (aka UKG), will be used to facilitate this process.

### Independent contractors (without records in People & Culture's HRMS) and visitors:

The following must be shown to designated Facilities personnel **before** an independent contractor or visitor is eligible to enter a CMA place of business:

- proof of up to date vaccines (whether printed or digital)
- proof of identity and
- proof of [provincial screening](#)



The Facilities designate will confirm the individual's identity and vaccination status based on the information provided; however, will not retain this information. For contact tracing purposes, the following information will be confidentially maintained by the Facilities designate:

- the contractor's or visitor's name, telephone number, email address
- date and time of visit, and
- confirmation of identification and vaccination status

## Exemptions

In the uncommon situation where an employee cannot be vaccinated against COVID-19 for medical reasons or other reasons protected under applicable law, and where management requires the employee to attend at a CMA place of business, the employee can request an accommodation (otherwise any business should be conducted remotely). Exemption requests will be considered on a case-by-case basis and will be granted only where the request is accompanied by a written medical exemption from a licensed physician or nurse practitioner (if the exemption is being requested for medical reasons) or meets the requirements of applicable law. A medical exemption should indicate if the reasons are temporary or permanent and does not need to include the reason (diagnosis) for the exemption.

Exemptions as outlined above must be approved by the Vice President, People and Culture, in consultation with the employee's manager, as appropriate. Employees without an authorized exemption will not be granted access to a CMA place of business and must continue to work remotely.

Other individuals who are entitled to accommodation in accordance with applicable human rights laws may contact the Vice-President, People & Culture. Requests for accommodation will be assessed on a case-by-case basis.

## Time off for Vaccination Purposes

The Enterprise strongly encourages all employees to be fully vaccinated against COVID-19. Personal Leave Days (5 days in 2022) are available to all employees who may need time off to receive their vaccines.

## Compliance

The Enterprise is taking every reasonable precaution to protect the health and safety of our workforce. Employees also have the responsibility to work in compliance with all relevant policies and procedures to keep them safe. Employees who do not comply with the requirements of these procedures will not be permitted to access a CMA place of business.

## **Privacy**

The Enterprise takes the privacy of all CMA Participants seriously. In accordance with applicable privacy laws and CMA's Employee Personal Information Privacy Policy, any personal information received pursuant to this Policy and relating to the CMA Participants vaccination status (or request for exemption) will:

- be collected only as necessary and reasonable to achieve the purposes of this policy, including protecting the health and safety of all CMA Participants and limiting the spread of COVID-19 in the workplace, and determining whether a vaccination exemption request satisfies applicable legal criteria;
- be used for the purpose of protecting the health and safety of workers and third parties in the workplace, including, for example, effectively responding in the event of a COVID-19 outbreak; and
- be disclosed only to representatives designated by the Enterprise to enable them to ensure the proper conduct of operations and protect the health and safety of the employee concerned, co-workers, visitors, suppliers or the general public, if any; and
- not be disclosed to any third party unless the Enterprise receives the CMA Participant's consent or as otherwise required by law.



Personal information received under this Policy will be treated as confidential and will be stored and retained by the Enterprise in accordance with its Employee Personal Information Privacy Policy.

## Responsibilities

Vice-President, People and Culture (and/or their delegate) is responsible for:

- Establishing and monitoring the practices, guidelines, and internal controls pertaining to this Policy
- Approving exemptions and accommodation plans
- Providing high-level reports to the Enterprise Leadership Team, as required

People and Culture is responsible for:

- Communicating, interpreting, and applying this Policy
- Reviewing the Policy as necessary, for any changes, and updating as required
- Establishing a system for confidentially documenting vaccination status of individuals who may be required to attend a CMA place of business for business purposes
- Answering any questions regarding this Policy and its related procedures
- Notifying the Executive Vice-President in the respective business unit of any breaches to this Policy

Facilities Personnel are responsible for:

- Verifying proof of vaccination, proof of identify and completion of provincial screening for contractors/third parties and visitors requiring access to a CMA place of business
- Coordinating access to a CMA place of business directly with individuals (upon confirmation of required information as may be required)
- Maintaining and communicating the required policies, procedures, and safety protocols for use of a CMA place of business

CMA Participants are responsible for:

- Adhering to this Policy. A failure to comply with this Policy will result in an individual being denied access to a CMA place of business.

## Related policies

1. [Enterprise's procedural requirements](#)
2. [Employee Personal Information Privacy Policy](#)
3. [Respect in the Workplace Policy](#)

## Questions

If you have any questions related to this Policy, you may contact the Chief Medical Officer, Chief Privacy Officer or the Vice-President, People and Culture.



## Appendix A

### Return to office attestation

Before entering 1410 Blair Towers Place or any indoor space where the CMA is conducting business in person (“CMA place of business”), all Enterprise employees (including full-time, part-time, temporary, and casual staff, and students) are required (on a one-time basis) to review and abide by the following statements. By clicking on “Accept”, you acknowledge that you have read, understood, and agree to adhere to the principles in this document. The pandemic continues to evolve, and Public Health advice and CMA guidelines may be adjusted in the future accordingly.

- I respect the decision of my co-workers whether they physically go to a CMA place of business or not. I will not pressure anyone to attend a meeting in person nor ask them to provide a reason to not attend in person.
- I will not enter a CMA place of business unless I am up to date with Covid-19 vaccines (valid exemptions for medical or other reasons protected under Human Rights legislation permitted as approved by People & Culture).
- I understand that masks are highly recommended in indoor crowded settings, even if not currently required. I will be respectful of other people’s choice to wear or not wear a mask.
- If I feel unwell for any reason, whether related to COVID-19 or not, I will not go to a CMA place of business. Relevant symptoms include, but are not limited to, fever, cough, sore throat, fatigue, headache, vomiting/diarrhea, nasal congestion/runny nose, loss of taste or smell or otherwise, which are not explained by a baseline condition or non-contagious cause (e.g., allergies).
- If I have tested positive (antigen or molecular testing) for COVID-19, I will stay home as per public health guidelines for isolation. I will not go into a CMA place of business until I meet public health guidelines for ending isolation.
- I understand there are certain circumstances where the nature of the work requires on-site attendance, and that CMA maintains its authority to manage all employees, working on-site or remotely.