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COVID-19 Vaccination Policy

The Waalitj Foundation (The Foundation) has an obligation to provide a work environment without risks to health and safety for its employees, volunteers, subcontractors, participants, visitors and clients, so far as is reasonably practicable. As such, this COVID-19 Vaccination Policy (Policy) outlines how the organisation will manage the risks associated with exposure to COVID-19.

- Scope**
- This policy applies to all existing permanent, contracted and casual employees of The Foundation.
 - New employees yet to begin their employment with The Foundation
 - All contractors, consultants and service providers of The Foundation.
 - All clients, program participants and volunteers of The Foundation
 - All other visitors to The Foundation’s worksites.

In the event of any inconsistency between any direction issued under a relevant State or Territory law or by a Relevant Authority (Direction) and this Policy, the Direction will prevail to the extent of that inconsistency.

- Administration**
- The Chief Executive Officer will be responsible for the enforcement of this policy, in conjunction with General Managers.

Definitions

For the purpose of this policy, the following definitions apply:

Term	Definition
Workplaces	Workplaces include, but are not limited to, any office or workspace owned, leased or otherwise occupied by The Foundation at which employees conduct their work. Other Workplaces in which The Foundation’s employees perform their work include, but are not limited to, schools, prisons, venues, and function centres.
Visitors	Includes clients, program participants, partners, service providers
Fully vaccinated	Fully vaccinated means that a person has received all dose(s) of a TGA approved COVID-19 vaccine as prescribed by the Relevant Authority (or other relevant body) including any boosters.
Relevant Authority	The person or body in each State or Territory responsible for issuing directions and guidelines with respect to the movement of people within a State and across State borders with respect to COVID-19
TGA	Therapeutic Goods Administration (Department of Health), being the medicine and therapeutic regulatory agency of the Australian Government

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Principles

The Australian Technical Advisory Group on Immunisation (ATAGI) advises that COVID-19 can cause serious, life-threatening complications, and there is no way to know how COVID-19 will affect an individual. Further, a person who gets infected with COVID-19 could spread the virus to friends, family, co-workers and others around them. This policy applies unless exemption applies based on:

- Medical grounds
- Other exemptions under the Australian Laws.

Work Health and Safety (WHS) Obligations

Under the Occupational Safety and Health Act and Work Health and Safety Act, The Foundation has a duty of care in providing a high standard of Health and Safety at its workplaces and ensuring, as far as practicable that employees are not not injured or harmed because of their duties.

The duty of care includes providing and maintaining workplaces, so employees and visitors are not exposed to hazards and risks. To comply with these Acts the Waalitj Foundation has performed a risk assessment to evaluate the likelihood of COVID-19 transmission, the potential degree of harm to employees and visitors and the availability and suitability of control measures. The following information was considered during the assessment process:

- Operations of The Foundation.
- Visitors of The Foundation (including participants, clients, partners, service providers).
- Workplace locations.
- Government advice.

Following the risk assessment along with advice from the Department of Health and the State/ Territory Government agencies, The Foundation has determined that the exposure to COVID-19 is a potential hazard for staff and visitors to its workplaces and the spreading of this disease is considered catastrophic. For this reason, The Foundation has established control measures to protect employee's and visitor's health and safety. Some of these control measures include:

- Mandatory vaccination for Staff according to the Government Mandate.
- Only fully vaccinated visitors can attend face to face sessions at The Foundation's workplaces.
Note: Exceptions include DSG school-based participants, and Justice participants based within the prison. In-person support may be provided to these participants if unvaccinated, in accordance with the Foundation's COVID19 Safe Working Practices.
- Regular disinfecting protocols.
- Sanitising stations around the workplace.
- Visitor registers.
- COVID infection control training.
- COVID-19 Management plan.
- Closely monitoring the Australian Government Department of Health, Smartraveller website and any advice from state or territory government agencies.

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Vaccination requirements

All people working or visiting any of the Foundation's workplaces should be fully vaccinated against COVID-19 according to the State/ Territory timeline.

The Foundation will support employees to be vaccinated including providing paid time off to attend booked vaccination appointments and (where necessary) to recover from any side effects.

Support for Non-Vaccinated participants and clients

The Foundation will continue providing services to non-vaccinated clients and participants by utilising digital channels including virtual and phone mentoring.

Visit control measures

The Foundation is taking a precautionary approach to manage the spread of COVID-19 within its workplaces. As part of this approach, the organisation has adopted the following control measures:

- Employees and contractors including service providers will not conduct any offsite in-person meetings with non-vaccinated participants, clients, service providers, partners etc effective 1 February 2022.
- Additional communication channels such as phone calls, online platforms, etc. will be utilised to ensure operations can be maintained between The Foundation and non-vaccinated visitors.
- Employees working in prisons may have contact with non-vaccinated people, for this reason, they are advised to wear a face mask at all times whilst working from those sites. Please refer to The Foundation's COVID-19 Safe Working Practices.
- Employees working in schools may have contact with non-vaccinated students, for this reason, they are advised to wear face masks when working from those sites. Please refer to The Foundation's COVID-19 Safe Working Practices.

