

COVID-19 Mask/Face Covering Policy

Preamble

As the COVID-19 pandemic continues to affect Canadians and the Delta variant surges in Canada and other countries around the world, The London Potters Guild at London Clay Art Centre continues to be committed to doing our part to stop the spread of COVID-19.

In February 2021, the Public Health Agency of Canada (PHAC) published [a brief](#) called “Does wearing a mask in public decrease the transmission of COVID-19?” The study concludes: “This body of evidence suggests that mask use does decrease transmission in the community when adherence levels are good and when masks are worn in accordance with public health guidance.”

Intent

The London Potters Guild (LPG) at London Clay Art Centre (LCAC) takes the dangers of the pandemic seriously and is committed to the health and safety of its employees and participants. As such, we require the use of masks/face coverings to minimize the risk to employees and participants and have created this policy regarding the use of masks/face coverings at LCAC during the time of COVID-19.

This policy must be observed at all times when working in areas requiring mask/face coverings and will remain in effect until it is no longer necessary relative to the appropriate legislation and public health guidance related to COVID-19 transmission.

Guidelines

All employees, contract staff, studio-users, volunteers, students, and visitors must properly wear an appropriate mask/face covering indoors at LCAC when working in and passing through the common areas. Additionally, masks/face coverings must be worn when in contact with the public both indoors and outdoors, for example in the LCAC retail store, providing tours of the building, and working at an LCAC event such as a Potters Market sale.

Any masks/face coverings for COVID-19 protection used at or provided by LCAC should comply with the best practice advice of public health authorities and in consideration of the requirements under Ontario’s Occupational Health and Safety Act (OHSA).

Appropriate Mask/Face Coverings for COVID-19

NOTE: Cloth or non-medical masks are not personal protective equipment (PPE) and should not be used as substitutes for any masks employees must wear as PPE.

Fully vaccinated individuals:

ACCEPTABLE mask/face coverings at LCAC for **vaccinated** individuals:

- reusable or disposable medical or non-medical cloth masks or face coverings such as a bandana, scarf, or handmade cloth mask that fully covers the nose,

mouth, and chin with no gapping. ([City of London, Mandatory Use of Face Coverings](#))

Unvaccinated individuals:

ACCEPTABLE mask/face coverings at LCAC for **unvaccinated** individuals:

- Disposable medical or N95 masks only.

UNACCEPTABLE masks/face coverings at LCAC are:

- Plastic shields (unless worn over a properly fitting mask or face covering);
- Masks with exhalation valves or vents;
- Torn or dirty masks/face coverings.

Using Masks/Face Coverings

Putting on masks

- Confirm the mask is facing the correct direction. Many cloth or nonmedical masks have only one correct orientation.
- The mask should fit snugly on the face, covering the nose, mouth, and chin without gaps.

Wearing masks

- While wearing a mask/face covering, avoid touching the face or mask/face covering.
- Do not wear masks/face coverings in a way that uncovers the nose or mouth.
- Do not place masks/face coverings on the forehead or under the chin. If a mask/face covering must be removed (such as during an eating period), follow the proper procedure below.

Removing masks

- Immediately after removing the mask in a personal workspace at LCAC, either dispose of it in the proper place (if the mask is disposable) or place it in a non-public location such as a pocket or plastic bag, not on a desk or other publicly accessible surface.
- Reusable masks should be washed thoroughly before reuse and stored/cleaned in accordance with the manufacturer's instructions and requirements.

Responsibilities of the Employer (the LPG at LCAC)

The LPG/LCAC will post signs at all entrances informing everyone who enters the building about the requirements for wearing masks/face coverings, in addition to any other COVID-19 related safety measures.

We will train employees, contract staff, volunteers, and studio-users on proper procedures and their responsibility to wear masks/face coverings at LCAC. We will train relevant employees, contract staff, and volunteers on the organization's procedure for interacting with the public and others at LCAC regarding wearing mask/face coverings.

