

# COVID-19 vaccination policy

Drafted by:	Principal	Approved by Council on:	6 December
			2021
Responsible person:	Principal	Scheduled review date:	As required by the
			Emergency
			Management
			Committee of the
			College

## 1. Introduction

Jane Franklin Hall is committed to ensuring the health and safety of all community members, as well as contractors and visitors to the College, so far as is reasonably practicable.

This risk-based policy aims to assist in safeguarding the health of all College community members and visitors from the serious safety risks and potentially significant adverse health impacts associated with COVID-19.

Requiring vaccination of all members of our community is a control measure to manage the risk of COVID-19 in our College and maintain our duty of care to our students as well as to support community safety. The College will also ensure that additional controls, such as physical distancing and good hygiene continue to be implemented in accordance with its safety plans and with government guidelines.

This policy has been developed using a risk management approach, having regard to the nature of the risks associated with COVID-19, community COVID-19 outbreaks, and scientific and government guidance.

## 2. Application

- 2.1 This policy applies to:
  - 2.1.1 everyone who can be reasonably considered as being connected to the current College community: residents, non-resident members, staff, tutors and volunteers including but not limited to Council, Fellows, Chaplains and Council sub-Committee members;

- 2.1.2 visitors to the College including but not limited to contractors, those attending student club events and family members.
- 2.1.3 the COVID-19 vaccination and includes any other vaccination requirements which apply now or in the future.
- 2.2 This policy takes effect from 6 December 2021 and will be in effect until advised otherwise by the College.

ATAGI	The Australian Technical Advisory Group on Immunisation	
Booster	An additional dose of a vaccine needed periodically to	
	'boost' the immune system.	
College	Jane Franklin Hall, 6 Elboden Street, South Hobart	
Community members	Residents, non-resident members, staff, tutors and	
	volunteers including but not limited to Council, Fellows,	
	Chaplains and Council sub-Committee members.	
Fully vaccinated	An individual that has received both doses of a COVID-19	
	vaccine approved by the Therapeutic Goods Administration	
	for use in Australia	
Staff	Those with a current employment contract with the College.	
	This does not include tutors, who are considered part of the	
	wider College community.	
Students	Those with a current residential agreement with the College.	
Vaccination	A COVID-19 vaccination as recommended by the ATAGI	
Vaccination deadline	All members of the College community and visitors must	
	be fully vaccinated to enter the College premises or to	
	attend College organised events off-site	
Visitors	Anyone who is does not fit within the definition of	
	"community member' and who is entering the property	
	temporarily to: a) perform work for the College such as	
	contractors; b) deliver or collect items to/from College	
	community members; c) meet with community members;	
	d) overnight or temporary stay guests or; e) attend an event.	
	Parents, family members and friends of current residents	
	are considered visitors for the purpose of this policy.	

## 3. Definitions

## 4. COVID-19 Vaccinations

- 4.1 In accordance with work health and safety obligations, as a condition of entry to the College site, the College requires community members and visitors to be fully vaccinated in one of the following ways:
  - 4.1.1 fully vaccinated with two doses of an ATG-approved COVID-19 vaccine; or

- 4.1.2 can demonstrate having received a first dose of an ATG-approved COVID-19 vaccine with an appointment for a second dose.
- 4.2 In a limited set of circumstances it may be possible for the College to admit community members and visitors to the College where it can be demonstrated that an appointment for a first dose of a COVID -19 vaccination has been made and a second will be made as soon as possible afterwards. In such cases, written permission from the Principal must be gained before the individual is allowed to enter the College and protective measures such as mask wearing may be required of the individual.
- 4.3 It is anticipated that booster vaccinations will be required from time to time, on at least an annual basis. If this is the case, community members and visitors are expected to obtain the booster vaccination within appropriate timeframes as advised by Tasmanian Public Health in order to remain fully vaccinated.
- 4.4 The same arrangements that apply to initial vaccinations as set out in this policy will apply in respect of boosters, including in respect of failure to comply with the requirement to obtain the booster vaccination.

## 5. Exemptions

- 5.1 The College will exempt College community members or visitors providing they can provide the College with a completed and authorised COVID 19 Tasmanian government 'Vaccine Medical contraindication' form.
- 5.2 A medical certificate will not be accepted by the College as proof of medical exemption from receiving a COVID-19 vaccination.
- 5.3 Where College community members receive a medical exemption from another jurisdiction, the College will accept the equivalent to a Tasmanian government Vaccine Medical contraindication form, providing it is approved by that jurisdiction and accepted by the Tasmanian government.
- 5.4 The College may require those who are exempt from receiving COVID vaccinations to take additional protective measures including but not limited to wearing face masks or other personal protection equipment on site.

