

## VACCINATION DATA COLLECTION NOTICE

The COVID-19 pandemic has given rise to significant health and safety risks for those within the province and our community. The Interior region has been particularly affected by COVID-19 disease during the fourth wave, with significant impacts to the healthcare system. Lower than provincial average vaccination rates in some parts of the region have contributed to higher levels of disease transmission. As such, a large number of our school community members have been affected, particularly students under the age of 12 who have not yet had an opportunity to be fully vaccinated.

Health risks of COVID-19 to students are low but disease can be more serious among adults. Schools remain an overall safe and controlled environment; however, COVID-19 exposures and clusters continue to occur. Interior Health contact tracing efforts have resulted in a large number of exclusions and the temporary closure of Mar Jok Elementary as an outbreak control measure.

These clusters place all stakeholders at risk, including the families of students and staff who may find themselves at risk because of an exposure that occurred on the school site.

School is an essential service and students rely on school for their educational and social needs, as well as for physical activity. It is essential that school remain available for as many students as possible to support their wellbeing. The lifting of some of the regional health restrictions and the uncertainty of new variants, has required the School District to continue its commitment to ensuring the continuity of school services in a safe environment.

COVID-19 vaccines are safe and effective, and help prevent serious disease. While it is possible to contract COVID-19 despite being vaccinated, the illness is generally milder. There is strong evidence to suggest that those who have been vaccinated are less likely to contract the disease. Vaccinations reduce transmission by limiting the length of time an individual is infectious.

A number of sectors and organizations around the province have recently announced plans or have been required to impose mandatory vaccination and data collection programs in order to assess and mitigate risks. The School District is in the process of considering a number of a different options that would allow us to reduce the risk of transmission of COVID-19 among staff and students. At this stage, no decisions have been made about the implementation of a mandatory vaccination program.

Earlier this year, the School District administered a voluntary and de-identified survey in order to collect data about the rates of vaccination among School District staff. That process was intended to collect data that would allow the School District to better understand transmission risk and to make plans to address and mitigate those risks. Regrettably, the level of participation was not sufficient to allow the School District to collect meaningful or reliable data.

This Notice describes a further vaccination data collection program being undertaken by the School District. We take seriously our obligation to ensure the health and safety of all staff and students. In order to discharge this responsibility, it is necessary for us to collect information about the vaccination status of all employees of the School District so that we can engage in appropriate planning to protect against the risk of transmission.

This process of data collection is strongly supported by the Interior Health Medical Health Officer as an important step in the risk assessment of school exposures, clusters and outbreaks.

The purpose of this Notice is to provide employees with information about how such information will be collected, used and disclosed in compliance with applicable privacy laws, including the *Freedom of Information and Protection of Privacy Act* (“FIPPA”).

If you have questions or concerns about your privacy in relation to this program, please feel free to contact the School District's Privacy Officer at [privacy.officer@sd23.bc.ca](mailto:privacy.officer@sd23.bc.ca).

### *What information am I being asked to share?*

Consistent with applicable privacy laws, the School District plans to collect only the minimum amount of personal information required to address health and safety issues raised by COVID-19.

Employees will be emailed a secure weblink asking them to:

- indicate their vaccination status;
- upload a copy of their vaccination card or other proof of vaccination so that the School District can validate vaccination status, and;
- electronically sign that the information is correct.

Employees who do not wish to provide a copy of their proof of vaccination document may contact Human Resources to make other arrangements to verify their vaccination status.

### *Am I required to share information about my vaccination status?*

It is our expectation that all employees will participate. Doing so supports our ability to assess and protect against workplace risk and engage in necessary planning activities and comply with our legal obligations to staff and students.

The School District reserves the right to follow up or require disclosure from those who do not participate if it determines that their vaccination status information is needed for risk assessment, workplace health and safety purpose, or to implement any vaccination programs that may be adopted by the School District.

Employees who elect not to provide their vaccination status to the School District will be deemed to be unvaccinated, which means that they may be subject to follow up and additional protective measures that may be implemented by the School District.

Any employees who misrepresent their vaccination status may be subject to discipline.

### *How will my information be used?*

The School District is seeking to collect and use information about the vaccination status of our employees in order to:

- better understand the risk of infection in schools and in the workplace;
- make decisions about whether mandatory vaccination or other risk mitigation programs are needed;

- support and implement any vaccination or risk mitigation programs that may be adopted;
- plan for operational continuity and support risk mitigation and contact tracing efforts in the event that an exposure occurs within a school or the workplace.

Proof of vaccination documents will be used only to verify an employee's vaccination status or to identify and investigate any instances of fraud or misrepresentation.

In order to minimize the privacy impact on individuals, the use of vaccination status information will take place in two stages.

#### STAGE 1

- At the first stage, all data collected will be held at the School Board Office and will be accessible only to authorized personnel involved in analyzing the data, such as compiling aggregated statistics about rates of vaccination among employees and employee groups (e.g. by workplace, function, or risk level). At this stage, data will not be used to make individual employment decisions. Employees will be given until January 14, 2021, to verify their vaccination status.

#### STAGE 2

- In the second stage, if the Board of Education makes a decision to proceed further after Stage 1, the School District will develop its mitigation plans using the aggregated data. The collected data may then be used for program implementation and broader health and safety purposes, such as to monitor and enforce compliance with any vaccination mandates or similar programs that may be adopted. The District will participate in any agreements achieved between BC Public School Employers' Association (BCPSEA) and BC Teachers' Federation (BCTF) or CUPE.

#### *How will my information be protected?*

Vaccination status information will be used by the School District as described in this Notice. This information will be maintained separately from other employment records, and will be destroyed as soon as possible if there is no business, legal or operational need to retain it.

#### *Who will have access to my information?*

Access to vaccination data will be shared internally on a strictly need-to-know basis and only for the purposes described above. This information will be shared externally only where permitted or required under applicable laws, such as where it is requested or required by public health officials.

Proof of vaccination status documents will be stored separately from other data or files, and access to it will be restricted to a small number of authorized users. All access to this data will be logged and audited to ensure that no unauthorized access takes place.

### *Legal Authority for Collection*

All personal information collected under this Notice will be collected under the authority of the *School Act*, the *Workers Compensation Act*, and sections 26(c) and (e) of FIPPA. Any personal information collected by the School District in the course of verifying vaccination status information with public health officials is collected under the authority of section 27(1)(f) and 27(4) of FIPPA.

### *Who should I contact if I have questions or concerns?*

If you have any questions or concerns about this Notice or the collection of your information, please contact the School District Privacy Officer at [privacy.officer@sd23.bc.ca](mailto:privacy.officer@sd23.bc.ca). You may also wish to review the School District's privacy policy at:

<http://www.sd23.bc.ca/Board/Policies/Section%203%20%20Staff/387.pdf>