

INTERNATIONAL BUSINESS UNIVERSITY (IBU)

POLICY CONTROL

Policy Number	2002 (previously BOG 201)
Policy Title	IBU COVID-19 Vaccine and Prevention Policy
Policy Owner / Responsible Offices	Human Resources
Approval Authority	Board of Governors
Applies To	All students, faculty, staff, volunteers, contractors, vendors, and visitors seeking access to IBU premises or participating in in-person IBU activities
Approval Date	September 7, 2021
Effective Date	September 7, 2021
Review Date/s	December 30, 2021
Revision Date/s	-
Revision Implementation Date/s	-

1. INTRODUCTION AND BACKGROUND

International Business University (“IBU”) is committed to maintaining a safe and healthy environment for every student, faculty member, staff member, volunteer, contractor, vendor, and visitor.

This Policy is designed to both outline clear steps by which IBU can reduce the risk of the spread of COVID-19; and also, to define a framework by which adjustments to strategy may be applied nimbly, as the nature of the pandemic, and our understanding of it, shifts rapidly as well.

In developing and executing this Policy, IBU will continue to be in alignment with evolving Public Health guidelines and focused on the safety and security of its community.

IBU, along with other post-secondary institutions, has received a strong recommendation from the Council of Ontario Medical Officers of Health (COMOH) to require mandatory vaccination for all Persons seeking access to campus or to otherwise participate in in-person activities.

IBU committed to strictly follow the COMOH recommendations and aligns its COVID-19 Vaccine and Prevention Policy with the instructions issued by the Ontario Chief Medical Officer of Health and the Post-secondary Education Health Measures Framework for Fall 2021 (the “Framework”) published on September 3, 2021 as revised by the Ministry of Colleges and Universities of Ontario.

2. PURPOSE

IBU is committed to maintaining a safe and healthy environment for every student, faculty member, staff member, volunteer, contractor, vendor, and visitor. This policy is designed to both outline clear steps by which IBU can reduce the risk of the spread of COVID-19; and also, to define a framework by which adjustments to strategy may be applied nimbly, as the nature of the pandemic, and our understanding of it, shifts rapidly as well. In developing and executing this policy, IBU will continue to be in alignment with evolving Public Health guidelines and focused on the safety and security of its community.

IBU, along with other post-secondary institutions, has received a strong recommendation from the Council of Ontario Medical Officers of Health (COMOH) to require mandatory vaccination for all Persons seeking access to campus or to otherwise participate in in-person activities. IBU committed to strictly follow the COMOH recommendations and aligns its COVID-19 Vaccine and Prevention Policy with the instructions issued by the Ontario Chief Medical Officer of Health and the Post-secondary Education Health Measures Framework for Fall 2021 (the “Framework”) published on September 3, 2021 as revised by the Ministry of Colleges and Universities of Ontario.

3. POLICY STATEMENT

International Business University affirms its commitment to maintaining a safe, healthy, and secure campus environment by implementing evidence-based COVID-19 prevention measures, including vaccination requirements, masking protocols, testing, and public-health practices, in alignment with applicable public-health guidance and legal obligations.

4. APPLICABILITY

This Policy applies to all persons seeking access to IBU campus or facilities, or otherwise participating in in-person IBU activities, including but not limited to students, faculty, staff, contractors, volunteers, visitors, and guests at IBU-sponsored events.

5. DEFINITIONS

Fully Vaccinated

Having received the complete series of a COVID-19 vaccine approved or recognized by applicable public-health authorities, and having completed the required post-vaccination period.

COMOH

Council of Ontario Medical Officers of Health.

Framework

The Post-secondary Education Health Measures Framework for Fall 2021 issued by the Ministry of Colleges and Universities of Ontario

6. POLICY

6.1 CAMPUS VACCINE REQUIREMENTS

In order to contribute to the ongoing global effort to minimize the spread of Covid- 19 and fully comply with COMOH recommendation and the Framework, IBU is requiring as of September 7 that all persons who seek access to IBU campus or otherwise participate in in-person activities, visiting its campus and facilities be fully vaccinated against COVID-19 or apply for an exemption.

