

## COVID-19 Vaccination Requirements Policy

<b>Date Created:</b>  Approved by the RNS Principal 23/11/2022  Ratified by the RNS Board 07/12/2022	<b>Next Review:</b>  2023 or as needed aligned with government health advice	<b>Availability:</b> <table><tr><td>Web</td><td></td></tr><tr><td>Office</td><td>X</td></tr><tr><td>On Request</td><td>X</td></tr></table>	Web		Office	X	On Request	X	<b>Actions:</b>
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### APPLICATION

This COVID-19 Vaccination Requirements Policy applies to all employees of River Nile School (RNS). This Policy is subject to review from time to time in line with the Department of Health, and, with changing occupational, health and safety risks.

### OVERVIEW

This Policy outlines the COVID-19 vaccination requirements for RNS employees and other Workplace Participants, to ensure a safe workplace for all employees, students, and visitors.

This Policy contains several defined terms and should be read in conjunction with the definitions section below.

The Occupational Health and Safety Act 2004 (OHS Act) requires that employers ensure, so far as is reasonably practicable, that they provide and maintain a working environment for their employees that is safe and without risks to health and that other persons are not exposed to health and safety risks arising from the employer's activities.

The following principles underpin this Policy regarding the COVID-19 vaccination requirements:

- RNS is responsible for providing a safe working environment, consistent with the duties of employers under the OHS Act. Both infection and serious illness resulting from COVID-19 are workplace health and safety risks.
- Vaccination is a reasonably practicable measure that will assist to control the risk of transmission of COVID-19 in the working environment of RNS. At RNS we have:
  - An extremely vulnerable cohort of students, the majority of whom are relatively recent arrivals to Australia and live in high density public housing or group homes,
  - An onsite childcare facility supporting vulnerable children of refugee and asylum seeker background aged 6 months to 5 years

### VACCINATION REQUIREMENTS

#### Existing employees and other Workplace Participants

- Subject to the exceptions below, only employees with up-to-date vaccination status against COVID-19 and who provide evidence of their Vaccination Status are permitted to work at RNS.
- Currently (23<sup>rd</sup> November 2022), up-to-date means three doses. This is made up of two primary doses plus a booster within 3 to 6 months after the primary doses. A booster can be given safely and effectively at any time after six months to become 'up-to-date' if the booster had not been received earlier.

Please see the COVID-19 Vaccination Requirements – summary (Appendix A) for further details.

#### Prospective employees or other Workplace Participants

- When recruiting, the advertising and engagement documentation must clearly state that engagement is subject to the person providing evidence to RNS confirming their Vaccination Status as up-to-date or as an Excepted Person.
- The person must provide evidence of Vaccination Status as part of the recruitment or onboarding process. Depending upon the nature of the role, if a preferred candidate meets the definition of an Excepted Person, they may not be able to be employed by RNS.
- If a preferred candidate is an Excepted Person, RNS will carry out a risk assessment and assessment of the role

to determine if any measures are capable of being put in place to reduce the risk of COVID-19 acquisition and health impact to the employee in the environment and that would enable the candidate to perform the inherent requirements of the role safely.

### **Exceptions**

- An employee may be permitted to work at RNS if the employee is an Excepted Person (see definitions below) and has produced Acceptable Certification to RNS to substantiate that they are an Excepted Person.

## **SUPPORT FOR EMPLOYEES**

All RNS employees can access up to half a day's time off without loss of pay to receive a COVID-19 vaccine dose. In addition, personal leave entitlements may be available for employees who suffer any adverse reaction to the vaccine.

## **DEFINITIONS**

To the extent that any definition below refers to or is based upon ATAGI guidance, such definition is intending to change from time to time to remain in line with the most current ATAGI guidance.

ATAGI Clinical Guidance on COVID-19 vaccine can be found here and was last updated 28 September 2022  
<https://www.health.gov.au/initiatives-and-programs/covid-19-vaccines/advice-for-providers/clinical-guidance>

Where material changes to this guidance occurs, RNS will communicate changes through all staff communication channels.

### **Acceptable Certification**

For the purpose of determining an employee's status as an Excepted Person is:

- A current COVID-19 digital certificate issued by Services Australia that states that the person is unable to receive a dose, or a further dose, of any COVID-19 vaccine that is available in Australia
- A printed version of the COVID-19 digital certificate referred above
- A current Immunisation History Statement displayed through the Medicare App, that states that a person is unable to receive a Booster Dose that is available in Australia
- A printed version of the Immunisation History Statement referred to in subclause above; or

In relation to a Temporary Medical Exemption

- A certificate from a medical practitioner that certifies that the person has a specified valid reason for a temporary exemption, where that reason is one of those specified in the "ATAGI Guidance on acute major medical conditions that warrant a temporary medical exemption relevant for COVID-19 vaccines", as updated from time to time (last updated 5 October 2022).