## 6. Evidence of current COVID-19 vaccination status

6.1 All staff must provide evidence of their vaccination status to the College office by 10 January 2022.

- 6.2 All other members of the College community must provide evidence of their vaccination status to the College prior to or as soon as entering the College premises for the first time after 6 December 2021.
- 6.3 Visitors must provide evidence of their vaccination status to the College office prior to or upon immediate arrival at the College.
- 6.4 Evidence of a person's vaccination status will be sighted by a member of the College office team and the individual's status entered on a vaccination register, created, managed and reviewed by the College.
- 6.5 Once the vaccination status of College Community members and visitors is recorded on the College vaccination register continued proof of vaccination does not need to be provided unless there is a change in vaccination status.
- 6.6 Community members and visitors will be required to provide updates to their vaccination status to the College as soon as practicable after the update occurs.

## 7. Assistance in facilitating vaccination

The Australian Government has confirmed that the COVID-19 vaccine will be provided free of charge to all Australian citizens, permanent residents and work visa holders. The College will provide support to staff by allowing them to attend local vaccination clinics during work time, if required. Staff must discuss this with their manager in advance of the appointment.

## 8. Failure to comply with vaccination request

- 8.1. Staff
  - 8.1.1 Failure by staff members to comply with the requirements in this policy may constitute a refusal to follow a lawful and reasonable direction by the College and may impact a staff member's ability to perform the inherent requirements of their position. This may have consequences on the employment of the staff member, including potential termination of employment.
  - 8.1.2 If a staff member cannot provide evidence of their vaccination status by the vaccination deadline, they must attend a meeting with their immediate supervisor and the Principal of the College to outline their reasons for non-compliance.
  - 8.1.3 Each case of refusal will be assessed based on the staff member's individual circumstances. The process for doing so will generally be as follows:

- i. The College will consider the staff member's explanation and consider whether suitable alternative controls can be put in place to protect other staff, residents, other members of the College community and visitors.
- ii. Alternative controls could include a requirement that the refusing staff member wear additional personal protective equipment, be unable to visit parts of the College or attend College events, be subject to additional testing or be redeployed into a different role, where reasonably practicable.
- iii. Should there be no suitable alternative controls that can be put in place, the College will consider whether the staff member's refusal to be fully vaccinated indicates that the staff member is unable to perform the inherent requirements of their position or otherwise constitutes a refusal to follow a lawful and reasonable direction. If that is the case, then refusal may result in termination or suspension of the staff member's employment.
- 8.1.4 Where a staff member refuses to comply with the requirement to provide evidence of their vaccination status, the College may enter into an agreement with that staff member for them to take leave immediately. In this circumstance, the staff member may access accrued annual leave, time in lieu (if eligible), and leave without pay, or a combination of these types of leave. Staff may not access personal leave.
- 8.1.5 A staff member who is not immunised may also be subject to restrictions imposed by third parties, and such restrictions could impact the staff member's ability to participate in work activities.

## 8.2. Students

- 8.2.1 Failure by students to comply with the requirements in this policy will impede the College's ability to meet its duty of care obligations under common law.
- 8.2.2 Non-compliance with this policy is also in breach of the College Residential Agreement, as outlined in the College Obligations and Terms of Residence (COTR).
- 8.2.3 For these reasons, students who cannot provide evidence of their vaccination status, will not be permitted to reside at the College, to enter the College grounds or to attend a College event or activity.
- 8.2.4 Where entry to the College is denied, the student will receive a full refund of all fees paid in advance.

- 8.2.5 Where possible, a student who is not permitted to reside at the College may be offered non-resident membership with the proviso that participation in College life is undertaken only in an online capacity.
- 8.2.6 Where possible and with consideration for all circumstances including the behaviour of the student, the student may return to College should they subsequently become fully vaccinated.
- 8.3 Other community members and visitors
  - 8.3.1 Other community members and visitors to the site are required to provide evidence of their vaccination status prior to or immediately upon entering the College.
  - 8.3.4 Non-vaccinated College community members and visitors are not permitted on the College premises.

#### 9. Confidentiality and privacy

- 9.1 Information regarding a college community member's or visitor's health including their vaccination status will be treated confidentially.
- 9.2 The information collected will be used to build a register of vaccination status of all our community members. The College will not store copies of vaccinations status or records but will cite vaccination status on the register.
- 9.3 Any copies of vaccination status that are mailed or emailed to the College will be destroyed or deleted once the evidence has been sighted by a College office employee.
- 9.4 Community members and visitors should also keep a record of their vaccination evidence and/or medical contraindication.
- 9.5 The College will de-identify personal information for the purposes of aggregated reporting.

#### 10. Review

This policy will be reviewed as the changing circumstances of managing the impacts of COVID19 also change and with consideration for Tasmanian public health guidelines.