

## **Employee COVID-19 Vaccination Status Information Handling**

Fraser Health's Information Access and Privacy office has seen an increase in questions about Fraser Health's handling (collection, use, and disclosure) of employees' personal COVID-19 vaccination status information (the "C19 Vaccination Status Information").

We hear you and are here to help. Take a moment to review the answers to the following Frequently Asked Questions (FAQs)...

## FAQs - Employee COVID-19 Vaccination Status Information Handling

### **Q1 - Why is my C19 Vaccination Status Information being collected by Fraser Health?**

On September 13, 2021, the Provincial Health Officer (PHO) publically announced a program of mandatory COVID-19 vaccination for workers or volunteers in all health-care facilities across the province, effective October 26<sup>1</sup>. This vaccine mandate had previously only applied to workers in long-term care and assisted living facilities<sup>2</sup>. This verbal order by Dr. Henry was reaffirmed and expanded in the newly released written [October 14, 2021 PHO Order](#) and [October 21, 2021 PHO Order](#).

Fraser Health, like all health authorities in BC must comply with all PHO Orders. To comply we are required to handle limited C19 Vaccination Status Information necessary to confirm whether an employee's vaccination status meets the requirements of the PHO Orders.

### **Q2 - What legal authority does Fraser Health have to collect this information?**

Fraser Health is acting under the authorities of sections 26(a),(c), (e), 27(1)(a)(iii), 27(1)(f) and 27(1)(b) of the BC *Freedom of Information and Protection of Privacy Act* (FIPPA); as well as the BC *Public Health Act*, and the *E-Health (Personal Health Information Access and Protection of Privacy) Act*.

### **Q3 – Does Fraser Health require my consent to handle my C19 Vaccination Status Information?**

Fraser Health takes the privacy and security of our employees' personal information very seriously and only handles it as authorized under legislation.

In this case we don't need consent because Fraser Health is otherwise authorized by legislation (see question 2) and as set out in the PHO Orders, to handle your C19 Vaccination Status Information without obtaining consent. Fraser Health and its employees and contractors are required to comply with all PHO Orders.

### **Q4 - How will Fraser Health use my C19 Vaccination Status Information?**

The C19 Vaccination Status Information of employees will be used to comply with the information reporting and monitoring requirements set out in the PHO Orders. It is also now mandatory for Fraser Health to establish current and ongoing vaccination status monitoring activities to ensure that all employees are provided with a safe and healthy workplace; to manage the employment relationship; and to enable public health surveillance and health sector planning. C19 Vaccination Status Information is

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<sup>1</sup> <https://www.youtube.com/watch?v=93Rnjmr7iCk>

<sup>2</sup> <https://www2.gov.bc.ca/assets/gov/health/about-bc-s-health-care-system/office-of-the-provincial-health-officer/covid-19/covid-19-pho-order-vaccination-status-information.pdf>

also aggregated (rolled up and anonymized so it cannot identify any one individual) and used to assess broader public health, and health sector planning needs. The handling of C19 Vaccination Status Information required to perform these current and ongoing activities is authorized under FIPPA and the *Public Health Act*.

**Q5 - How is employee C19 Vaccination Status Information kept safe?**

Vaccination Status Information is maintained in a secure information system known as the Workplace Health Indicator Tracking and Evaluation (WHITE) system, which has been in existence for many years and is specifically designed to maintain workplace health and safety information. This provincial system has been reviewed locally and provincially from a privacy and information security risk perspective and has been approved as having the necessary safeguards in place to keep your information safe as required by the FIPPA.

**Q6 - Who will be accessing/using my C19 Vaccination Status Information?**

Only authorized users of the WHITE system have access to your C19 Vaccination Status Information on a "need to know" basis and only for authorized permitted work purposes. Users of WHITE do not have access to your personal health number or C19 vaccination related health records. The system will only provide information verifying whether or not you have been vaccinated, or if partially vaccinated, the date of your first dose. Your privacy is further protected by limiting the sharing of C19 Vaccination Status Information that *specifically identifies you* through our Management Center to only those authorized individuals who must view it to confirm your Vaccination Status, otherwise manage the employment relationship with you and to comply with the PHO Order.

**Q7 – Who do I contact if my privacy related question has not been answered by these FAQs?**

If you have reviewed the FAQs and you still have question related to privacy please contact us at [Informationprivacy@fraserhealth.ca](mailto:Informationprivacy@fraserhealth.ca).