

**BC PUBLIC SERVICE
OCCUPATIONAL SAFETY AND
HEALTH VACCINATION POLICY
QUESTIONS AND ANSWERS
for Contractors and other
Parties in the Workplace**

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Where ideas work

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Part One: HR Policy 4

1. What is required under the BC Public Service HR Policy 4 COVID-19 vaccination policy?

[Human Resource Policy 4 Occupational Safety and Health](#) has been updated to require all parties to provide proof of full vaccination for COVID-19 before entering a staff-only area of an indoor public service workplace while public service staff are present, for any purpose other than receiving a direct ministry service for public or clients.

Organizations (ministries), workplaces, and staff must confirm proof of full vaccination for any party that they are responsible for, allow or otherwise invite or direct into a staff-only area of an indoor workplace. This requirement includes, but is not limited to, contractors, statutory appointees, meeting attendees, interns, students, staff from other employers and visitors.

The policy does not apply to members of the public entering a BC Public Service workplace or interacting with a BC Public Service employee for the purposes of receiving a government service.

Fully vaccinated means the person has a fully vaccinated (green) B.C. Vaccine Card or can provide equivalent proof from another province or country.

2. What is a staff-only area of an indoor workplace?

Staff-only areas are work areas where the public or clients have restricted access, including offices, meeting rooms, cubicles, work points, and desk spaces that don't provide service to clients or the public.

An indoor workplace is any Public Service workplace within a building or structure. This includes temporary or permanent spaces in any building or trailer including a tent with more than one sidewall.

3. What is a direct ministry service for public or clients?

The BC Public Service has legislated responsibilities to provide services to the citizens of B.C. These direct client services can be generalized as:

- Transactions or functions that ministries provide to the public or clients
- Services or functions that a client is compelled to attend or participate in

If you have any questions about direct services, contact a BCPSA Safety Specialist for assistance via MyHR, using the category COVID-19 > Contractor Vaccination for assistance.

4. Why is the BC Public Service updating Occupational Safety and Health Policy4?

Throughout the pandemic, the BC Public Service has aligned its response to support the overall provincial pandemic response and follow the guidance of the Provincial Health Officer (PHO). Implementing the COVID-19 vaccination policy is consistent with that direction and is an additional measure to ensure our workplaces are as safe as possible. We also recognize that we have a role to play in supporting the provincial effort to increase vaccination rates to protect the health of our colleagues and our communities.

5. What if public health requirements for full vaccination change, such as the recent announcement of vaccine boosters?

The policy will be reviewed and updated as needed based on guidance and direction from the Provincial Health Officer. When announcing the plans for offering vaccine booster doses, the Provincial Health Officer indicated that, currently, this does not change what is considered to be fully vaccinated.

6. Does this policy apply to all BC Public Service workplaces?

This policy applies to any government organization with BC Public Service employees that are hired under the Public Service Act, including any Board, Commission, Agency, or other organization to which the Public Service Act applies or whose employees are hired in accordance with the Public Service Act. If a Board, Commission, Agency, or organization can demonstrate, however, that it has a comparable COVID-19 vaccination policy, it will not be obliged to apply the specific requirements as set out in this policy.

7. Does this policy apply to visitors, student placements, interns, family visiting etc.?

Yes. Everyone must provide proof of full vaccination if entering the staff-only area of an indoor workplace, for any reason other than receiving a direct client service. Where possible, staff should make arrangements to meet in public areas of the workplace or outside for family or other social visits.

8. Does my workplace or ministry have to check for proof of vaccination from janitorial staff or other building services?

No. The Real Property Division of the Ministry of Citizens' Services has been working with their industry partners to ensure building maintenance and contractor staff are fully vaccinated. Ministries and workplaces also do not need to confirm vaccination status of anyone who may be entering the office after hours or on weekends when no public service staff are present.

9. How do I confirm proof of vaccination of staff from other employers?

Public service employees must confirm vaccination by viewing a digital or paper version of the fully vaccinated (green) B.C. Vaccine Card. Proof of vaccination must be shown either in person or via a live videoconference. Emailed, photocopied, or verbal verifications will not be accepted as proof of vaccination.

Staff from other ministries that are attending your worksite are not required to show proof of vaccination since their supervisor has confirmed their vaccination as part of the COVID-19 vaccination policy for employees.

10. Who can confirm the vaccination status of contractors and other parties who are entering the employee-only area of an indoor BC Public Service Workplace?

All BC Public Service employees (including management, bargaining unit, Schedule A, and OIC appointees) can confirm the vaccination status of contractors or others entering the employee-only area of an indoor BC Public Service workplace. This helps ministries and workplaces comply with [Occupational Safety and Health Policy 4](#) and make a healthier, safer workplace for employees, contractors, public and clients. Ministries are free to create a system to confirm vaccination that best suits their business needs.