In service of this requirement, all IBU faculty, staff, contractors, volunteers, visitors and students are required to provide documentation as proof of their vaccinated status, subject to substantiated medical and human rights exemptions, in accordance with all applicable laws and regulations. Documentation should be a certification of vaccination, for example the receipt provided by the Ontario Ministry of Health, or a medical document detailing the date, location, and type of vaccine administered.

Faculty, students and staff must provide their proof of vaccination by September 7, 2021.

At this time, students are advised to attend their classes remotely and to maintain appropriate COVID-safety practices. If an IBU student is required to visit campus during the Fall 2021 semester, that student will be asked to provide documentation as proof of their vaccination status.

All visitors to IBU premises and all guests at IBU sponsored events must be fully vaccinated or exempted in accordance with the guidelines outlined in this Policy.

IBU will organize an educational session to inform its members about:

1. How COVID-19 vaccines work;
2. Vaccine safety related to the development of the COVID-19 vaccines;
3. The benefits of COVID-19 vaccination;
4. Risks of not being vaccinated against COVID-19, and
5. Possible side effects of COVID-19 vaccination.

IBU members who have not been fully vaccinated as of the date of this Policy are strongly encouraged to become fully vaccinated until October 18, 2021. Individuals who do not provide proof of being fully vaccinated against COVID-19 between September 7, 2021 and October 18, 2021 are required to:

- Submit to regular antigen point of care testing for COVID-19 in a manner and at a frequency to be determined by IBU that must be at a frequency of at least once every seven (7) days, and
- Provide verification of a negative test result.

Individuals who are partly vaccinated (have received one dose of a two-dose vaccine series, or a final dose of a two-dose vaccine series within the last 14 days), should undertake antigen testing until they are fully vaccinated.

As of October 19, 2021, no person will be allowed to access to IBU campus or otherwise attend in person activities unless fully vaccinated or have received an exemption.

6.2 CAMPUS MASKING AND PUBLIC-HEALTH PROTOCOLS

Masks are to be worn in all public spaces within the building,

For the Fall 2021 semester, within the IBU campus, occupying the 9th floor of 80 Bloor Street West, masks are required in any situation in which:

- Appropriate social-distancing is not possible,
- Persons not directly employed by IBU are present,
- Students are present.

IBU requires that its faculty and staff practice frequent hand-washing and proper sanitization in the workplace.

6.3 EXEMPTIONS

IBU respects that a few members will have substantiated grounds recognized by human rights and employment legislation (e.g., medical, religious or disability grounds) to not be vaccinated.

IBU will consider requests, based on these grounds, to be exempt from our full vaccination requirement on a case-by-case basis.

Exemptions will be granted only where the request meets the requirements of applicable human rights and employment legislation.

A person who granted exemption should provide proof of negative antigen testing for COVID-19 in a manner and at a frequency to be determined by IBU that must be at a frequency of at least once every seven (7) days.

6.4 ONGOING CONCERNS

This policy is meant to work in concert with subsequent policies and IBU Covid-19 Safety Plan implemented in the fight against the spread of COVID-19. No language here should be used to contradict policies developed in the future.

COVID-19 is a moving target, and IBU is committed to remaining current with the best practices against it.

Implementation details, including the methods by which IBU members will be able to provide proof of vaccination status and how to apply for an exemption from the

requirement to be fully vaccinated to attend an event on IBU premises or sponsored by IBU, will be determined according to the guidance and recommendations issued by the public health authorities.

6.5 COMPLIANCE

IBU Members who do not comply with the requirements of this Policy or any procedure enacted under it may be subject to remedial actions and consequences, complaint and disciplinary procedures and other actions as determined by IBU.

7. ROLES AND RESPONSIBILITIES

The President is responsible for the implementation of this Policy. The President may delegate its responsibility to individuals who will be responsible for the implementation of this Policy. The President or the delegated person may issue requirements and procedure for the implementation of this Policy.

