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Planning an effective rollout Considerations for a vaccination-status program

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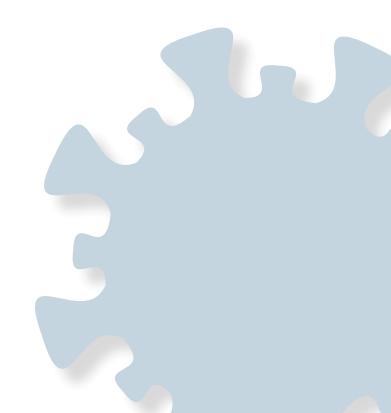
## Context

As workspaces and public venues across the country increase their openness, organizations are seeking to ensure a safe and seamless transition to their next normal, of which vaccination-status management is a key enabler. This document is a guide to help organizations determine how to manage and implement vaccine-status tracking. It asks the critical questions leaders should think through carefully in considering their key stakeholders.

## Vaccination policies have begun rapidly emerging across both public and private sectors.

- Strategies have taken different forms, including variations on mandatory-vaccination or testing requirements, and offering educational programming, as well as the introduction of varied working models for vaccinated as opposed to unvaccinated employees.
- Employees, customers, and suppliers are seeking clarity during this time.

Organizations need to determine their **positions on vaccination policies**—based on clearly outlined questions and criteria—and, where required, **implement vaccination verification and tracking systems** that can be quickly adapted to keep pace with the changing landscape.



The changing landscape of verifiable, digital vaccination credentials across the country makes the development of vaccination policies even more complex.

- Provincial and territorial governments are working to establish verifiable credentials.
- However, approach and timelines will vary, with a pan-Canadian response still under development.
- Organizations, too, differ on possible methods to confirm employees', customers', and/or suppliers' vaccination status.

# Self-attestation Werifiable governmentissued credentials

Solution providers have started to develop light-touch options to help organizations track, manage, and verify vaccination status across the workforce.



# Vaccination-status tracking components

Organizations will need to review these 10 components of any proposed vaccination-status tracking program and address the key issues outlined, all of which are critical to the program's successful launch and management.



#### Corporate vaccination policy

Define the corporate policy on whether vaccination will be required for employees, customers, and/or suppliers



#### **Business operations**

Determine the organizational support required to ensure the successful implementation of the vaccination policy



#### Governance

Create a governance body that will develop and implement the organization's vaccination policies



#### **Human resources**

Define the implications of a vaccination strategy on HR policies and training, as well as on organization norms and culture



## **Privacy and consent management**

Agree on how to manage employee, customer, and supplier consent for the program



#### Technology

Identify the tool(s) required to manage vaccination-status tracking (e.g., government-issued credentials)



## **COVID-19 testing**

Determine whether testing can be an alternative to vaccination, establish the testing process, and define the recommended interval between test and result for an accepted assessment of health status



### **Data and reporting**

Develop a data-management and reporting process for collecting, securely storing, and disclosing vaccination-related information



#### **Brand management and communication**

Specify the approach to managing external brands and internal/external communications to announce the vaccination policy to employees, customers, and suppliers



## Risk, legal, and ethics

Identify key risks—as well as legal and ethical obligations—involved in implementing mandatory-vaccination policies



## Critical considerations for a successful corporate vaccination-status management program



## Corporate vaccination policy

- Will your organization mandate vaccination for employees, customers, and/or suppliers?
- Will the policy be the same for all employees, customers, and suppliers?
- Will it be the same across geographies?
- How do approaches differ for those who can't be vaccinated versus those who choose not to be?
- Will proof of vaccination status be required? If self-attestation is preferred, will the organization conduct audits?
- Which vaccines will be accepted and how will fully vaccinated be defined?
- Will financial and/or other vaccination incentives be offered?
- How will the organization utilize verifiable vaccination-status credentials where issued by the government?



## Governance

- Will a specific person or group be charged with developing and implementing the organization's vaccination policies?
   If so, how will this choice be made?
- How will ongoing updates to the vaccination policy and other organizational decisions be tracked?
- How will the organization act to seek out and address any concerns that employees, customers, and suppliers may have?
- How is your organization tracking public health and legislative updates concerning mandatory vaccinations and vaccination credentials?
- How will your leadership team address policy challenges from unions, employees, and other stakeholders?



