

MANDATORY COVID-19 VACCINATION POLICY

PURPOSE

At Stouffville Amateur Hockey League “SAHL”, we are committed to providing and maintaining a safe and healthy environment for all. Consistent with this commitment, SAHL has established this Mandatory COVID-19 Vaccination Policy (the “**Policy**”). The Policy requires that, in accordance with the terms set forth below, all persons subject to this Policy (as defined in Scope, below) be double vaccinated for COVID-19 or obtain an approved accommodation or exemption.

BACKGROUND

SAHL has legal obligations to take *every precaution reasonable in the circumstances* to protect the health and safety of a worker and its stakeholders.

The objective underlying this Policy is to provide a healthy and safe environment for employees, contractors, coaches, athletes, support staff and customers, and safeguard the broader communities in which they live.

SCOPE

This Policy applies to all SAHL staff, contractors, directors, coaches, athletes, support staff, volunteers and customers (Collectively “SAHL Stakeholders”).

TIMING

All SAHL Stakeholders must be fully vaccinated by September 17, 2021. “Fully vaccinated” includes both doses of the vaccine, where applicable. It is the responsibility of the SAHL Stakeholder to ensure there is sufficient time to receive both doses of the vaccine by September 26, 2021.

After September 17, 2021, subject to relevant accommodations or exemptions, all SAHL Stakeholders must be fully vaccinated.

SAHL staff who fail to comply with the terms set out in this Policy may be subject to disciplinary action, up to and including termination from their employment.

PROOF OF VACCINATION

Once a SAHL Stakeholder has been fully vaccinated, they are required to provide proof of vaccination to SAHL. This must be provided prior to September 17, 2021, or for new staff members, prior to their first day of employment. Proof can be in the form of a copy of the proof

of vaccination given at the time of receiving vaccination, or a letter from a medical practitioner, confirming the SAHL Stakeholder has been vaccinated.

SAHL will only collect, use and disclose information regarding a SAHL Stakeholder's vaccination status in accordance with its Privacy Policy and all applicable privacy laws.

EXEMPTIONS

SAHL recognizes its responsibilities and duties under provincial human rights legislation, such as the Ontario *Human Rights Code* (the "Code"). If a SAHL Stakeholder is unable to be vaccinated, due to a protected ground, as defined by the Code, SAHL has a duty to accommodate to a point of undue hardship.

However, this duty to accommodate must be balanced against SAHL's obligations to protect the health and safety of SAHL Stakeholders. Due to the serious health threat COVID-19 presents to the public, if a SAHL Stakeholder will not be vaccinated because of a protected ground under the Code, they must request an accommodation or exemption which falls under one of the following two categories:

1. Medical Condition; or
2. Religious/Creed.

Medical Condition Exemption

A SAHL Stakeholder who is requesting an exemption from this Policy on the basis of a medical condition must provide SAHL with a letter from a medical practitioner, clearly stating the reason why the staff member should be exempted from receiving the vaccine.

Religious/Creed Exemption

The Ontario Human Rights Tribunal defines religion as "the practices, beliefs and observances that are part of a faith or religion. It does **not** include personal moral, ethical or political views". Creed is more broadly defined, however, has limitations. The following characteristics are relevant when considering if a belief system is a creed under the *Code*. A creed:

- Is sincerely, freely and deeply held;
- Is integrally linked to a person's self-definition and spiritual fulfilment;
- Is a particular, comprehensive and overarching system of belief that governs one's conduct and practices;
- Addresses ultimate questions of human existence, including ideas about life, purpose, death, and the existence or non-existence of a creator and/or a higher or different order of existence;
- Has some "nexus" or connection to an organization or community that professes a shared system of belief.

There is no requirement under the Code to accommodate a bald refusal to be vaccinated arising from a political belief and/or principles. Political belief, such as the objection to receiving the vaccination on a principled basis, is not a protected ground under the Code.

A SAHL Stakeholder may apply for an exemption, due to religious belief or creed. SAHL reserves the right to ask for materials in support of SAHL Stakeholder's religious belief or creed, including a letter of support from a religious leader or community.

Process to Receive an Accommodation

1. The SAHL Stakeholder who seeks an accommodation, including an exemption, is required to complete a COVID-19 Vaccination Accommodation/Exemption Request Form.
2. The staff member must provide the completed Accommodation/Exemption Request Form to SAHL's **Board of Directors**, with supporting documentation.
3. The **Board of Directors** will consult with other appropriate SAHL personnel to determine whether the accommodation, including an exemption, will be granted based on the accommodation process set out below. If additional information is required from the SAHL Stakeholder, the **Board of Directors** will follow up.
4. The **Board of Directors** will confirm receipt the Accommodation/Exemption Request Form. An original copy of the Form will be securely stored at SAHL.

The accommodation process is a shared responsibility. All parties should co-operatively engage in the process, share information and consider potential accommodation solutions. SAHL Stakeholders who are requesting an accommodation are required to:

- Make the accommodation needs known to the best of their ability, preferably in writing, in a timely manner;
- Answer reasonable questions or provide information about relevant restrictions or limitations, including information from health care professionals;
- Take part in discussions about possible accommodation solutions;
- Co-operate with any experts whose assistance is required to manage the accommodation process;
- Meet agreed-upon performance standards and requirements, once accommodation is provided; and
- Work with SAHL administration on an ongoing basis to manage the accommodation process.