We will:

- Require the wearing of and provide disposable medical and N95 masks to unvaccinated employees and certain contractors who have been granted use of rapid screening tests before entering LCAC;
- Not require members of the public to prove they are exempt from requirements to wear a mask when their interaction at LCAC endures for 15 minutes or less;
- Either require employees, contract staff, studio-users, and visitors who express an exemption and intend to spend more than 15 minutes in a single visit or to work at LCAC on a regular basis to provide a letter from a physician that outlines the individual's restrictions, or work collaboratively to develop a reasonable and safe solution. Understanding the individual's restrictions will help us to formulate reasonable accommodation(s) for wearing a mask at LCAC;
- Offer a private meeting with LCAC's Executive Director to address concerns of immune compromised individuals who regularly use LCAC;
- Provide a disposable mask to employees, contract staff, and other members of the public (i.e. customers, visitors) who forget to bring their own mask/face covering;
- Make available at all entrances alcohol-based hand sanitizer for anyone who enters LCAC;
- Offer a copy of this policy to anyone who requests it, along with information about any applicable act, regulation, bylaw, or order;
- Deny entry to anyone who becomes aggressive about the mask/face covering requirement.

Responsibilities of Employees, Contract Staff, Volunteers, Studio-users, and Students

Vaccinated employees, contract staff, volunteers, studio-users, and students are responsible to provide their own acceptable mask/face coverings and to wear them appropriately.

Unvaccinated employees and certain contractors who have been granted the use of rapid screening test before entering LCAC, must continuously wear a disposable medical grade or N95 mask while at LCAC, including in their office spaces at their desks. LCAC will provide a medical grade or N95 mask in these circumstances.

Employees, contract staff, and volunteers must wear masks when offering goods and services to the public or in any area that is accessible to the public. Public spaces include but are not limited to:

- Hallways, classrooms, open and semi-private studios, retail store, lift/elevator, washrooms, vestibules, staircases, and other spaces or vehicles where work is done.

Employees, contract staff, studio-users, and volunteers are responsible to help enforce this policy by reminding others to wear their mask/face covering properly while at LCAC.

Vaccinated employees, contracted staff, and volunteers may remove their masks/face coverings in the following circumstances:

Indoors

- within their offices when alone at their desks*;
- while eating in the upstairs meeting area, provided they maintain at least 2 meters or 6 feet distance from others;

*When another person enters the space, both parties must put on their mask/face covering for the duration of the interaction.

Outdoors

- during non-work or volunteer-related time, before entering or after exiting LCAC.

Unvaccinated employees and certain contractors may only remove their disposable medical or N95 masks in the following circumstances:

- for 15 minutes or less while eating lunch alone in their office spaces.

Responsibilities of Studio-Users and Students

Studio-Users

- Common studio areas - studio-users who work in the common areas, including the hand building and wheel throwing areas, the sinks, the glazing area, the kiln room, the glaze kitchen, etc., must properly wear a medical or non-medical mask/face covering at all times.
- Semi-private studios (including artists-in-residence) - individuals who use semi-private studios at LCAC can remove their medical or non-medical mask/face coverings when they are alone in their studio space*, with the curtain closed. They are required to properly wear a mask/face covering when entering or exiting LCAC or when using the common areas such as the glazing area, washrooms, etc.

*When another person enters their space, both parties must put on a mask for the duration of the interaction.

Students

- Classrooms and common areas - students are required to properly and continuously wear appropriate masks/face coverings at LCAC.
- No exceptions will be made for students, including studio-users, employees, contract staff, and volunteers who register for a class.

PROCEDURE: Accommodations for Mask/Face Covering, COVID-19

Preamble

The London Potters Guild (LPG) at London Clay Art Centre (LCAC) understands and respects that some individuals experience medical issues that make it difficult for them to wear a mask/face covering.

