

# COVID-19 (Novel Coronavirus) FAQ for Face Coverings

## Mandatory Face Coverings in Enclosed Spaces

August 21, 2020. Version 3.0

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### Background

- On July 30, 2020, Southwestern Public Health issued a letter of instruction to businesses to implement mandatory face coverings in all enclosed public spaces in Oxford County, Elgin County and the City of St. Thomas.
  - It takes effect at 11:59 p.m. on July 30, 2020.
  - Businesses have a one-week grace period to prepare and train staff. All policies are required to be in place by 12:00 a.m. on August 6, 2020.
  - Under the instruction, no person aged two years or older is permitted to enter or remain in an enclosed public space unless they are wearing a face covering at all times.
  - Certain individuals may be exempt based on medical conditions, age – developmentally or chronologically – or during specific activities that may inhibit a person's ability to breathe.
  - The full letter of instruction can be found [here](#).
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### When does the face covering instruction come into effect?

The letter of instruction comes into effect at 11:59 p.m. on July 30, 2020. Businesses have a one-week grace period if they need time to prepare and train staff. All policies are required to be in-place by 12:00 a.m. on August 6<sup>th</sup>, 2020

### What establishments/businesses/organizations are included in this instruction?

This letter of instruction for face coverings is intended for all commercial establishments, public transit, and commercial transportation service vehicles – such as limousines, taxis, buses and rideshare agencies.

It applies to indoor areas in these establishments that are open or accessible to the public. Examples include indoor dining areas of a restaurant, indoor farmers' markets, or indoor food courts at a mall, among other spaces.

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A commercial establishment may include but is not limited to:

- Banks or financial institutions
- Casinos, bingo halls and charitable gaming establishments
- Convenience stores
- Entertainment venues, including cinemas
- Indoor farmers' markets and flea markets
- Fitness centres and gyms
- Grocery stores and bakeries
- Gas stations (indoor premises)
- Malls and plazas
- Mechanics shops, garages, and repair shops
- Personal service settings
- Retail stores
- Restaurants, cafes, pubs, bars, and nightclubs
- Sports and recreational centres, including community centres
- Municipal and government offices
- Non-profit agencies serving the public
- Professional offices serving the public (e.g. lawyers, accountants, etc.)

Additionally, it applies to establishments that offer to provide services, including but not limited to professional, counselling, personal care, funeral home, transportation, repair, and rental services, to the public. It also applies to places of worship and private schools. It does not apply to services related to childcare and day camps, care for the elderly and persons with disabilities.

## **I own/operate/am responsible for one of these defined businesses/organizations. What is my responsibility?**

There are two policies each business or organization is required to have under this instruction. Businesses may also choose to have one policy that covers both scenarios. You are required to train employees on how to implement and enforce them.

### *Enclosed Public Space Policy:*

- Have a policy in place to ensure that no person is permitted to enter or remain in an enclosed public space of your business or organization unless they are wearing a face covering at all times. The face covering must cover the mouth, nose, and chin without gaping, and may be temporarily removed to access services provided by your business or organization when it is reasonably required. Here is a sample policy to consider ([Toolkits for Establishments and](#)

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Businesses – including sample policy).

## *Enclosed Employee Space Policy:*

- You must also have a policy in place for enclosed employee spaces which are accessed by employees and not accessed by the public.
- Ensure the following are in place for persons accessing this space:
  - Physical distancing of two metres.
  - Face covering requirement if physical distancing is not possible.
  - Routine screening for COVID-19 symptoms, including requiring those with symptoms to stay home and advising them to be tested for COVID-19.
  - Promoting excellence in hand hygiene and cough and sneeze etiquette.
  - Enhanced cleaning and disinfecting of surfaces.

## **What additional measures are expected under this letter of instruction?**

- Post visible **signage** indicating all persons must wear a face covering.
- Require employees to provide verbal reminders to persons entering the premises without a face covering, or persons removing their face covering while in the premises.
- Place alcohol-based hand sanitizer (60% alcohol or more) at all entrances and exits.
- Ensure all employees are aware of the policies and are trained on implementation and enforcement.
- Provide a copy of the policies, if requested, to a Public Health Inspector or other person authorized to enforce the relevant instructions.

As a reminder, Ontario Regulation 364, a regulation under the new *Reopening Ontario Act*, also requires persons responsible for a place of business or a facility that is open to the public to limit the number of people in the place of business or facility. This is so that every member of the public is able to maintain physical distancing of at least two metres (6 feet) from one another.

