

August 18, 2021

RE: [Industrial Camps - July 7, 2021 Order of the Provincial Health Officer](#) and vaccine status reporting

The purpose of this notice is to notify you of the requirement to report vaccine status of your workforce under [Industrial Camps - July 7, 2021 Order of the Provincial Health Officer](#).

Industry must be vigilant in establishing and maintaining effective barriers to prevent within work site and community transmission. High immunization rates among your workforce is a critically important protective factor for the health of the total population. Northern Health (NH) is actively supporting our industry partners to provide workers with access to vaccines through the Industrial Immunization Program.

In July 2021, NH requested estimations of community vaccination rates to better understand and evaluate risks presented by industrial projects and operations. Due to limitations at the time, queries within projects were voluntary and surfaced partial information at best. As a result of those inquiries, Northern Health learned three things:

1. industry is challenged to collect vaccination status of workers due to privacy and human rights concerns;
2. the rotational nature of the workforce and turnover rates results in ongoing changes to population vaccination rates; and
3. anecdotal estimates of vaccination rates tend to overestimate the actual rate of vaccination.

Pursuant to Section 70 of the *Public Health Act*, as a Medical Health Officer for the Northern Health Authority, it is my duty to protect the health and wellness of residents and visitors within my region. Without a clear understanding of the actual and ongoing vaccination rates of workforce populations, my team is unable to accurately estimate the risk to public health and apply appropriate mitigations.

I am drawing your attention to Section A paragraph 12 of the [Industrial Camps - July 7, 2021 Order of the Provincial Health Officer](#) pursuant to Sections, 30, 31, 32, 39 (3), 53, 54 and 67) *Public Health Act*, S.B.C. 2008 states that an employer must do the following:

- (12) *In the event of the occurrence of a case, cluster or outbreak of communicable disease in workers,*
- c. report daily to the medical health officer, or a physician acting on behalf of the medical health officer, on*
 - iv. any other information, including personal information, relevant to the prevention and control of the transmission of communicable disease among workers and in surrounding communities, as requested by the medical health officer or physician;*

Section C paragraph 5 of this same order states that workers must do the following:

(5) provide information, including personal information, requested by an employer in the course of fulfilling the responsibilities of the employer under Part A, or requested by a co-ordinator in the course of fulfilling the responsibilities of the co-ordinator under Part B.

As such, and as a Medical Health Officer of Northern Health Authority, I share this to let you know that, in the event of a case, cluster, or outbreak, I will request the vaccine status of all workers at your project. You will be requested to provide the following information to me or my delegate as soon as possible. Information request will include, by work site:

- % of workers fully vaccinated, partially vaccinated, and unvaccinated with a Health Canada approved COVID-19 vaccine.

During the course of an investigation and management of cases, clusters and/or outbreak I am also writing to inform you that I will request that you make available specific information related to the vaccine status of workers as required by me or my delegate and as soon as possible:

- The full names, date of birth, health care number, and COVID-19 vaccine history including vaccine product received of workers as required and requested by me or my delegate, and in a format that is acceptable to me or my delegate.

You must treat personal information collected from a worker for the purposes of the Order as confidential and store it securely and only use and disclose it for the purposes of the Order and under the direction of a Medical Health Officer or delegate. You must not destroy the information collected until such time as a Medical Health Officer or delegate indicate that it can be destroyed, after which you have 30 days to do so and in keeping with the original intent of the Order.

As important as having an immunized workforce is, it is also very important that you are vigilant in supporting good public health practices among your workforce. This includes regular handwashing, respecting personal space, following the work place's safety plan and not working when symptomatic.

Should you have any questions please do not hesitate to contact me or my delegate.

Sincerely,

Dr. Jong Kim, MD, MSc, FRCPC
Chief Medical Health Officer
Northern Health