11. Can I ask meeting attendees or staff from other employers to email a copy of their QR code ahead of the meeting or site visit?

No. This creates issues with information gathering and records retention. Employees should visually verify proof of vaccination in person or via a live videoconference.

12. Do I have to check vaccination status every time a regular attendee to our office comes for a meeting?

If the meeting organizer or another delegate has confirmed proof of vaccination in the past and remembers that the person has confirmed proof of vaccination, they don't need to be re-checked. No lists should be created or kept of someone's vaccination status.

13. How can I publicize that proof of vaccination is required?

Organizations must be careful not to give the false impression that proof of vaccination is required for direct client service or service in a designated area for clients or the public. Use signs, such as "proof of vaccination required beyond this point", posted where employees or others are entering the staff-only area of the workplace. When sending meeting invitations, you may include proof of vaccination requirements, or provide alternatives such as virtual meetings or teleconference numbers.

Part Two: Contractors

14. [NEW] Do contracts and corporate supply agreements contain notice to contractors or language about the new vaccination requirements?

Clause 2.9 in the corporate contract templates has been revised and supports the application and enforcement of the vaccination requirements by requiring contractors, their employees and subcontractors, to comply with all facility access policies that are brought to their attention.

[Human Resource Policy 4 Occupational Safety and Health](#) requires proof of full vaccination for COVID-19 before entering a staff-only area of an indoor public service workplace while public service staff are present.

15. [NEW] Do I have to provide new contractors or contractors entering a new agreement notice of the new policy?

[BC Bid](#) has posted a [Contractor Vaccination Notice](#) on their homepage. Contract managers must review the notice with contractors and ensure they can meet the terms of the agreement and HR Policy 4. The notice contains a Certification Form that may be used, see Question 16.

16. [UPDATED] Who must verify proof of vaccination of contractor staff who will enter staff-only areas of our workplace?

Organizations may set up a system for confirming proof of vaccination that best suits their business requirements. For example, verifying vaccination status could be done by contract managers, a central person at a workplace where the contractor is working, or an employee responsible for allowing access to staff only work areas.

A certification form was provided with the notice to contractors and is available on the [procurement service support page](#). This may be particularly helpful with large contractors or contractors working at multiple sites. Please note, if contractors have filled out the original form using the term “attestation”, they are not required to sign a copy of the new certification form.

Worksites accessing a Corporate Supply Agreement are responsible for ensuring that the vendor attending a workplace complies with Human Resource Policy 4.

17. How should the confirmation of vaccination be recorded? Is there a central repository?

No. Record keeping should be kept to a minimum. If you are using certification, keep the form with the contact file. If a visual check of vaccination status is required before a contractor enters staff-only areas of a workplace, no record should be kept. Workplaces must not keep a record of an individual contractor’s vaccination status.

18. Do I have to check every time a contractor or their staff come to our workplace?

If proof of vaccination has been previously confirmed, and the workplace remembers that the person has confirmed proof of vaccination, they don’t need to be re-checked. No lists or records should be created or kept of anyone’s vaccination status.

19. If a contractor requests an exemption based on Human Rights criteria, is it up to the Ministry to determine validity?

No. It is the employer that has the duty to accommodate and determine validity of the issue and reasonable accommodation. We are not the employer of the individual requesting the accommodation for vaccination exemption. The notice to contractors requires them to inform the contractor manager of any accommodations or exemptions, the impacted work locations and what they proposing as safety measures if they wish to to have the accommodated employee in the staff only area of our workplace. The contractor should not be sharing any private information of their employees such as the reasons for an accommodation request.

20. A contractor has identified that they have an individual who is exempt from being vaccinated and wants to send them to our workplace. What are my next steps?

Contract managers can work with the employer (contractor) on what preventive measures have been, or could be, put in place to adequately mitigate risks of COVID-19 transmission. All mitigation measures are subject to prior written approval by the ministry contract manager. The first questions to ask are

- Does this person have to be on the worksite? I.e. can they deliver service remotely?
- If they need to be on site, is it in the staff-only area?
- Can the service be delivered in the staff-only area when staff are not present (e.g. after hours, weekends)?
- Can the contractor assign a fully vaccinated staff member to the required task/work?

If none of these options provide a solution, contact a BCPSA Safety Specialist for assistance via ask MyHR, using the category COVID-19 > Contractor Vaccination for assistance.

21. I have a contractor (or contractor's staff) who is only partially vaccinated. Can I allow them into staff-only areas of indoor workplaces?

No. The policy only allows fully vaccinated individuals to enter staff-only areas of indoor public service workplaces. If the contractor states that the individual has an exemption or accommodation, the contract manager should work with the contractor on preventive safety measures to be taken until the person becomes fully vaccinated. See Question 18.

Note: The Janssen (Johnson & Johnson) vaccine is now available in B.C. People are considered fully vaccinated after one shot of this vaccine.