### **ATAGI**

Means the Australian Technical Advisory Group on Immunisation.

### **Booster Dose**

- a) a second dose of a COVID-19 vaccine after receiving one dose of a one dose COVID-19 vaccine; or
- b) a third dose of a COVID-19 vaccine after receiving two doses of a two dose COVID-19 vaccine, including different types of two dose COVID-19 vaccines.

### **Employee**

Includes employees and contractors engaged by RNS.

### **Excepted Person**

Means an employee who holds Acceptable Certification that they are unable to receive a dose, or a further dose, of any COVID-19 vaccine that is available in Australia due to:

- a) a Medical Contraindication; or a
- b) a Temporary Medical Exemption.

### **Medical Contraindication**

Means a contraindication to a COVID-19 vaccine in accordance with ATAGI Clinical Guidance on COVID-19 vaccine contraindications, as updated from time to time last updated 5 October 2022 – available here:

<https://www.health.gov.au/initiatives-and-programs/covid-19-vaccines/advice-for-providers/clinical->

### **Vaccination Status**

Means one of the following:

- a) Up-to-date; or
- b) Under-vaccinated; or
- c) Excepted Person.

### **Temporary Medical Exemption**

Means an exemption made by a medical practitioner in accordance with ATAGI expanded guidance on acute major medical conditions that warrant a temporary medical exemption relevant for COVID-19 vaccines

<https://www.health.gov.au/sites/default/files/documents/2022/08/atagi-expanded-guidance-on-temporary-medical-exemptions-for-covid-19-vaccines.pdf> as updated from time to time (last updated 30 August 2022).

Current ATAGI guidance indicates that valid reasons for a temporary medical exemption may include:

An exemption should not be given when an alternative COVID-19 vaccine is available. Valid reasons for a temporary exemption include:

- Inflammatory cardiac illness within the past 3 months, e.g., myocarditis or pericarditis; acute rheumatic fever or acute rheumatic heart disease (i.e., with active myocardial inflammation); or acute decompensated heart failure.
- Acute major medical condition (such as undergoing major surgery or hospital admission for a serious illness). o Typically, these are time-limited conditions (or the medical treatment for them is time limited).
- SARS-CoV-2 infection, where vaccination should be deferred for 3 months after a confirmed infection. The next scheduled dose should be given as soon as possible after the 3-month period.
  - Ensure when reporting this temporary medical deferral to the AIR that you choose the category 'acute major medical illness' and that it is not for a duration longer than 4 months.
  - Infection needs to be confirmed via polymerase chain reaction (PCR) or rapid antigen test (RAT). RAT results should only be accepted where the result has been reported to the relevant jurisdiction reporting system (where possible).
- Any serious adverse event attributed to a previous dose of a COVID-19 vaccine, without another cause identified, and with no acceptable alternative vaccine available. For example, a person <60 years of age, contraindicated to receive Pfizer vaccine and in whom the risks do not outweigh the benefits for receipt of AstraZeneca vaccine, is eligible for a temporary exemption.
- If the vaccine is a risk to themselves or others during the vaccination process they may warrant a temporary vaccine exemption. This may include a range of individuals with underlying developmental or mental health disorders but noting that non-pharmacological interventions can safely facilitate vaccination in many individuals with behavioural disturbances and that specialist services may be available to facilitate the safe administration of vaccines in this population.
- Chronic symptoms following COVID-19 ('Long COVID') are not a contraindication to COVID-19 vaccines but do warrant a clinical discussion with the patient.
- Pregnancy is not a valid reason for exemption in the absence of any of the criteria listed above

### **Under-vaccinated**

Is the vaccination status of an employee whose Vaccination Status is not up to date or Excepted Person.

### **Up-to-date**

Means, for the purposes of vaccination status, vaccination in line with ATAGI guidance, as updated from time to time. Current ATAGI guidance indicates Up-to-date means (last updated 10 February 2022).

- For individuals aged 16 years and over:
  - having completed an appropriate primary course of a Therapeutic Goods Administration (TGA) approved or recognised vaccine; and
  - within six months of completion of that course, having received a booster dose.
- For children and adolescents aged 5-15 years, having completed an appropriate primary course of a TGA approved or recognised vaccine.

- For severely immunocompromised individuals aged 5 years and over:
  - having completed an appropriate primary course of a TGA approved or recognised vaccine (this requires a third primary dose of a vaccine between two and six months after dose two).
- For individuals who have had prior COVID-19 (including asymptomatic SARS-CoV-2 infection):
  - if infected prior to commencing or completing the relevant vaccination course, their next dose can be deferred for up to four months;
  - if infected after completing the relevant vaccination course then if both six months have passed since the completion of that course and four months have passed following their infection, having received a booster dose.

