

TOWN OF COMOX
VACCINATION INFORMATION COLLECTION PROGRAM (VICP)
October 22, 2021

Preamble

The BC Government's Gathering and Events Public Health Order of September 10, 2021, requires that recreation centres check the vaccine status of some customers/users before they access services.

The relevant portions of the PHO for collection of vaccine information are:

D Proof of Vaccination

4. e) If an event takes place on more than one day, the requirements in this section apply on each of those days.

6. Subject to section 7, an organizer must not retain proof of vaccination or identification provided by a participant or use it for any purpose other than to confirm that a participant has been vaccinated, as required by this Order.

7. Despite section 6, with the written consent of a participant, an organizer may keep a record of the fact that the participant has provided proof of being vaccinated in compliance with this Part until this Order expires or is repealed, and the organizer may rely upon this record to satisfy the requirements in this Part with respect to future participation by the participant in an event at the same place.

It is under these conditions that staff created the vaccination information collection program (VICP).

1. Purpose

The purpose of the VICP is to respond to customers' requests to simplify the vaccine check/entry process to the Comox Community Centre.

The VICP was developed to meet the following requirements:

- It must be simple and quick for staff to input vaccine status to customer's ActiveNet accounts.
- Vaccine information must only be accessible by staff. It must be manipulated, edited, or counterfeited by customers or third parties.
- The stored information must be vague; it will not directly refer to customers' vaccine status.

2. Voluntary Customer Participation

Customer participation is voluntary. Customers may opt to show proof of vaccine and government issue photo identification at every visit if they do not wish to participate in the VICP.

3. Customer Consent

Staff will give customers written terms of VICP consent. Customers will provide their consent by signature. Staff will record this consent by selling the customer a zero-dollar ActiveNet membership called 'Consent Membership' which expires December 31, 2022.

Consent terms:

I voluntarily agree and consent to the Town of Comox collecting and storing my Covid-19 vaccine status in my ActiveNet account. The Town of Comox is collecting this information for the sole purpose of confirming my proof of vaccination to allow me to attend and participate in a recreational activity offered by the Town of Comox that requires proof of a Covid-19 vaccination (Activity). This information will not be shared with anyone and will be deleted by the Town of Comox when it is no longer required. I confirm that I can withdraw this consent at any time by contacting Town of Comox in person. I further acknowledge that I may be asked to produce my proof of vaccine card and valid government identification before participating in an Activity, and that I will comply. I will contact the Comox Community Centre at 250-339-2255 if I have any questions about this consent.

4. How Customer Information Is Added to ActiveNet Account

Customers who want to participate in the VICP must provide:

- A government issued QR code that staff successfully scan with Android or IOS BC Government Vaccine Card Verifier app (or as per relevant out of province or other jurisdictions procedures)
- Valid government issued photo identification.

Step 1:

- Staff will add or retake customer account photo with designated TOC water mark.

Step 2:

- Staff will add ActiveNet Alternate Key Entrance Status and value "002" to customer account.

5. How VICP Is Used

VICP information will be used two ways: membership scans and registered programs.

Membership scans:

Customers will scan their applicable activity card to gain access to the relevant program area. Staff check that the customer photo has the designated watermark confirming their double vaccine status.

Registered programs:

Recreation program leaders check activity roster sheets printed with Alternate Key Customer Information to confirm participants' double vaccine status.

Drop-in programs:

Staff check that the customer photo has the designated colour card confirming their double vaccine status.

6. Account Correction or Deletion

Customers may request to correct or delete their stored information at any time during business hours. These requests are only accepted in person confirmed with government issued photo identification.

Deleting customer vaccine information:

- Add a new membership photo added to the customer account or remove watermark
- Delete the Alternate Key information on the account.
- Cancel Consent Membership

7. Safeguards

The Town of Comox uses cloud based ActiveNet recreation software, a worldwide leader in the field of recreation services and financial management. Staff access to ActiveNet is only by unique password and two factor multi-authentication. ActiveNet stores their customer data in Canada.

Customers' vaccine status will only be stored on ActiveNet. No other program or platform will host this information.

8. Time and scope of procedure

The VICP will exist for as long the PHO requires operators to check customer vaccine status. The end of the PHO requiring vaccination checks will prompt staff to:

- Retake customer photos or remove watermark
- Print a customer list with everyone holding the relevant Alternate key. Staff will remove the information from each customer account.
- Cancel Consent membership from customer account.
- Supervisors will confirm all the above tasks are complete and submit this record to the Recreation Director.

Should the vaccine program be restarted there will be no residual, legacy information for staff. All new information and inputs will be required.

9. VICP Procedures

This document will be posted on the TOC website and will be sent as a pdf to customers when requested. TOC staff will review this document with staff. These procedures will be reviewed and updated as required.

10. Customers' Responsibility

Customers may be required to show proof of government photo identification and vaccine status at any time to verify the vaccine information on hand.