

COVID-19 Mandatory Vaccination Policy

POLICY STATEMENT AND OBJECTIVES

The Victorian Government has released the COVID-19 Mandatory Vaccination (Specified Facilities) Directions (updated from time to time as needed) (Health Directions).

These Health Directions require the College to take steps to ensure staff are vaccinated in order to limit the spread of SARS-Cov-2 in school settings, and effectively require that staff (unless exempt):

- receive a first dose of the COVID-19 vaccination by 25 October 2021; and
- are fully vaccinated by 29 November 2021.

Compliance with the Health Directions is mandatory under the Public Health and Wellbeing Act 2008 (Vic). Failure to do so is an offence.

Lavalla Catholic College (the College) is committed to the health and safety of its staff, students and broader school community, which includes preventing the spread of diseases such as COVID-19 on campus and amongst members of the College community.

There is a high risk of COVID-19 infection in the context of a public-facing school environment which requires staff – during on campus learning – to regularly come into contact each day with a large section of the school community (including staff, students and parents), having regard to the increased rates of community transmission of the Delta variant of SARS-CoV-2, as well as the increased health risks of the virus to people who might not previously have been considered to be vulnerable.

The College will comply with the Health Directions.

This policy accordingly sets out the measures which the College is taking to ensure that staff are vaccinated in compliance with the Health Directions, and outlines the limited exemptions which are available.

SCOPE

This policy applies to all staff members.

DEFINITIONS

CHO Directions means the Directions issued by Victoria's Chief Health Officer or authorised delegate under the *Public Health and Wellbeing Act 2008* (Vic.) in relation to mandatory vaccination requirements, including the *COVID-19 Mandatory Vaccination (Specified Facilities) Directions*, as in force at the relevant time.

COVID-19 vaccination means a COVID-19 vaccine approved by the Therapeutic Goods Administration for use in Australia, or where a person has been vaccinated overseas, a World Health Organisation COVAX approved COVID-19 vaccine. Currently, the Pfizer-BioNTech (COMIRNATY), AstraZeneca and Spikevax (Moderna) vaccines are approved for use in Australia.

Critical unforeseen circumstance means a circumstance that Lavalla Catholic College could not reasonably have foreseen nor planned for which results in a critical need for staff.

Emergency situation means a situation where it is reasonably apparent to Lavalla Catholic College that medical treatment is necessary, as a matter of urgency, to:

- save a person's life;
- prevent serious damage to a person's health; or
- prevent a person from suffering or continuing to suffer significant pain or distress.

Excepted Person means an employee or Staff Member who holds certification from a medical practitioner which states that they are unable to receive a dose, or a further dose, of a COVID-19 vaccine due to:

- a medical contraindication; or
- an acute medical illness (including where the person has been diagnosed with SARSCoV-2) and the certification provided is within the effective date specified by the medical practitioner or six months from the date of certification, whichever is earlier.

Policy Implementation Date: 16th November 2021

Policy Ratified by: Lavalla Catholic College Leadership Team: 16th November 2021

Next Review: January 2022

Fully Vaccinated means, in respect to an employee or Staff Member, that the employee or Staff Member has received two doses of a COVID-19 vaccine.

Medical contraindication means one of the following contraindications to the administration of a COVID-19 vaccine:

- anaphylaxis after a previous dose;
- anaphylaxis to any component of the vaccine, including polysorbate or polyethylene glycol;
- in relation to AstraZeneca: history of capillary leak syndrome or thrombosis with thrombocytopenia occurring after a previous dose;
- in relation to Comirnaty or Spikevax: myocarditis or pericarditis attributed to a previous dose of either Comirnaty or Spikevax; or
- the occurrence of any other serious adverse event that has been attributed to a previous dose of a COVID-19 vaccine by an experienced immunisation provider or medical specialist (and not attributed to any other identifiable cause; and has been reported to State adverse event programs and/or the Therapeutic Goods Administration.

Partially Vaccinated means, in respect to an employee or Staff Member, that the employee or Staff Member has received one dose of a COVID-19 vaccine and is not an Excepted Person.

Premises has the same meaning as in the *Public Health and Wellbeing Act 2008* (Vic.) but does not include a Staff member's ordinary place of residence.

Unvaccinated means, in respect to an employee or Staff Member, that the employee or Staff Member has not received a dose of a COVID-19 vaccine and is not an Excepted Person.

Vaccination Status means whether an employee or Staff Member is Fully Vaccinated or Partially Vaccinated or Unvaccinated or an Excepted Person.

Policy Implementation Date: 16th November 2021
Policy Ratified by: Lavalla Catholic College Leadership Team: 16th November 2021
Next Review: January 2022

School: includes a boarding house, childcare or early childhood service, and outside school hours care service.