### Workplace Participant

Includes contractors, subcontractors, consultants, service providers, an employee of a labour hire company and other individuals employed by a third party to perform work on behalf of RNS.

## PROVIDING PROOF OF VACCINATION

Evidence of vaccination, or a booking to receive a vaccination, must be submitted to RNS and 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.
- A statement of your vaccination history which you can request from the Australian Immunisation Register.
- A record from a health practitioner.

Staff must submit their proof of vaccination via the mechanism deemed by RNS to be most secure, which may include by email to the Administrative Coordinator. This will be communicated to staff by the Principal.

Volunteers and contractors must submit their proof of vaccination to their nominated contact at RNS and provide a copy to the Administrative Coordinator.

## RECORD KEEPING

RNS is collecting vaccination information to:

- Enable RNS to manage the risks to staff, students and the school community arising from COVID-19, including preparing for any possible future outbreaks.

When collecting vaccination information, RNS will comply with its Privacy Policy, which is available via SharePoint.

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.

## RELATED DOCUMENTS, POLICIES and APPENDICES

- RNS Privacy Policy
- COVID-19 Vaccination Requirements – summary Appendix A
- ATAGI expanded guidance on acute major medical conditions that warrant a temporary medical exemption relevant for COVID-19 vaccines <https://www.health.gov.au/sites/default/files/documents/2022/08/atagi-expanded-guidance-on-temporary-medical-exemptions-for-covid-19-vaccines.pdf>

## Appendix A

### COVID-19 Vaccination Requirements - summary

Scenario	When are you considered up-to-date*?
<b>General population 16 years and over</b>	<b>Up-to-date means three doses.</b> This is made up of two primary doses plus a booster within 3 to 6 months after the primary doses. A booster can be given safely and effectively at any time after six months to become 'up-to-date' if the booster had not been received earlier.
<b>Children and adolescents aged 5-15 years</b>	<b>Up-to-date means two doses.</b> This is made up of two primary doses. A booster dose is not currently recommended for this cohort.

<b>Severely immunocompromised people 16 years and over</b>	<p><b>Severely immunocompromised people 16 years and over are considered up-to-date after three doses.</b></p> <p>The third dose should usually be received 2 to 6 months after your second dose. This can be reduced to a minimum of 4 weeks <a href="#">in some instances</a>. It's recommended that you also have a booster (fourth) dose three months after your third dose.</p>
<b>Severely immunocompromised children and adolescents aged 5-15 years</b>	<p><b>Severely immunocompromised children aged 5-15 years will be considered up-to-date after three primary doses.</b></p> <p>The third dose should usually be received 2 to 6 months after a second dose. Children aged 12 to 15 who are severely immunocompromised or have other complex health needs are also recommended to receive a booster (fourth) dose, however this is not required to fulfill 'up to date' requirements.</p>
<b>People who have had COVID-19 who have not started or completed course of vaccination</b>	<p><a href="#">After having COVID-19</a> you are still required to complete your vaccination schedule (as outlined above), however, you can defer your next dose up to four months from diagnosis of the latest infection to be considered up-to-date. This applies to people who have not yet started or have started but not completed their primary doses. You then have up to six months to have your booster (third) dose to remain up-to-date.</p>
<b>People who have had COVID-19 who have completed their primary course</b>	<p><a href="#">After having COVID-19</a> you have up to four months from diagnosis to receive your booster dose.</p> <ul style="list-style-type: none"> <li>• If it's been less than 6 months since your last dose, you are still up-to-date.</li> <li>• If it's more than 6 months, then you'll need to get your booster (third) dose to remain up-to-date.</li> </ul>
<b>Excepted Person (Temporary Medical Exemption)</b>	<p>If you're an Excepted Person (with a temporary medical exemption) you are temporarily not required to have a COVID-19 vaccination*. Once the temporary exemption expires, you will need to complete the course of vaccinations that aligns with your personal circumstances (as outlined above).</p> <p>RNS will need to complete a risk assessment and an assessment of your role. This helps us understand if we need to put any measures in place to support you to perform your role while keeping you and others safe.</p>
<b>Excepted Person (Medical Contraindication)</b>	<p>If you're an Excepted Person, then you're not required to have a COVID-19 vaccination*. RNS will need to complete a risk assessment and an assessment of your role. This helps us understand if we need to put any measures in place to support you to perform your role while keeping you and others safe.</p>

The definition of up-to-date is as per [ATAGI Statement](#) published on 10 February 2022

\*Exemptions must be made by a medical practitioner in accordance with the [ATAGI Guidance](#) on acute major medical conditions that warrant a temporary medical exemption relevant for COVID-19 vaccine.

Referenced

<https://www.health.gov.au/news/atagi-statement-on-defining-up-to-date-status-for-covid-19-vaccination>