

POL/HRM 08 INFECTION CONTROL – ADDENDUM 2 – COVID-19 VACCINATION

DOCUMENT CONTROL

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ADDENDUM 2 STATEMENT

Lifebridge is committed to the health and safety of its customers and its Representatives and to limiting or reducing the spread of vaccine-preventable diseases such as COVID-19.

The Commonwealth Government has confirmed that from 25 October 2021, an in-home and community aged care worker or a person who provides disability services must have received one dose of a COVID-19 vaccine and be fully vaccinated against COVID-19 as a condition of engagement by 29 November 2021. The NSW Government has issued Public Health (COVID-19 Aged Care Facilities) Amendment (No2) Order 2021 to this effect.

This policy sets out the measures Lifebridge is taking to ensure it meets all its legal requirements related to the COVID-19 vaccination, including Representative obligations

SCOPE

This policy applies to all employees, Directors, Volunteers, Students and Contractors of Lifebridge Australia Ltd. For the purpose of this policy, Employees, Volunteers, Students and Contractors are referred to as Lifebridge Representatives.

DEFINITIONS

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.

1. COVID-19 VACCINATION REQUIREMENTS

- 1.1 Lifebridge recognises that having a vaccination, including the COVID-19 vaccination, is a personal choice. However, on and after 29 November 2021, it will become a condition of engagement for all Lifebridge Representatives to have had two doses of a COVID-19 vaccination. This is the requirement under the NSW Health Order and is a lawful and reasonable requirement.
- 1.2 In order to continue to work at Lifebridge, all Representatives must have had at least one dose of a COVID-19 vaccination by 25 October 2021.
- 1.3 To meet this deadline, all Representatives must take the following steps (if they have not already):
 - 1.3.1 If relevant, seek medical advice regarding the COVID-19 vaccination, as it relates to you.
 - 1.3.2 Where you do not have a genuine medical contraindication (a valid medical reason not to have the COVID-19 vaccination), make appointments to receive your first and second doses of the COVID-19 vaccination.

- 1.3.3 If you have trouble making an appointment or need to provide evidence of your status as a Lifebridge Representative please contact your manager or primary contact.
- 1.3.4 Provide human.resources@lifebridge.org.au with confirmation (Covid-19 Vaccination Certificate or Immunisation Record) that you have received your COVID-19 vaccination, after both your first and second dose.
- 1.3.5 If you do have a valid medical contraindication, you will need to provide that information to your departmental manager and human.resources@lifebridge.org.au on the appropriately signed form provided through the Department of Health.
- 1.3.6 If a Worker chooses not to have a COVID-19 vaccination, they should speak to their manager and the content under 'Un-vaccinated Staff without a Valid Exception or Medical Exemption' applies.

2. EXCEPTIONS TO COVID-19 VACCINATION REQUIREMENTS

In accordance with the Public Health (COVID-19 Aged Care Facilities) Amendment (No 2) Order 2021 (NSW), the direction to be vaccinated does not apply to an in-home and community aged care worker or a person who provides disability services who;

- (i) is unable, due to a medical contraindication, to be vaccinated against COVID-19, and
- (ii) presents to their Manager a certificate, in the form approved by the Chief Health Officer, issued by a medical practitioner, specifying the medical contraindication that makes the worker unable to be vaccinated.

3. CONTRAINDICATIONS TO COVID-19 VACCINATION - VALID MEDICAL EXEMPTION

3.1 A medical exemption applies where a Worker:

- 3.1.1 is unable to receive a COVID-19 vaccination because the Worker has a recognised medical contraindication (a medical condition that prevents them from receiving the vaccination); and
- 3.1.2 provides a medical certificate from a registered medical practitioner:
 - i. certifying that the Worker is unable to receive the COVID-19 vaccination because they have a recognised medical contraindication;
 - ii. indicating whether the medical contraindication will permanently or temporarily prevent COVID-19 vaccination; and
 - iii. if the medical contraindication only temporarily prevents a COVID-19 vaccination, specifying when the person may be able to receive the COVID-19 vaccination.

3.2 The best way to provide this evidence is by asking your medical practitioner to complete the 'COVID-19 Vaccine Medical Contraindication Form'.

3.3 If a registered medical practitioner certifies that a Lifebridge Representative has a temporary medical contraindication, 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 Representative must provide a new medical certificate from their doctor, regarding the medical contraindication.

