

## HR 713: Mandatory Mask Policy

<b>Policy Title:</b>	Mandatory Mask Policy
<b>Policy Number:</b>	HR713
<b>Owner:</b>	Vice-President, Human Resources & Organizational Development
<b>Approved by:</b>	CET
<b>Effective Date:</b>	October 15, 2020
<b>Reference:</b>	N/A
<b>Links to Other Policy:</b>	Occupational Health & Safety (CR1201) Workplace Accommodation & Return to Work Academic Accommodations for Students with Disabilities Employee Discipline / Student Code of Conduct

St. Lawrence College is committed to making our resources usable by all people, whatever their abilities or disabilities. This document will be made available in alternative format upon request.

## BACKGROUND

### Definitions:

**College community members:** an umbrella term that refers to all employees, students, contractors, volunteers and visitors.

**Enclosed College spaces:** is any indoor area that the public is invited or permitted to access, either expressly or by implication, in order to receive or to provide goods or services. It includes all common spaces, corridors, academic areas, eating establishments, meeting and conference rooms, operational support areas, group offices, open work areas and other workspaces occupied by more than one (1) person. Office spaces and other work areas where the public is not invited or permitted access and that are restricted to only one person at a time are excluded from this definition.

**Mask:** describes any personal cloth mask, medical mask, disposable mask, or other face coverings, (e.g. bandana, a scarf or cloth), for filtering respiratory droplets, that securely covers the nose, mouth, and chin and is in contact with the surrounding face without gapping. Masks are not considered personal protective equipment (PPE) in the context of College health and safety guidelines and programs, unless they are surgical or procedure masks that are issued for the purpose of protecting the wearer from a hazard they may come in contact with.

### Purpose:

St. Lawrence College is committed to the health and safety of its community and is committed to reducing the risk of COVID-19 transmission. The College has adopted the requirement for all persons who are accessing or using shared or communal spaces within any enclosed College spaces to wear a mask that covers the nose, mouth and chin. The requirement for mandatory masks does not apply in specific circumstances outlined in this policy. All College community members have a shared responsibility to take steps necessary to minimize the spread of COVID-19 and protect vulnerable members of the SLC community.

**Scope:**

This policy outlines the general process to be used and provides expectations for College community members accessing an enclosed SLC location. The policy is meant to ensure consistent prevention practices are adhered to for the purpose of minimizing the transmission of COVID-19 to all members of the SLC community, including its employees, students, volunteers, contractors and visitors. While a physical distance of 6 or more feet is a key aspect of slowing the spread of COVID-19 as is frequent cleaning, hand-washing and use of sanitizer; a personal mask is an additional preventative public health measure to minimize the spread of the virus from a person who may be carrying the virus but not showing symptoms (“asymptomatic”). A personal mask is not considered Personal Protective Equipment (“PPE”) and does not protect the wearer from the COVID-19 virus. Employees or students whose jobs or programs require the use of PPE will be provided with appropriate face masks to meet PPE standards applicable to their position.

Provisions of relevant collective agreements and the application of existing policies and legislation continue to apply. The requirement for personal masks should not be interpreted in a way that conflicts with or replaces existing requirements or obligations under the *Occupational Health and Safety Act* or other legislation.

**POLICY STATEMENTS**

1. All College community members are required to wear personal masks when attending College campuses and worksites; and
2. All College community members are to follow proper procedures for wearing personal masks, in accordance with Public Health Guidelines; and
3. All College community members are required to respectfully advise individuals entering enclosed College locations of the requirements to wear a personal mask. Similarly, College community members are to remind others within the enclosed College worksite of the mandatory requirement to wear a personal mask unless the individual is otherwise

exempt. College community members are not expected to actively and directly enforce the requirement for others to wear a personal mask.

4. When reasonably required, community members may temporarily remove a personal mask for the following purposes when:
  - a. Working in outdoor areas except in instances where physical distancing of six (6) or more feet cannot be maintained; or
  - b. Working in isolation and in an area not open to others; or
  - c. Performing duties behind a physical barrier (e.g. plexiglass barrier). NOTE: In instances where physical distancing cannot be maintained with others within or behind a physical barrier, personal masks must be worn.
  - d. Consuming food or drink; or
  - e. Receiving any such services that require the removal of face coverings (in clearly marked areas with appropriate signage); or
  - f. For any emergency or medical purpose.
5. A person shall be exempt from wearing a face covering on SLC enclosed premises if they meet any of the following criteria:
  - a. Persons who cannot place or remove a face covering without assistance under the Accessibility for Ontarians with Disabilities Act (AODA) or who have protections under the Ontario Human Rights Code, R.S.O 1990, c.H.19, as amended; or
  - b. Children under two years of age, or children under the age of five years (chronologically or developmentally) and who refuse to wear a mask and cannot be persuaded to do so by their caregiver; or
  - c. Persons who require accommodation based on defined grounds under the Ontario Human Rights Code; or
  - d. Persons with medical conditions rendering them unable to safely wear a mask as defined by Public Health which may include specific types of breathing difficulties or cognitive difficulties. Such conditions shall be assessed in accordance with the appropriate accommodation process.
6. Implementation of this Policy will be enacted and enforced in “good faith” and should be primarily used to educate people on personal mask use in enclosed SLC premises.

**Exemptions:**

While no person shall be obligated to provide proof of any of the exemptions noted in Section 5, individuals who believe themselves to be exempt are required to engage Human Resources (for staff) or Student Wellness & Accessibility (for students) to support individual needs. The College’s existing accommodation practices will be implemented to consider and respond to requests for accommodation under the Mandatory Mask Policy.

## MONITORING

### Methods of enforcement

All persons accessing SLC facilities or work sites are expected to comply with this policy, unless exempt. Anyone not wearing a personal mask as expected and in accordance with the above provisions will be provided a reminder of the requirement to wear a face covering. Persons who provide reasons that do not fall within an exemption category will be directed to wear a personal mask or asked to leave the enclosed SLC location or worksite as appropriate. Persons who refuse to comply with the Mandatory Mask Policy may be subject to College disciplinary sanctions and alternate enforcement measures, where appropriate, when reported to College administration (Human Resources, Safety and Security or Student Services). It is strongly advised that individuals who are exempt from wearing face coverings should utilize other risk mitigation strategies and avoid all public places where social distancing of 2 meters cannot be maintained.

## PROCEDURE

### Duration of Policy

This policy will be in effect until further notice and will be modified in accordance with appropriate recommendations by local health unit(s) and/or legislation.

This policy will be regularly reviewed by Human Resources & Organizational Development in collaboration with Health and Safety as well as Student Wellness & Accessibility.

## SPECIFIC LINKS

### Related Policies:

- [Occupational Health & Safety \(CR1201\)](#)
- [Workplace Accommodation & Return to Work](#)
- [Academic Accommodations for Students with Disabilities](#)
- [Employee Discipline](#) / [Student Code of Conduct](#)

## ADDITIONAL RESOURCES

- [Return to Campus Information](#)
- [Updates on COVID-19](#)