Staff Member:

- any person employed to work in a school (including teachers, early childhood educators and educational support staff);
- a person contracted to work at a school and who will or may be in close proximity to children, students or staff, whether or not engaged by the College (including casual relief teachers, IT personnel, NDIS providers and auditors, but excluding delivery personnel);
- staff of any other entity who attend a school;
- volunteers that attend a school and work in close proximity to children, students or staff (including parent helpers); and
- Students on placements at a school.

THE HEALTH DIRECTIONS

The following is a summary of the Health Directions which apply to the College.

Collect, record and hold vaccination information

The Health Directions require the College to collect, record and hold vaccination information about any staff member who is, or may be, scheduled to work at a school.

Vaccination information includes:

- The staff member's vaccination status.
- If a staff member is unvaccinated, whether the staff member has a booking to receive at least the first dose of a COVID-19 vaccination by 25 October 2021.
- If a staff member is unvaccinated and in self-quarantine, whether the staff member has a booking to receive at least the first dose of a COVID-19 vaccination within 7 days of the end of the period of self-quarantine.
- If a staff member is partially vaccinated, whether that staff member has a booking to be fully vaccinated by 29 November 2021.
- If the staff member has a medical exemption, clarification from a medical practitioner that the staff member is unable, due to that exemption, to receive a dose, or a further dose, of a COVID19 vaccine.

Policy Implementation Date: 16th November 2021

Policy Ratified by: Lavalla Catholic College Leadership Team: 16th November 2021

Next Review: January 2022

Prevention of entry to premises

The Health Directions require the College to take all reasonable steps to ensure that, on or after 18 October 2021, a staff member who is unvaccinated does not enter, or remain on, the premises of a school for the purposes of work.

If the College does not hold vaccination information about a staff member, the College must treat the staff member as if the staff member is unvaccinated.

The only exceptions are as follows:

- The staff member has a booking to receive the first dose of a COVID-19 vaccination by 25 October 2021. In this case, the staff member must wear, at all times while on the College's premises, personal protective equipment that includes at a minimum, a surgical mask and face shield.
- The staff member is unable to be partially vaccinated before 25 October 2021 because they were in self-quarantine under the Diagnosed Persons and Close Contacts Directions, and has a booking to receive the first dose of a COVID-19 vaccination within 7 days of the end of the period of self-quarantine.
- The staff member has a medical exemption.

Exceptional circumstances

The Health Directions specify limited exceptional circumstances in which the College is not required to comply with the above obligations.

These include where a staff member is required to attend the College's premises and carry out assessments of an oral or performance examination as part of the Victorian Certificate of Education or International Baccalaureate, or work as a venue coordinator for any such examinations.

Exceptional circumstances must be approved by the College, and the relevant staff member's presence on the College's premises will be only for the period of time necessary to respond to the relevant circumstance.

Policy Implementation Date: 16th November 2021

Policy Ratified by: Lavalla Catholic College Leadership Team: 16th November 2021

Next Review: January 2022

ARRANGING A COVID-19 VACCINATION

To enable the College to comply with the Health Directions, staff are encouraged to take the following steps (if they have not done so already):

- If relevant, seek medical advice regarding the COVID-19 vaccination, as it relates to you.
- Where you do not fall within one of the medical exemptions outlined below, make appointments to receive your first and second doses of the COVID-19 vaccination.
- Where you do fall within one of the medical exemptions outlined below, obtain a medical exemption certificate.
- If you have trouble making an appointment, please contact your manager.
- When you receive your first and your second COVID-19 vaccination dose, ensure that you keep a record of these.

The College will support current employees to get vaccinated through the following initiatives:

- Allowing employees paid time off to attend an appointment to receive their COVID-19 vaccination upon provision of proof of this appointment.

Staff can access COVID-19 vaccinations at various locations including vaccination hubs, roving clinics, general practices, some pharmacies. The dedicated COVID-19 Vaccine Helpline 1800 020 080 (select option 2) can answer any questions you may have about vaccination and can help you book a vaccination appointment. Vaccinations are free, and you do not need a Medicare card to make an appointment or receive the vaccination.

PROVIDING PROOF OF VACCINATION STATUS

Evidence of vaccination status (including proof of vaccination, or proof of a booking to receive a vaccination, or proof of a medical exemption) must be submitted to John Freeman, the Principal by close of business on 15 October 2021.

Proof of vaccination can include:

- A vaccination certificate or other evidence from a vaccine provider.
- An immunisation history statement which can be accessed from Medicare online or the Express Plus Medicare mobile app.

Policy Implementation Date: 16th November 2021

Policy Ratified by: Lavalla Catholic College Leadership Team: 16th November 2021

Next Review: January 2022

- A statement of your vaccination history which you can request from the Australian Immunisation Register.
- A record from a health practitioner.

EXEMPTIONS FROM COVID-19 VACCINATION REQUIREMENTS

If a staff member believes they are medically exempt from the vaccination requirements set out in this policy, for a reason specified in the Health Directions, or that other exceptional circumstances apply, they must promptly notify John Freeman, the Principal, and in any event by close of business on 15 October 2021.