3.4 Where a Representative has a genuine medical contraindication, Lifebridge may consider implementing additional safety measures. An employee may also seek to discuss with their manager whether redeployment is a relevant option for them.

3.5 After consultation, if Lifebridge is unable to maintain safety obligations for the Representative and/or customer through additional safety measures or provide redeployment options, and it is determined the worker is unable to undertake their role, their engagement may come to an end.

4. UN-VACCINATED WORKERS WITHOUT A VALID EXCEPTION OR MEDICAL EXEMPTION

4.1 Lifebridge Representatives who choose not to have a COVID-19 vaccination by 25 October 2021 and who do not have a valid medical exemption to a COVID-19 vaccination (as set out above); will not be able to provide the duties associated with their position as a Lifebridge Representative.

4.2 Rosters will be changed (where relevant) so that only Representatives that comply with the obligations set out in this policy will provide service or perform duties. If the Representative is an employee, they will be provided with an opportunity to discuss their circumstances with their manager. Lifebridge may at its absolute discretion consider redeployment, allowing them to take accrued annual or long service leave, or temporarily suspending them from their position without pay.

4.3 At any time from 29 November 2021, if the Representative continues to refuse to receive a COVID-19 vaccination, it may be determined the Representative is unable to undertake their role and their employment or their engagement may come to an end.

5. RECORD KEEPING

5.1 All Workers need to provide evidence of their COVID-19 vaccination status as soon as possible. The purpose of collecting this information is:

5.1.1 To enable Lifebridge to ensure that all Representatives comply with the conditions of their engagement, which includes receiving a dose of COVID-19 vaccination by 25 October 2021.

5.1.2 To enable Lifebridge to take the necessary steps if a Representative does not meet the conditions of their engagement by being fully vaccinated against COVID-19 by 29 November 2021.

5.1.3 As part of ensuring Lifebridge is taking all reasonably practicable steps to ensure the health and safety of Representatives and customers, including preparing for any possible future outbreaks.

5.1.4 So that Lifebridge can comply with obligations to keep a record of the vaccination status of all paid employees, volunteers and contractors and report this information through My Aged Care. More information about Lifebridge's reporting obligations is set out under 'Reporting' below. Evidence of your COVID-19 vaccination can include:

- (i) a vaccination certificate or other evidence from a vaccine provider;
- (ii) an immunisation history statement which can be accessed from Medicare online or the Express Plus Medicare mobile app;
- (iii) a statement of your vaccination history which you can request from the Australian Immunisation Register;
- (iv) a record from a health practitioner.

5.2 When collecting your vaccination information, Lifebridge will comply with Policy GM 3 – Privacy and Confidentiality.

5.3 Your vaccination information will be securely stored and kept confidential in the Human Resource Information System (HRIS), on Visicase (Customer Management System) and on the External Contractor Register in accordance with Policy GM 03 – Privacy and Confidentiality and will only be accessible to people who are required to access it. Representatives can request to access their vaccination record information at any time and can also request that any relevant updates are made to it.

6. NEW LIFEBRIDGE REPRESENTATIVES

- 6.1 Representatives engaged from 25 October 2021 will be required to comply with the compulsory COVID-19 vaccination requirements.
- 6.2 The requirements set out in this policy regarding having a COVID-19 vaccination and the evidence requirements will apply to new Representatives. These requirements must be met before the Representative commences their engagement duties.
- 6.3 In addition, the requirement to have a COVID-19 vaccination may be a specified condition of a Representatives contract agreement.

7. REPORTING

- 7.1 As an Approved Provider, Lifebridge is required to provide weekly reports through My Aged Care on the:
- I. total number of workers, volunteers and contractors employed by Lifebridge;
 - II. the number of workers, volunteers and contractors at Lifebridge who have received a single dose of a COVID-19 vaccine;
 - III. the numbers of workers, volunteers and contractors who have received all required doses of a COVID-19 vaccine.

The personal details of individuals will not be provided.

Relevant Legislation and Guidelines

- *Aged Care Act 1997 (Cth)*
- *Public Health Act 2010 (NSW)*
- *Public Health (COVID-19 Care Services) Order 2021 – this includes Public Health (COVID_19 Aged Care Facilities) Amendment (No 2) Order 2021*
- *The Health Privacy Principles (HPPs)*

Relevant Documents

- *Pol GM 03 – Privacy and Confidentiality*
- *Pol HRM 07 – Work, Health and Safety*
- *HR 01i – Registration and Agreement*
- *CM 01b – Home Care Agreement*