Proof of compliance with vaccination requirements

All employees, contractors and service providers are required to provide evidence of their compliance with applicable vaccination requirements.

Upon entering a workplace(s) of The Foundation, Visitors will be required to confirm their vaccination status via the Envoy sign in system or via the COVID-19 Vaccination Declaration Form.

Privacy Collection Statement

a. What information is being collected and why?

Various State/Territory Government agencies have issued public health directives in relation to mandatory vaccination in certain Industries and occupations including all the Foundation programs.

Where authorised under those directives, The Foundation is required to collect information in relation to the COVID-19 vaccination status of employees, contractors, service providers, visitors, clients, participants who attend the Foundation's workplaces or receive its services.

The Foundation is permitted to collect this information under the Privacy Act to lessen or prevent a serious threat to life, health or safety of any individual or to public health or safety.

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b. Proof of Vaccination

In association with the COVID-19 Vaccination Status of our employees and visitors The Foundation will collect the following information.

Foundation Staff, Contractors, Service Providers	Visitors, Clients, Program Participants,
<ul style="list-style-type: none"> • Name. • A copy of either: <ul style="list-style-type: none"> ○ COVID-19 Digital Certificate, ○ Immunisation history statement ○ International COVID-19 Vaccination Certificate ○ Doctor's letter showing that the person has received all required doses of the vaccine 	<ul style="list-style-type: none"> • Name • COVID-19 Vaccination Declaration Form/statement • Contact details

Those who are not vaccinated who have obtained an official exemption may be asked to supply information/evidence of this.

c. How will this information be used?

The Foundation will collect, store, use and may disclose personal and health information to:

- Check whether vaccination has occurred.
- Determine if we can safely and lawfully allow you to visit our workplaces.
- Contact you, or pass your contact details to appropriate health authorities (to undertake their functions in respect of COVID-19) and other third parties (for contact tracing if you or anyone you may have come into contact with while visiting our sites are diagnosed with COVID-19).
- Comply with any applicable laws.

d. What happens if a visitor, Participant or client refuse to provide this information?

If a visitor chooses not to provide the Foundation with this information, they may be refused entry into the Foundation's workplaces.

Exemption Management

The Foundation's vaccination requirements will apply to all employees except where a medical exemption is approved. A medical exception needs to be provided by a qualified medical practitioner. In the event of such an exemption being received, The Foundation may require advice or assessment from an independent specialist medical practitioner.

All medical assessments will be treated sensitively and confidentially.

If a medical exemption is approved, The Foundation will, where reasonably practicable, seek to put in place suitable and safe alternative working arrangements. This will be managed on a case by case basis.

Non-compliance with the vaccination requirements

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POLICY

In the absence of an approved medical exemption, failure to comply with The Foundation's vaccination requirements will constitute non-compliance by the employee of the employer's lawful and reasonable direction and may result in management of the employee under The Foundation's employment arrangements (including, in the event of non-compliance, termination of employment).

Monitoring and Review

The Foundation acknowledges that the COVID-19 situation in our country continues to evolve and as such, our policy position may also evolve or change over time.

The Foundation will review this Policy periodically, in accordance with restrictions imposed by the Relevant Authority and exemptions (where necessary), based on Government and medical advice, legislative changes, organisational changes and community transmission rates of COVID-19.

Responsibilities

Chief Executive Officer is responsible for:

- The enforcement of this policy.

People and Capability are responsible for:

- Handling employee's personal information according to the Office of the Australian Information Commissioner (OAIC).
- Providing regular updates to employees about COVID-19 requirements and any changes to organisational policies or procedures.
- Providing employees with information and links to relevant services should they require support.
- Updating the policy as required.

Employees are responsible for:

- Complying with directions from the Australian Government and Health Department.
- Following the organisation's COVID-19 site protocols.
- Following health and safety policies and procedures.
- Taking reasonable care of their own health and safety and the health and safety of others.

References

Document
Australian Government COVID-19 vaccination
National guide for safe workplaces – COVID-19
COVID 19 Mandatory Vaccination and Vaccination Program Policy
Mandatory COVID-19 vaccination policy for WA workforces
COVID-19 vaccinations: workplace rights and obligations
Australia's anti-discrimination law
ATAGI Expanded Guidance on temporary medical exemptions for COVID-19 vaccines
Chapter 3: APP 3 – Collection of solicited personal information
Waalitj Foundation's COVID-19 Management Plan