Intent

The London Potters Guild (LPG) at London Clay Art Centre (LCAC) is committed to the health and safety of its employees and participants. We strive to find mutually agreeable solutions in circumstances where an individual employee or contract staff person may need an accommodation. As such, we have created this procedure for communicating and potentially developing a reasonable accommodation.

Guidelines

We will **not** make accommodations for students, studio-users, or volunteers. They must wear a mask or face covering at all times while at LCAC.

We will take in good faith an expression of exemption for wearing a mask/face covering from a fully vaccinated employee or contract staff person at LCAC. In such circumstances, we will attempt to develop a reasonable accommodation for the individual provided any potential accommodation related to mask/face coverings does not present undue hardship for continued operations at London Clay Art Centre.

We will not make mask/face covering accommodations for anyone who is **unvaccinated**.

In arriving at a solution or decision in these matters, we will take into consideration the following legislation and guidelines, and determine which supersedes given the specific circumstances in question:

- [Government of Ontario Regulation 364/20](#)
- [Ontario Occupational Health and Safety Act](#)
- [City of London's mandatory use of face coverings in all indoor settings across the province](#)
- [Middlesex London Health Unit's guidance on mandatory face coverings](#)

Procedure for expressing an exemption

1. A vaccinated employee or contract staff person at LCAC who is unable to put on or remove a mask/face covering, or has a condition that prevents them from wearing a mask/face covering, may speak with LCAC's Executive Director or designate to begin the accommodation process.

2. The Executive Director or designate and the individual requiring accommodation are expected to work in good faith to provide the necessary information to establish the accommodation plan. The Executive Director or designate will only ask information needed for accommodation. Individuals requiring accommodation should not provide diagnoses in any information submitted.
3. After developing the accommodation plan, a hazard assessment will be conducted by management or designate on the risk of transmission of COVID-19. If there remains a significant risk of transmission of COVID-19, the accommodation plan will be replanned by both management, or designate, and the individual requiring accommodation to implement hazard controls against the transmission of COVID-19 as recommended by management's hazard assessment.

Process for Establishing an Accommodation Plan

An Accommodation Plan is a written plan outlining the limitations and needs of an individual requiring accommodation. It includes a timeline and the most appropriate accommodation for the situation.

1. Any vaccinated employee or contract staff person at LCAC declaring a need for accommodation for masks/face coverings, or any of the prohibited grounds of discrimination, will be invited to collaborate on the accommodation process*. Accommodation is always a cooperative effort between the individual and management. Employees with disabilities as defined under relevant human rights codes and disabilities acts, regardless of where or when the disability, injury, or illness occurred, are entitled to accommodations without judgement, bias, or discrimination.

*Accommodation does not extend in circumstances when an employee or contract staff person wishes to register in a class offered at LCAC. All students must wear a mask/face covering at LCAC at all times.

2. The Accommodation Plan process:

<input type="checkbox"/> Identify the need for accommodation	Consider: What are the medical certificates, documentation, or other resources that identify the need for accommodation?
<input type="checkbox"/> Determine, in consultation, the barriers stopping the individual from performing their job or a specific task normally	Consider: What specific objectives does the individual have difficulty reaching? What specific barriers/physical/psychological issues are stopping them from achieving those objectives?
<input type="checkbox"/> Develop a plan for achieving the objectives in	Consider: What is the least disruptive alternative method for reaching those objectives? What would the individual's

an alternative manner with a timeline for review	solution be? What is within the capabilities of the organization? What is a win-win solution for both parties?
<input type="checkbox"/> Document an agreed-upon accommodation plan	Final accommodation decision requires approval of management. The plan is signed by the Individual and management.
<input type="checkbox"/> Implement the accommodation process	Consider: What is the implementation timeline? What will the individual do in the meantime?
<input type="checkbox"/> Provide training as appropriate	Consider: Will other employees require training as well? Review and revise based on feedback; provide the (updated) accommodation plan to the management.