8. REVIEW

This policy was last reviewed on December 30, 2021 Further on this policy shall be reviewed on a regular basis to ensure continued relevance, regulatory compliance, in line with evolving Public Health guidelines or other changing circumstances to ensure the safety and security of its community. as referenced within the policy. The standard review cycle for this policy is every three (3) years, or earlier if required due to regulatory change or institutional need.

9. COMPLIANCE PROCEDURES

Compliance with this Policy is monitored through institutional oversight mechanisms and enforcement actions as determined by IBU.

10. EVALUATION AND QUALITY ASSURANCE

The effectiveness of this Policy is assessed through ongoing monitoring of public-health guidance, campus safety conditions, and institutional compliance outcomes.

11. RELATED DOCUMENTS

- IBU COVID-19 Safety Plan
- Ontario Chief Medical Officer of Health Directives
- Post-secondary Education Health Measures Framework (Fall 2021).

Company Details

Business Name: International Business University
Date Completed: June 25, 2021
Date Distributed: June 25, 2021
Revision date:
Division Group: All
Developed By: General Counsel
Others consulted:

International Business University (“IBU”) is committed to providing a safe workplace in which all of our students, faculty, staff, visitors and others (all together the “IBU Community”) are protected to the extent reasonably possible from the risks associated with COVID19. IBU recognizes its responsibility to follow the best available guidance and public health requirements. This plan is made available online and is posted in the workplace for our students, faculty and staff.

The COVID-19 pandemic is an evolving situation. IBU’s Covid 10 Safety Plan is reviewed regularly and changes are made as required by the government and public health authorities. Further information can be found at the Ontario government’s COVID-19 website.

HOW WILL YOU ENSURE ALL WORKERS ARE INFORMED AND CAN KEEP THEMSELVES SAFE FROM EXPOSURE TO COVID-19?

- We have reviewed publicly available social distancing and sanitation guidelines.
- We have reviewed applicable Ministry of Health, Toronto Public Health and Workers’ Safety and Compensation Commission (“WSCC”) guidelines.
- In coordination with our executive management team, we have assessed the risks associated with our premises: where our students, faculty, staff and visitors may gather or work closely next to each other and where they may interact with others.
- We then assessed how we could reduce the risk of direct contact between our students, faculty, staff and visitors and between our students, faculty, staff and visitors and others.
- We put in place a mandatory Covid 19 awareness training for access to IBU Premises.

- We developed workplace checklists and templates.
- Assessing risk is an ongoing process. We actively encourage all of our students, faculty and staff to inform IBU management if they have any concerns they have about exposure in our premises.
- This plan is subject to change as new information regarding COVID-19 becomes available, and may be revised as required by applicable public health guidelines and legislation.
- We developed Supervisor requirements. Accordingly, our Supervisors are required to :
 - I. Identify and understand the hazard (COVID-19)
 - II. Identify the impacted individuals (all members of IBU community)
 - III. Evaluate measures to control the hazard.
 - IV. Implement appropriate measures to control the hazard.

HOW WILL YOU SCREEN FOR COVID-19?

All of our faculty, staff and students are required to complete the Ontario COVID-19 self-assessment tool everyday no more than one hour before arriving IBU premises and follow the recommendations provided. Confirmation of completion must be provided to the individual on-site supervisor (manager, director, instructor, etc.).

Health Screening

- All our premises will display notices advising of passive screening measures.
- All of our faculty, staff and students are encouraged to self-monitor on a regular basis. If any of our faculty, staff and students is feeling unwell, they are advised to stay home or contact their manager, director, instructor, etc. before arriving IBU.
- All faculty, staff and students are required to complete an active pre-check health screen prior to arriving at IBU, which includes assessing their health using Ontario COVID-19 self- assessment tool. This tool includes questions for our faculty, staff and students on their health such as the following:

If he or she:

- Has been diagnosed as being infected with COVID-19;
- Is awaiting the results of a lab test for COVID-19;
- Has symptoms of COVID-19, even if mild. These symptoms include fever, cough, shortness of breath, chills, fatigue, recent loss of sense of smell or taste, feeling unwell;

- Has been in contact with someone who has or is suspected to have contracted COVID-19;
- Has been told by public health officials that he or she may have been exposed to COVID-19;
- Has returned from travel outside Canada in the last 14 days.

