

Annex I Valid Employee Identification

An individual's vaccination status is health information that is considered personal information within the meaning of section 3 of the [Privacy Act](#).

As such, after November 15, 2021 (when mandatory vaccination policy comes into effect), a valid Government of Canada photo identification may be used as a proxy for attestation of full vaccination or exemption under duty to accommodate.

In cases where a visiting federal employee can not provide valid identification, their manager may provide a written confirmation of employee attestation/accommodation on a "need-to-know" basis as per section 3 of the *Privacy Act*.

As is the case with other personal information, vaccination status must be managed in a manner that protects the privacy of the individual. This means that employees' vaccination status is collected, used, or disclosed in accordance with the *Privacy Act*. For instance, principles such as "minimum collection" and "need-to-know" must be followed.

From a privacy perspective, the use of an attestation process to confirm COVID-19 vaccination status is compliant with privacy legislation and policies. In using the Government of Canada Vaccine Attestation Tracking System (GC-VATS), only the minimum amount of personal information that is necessary to achieve the objective of keeping the workplace safe and secure is collected while putting in place security safeguards to ensure that only those with a clear need-to-know such as an employee's manager will have access to this information.