

**POLICY ON STUDENT AND EMPLOYEE IMMUNIZATION
FOR CLINICAL COURSES OR HEALTH CARE INTERNSHIPS**

Adopted: September 15, 2015

Revised: August 15, 2017

Effective: Immediately

BACKGROUND

The *Ministère de la Santé et des Services Sociaux* has issued two documents entitled *Protocol d’immunisation du Québec*¹ (the “Protocol”) establishes norms of practice in the Health Care field, and *Immunisation des travailleurs de la santé, des stagiaires et de leurs professeurs*² (the “Recommendations”) which provides the vaccination recommendations and schedules for faculty and students at Clinical Sites. The Recommendations document assigns to both partners³, the College and the Clinical Site, the responsibility of developing an agreement that defines respective roles in ensuring proper vaccinations. This collaboration is formalized through a Contract of Association signed by both the College and the Clinical Site.

PURPOSE

The purpose of this policy is to ensure safety to patients, students, and Employees through compliance with government protocols regarding immunizations (vaccinations).

POLICY

- a) Health Care Workers who have direct contact with patients have an obligation to be immunized⁴. Failing to be immunized poses a risks to patients, co-workers, students and their families. The Recommendation equates this responsibility with “due diligence”⁵

« En l’absence de contre-indications, leur refus de se faire vacciner peut être assimilé à un manquement à leur obligation de diligence envers leurs patients.»

- b) If for health or other reasons, an Employee chooses not to be immunized, the College has the responsibility of offering the Employee reasonable alternatives with regard to the equitable re-assignment of workload, or placing the Employee on leave in cases of a sudden communicable disease outbreak making non-immunized individuals vulnerable.
- c) The College has no authority to impose an immunization requirement on any student. In some cases, however, alternative clinical learning activities may not be possible and a student who refuses or cannot be immunized may be denied access to learning activities necessary to complete graduation requirements. In such cases, alternative arrangements will have to be explored as per the responsibilities section below.

In all cases where an individual refuses to accept immunization according to the Protocol, the College has the responsibility of informing them of the risks involved.

¹ *Ministère de la Santé et des Services Sociaux* (2014-02-17 link: http://publications.msss.gouv.qc.ca/acrobat/f/documentation/piq/piq_complet.pdf)

² *Ministère de la Santé et des Services Sociaux* (2014-02-17 link: <http://publications.msss.gouv.qc.ca/acrobat/f/documentation/2013/13-278-36W.pdf>)

³ *Ibid.*, section 1.2 (page 5)

⁴ *Ibid.*, section 1.1 (page 3)

⁵ *Ibid.*, section 1.1 (page 3)

By virtue of this policy the following responsibilities are assigned:

1. The College is responsible for:
 - i. Ensuring that valid Contracts of Association are established and maintained with each Clinical site
 - ii. Ensuring that each Employee and student is protected with liability insurance in discharging their responsibilities.
 - iii. Ensuring that applicants to programs of study with immunization requirements are informed of immunization requirements before being admitted to the program.
 - iv. Informing candidates for employment of this policy, if relevant.

2. The Sector Dean is responsible for:
 - i. Negotiating Contracts of Association with Clinical Sites and ensuring that the contracts are signed according to College bylaws.
 - ii. Ensuring that the terms of the Contract of Association are honored by the College and by the Clinical Site.
 - iii. Ensuring that Employees reporting to them are compliant with the terms of this immunization policy.
 - iv. Ensuring that the terms of the Contracts of Association are made known to the relevant programs of study and the College Nurse.
 - v. Ensuring that every reasonable attempt is made to offer an equitable workload to employees who choose not to be, or cannot be, immunized according to the Recommendations.

3. Department Chairs are responsible for:
 - i. Ensuring that the College Nurse is informed of program requirements for the timely placement of students in their clinical component.
 - ii. Ensuring that students are informed of this policy, and also of the need for the College to transmit relevant personal information to affiliated Clinical Sites.
 - iii. Collaborating with any student and the Sector Dean in an attempt to find alternate learning activities or clinical placements for students who refuse or are unable to be immunized.
 - iv. Ensuring that their students are compliant with the immunization protocol 20 calendar days prior to their clinical component. .