If our faculty, staff and students answers yes to any of these questions, they are not allowed to enter to IBU premises and must self-isolate for 14 days where required.

- The questions asked for screening may be revised to account for changes in provincial public health requirements.
- IBU management team will be responsible for ensuring that our faculty, staff and students have completed their active screening and will be trained accordingly.
- All screening records will be maintained in accordance with applicable privacy legislation.

HOW WILL YOU CONTROL THE RISK OF TRANSMISSION IN YOUR WORKPLACE?

Workplace flexibility will continue to be required during Covid 19. We instructed our staff and faculty to “work-from-home” to the maximum extent possible. We will develop and adopt a “Return to Campus” process to handle the opening of spaces and return of departments to on-campus operations.

The risk of transmission is controlled by ensuring that all departments and services have implemented appropriate mitigation measures. Mitigation measures that are being implemented across campus include:

- Workplace Guidelines to outline physical distancing and reconfiguring workspaces, hand hygiene, and mandatory use of face coverings;
- Workplace sanitization and ventilation’
- Wall posters, wayfinding, signage, communications including email, newsletters and social media;
- The use of plexi shields barriers at service counters;
- Implementing staggered scheduling of work duties to limit contact;
- Setting up sanitizer stations around campus and ensuring that current stations are monitored/refilled as needed;

- Enhanced Cleaning protocols and procedures;
- Mandatory COVID-19 training for all staff and faculty;
- Requiring additional PPE where appropriate; and
- Travel Restrictions.

Implementation of the Protocols to Reduce Risk

- Mandates and public health orders have been identified. IBU will continue to monitor for updates as they become available.
- We have identified what risks need to be mitigated through five levels of protection to reduce the risk of COVID-19 transmission:
 - Level One: Elimination Measures;
 - Level Two: Physical Distancing;
 - Level Three: Engineering Measures;
 - Level Four: Administrative Measures; and
 - Level Five: Personal Protective Equipment (PPE).

Based on the foregoing, IBU will be operating with a Workplace flexibility mode (modified and restricted schedule) in the coming months in compliance with public health guidelines. As we look forward to opening the IBU's inaugural academic year, we are executing the following measures.

Level One: Elimination Measures

- “Elimination” in this context means primarily eliminating the hazard entirely such as the need for face-to-face contact.
- Attendance at our premises by our business partners and visitors will be limited to visits for essential business needs.

Level Two: Physical Distancing

We are executing the following measures to create and promote physical distancing in our premises:

- We will follow all provincial requirements on the capacity allowed for our offices and classrooms;
- Following guidance provided by the local health and provincial jurisdictions, all our staff will maintain a 2-metre physical distance between themselves to

the best extent possible;

- All direct physical contact will be avoided or kept to an absolute minimum;
- All in-person team meetings will be kept to an absolute minimum;
- If in-person meetings are required, the organizing department must prepare an advance plan of how physical distancing will be maintained; and
- Where required, we will create and retain logs for access points and rooms where physical distancing is not possible.

Level Three: Engineering Controls and Hazard Isolation

- We will implement general access restrictions in our premises;
- Physical barriers in the form of plexi shields will be placed at our reception areas;
- We will install additional physical barriers in the form of plexi shields where possible operationally between our employees that may have to work side by side;
- All physical barriers introduced into our premises will be added to the cleaning and sanitizing cadence described below.

Level Four: Administrative Controls

Personal Hygiene

- IBU premises' needs in terms of the quantity of personal hygiene products to have available in the workplace, such as soap, paper towels, and alcohol-based hand sanitizers, and waste bins will be examined and will continue to be reviewed to ensure allocations are appropriate.
- All faculty, staff and students must maintain proper hygiene practices to help reduce the risk of infection or spreading infection to others:
 - wash hands after potential contamination and at least every 30 minutes with warm soap and water for at least 20 seconds, especially when arriving at IBU, prior to and after eating or taking a break, handling something that is frequently touched, after using the washroom;
 - faculty, staff and students may use alcohol-based hand sanitizer (minimum of 60% alcohol concentration) following proper handwashing but should not use this as a substitute for handwashing;

- when coughing or sneezing:
- cough or sneeze into a tissue or the bend of your arm, not your hand, and
- dispose of any used tissues as soon as possible in a lined waste basket and wash your hands afterwards;
 - avoid touching eyes, nose, or mouth with unwashed hands;
 - avoid contact with individuals who are sick, and
 - wash work clothes immediately upon returning home.
- In addition to the provision of soap and water, hand sanitizer will be provided at entrances into our premises, and in all restrooms.