3. If an employee's or contract staff person's request for accommodations cannot be met due to a safety risk or because they will cause undue hardship for ongoing operations, the employee or contract staff person may or may not be offered a placement in another position as part of the accommodation plan if the supervisor can ensure they:
 - a. Have the qualifications and skill-sets necessary for success in the new position;
 - b. Can perform the tasks associated with the new position;
 - c. Agrees that the new position and the associated work is acceptable.
4. Management and supervisors will act in good faith throughout the accommodation process. If any employee or contract staff person feels they are being discriminated against, they may make a written complaint to the Executive Director; if the Executive Director was involved in the accommodation process then the employee may make a written complaint to the Board of Directors. Once a written complaint is received the LPG/LCAC will complete a thorough and timely investigation. It is important to realize that unfounded/frivolous allegations of discrimination may cause both the accused person and the LPG/LCAC significant damage—if it is determined by the LPG/LCAC that any employee or contract staff person has knowingly made false allegations of discrimination, disciplinary action will be taken.

Interacting with the Public and Others at LCAC, Improperly Worn or No Masks/Face Coverings, COVID-19

Intent

The London Potters Guild (LPG) at London Clay Art Centre (LCAC) is committed to the health and safety of its employees, contract staff, volunteers, studio-users, students, and visitors. As such, we have created this procedure for LCAC representatives about how to interact with members of the public or others at LCAC who are not wearing, will not wear, or are improperly wearing a mask/face covering during COVID-19.

Guidelines

All employees, contract staff, studio-users, volunteers, students, and visitors must properly wear an appropriate mask/face covering indoors at LCAC when working in and passing through the common areas.

Employees, contract staff, volunteers, and studio-users who interact with the public and others at LCAC (LCAC representatives) must behave respectfully toward all people at all times.

Procedure

It is important to remember that not all disabilities are immediately visible.

15-minutes or less

If a member of the public will be inside LCAC for 15-minutes or less, LCAC representatives will **not** request proof of exemption from requirements to wear a mask.

LCAC representatives will inform unmasked visitors of our policy for:

- Wearing mask/face coverings - either verbally or by showing them the posters on the exterior doors and;
- Sanitizing hands using the hand-sanitizer provided at each entrance at LCAC.

LCAC representatives will inform visitors that they are welcome to stay for up to a maximum of 15-minutes without their mask and will make every effort to encourage the visitor to exit the building within 15-minutes of entering.

More than 15-minutes

There are **no exemptions** from mask/face coverings for anyone who visits LCAC longer than 15-minutes. Regardless of claims of medical exemption, everyone at LCAC must properly wear an appropriate mask/face covering at all times.

LCAC representatives should:

- Inform the individual of our policy for wearing a mask/face covering at all times as a measure to protect the health of everyone at LCAC;
- Offer to provide a disposable mask to be used for the duration of their visit.

If an individual **refuses to wear a mask** despite being informed of the LCAC mask/face covering policy and having been offered a disposable mask, the LCAC representative should immediately notify the Executive Director, or appropriate designate, who can intervene to resolve the situation.

- LCAC representatives can deny entry to anyone who becomes aggressive about the mask/face covering requirement;
- Call 911 in any circumstance in which a visitor exhibits threatening or violent behaviour.

Interactions Between Employees, Contract Staff, Volunteers, Studio-Users, and Students

We rely on employees, contract staff, studio-users, and volunteers to help enforce the COVID-19 Mask/Face Covering Policy at LCAC by doing the following, when possible:

- Respectfully remind the individual of our policy for wearing a mask/face covering properly at all times as a measure to protect the health of everyone at LCAC; refer to the policy posted on the bulletin board or in the COVID-19 policy binder accessible on both floors at LCAC;
- Inform the Executive Director in circumstances when the individual refuses to comply with the mask/face covering policy and/or becomes upset.