## Privacy and consent management

- How will your organization address informed consent in terms of stakeholders disclosing their vaccination status?
- How will the organization manage stakeholders who don't consent to sharing their vaccination status?
- How will you track and manage provincial/territorial and federal guidelines on privacy and consent?
- What consideration has been given to privacy principles, including necessity, effectiveness, and proportionality in terms of the intended public health goal?



## COVID-19 testing

- Will the organization implement a testing program and, if so, will participation be voluntary?
- Will the chosen testing strategies be applied to all stakeholders, or to unvaccinated people?
- If testing is used as an alternative to vaccination, what's the organization's validity period for test results?
- What type of test will an organization require (e.g., rapid antigen-detection, PCR)? How will you procure the tests?
- Who will conduct the testing?
   Will it be done onsite and/or be otherwise supervised?
- How will results be recorded?
- Will the organization cover testing-related expenses?



## **Brand management** and communication

- What are the anticipated implications of your vaccination policy on the organization's brand?
- How can this policy be used to elevate your brand? To this end, what external marketing, if any, will the organization use?
- How will stakeholders be informed of the vaccination policy? For example, what communication channels will you use?
- Who will be responsible for communicating this policy to stakeholders?
- What will be the process for employees, customers, and suppliers to ask questions about the policy?
- What educational, policy-related materials will the organization develop?
   Will a helpline be established?
- What supports, if any, will be developed to encourage the vaccine-hesitant? Will these options be extended to their families?



## **Business operations**

- How will vaccination status be confirmed (e.g., verification upon arrival to the workplace/campus/venue)?
- How frequently will status need to be authenticated?
- How can the organization minimize the impact this verification process will have on daily operations?
- How will the vaccination policy affect commercial operations and/or client services?



## **Human resources**

- How might a vaccination program affect existing policies, such as remote-work accommodation and disability management?
- How could such a program affect collective agreement(s) and/or other employment contracts?
- What considerations will be needed for accommodation policies and procedures, and for occupational health and safety records?
- How will your organization treat employees who refuse to comply with the vaccination policy and/or to reveal their vaccination status?
- If staff are unvaccinated, can their work be done remotely/virtually?
   How will the organization manage alternative work models?
- What training will be required for HR staff to implement a vaccination policy?
- How will implementing—or not implementing—such a policy affect organization culture?
- How can organizational culture be preserved with a vaccination policy?



## **Technology**

- Does your organization need a technology-enabled solution to manage vaccination-status credentials and/or testing results?
- What technology solutions will be used to allow stakeholders to declare their vaccination status? Will this be integrated with an existing humanresources information system, or will it require a new application?
- How will policy stipulations (e.g., vaccination-status declarations, negative tests) be verified?
- Can you adapt the vaccination-verification solution(s) issued by your specific provincial/territorial government(s) for organization-wide use?



## Data and reporting

- What data concerning vaccination status will the organization collect?
- How will it be collected and stored?
- How—and to whom in the organization—will it be reported? And who else in the organization will have access to this information?
- What data-retention policies and processes must the organization establish and/or adhere to?
- Does your industry or sector have specific data-reporting requirements?
- How does collecting and storing this information affect your organization's privacy principles, policies, and legislative framework?





## Risk, legal, and ethics

- What are the various vaccinationrelated regulations in the geographical areas where you operate?
- What legal consultations, if any, are required before the organization can implement a vaccination policy?
- Has the organization weighed the risks of having versus not having a vaccine policy? Are management and the board of directors in alignment?
- Does the organization have an understanding of potential humanrights claims by those who may contest the policy—including assertions of alternative health and safety practices by those who aren't vaccinated? Is a legally compliant strategy in place to respond to such claims?

- What are the legal risks and exposures of not requiring the workforce to be vaccinated?
- What, if any, is the organization's ethical responsibility to implement a vaccination program?
- If such a program is not developed, would this inaction be in conflict with the organization's values and code of ethics?
- Is there a clear strategy in place to deal with stakeholders who falsify proof of vaccination and, as such, potentially put the business, clients, and other contacts at risk?

# What's next for your organization?

- As businesses across the country slowly revert to on-site work, the time has come to create organization-specific vaccination plans.
- At the outset—as government policies change, technology solutions are adopted, and science continues to expand—organizations must accept that developing these vaccination programs will be an ongoing process.
- The questions in this document are meant to help guide you as you create your own, tailored plan; however, strong internal governance will be essential for your vaccination policy's ultimate success.

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