4. Employees are responsible for:
 - i. Respecting the immunization Recommendations.
 - ii. Ensuring that the Immunization Coordinator is informed of the names of Employees and students who may require immunization by virtue of the Recommendations.
 - iii. Informing the Immunization Coordinator of their compliance or non-compliance with the immunization requirements.
 - iv. Requesting, in writing, alternative arrangements of their Sector Dean within one calendar week of being assigned their workload for the semester, should they refuse or be unable to be immunized according to the Recommendations.
 - v. Informing the Sector Dean in writing, of any changes in personal health care conditions (including pregnancy) that may affect their immunization requirements.
 - vi. Informing the College Nurse and Department Chair of any communicable disease outbreak at the Clinical Site, or of any instance of patients recently diagnosed with tuberculosis.
 - vii. Ensuring students have access to post-exposure prophylaxis according to guidelines in the document *Guide pour la prophylaxie postexposition (PPE) aux personnes exposées à des liquides biologiques dans le contexte de travail* (MSSS, 2011) in the case of an exposure, and informing the department chair, and, if deemed serious enough, the College Nurse and the Sector Dean as soon as possible.

5. College Nurse is responsible for:
 - i. Informing students and Employees of the immunization requirements of the clinical site.
 - ii. Monitoring changes to the Protocol and Recommendations documents, and making appropriate recommendations to the Department Chair and Sector Dean.
 - iii. Collaborating with Clinical Sites, Employees, and the Department Chair in the event of any communicable disease outbreak at a Clinical Site or of any instance of patients recently diagnosed with tuberculosis in order to prevent the transmission of disease.
 - iv. Ensuring that every Employee or student that chooses not to be immunized according to the Protocol is informed of the health risk involved.
 - v. Provide guidance and direction to the Immunization Coordinator and be a resource person with regard to immunization protocols.

6. Immunization Coordinator
 - i. Coordinating with the Department Chair the identification of all individuals subject to the immunization protocol.
 - ii. Monitoring the immunization status of each student and coordinating their immunization needs.
 - iii. Entering the immunization status of the students in Omnivox to make the information accessible to the students and employees.
 - iv. Providing access to the immunization status of students and Employees to the authorities identified in the Protocol and Recommendations, the Department Chair, and the Sector Dean.
 - v. Receive guidance and direction from the College Nurse and provide periodic updates.

7. Students are responsible for:
 - i. Complying with the immunization Protocol.
 - ii. Informing the Department Chair and College Nurse in writing of their intention not to be immunized before registering in a Clinical course, and requesting alternate arrangements.
 - iii. Providing required information to the Immunization Coordinator demonstrating their compliance or to the College Nurse if non-compliant with immunization requirements.
 - iv. Using the services of the College Nurse to address their immunization needs at the appropriate time.
 - v. Informing the College Nurse and Department Chair, in writing, of any changes in personal health care conditions (including pregnancy) that may affect their immunization requirements.

Consultation on this policy

Writing team: Medical/Social Serv Prg Chairs/College Nurse/Dean SMSE

2013-09-04 v4 Student Services / College Nurse

2013-09-04 v4 Director of Administrative Services

2014-03-26 v5 Deans Group

2014-03-28 v5 DTU CRT

2015-09-15 v6 Deans Group

2015-09-03 v6+ minor modification by SMSE

2016-06-13 revisions to reflect creation of Immunization Coordinator role in collaboration with College Nurse

DEFINITIONS:

Clinical Site –	health care provider or institution. The term is used here to include any public or private institutions or clinics used by the programs of study for their Clinical Components.
Clinical Component –	the program component that students take at a Clinical Site. The term includes what is commonly referred to as clinical, stage, and internship components of the program.
Department Chair ⁶ –	person assigned the role by virtue of the faculty collective agreement. Responsibilities assigned to the Department chair may, by agreement, be discharged by the Program Coordinator.
Clinical Coordinator-	person assigned by department to coordinate the placement of students in partner sites.
Program Coordinator –	person assigned the role by virtue of the faculty collective agreement
Employee –	a person employed by Dawson College. The term in this context often refers to teachers, but includes any employee whose duties include work at a Clinical site.
Health Care Worker –	any health care worker as defined by the <i>Protocol d'immunisation du Québec</i> , including students and teachers in those fields.
The Protocol –	refers to the document « <i>Protocol d'immunisation du Québec</i> » issued by the <i>Ministère de la Santé et des Services Sociaux</i>
The Recommendations –	refers to the document « <i>Immunisation des travailleurs de la santé, des stagiaires et de leurs professeurs</i> » issued by the <i>Ministère de la Santé et des Services Sociaux</i>
Contract of Association –	refers to a signed agreement between Dawson and the Clinical Site on roles and responsibilities.
Exposure –	increased vulnerability through injury/accident/cross contamination, which may require post event prophylaxis and/or treatment. e.g. Biting, scratching, needle sticks /cuts and inhalations

⁶ “Department Chair” is referred to as “Department Coordinator” in the English version of the Collective Agreement