Postings

- A copy of this safety plan and all COVID-19 policies are posted for faculty, staff and students to review online. Access to all COVID-19 policies will be provided to occupational health and safety / public health authorities upon request.
- Signage will be provided for our faculty, staff, students, visitors and others to be aware of COVID-19 symptoms and to not enter IBU premises if they are sick or exhibiting any symptoms of COVID-19.
- Signage will be posted reminding our faculty, staff, students, visitors and others on proper hand hygiene and respiratory etiquette.
- All IBU premises will post any recommended or required materials published by the applicable public health authorities or provincial governments in the back office, restrooms and around the student lounge area. Postings will include but are not limited to:
 - how to reduce the spread of COVID-19 and/or general health tips;
 - handwashing and use of hand sanitizer;
 - personal hygiene practices;
 - pre-entry screening;
 - physical distancing;
 - occupancy limits;
 - cleaning protocols;
 - how to self-monitor and/or self-isolate; and

- use of appropriate PPE (including facemasks).

Enhanced Cleaning and Sanitation Practices

General Guidelines

- Only a Health Canada Drug Identification Number (DIN) approved disinfectant may be used in kitchen and student lounge areas.
- Additional cleaning products are used for general cleaning procedures.
- All chemicals must be diluted to the appropriate and safe concentration or will arrive pre-mixed.
- All chemicals must be left on sanitizing and/or disinfecting surfaces for the appropriate length of time as stipulated by product instructions.
- Cleaning of all areas in the premises will occur with special attention to high-touch surfaces.
- Routine audits of cleaning practices will be conducted, as applicable.
- All high touch surfaces (doors, doorknobs, faucet handles, handles on carafes/equipment, tables, countertops, electronic devices including laptops, copy machines and scanners) will be sanitized or disinfected as appropriate at an increased frequency.
- If any our faculty, staff, or student has stored his or her lunch in a refrigerator, the refrigerator handle will be sanitized promptly after the refrigerator door is touched. The same considerations apply to microwaves.
- All equipment (including but not limited to coffee machines, hot water dispensers, drip coffee makers, utensils) will be sanitized as frequently as possible. Where feasible, this will occur after each use.

Education and Training

- Our faculty, staff, students, visitors and others will receive specialized training on the following areas. Where feasible, this training will be provided remotely:
 - overview of the applicable occupational health and safety regime;
 - overview of IBU's general pandemic protocols and resources (e.g. this plan and referenced policies);
 - training on the hazards associated with exposure, potential ways of contracting the virus, and control measures to break the chain

of infection such as escalated cleaning, cough etiquette, handwashing, etc.;

- premises cleaning and disinfection practices (including safety precautions and potential hazards for used disinfectants);
 - training on the proper use of PPE; and
 - first aid where applicable.
- Existing policies (e.g. work place safety and violence prevention) will be reviewed to determine whether they have sufficient captured any additional risk COVID-19 poses in the workplace.
 - IBU Supervisors will also receive training on acting as health screening leads (e.g. safety requirements for hierarchy of control; risk assessment protocols, etc.).
 - IBU will regularly check for updates and new advisories published by public health and safety authorities.
 - IBU will maintain regular and ongoing communication with our faculty, staff, students, visitors and others to advise of any changes to this policy or best practices on a timely basis.

Level Five: PPE

- IBU is requiring our faculty, staff, students, wear non-medical grade facial coverings.
- We are respectfully asking our visitors and others to wear facial coverings in our premises and where jurisdictionally required.