## **As a member of the public, what is my responsibility when I visit these establishments?**

You are required to wear a face covering at any business or organization that operates an enclosed public space. This includes wearing a face covering when you enter the establishment, and for the entire time you are there. You are not permitted to remove the face covering unless for temporary reasons – such as emergencies, or to eat or to drink. Your face covering must cover your mouth, nose and chin without gaping.

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## **I own/operate/am responsible for a business/organization that is not a commercial establishment/public transit/commercial transportation service. What is my responsibility?**

Workplaces and businesses that are not commercial establishments, public transit, or commercial transportation are not part of the mandatory face covering instruction.

Southwestern Public Health strongly advises all businesses and workplaces to develop a face covering policy that outlines when a face covering should be used, particularly in any space where physical distancing of two metres (6 feet) cannot be maintained. Here is a sample policy to consider ([Toolkits for Establishments and Businesses – including sample policy](#)). Be sure to incorporate training to ensure all employees understand the policy.

## **As a member of the public, I plan to visit an establishment that is not listed in this Letter of Instruction. Can they make me wear a face covering?**

Workplaces and businesses that are not commercial establishments, public transit, or commercial transportation are not part of this mandatory face covering instruction.

However, Southwestern Public Health strongly advises all businesses and workplaces to develop a face covering policy that outlines when a face covering should be used, particularly in any space where physical distancing of two metres (6 feet) cannot be maintained. If a business or workplace adopts a face covering policy even when they are not part of this mandatory face covering instruction, customers should respect and follow that policy unless they have reasons for exemption (see below). The business or organization should not request proof of this exemption. Operators should not refuse entry to someone for not having a face covering based on the need for an exemption that the customer/client identifies in “good faith.”

## **In what situations may a face covering be exempt?**

If sufficient barriers are provided for employees or volunteers to protect them from close contact from a member of the public (e.g., a Plexiglas barrier), a face covering is not required for the employee/volunteer. A face covering is still required for the member of the public, however.

Certain individuals may be exempt based on medical conditions, age – developmentally or chronologically, or during specific activities that may inhibit a person’s ability to breathe (such as during

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physical activity or fitness). Refer to the full letter of instruction for exemption examples. Operators should not refuse entry to someone for not having a face covering based on the need for an exemption that the customer/client identifies in “good faith.”

It is our hope that everyone takes responsibility to help contain COVID-19 and that no one makes a false exemption claim. Wearing a face covering is an incredibly caring act to protect other people from illness.

## **I have a condition that prevents me from wearing a face covering. Can I still visit these establishments?**

Certainly. We recognize that there are individuals who cannot wear a face covering for medical reasons. **You cannot be asked for proof of your exemption**, and operators should not refuse entry to someone for not having a face covering based on the need for an exemption that the customer/client identifies in “good faith.”

## **Someone has refused to wear a face covering. What can I tell them?**

Remember, some individuals cannot wear a face covering for medical reasons which are not always visible or apparent. For example, an exemption may be needed for those with lived trauma, individuals with mental health concerns, and individuals with sensory disorders. Please be caring and compassionate to each other. Wearing your face covering protects those who cannot wear one.

Operators should not refuse entry to someone for not having a face covering based on the need for an exemption that the customer/client identifies in “good faith.”

## **How will this be enforced?**

These policies will be enforced in “good faith”, using them primarily to educate persons on face covering use. Best efforts must be made to only allow entry to customers wearing a face covering. Employees must remind customers upon entry that a face covering is mandatory, or if a person unreasonably removed their face covering while in the premises.

Local by-law enforcement or police officers are the ones to determine if an individual should be fined for not obeying the businesses policies.

Operators should not refuse entry to someone for not having a face covering based on the need for an exemption that the customer/client identifies in “good faith.”

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## How do I report a non-compliant business or individual?

To report a non-compliant business or individual, please call the by-law enforcement for the municipality where the business exists.

## Are there fines for not wearing a face covering under this instruction?

Yes. While we encourage and support an education-first approach that is supportive to all persons, those who do not comply with the requirements may face a fine of \$750-\$1,000 up to a maximum of \$100,000. Corporations may also be liable for a fine of up to \$10,000,000 for each day or part of each day on which the offence occurs or continues.

## Can a business or organization deny entry to people?

It is recommended that businesses avoid confrontation on this mandate. Please remember that not everyone is able to wear a face covering due to medical or other genuine reasons. You cannot tell by looking at someone whether they have a condition that may inhibit them to wear a face covering. Show care and compassion for these individuals. We must trust that people will do what they can to protect themselves and others.

Operators should not refuse entry to someone for not having a face covering based on the need for an exemption that the customer/client identifies in "good faith."

