

At a Glance



Audit of the Environment and Climate Change Canada Application and Implementation of the Policy on COVID-19 Vaccination for the Core Public Administration Including the Royal Canadian Mounted Police – Leave Without Pay

In an effort to protect the health and safety of employees, and to improve vaccination rates among employees in the core public administration, the Treasury Board of Canada issued the [Policy on COVID-19 Vaccination for the Core Public Administration Including the Royal Canadian Mounted Police](#) (the Policy), which came into effect on October 6, 2021. As per the policy, all employees of the core public administration, including the Royal Canadian Mounted Police, must be vaccinated. This requirement applies whether employees are teleworking, working remotely, or working on-site.

Section 7.1.2 of the Policy outlines the applicable consequences of non-compliance for employees unwilling to be fully vaccinated or unwilling to disclose their vaccination status at two weeks after the attestation deadline of October 29, 2021. The consequences are as follows:

- Restrict employees' access to the workplace, off-site visits, business travel and conferences;
- Place employees on administrative leave without pay advising them not to report to work, or to stop working remotely, and taking the required administrative action to place them on leave without pay; and,
- Employees who have been placed on Leave Without Pay and who become partially vaccinated will resume work and have their pay reinstated.

The effective administration of the Policy at the departmental level is the responsibility of each department. The audit objective was to assess the application of the management control framework developed to support policy implementation at Environment and Climate Change Canada (ECCC), with a focus on the governance and the application of procedures established to administer the Section 7 provisions.

The Policy was suspended as of June 20, 2022, following a review of the public health situation. However, vaccines continue to be one of the most effective ways to protect against COVID-19. The Government of Canada will continue to monitor and assess the need for additional public health measures, including the possible reintroduction of vaccination mandates. This audit provides timely insights and opportunities for consideration as the Department proceeds with reinstating employees subject to administrative leave without pay as a result of the vaccination policy, and potentially preparing for a reintroduction of the vaccination policy.



What the audit found

The audit found that a management control framework has been developed and applied in a timely manner to support the implementation of the Policy and specifically with the administration of the consequences of non-compliance provisions outlined in section 7 of the Policy.

The governance structure and processes that were put in place supported the timely provision of guidance and advice to delegated managers (Section 34) and employees. It involved different bodies, at different levels, to support the vaccination Policy implementation and application of the consequence of non-compliance provisions and was found to generally operate as intended. The labour relations team played a key role in supporting delegated managers in the administration of the 55 (100%) cases of non-compliance identified during the period under review. This was found to be a good practice that contributed to the consistent application of the consequences of non-compliance.

The processes established to place employees on administrative leave without pay and suspend pay functioned as intended in all 55 (100%) cases reviewed. Furthermore, departmental officials processed 53 of the 55 cases in a timely manner. In two cases, documentation was provided to Trusted Source after the administrative leave without pay period should have commenced (after 10 and 24 business days, respectively).

Given the quick implementation of this policy, reliance was also placed on controls already established. As such, there were some limitations identified with regard to specific elements of the administration of the consequences provisions of the policy, namely the timeliness of actions taken to restrict employee network and facility. The audit found that that access to ECCC networks and physical workplaces had been restricted for employees placed on administrative leave without pay. However, the audit could not conclude on whether employees' accesses were restricted in a timely manner due to the lack of complete information available demonstrating timeliness of action.

Finally, the audit found that the Human Resources Branch developed a data visualization tool to support monitoring and reporting. This reporting tool provided adequate information to senior management to support the review of policy compliance. The audit found that there was an effective monitoring and reporting process in place up to the advice to delegated managers to support their decision-making on potential administrative leave without pay cases. However, monitoring could have been enhanced by establishing a monitoring and reporting process that extended to the complete lifecycle of the administration of decisions – from advice provided to delegated managers, to their decisions and the processes in place to fully administer the consequences of non-compliance provisions.

Opportunities for consideration

The report does not put forward recommendations for action. Rather, it presents two areas for consideration for similar future initiatives.

- Enhancing the monitoring and reporting over the complete lifecycle of the administration of decisions including the advice provided to delegated managers, to the decisions taken, and the processes put in place to fully administer the consequences of non-compliance provisions.
- Enhancing the logging and monitoring of employee network access and pursuing the implementation of a centralized building access system.

About the audit

The audit covered the period from November 15, 2021 to January 21, 2022 and focused on the effectiveness of the governance and monitoring practices established to support the implementation and application of the Policy. The audit also examined 55 cases (100%) of employees placed on administrative leave without pay as a consequence of non-compliance including restricting access to facilities and networks, as well as the reinstatement process for 6 of these employees who were reinstated during the scope period. It should be noted that for the period under review, ECCC had approximately 8,530 employees (which includes 389 employees on leave). Excluding the employees on leave, the vast majority (99%) attested as fully vaccinated and 89 employees made requests for accommodation. The audit excluded the validity of the vaccine attestations and any policy implementation related activities performed by external parties outside of ECCC's purview. It also excluded requests made for accommodation, these will be covered during a separate audit.