WHAT WILL YOU DO IF THERE IS A POTENTIAL CASE, OR SUSPECTED EXPOSURE TO, COVID- 19 AT YOUR WORKPLACE?

All of our affected faculty, students and staff, must notify their manager, director, instructor, etc. in the event they have been on campus in the 14 days prior to:

- the onset of symptoms potentially linked to COVID-19 and which are unrelated to pre-existing conditions;
- going for a COVID-19 test;
- being advised that they are to self-isolate by public health authorities (including under the Class Section 22 order); or

- receiving a positive COVID-19 test result.

Illness Policy

- IBU adopted a policy on employees not working when they are ill including COVID-19 symptoms.
- IBU Employees who have COVID-19 or symptoms have access to the sick leave reporting processes.
- In addition, to protect our employees from anyone who may be asymptomatic, we are requiring facial coverings be worn by all working and will ensure our employees are trained on the correct use and removal of masks.

Policy for Exclusion of Employees Requiring Self-Isolation

- As noted above, Ontario COVID-19 self- assessment tool must be completed before arriving at IBU.
- Based on current information available, IBU has a policy in place regarding any faculty, staff or student exhibiting symptoms of COVID-19, testing positive for COVID-19, or that had close contact with any confirmed or suspected case of COVID-19. This policy is subject to change as new information becomes available:
- IBU adopted a specific isolation protocol for employees who become sick while at work and designated an isolation room. IBU's executive team members will act as designated points of contact in this regard.
- IBU will maintain regular communication with our faculty, staff and students who are under self-isolation. Affected faculty, students and staff, when able to return to work as per public health guidelines, will contact their manager, director, instructor, etc. prior to returning to IBU premises.

Procedures have been developed and implemented in the event that a potential or suspected case of COVID-19 presents within the IBU, including contact tracing and liaising with Public Health Authorities. Public Health will contact those individuals directly.

When the University is notified about a probable or confirmed case of COVID-19, cleaning and disinfection of the affected campus area with a prolonged contact with affected individual will be completed in compliance with Public Health guidelines. Public areas where a person has passed through and spent minimal time (such as corridors) do not need to be specially cleaned and disinfected.

In the event of a confirmed case, faculty, staff and students should all be vigilant and continue to self-monitor for symptoms using the Ontario COVID-19 self-assessment tool regardless of they are fully vaccinated or not.

HOW WILL YOU MANAGE ANY NEW RISKS CAUSED BY CHANGES TO THE WAY YOU OPERATE YOUR BUSINESS?

- Flexible workplace process adopted;
- Return to Work has been broken down into stages for IBU;
- Remote work is encouraged;
- Risk Assessment to identify and assess any new and emerging risks or variants;
- Updating IBU community with changes in guidelines and restrictions;
- Approval process for all activities on campus.

HOW WILL YOU MAKE SURE YOUR PLAN IS WORKING?

Updates will be completed and communicated as necessary based on regulatory changes and Provincial changes to the framework.

In light of all the changes due to the pandemic it is important to safeguard our workplace by educating our faculty, staff and students on new and evolving risks, as well as new requirements under law that are changing from day to day.

Training for existing faculty, staff and students will be conducted at routine intervals and whenever there is a significant change to this Plan. To the extent possible, virtual training for new faculty, staff and students will be conducted before they are onboard so that they are aware of the relevant protocols on arrival.

The information provided to faculty, staff and students will be reinforced through signage and informational posters. They will receive, at a minimum high level Overview of:

- IBU's COVID-19 safety strategy, including this Plan;
- Mandatory Health Screening requirements;
- Physical Distancing Protocol;
- Sanitation Protocol;
- Isolation Protocol;
- Self-Isolation & Returning to the Workplace after diagnosis or exposure to COVID-19;
- Personal Hygiene Training;
- Training and Communications.

IBU will also make regular work place inspections to ensure compliance with this Policy applicable public health guidelines and legislation.

QUESTIONS AND COMMENTS

This safety plan may be subject to change as new information becomes available. Should you have any questions about this plan or IBU's COVID-19 requirements in our premises, please contact the following:

Swarna Bakshi Saini
Email: Ssaini@ibu.ca