## Are people allowed to be exempt for religious reasons?

No. The letter of instruction does not outline religion as an exemption. Businesses or organizations encountering individuals claiming this as an exemption should educate the individuals. Education is the extent of the business/organization's role. If there are ongoing concerns businesses are encouraged to contact the health unit for more support and investigation.

## Can customers remove their face covering?

Temporary removal, where necessary, is allowed for members of the public. Here are some examples:

- When communicating with someone with hearing or communication difficulties
- While actively engaging in an athletic or fitness activity where a face covering would inhibit breathing, such as swimming

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- When consuming food or drink
- For any emergency or medical purpose
- When checking ID to confirm ability to purchase an age-restricted product
- When accessing individual psychological counselling

## Are employees required to wear a face covering at all times?

If the employee/volunteer works behind or within a physical barrier, or in an area not designed for public access, a face covering is not needed for the employee/volunteer as long as physical distancing from all other people can be maintained. All employees/volunteers who have contact with the public and do not work behind or within a physical barrier must wear a face covering. In taxi or ride share services where there are no customers in the vehicle the face covering can temporarily be removed.

## What happens if an employee needs an exemption from wearing a mask?

The business should make all efforts to accommodate the employee to a position that is away from the public or behind a physical barrier. If the business cannot accommodate these health and safety measures for employees who require an exemption, they need to discuss this with the Ministry of Labour to determine next steps.

## How do I safely wear a face covering?

Health Canada provides an [excellent resource](#) for how to put on a non-medical mask or face covering. Southwestern Public Health has additional resources, including [this video](#) for putting on and removing a face covering, and this [signage](#) for properly wearing a face covering.

## Why is the age requirement 2 years and older?

We know children can transmit the virus to others, therefore including them was an important decision for our community to remain safe. We also know that in general children above two years old can safely wear a mask. Remember, children under the age of five years who refuse to wear a face covering and cannot be persuaded to do so by their caregiver, can be exempt.

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## What is a face covering?

The term “non-medical mask” and “face covering” are often used interchangeably by the Government of Canada and Public Health Ontario. Wearing a face covering is intended to protect other people from your germs, and their face covering protects you from their germs.

According to [Health Canada](#), face coverings should:

- be made of at least two layers of tightly woven fabric (i.e. cotton or linen)
- be large enough to completely and comfortably cover the nose, mouth and chin without gaping
- fit snugly to the nose, mouth and chin and secured to the head with ties or ear loops
- allow for easy breathing
- maintain shape after washing and drying
- be comfortable when worn so as not to require frequent adjusting
- be changed as soon as possible if damp or dirty

Masks with exhalation valves are not recommended, because they don't protect others from COVID-19 and don't limit the spread of the virus.

## Is a plastic face shield considered a face covering?

No. When you wear a plastic face shield, you do not have a snug fit around your nose, mouth and chin. A face shield may be used in combination with another form of protection (such as a non-medical mask, bandana, or other face covering, for example) to provide extra precaution for the wearer against droplets from another person.

Evidence shows that plastic face shields alone are NOT the equivalent to wearing a face covering. It does not filter respiratory droplets and does not provide a snug fit. However, the [World Health Organization](#) supports the use of face shields as a “better than nothing” approach. At a minimum, the face shield should cover the sides of the face and extend below the chin.

## What constitutes a physical barrier and how would I go about making one?

Sufficient physical barriers consist of solid surfaces such as glass or plexiglass that form a barrier between employees/volunteers and members of the public. The barrier should not allow members of the public to be within unobstructed reach of employees. The National Collaborating Centre for



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Environmental Health has [guidance on creating effective physical barriers](#), including instructions on size.

## **Does the Letter of Instruction mean that I have to wear a mask when in my apartment building or condominium?**

Masks are required when you are in enclosed public spaces. This Letter of Instruction does not include residential buildings or condominiums as they are not considered public spaces accessed by the general public. Residential building owners or condo boards may choose to implement their own policies within their buildings. It is recommended to wear a face covering when physical distancing cannot be maintained.

## **Does the Letter of Instruction apply to places of worship?**

Yes, places of worship would be considered enclosed public spaces, and therefore the Letter of Instruction and face covering requirements apply.

## **Where can I find more information?**

Call the Southwestern Public Health COVID-19 Call Centre at 1-800-922-0096 ext. 9 or visit [www.swpublichealth.ca/WorkplacesCOVID-19](http://www.swpublichealth.ca/WorkplacesCOVID-19) for information, signage and other resources to support face covering policies.