



AP 1-108– MANDATORY COVID-19 TESTING OF STAFF & VOLUNTEERS

BACKGROUND

The Western School Division, herein after referred to as the “Division”, is committed to upholding its statutory obligations to provide a safe environment to all pupils who attend our schools, all employees who work in our facilities, and all members of our community who volunteer or visit our schools (Public Schools Act 41(1); Workplace Safety and Health Act 4(1) & 4(2)).

On August 24, 2021, Manitoba Public Health announced its intention to introduce new Public Health Orders that would compel all employers providing services to vulnerable populations (including children) to observe the implementation of mandatory collection of proof of full vaccination or mandatory testing of all employees and school site visitors having direct contact with children. These Public Health Orders (hereafter referred to as “the Orders”) were issued on Sept. 24th, 2021 and coming into effect on October 18, 2021. The Orders can be accessed [here](#).

This Administrative Procedure is one component of a comprehensive [pandemic response plan](#) that aims to:

- ensure a successful return to in-school learning, uninterrupted by COVID-19 outbreaks;
- reduce transmission of COVID-19 in the Division’s schools and facilities; and
- mitigate the risk of severe COVID-19 outcomes among individuals in our schools, particularly those individuals who are unable to be vaccinated due to legitimate medical, personal or religious reasons or for whom vaccines are not currently approved, notably children born after December 2009.

In accordance with the Orders, educational workers including teachers, educational support staff, school administration staff, custodial staff, bus drivers, child care staff working in school-based early learning and child care facilities, clinical and health care related occupations in schools; volunteers; and post-secondary practicum students, and any other individuals having direct and ongoing prolonged contact with pupils, are required to provide proof of full vaccination or submit to testing pursuant to the Orders.

To comply with these requirements the Division has developed these Administrative Procedures, providing that all of its employees and/or volunteers who have direct contact with pupils in the Division must undergo testing up to 3 times per week or provide proof of full vaccination. Additionally, the Division mandates that all school trustees/board members are, at the discretion of the Division, required to submit proof of full vaccination prior to entry to school properties where children may be present and/or, at the discretion of the Division, to undergo testing up to three times per week, in order to enter a Division facility. For clarity, the Division may, at its discretion, require those school trustees/board members who attend a divisional facility on an irregular basis, to have conducted and received a negative test within 48 hours prior to their attendance at such a facility.

For the purposes of this policy, “fully vaccinated” shall mean individuals who have received both doses (any combination) of an approved two dose COVID-19 vaccine (AstraZeneca, Pfizer, Moderna), or a single dose of an approved single dose COVID-19 vaccine (Janssen/Johnson & Johnson) with more than 14 days having passed since the final vaccination was received, which definition shall be subject to ongoing amendment and compliance with the Manitoba Public Health definition of “full vaccination” which may exceed the current dosage definition.

PROCEDURES



Staff/Volunteers

1. All persons employed or engaged by the Division as of September 13, 2021—including casual, term, and permanent employees—are asked to disclose and provide proof of full COVID-19 vaccination status to their Principal or Supervisor.
2. Employees and volunteers who are not fully vaccinated against COVID-19 or who do not disclose their COVID-19 vaccination status will be required to undergo COVID-19 testing up to three times per week unless they have provided proof that they are fully vaccinated. For additional guidance related to extra-curricular activities and sport, please consult the Division.

New Employees and Volunteers

All persons offered casual, term, or permanent employment, or engagement as volunteers in the Division after September 13, 2021, will be required to disclose and provide proof of full COVID-19 vaccination status at the time of hire or engagement. Newly hired employees or volunteers who are not fully vaccinated against COVID-19 will be required to undergo COVID-19 testing up to three times a week, until they have provided proof that they are fully vaccinated.

Accommodation

Notwithstanding the foregoing and consistent with its human rights obligations, the Division will duly accommodate employees who are legally entitled to accommodation to the point of undue hardship. All employees requesting accommodation must participate in the accommodation process and provide reasonable and necessary information requested by the Division related to the accommodation request, failing which the Division may be unable to provide any accommodation.

Visitors

All visitors are required to comply with current Public Health Orders. Visitors at all times must maintain compliance with general safety measures, when applicable and warranted. These general safety measures include: mandatory use of medical masks when in the presence of pupils in indoor settings; maintaining physical distancing; proper hygiene measures, such as frequent handwashing and hand sanitization; self-monitoring for symptoms of COVID-19; and self-isolating or staying at home when sick.

This procedure will be reviewed and will be revised or rescinded, as established requirements, Public Health Orders and/or conditions warrant.

PROCEDURES

The Division will accept as proof of COVID-19 vaccination status the digital or physical version of the [Manitoba Immunization Card](#). Other forms of [proof acceptable to the Province](#) will be assessed by the Division.

Collection of personal health information will comply with the provisions of the [Personal Health Information Act](#), [AP 1-600 Freedom of Information and Protection of Privacy](#) and [AP 6-704 Records Management, FIPPA](#) and/or [PHIA](#) as appropriate.



Personnel responsible for hiring new employees or engaging new volunteers will verify the full vaccination status of applicants.

Employees and volunteers required to submit COVID-19 test results up to three times per week, must do so according to the schedule determined by the Division.

An employee or volunteer who is not at work or not on site on a day that they are scheduled to provide their test result, must provide it the day of their return to work or to the facility, prior to entering a school facility and/or prior to entering into direct contact with a pupil.

For the purposes of meeting the testing criteria the Division will accept the results of a self-administered rapid test provided by the Division.

An employee or volunteer receiving a positive test result following such a test must:

- a. Comply with the Orders;
- b. If at the workplace, must immediately leave the workplace. If not at the workplace, must refrain from attending the workplace;
- c. Immediately attend a Province of Manitoba Testing Site for a confirmatory PCR test;
- d. isolate and follow the advice of Public Health; and
- e. return to work only upon compliance with the Orders and on the written advice of Public Health.

Any breach of this Administrative Procedure by a Divisional employee or volunteer, including the provision of false and/or misleading information, may result in discipline, up to and including termination of employment or revocation of volunteer privileges.

The Superintendent of Schools will:

- a. closely monitor the requirements and recommendations of the Department of Education, Manitoba Public Health and the Governments of Manitoba and of Canada,
- b. inform the Board of any changes in circumstance which may impact the need and/or application of this Administrative Procedure,
- c. revise and update the Administrative Procedure as needed.

Consistent with [Board Policy 9 Board Superintendent Relationship](#) the Superintendent is authorized to establish further administrative procedures, make all decisions, and take all actions within the policy parameters established by the Board.

Reference:

- [The Public Health Act \(C.C.S.M. c. P210\)](#)
- [Public Health Orders – Sept. 24, 2021](#)
- [Public Schools Act \(Manitoba\) 41\(1\)](#)
- [Workplace Safety and Health Act \(Manitoba\) 4\(1\) & 4\(2\)](#)



Adopted: October 2021