The Health Directions recognise the following medical exemptions to the administration of a COVID19 vaccine:

- anaphylaxis after a previous dose;
- anaphylaxis to any component of the vaccine, including polysorbate or polyethylene glycol;
- in relation to AstraZeneca:
 - history of capillary leak syndrome; or
 - thrombosis with thrombocytopenia occurring after a previous dose;
- in relation to Comirnaty or Spikevax:
 - myocarditis or pericarditis attributed to a previous dose of either Comirnaty or Spikevax; or
- the occurrence of any other serious adverse event that has:
 - been attributed to a previous dose of a COVID-19 vaccine by an experienced immunisation provider or medical specialist (and not attributed to any another identifiable cause); and
 - been reported to State adverse event programs and/or the Therapeutic Goods Administration; or
- certification from a registered medical practitioner that a person is unable to receive a dose, or a further dose, of a COVID-19 vaccine due to an acute medical illness (including where the person has been diagnosed with COVID-19).

If a staff member has a medical exemption, they should provide the College with a medical certificate from a registered medical practitioner:

Policy Implementation Date: 16th November 2021
 Policy Ratified by: Lavalla Catholic College Leadership Team: 16th November 2021
 Next Review: January 2022

- certifying that the staff member is unable to receive a COVID-19 vaccination because they have a medical exemption;
- identifying the relevant medical exemption;
- indicating whether the medical exemption will permanently or temporarily prevent COVID-19 vaccination; and
- if the medical exemption only temporarily prevents a COVID-19 vaccination, specifying when the staff member may be able to receive the COVID-19 vaccination.

A staff member who is pregnant may provide evidence to the College that a registered medical practitioner has advised against vaccination due to the pregnancy, and specifying when the staff member may be able to receive the COVID-19 vaccination. Please note that pregnancy is not specifically recognised as a medical exemption under the Health Directions.

If a registered medical practitioner certifies that a staff member has a temporary medical exemption, which makes them unable to receive the COVID-19 vaccination, any exemption based on this only applies for the period specified in the medical certificate provided by the medical practitioner. If the medical reason continues beyond that period, the staff member must provide a new medical certificate from their doctor, regarding the medical exemption.

The Health Directions do not contain an exemption for a staff member who objects to the COVID-19 vaccination on personal, political or religious grounds.

UN-VACCINATED WORKERS WITHOUT AN EXEMPTION

If a staff member is not exempt but chooses not to be vaccinated, the staff member must promptly notify John Freeman, the Principal, and in any event by close of business on 15 October 2021.

Staff members who are not exempt, and who choose not to have a COVID-19 vaccination by the deadline(s) set out above, will not be permitted to work or to attend the College premises to perform the duties associated with their role. This may mean that the staff member is initially suspended from work without pay.

If the staff member is an employee, they will be provided with an opportunity to discuss their circumstances with their manager and any alternative options which may be available, including;

Policy Implementation Date: 16th November 2021
 Policy Ratified by: Lavalla Catholic College Leadership Team: 16th November 2021
 Next Review: January 2022

- alternative work arrangements, subject to the operational needs of the College; and
- the staff member taking accrued annual or long service leave.

Any decision regarding alternative options will be at the absolute discretion of the College, subject to its legal obligations. Staff who choose not to have a COVID-19 vaccination need to be mindful that this may ultimately result in dismissal.

RECORD KEEPING

The College is collecting vaccination information to:

- comply with the Health Directions;
- ensure that the College knows who is eligible to attend work under this policy; and
- enable the College to manage the risks to staff, students and the College community arising from COVID-19, including preparing for any possible future outbreaks.

When collecting vaccination information, the College will comply with its Privacy Policy, which is available via the College website.

Vaccination information will be securely stored and kept confidential and will only be accessible to people who are required to access it. You can request to access your vaccination record information at any time and can also request that any relevant updates are made to it.

The College is required to provide access to vaccination information to an Authorised Officer under the Public Health and Wellbeing Act 2008 (Vic) if requested to demonstrate compliance with the Health Directions.

NEW EMPLOYEES

Staff engaged after this policy is implemented will be required to be fully vaccinated against COVID-19 before starting their employment/engagement.

Policy Implementation Date: 16th November 2021
 Policy Ratified by: Lavalla Catholic College Leadership Team: 16th November 2021
 Next Review: January 2022

RELATED DOCUMENTS

Privacy Policy

COVID-19 Vaccine Medical Contraindication Form

REFERENCES

Legislation

COVID-19 Mandatory Vaccination (Specified Facilities) Directions (No 10).

Public Health and Wellbeing Act 2008 (Vic).

Other Links:

[Are COVID-19 vaccines safe?](#)

[Australian Immunisation Register](#)

[COVID-19 vaccine information in your language](#)

[The Fair Work Ombudsman's guidance on COVID-19 vaccinations](#)

Policy Implementation Date: 16th November 2021
Policy Ratified by: Lavalla Catholic College Leadership Team: 16th November 2021
Next Review: January 2022