

Guideline Title:	Immunisation Guideline
Guideline Owner:	Chief Safety Officer
Keywords:	Immunisation, Vaccination

This guideline supports the University to operationalise the *Work Health and Safety Policy* [*PL139*] and must be complied with.

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## 1. INTENT

The purpose of this guideline is to outline the process for Work Health and Safety (WHS) risk assessment of Infectious Disease, the determination of Immunisation requirements and the responsibilities associated with Immunisations where Workers, Students and Visitors may be at potential risk of exposure to Infectious Diseases or be required to be vaccinated as part of their work, research or learning.

## 2. ORGANISATIONAL SCOPE

This guideline applies to all Workers and Students conducting work or learning activities with or on behalf of the University, and all tenants of University owned or controlled facilities.

## 3. **DEFINITIONS**

The <u>University Glossary</u>, the <u>WHS Definitions Register</u> and the following definitions apply to this procedure:

Term:	Definition:
Australian Immunisation Handbook	The Australian Technical Advisory Group on Immunisation (ATAGI). <i>Australian Immunisation</i> <i>Handbook</i> , Australian Government Department of Health, Canberra, 2018, immunisationhandbook.health.gov.au
Immunisation	As defined by the Australian Immunisation Handbook, the process of inducing immunity to an infectious agent by giving a vaccine.

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Term:	Definition:
Infectious Disease, also known as communicable disease.	A disease caused by infectious agents that can be passed from one person or animal to another. Transmission can occur directly (through contact with bodily discharge), indirectly (for example, by sharing a drinking glass) or by means of vectors (such as mosquitoes). They are caused by bacteria, viruses, parasites or fungi or their toxic products. Examples of these communicable diseases include coronavirus, malaria, influenza and chickenpox.
Skin Penetration Procedure	A procedure in which the skin is cut, punctured, torn or shaved or the mucous membrane is, cut, punctured or torn.
Third-Party Mandate	A requirement from a third party for Workers and Students to meet certain Vaccination requirements prior to conducting work, research or learning at the third party's owned or controlled facilities. This may be in addition to a law, government regulation or health directive.
Vaccination(s)	Defined by the Australian Immunisation Handbook as the administration of a vaccine. If Vaccination is successful, it results in immunity.

# 4. GUIDELINE CONTENT

# General

- 4.1. The University recommends that all Workers and Students are immunised in accordance with the <u>Australian Immunisation Handbook</u>. There are also circumstances where Vaccinations are required as a result of a law, government regulation or Third-Party Mandate that must be adhered to in order to perform specific work, research or learning activities.
- 4.2. Workers or Students with an Infectious Disease are responsible for taking reasonable steps to minimise transmission to others as a result of University activities. This may include:
  - a. Informing their Manager/Supervisor of the Infectious Disease, or any change in their immune status, to enable a risk assessment to be conducted to determine if any alterations to work duties or learning activities are required to reduce the risk of transmission.
  - b. Not attending work, learning or any ECU controlled premises if unwell.
  - c. Additional controls such as provision of personal protective equipment like gloves and masks and increased hygiene measures e.g. cleaning and handwashing.
- 4.3. Persons conducting a Skin Penetration Procedure are responsible for communicating and documenting the requirement for participants who know, or could reasonably be expected to know, that they are or maybe suffering from an Infectious Disease to inform them of such disease before the procedure commences and, when having been



informed of this requirement, participants are responsible for abiding by this requirement.

4.4. Where Schools have determined specific Student Immunisation requirements, e.g. for student practicums, Executive Deans are accountable for ensuring School level documentation is developed and maintained to meet the requirements of this guideline.

## Identifying Immunisation Requirements

- 4.5. Some work activities, work related travel and learning activities may be associated with health hazards and risks related to exposure to Infectious Diseases. Members of University Executive, Deans and Directors are accountable, and, Managers and Supervisors are responsible, for minimising the risk of exposure to vaccine-preventable Infectious Disease during University activities so far as is reasonably practicable.
- 4.6. Managers and Supervisors are responsible for ensuring the risks associated with Infectious Disease are identified by undertaking a WHS risk assessment of the proposed work or learning activities prior to commencement. The WHS risk assessment should consider exposure to Infectious Disease and the recommended controls for the proposed work or learning activity. Refer to the <u>WHS Risk Assessment Procedure</u> for further information on conducting a risk assessment.
- 4.7. Workers and Students who may be at greater risk of contracting an Infectious Disease, or are dealing with vulnerable populations, due to their work, research or learning activities may be given a lawful and reasonable direction by the University to obtain Vaccinations to perform their role including:
  - Where Vaccinations are required as a result of a law, government regulation or Third- Party Mandate that must be adhered to in order to perform specific work.
  - When working in health or patient care.
  - When handling or exposed to human tissue, blood or bodily fluids.
  - When working with transmissible human or animal pathogens.
  - When in contact with animals, animal blood, tissues, products or waste.
  - When working in childhood education and care including early childhood education, teaching, outside school hours carers, child counselling services workers, youth services workers and childcare Workers.
  - When exposed to wastewater or untreated sewage.
  - First Aid Officers, Emergency and Essential Services workers.
  - When working in remote Indigenous communities.
  - When travelling internationally or nationally for a University related activity and it is a requirement of the country, state or territory travelled to.
- 4.8. ECU's <u>Recommended Vaccinations for persons at increased risk of certain</u> <u>occupationally acquired vaccine-preventable diseases</u>, is adapted from the <u>Australian</u> <u>Immunisation Handbook</u>, and provides detailed information on the <u>recommended</u> <u>Vaccinations for persons at increased risk of occupationally acquired vaccinepreventable diseases</u>. Thisshould be used as a guide only with reference made to the <u>Australian Immunisation Handbook for the most up to date information</u>. The vaccine recommendations in the handbook, along with any current law or government



regulation, should be used in conjunction with a WHS risk assessment to determine the Immunisation requirements of Workers and Students.

- 4.9. Where Workers and Students undertake work, research or learning activities on thirdparty premises, they must comply with any lawful and reasonable direction of the third party in relation to Vaccinations, including the production of evidence to substantiate Vaccination or immunity where requested.
- 4.10. University Workers and Students travelling internationally or domestically are responsible for seeking medical guidance on recommended and required Vaccinations, including COVID-19 Vaccinations, at least 6 and preferably 12 weeks prior to departure to allow adequate time to receive Vaccinations and develop immunity prior to travel. Many destinations also require proof of Vaccination against specific diseases as a condition of entry, e.g.:
  - a. Some countries may have COVID-19 travel requirements and require evidence of COVID-19 Vaccinations;
  - b. States and Territories of Australia may have changing requirements for evidence of Vaccinations such as COVID-19; and
  - c. proof of Yellow fever vaccine is required for entry to some parts of Africa, South and Central America and the Caribbean.

The Vaccination requirements for destination and transit countries can be viewed on the Australian Government Department of Foreign Affairs and Trade <u>Smartraveller</u> <u>website</u>.

- 4.11. Responsible Officers are responsible for communicating Vaccination requirements to contractors and Tenants attending or working on University owned or controlled premises and sighting evidence that systems are in place for tracking and maintaining Vaccination status evidence where the University requires it.
- 4.12. Tenants and contractors working on University owned or controlled premises are accountable for:
  - a. having a system in place for tracking and maintaining Vaccination status evidence that may be required under any law or government regulation;
  - b. maintaining a safe work environment; and
  - c. providing evidence to demonstrate compliance with (a) and (b) upon reasonable request by the University.
- 4.13. Guidance on Vaccination recommendations and requirements can be sought from an individual's General Practitioner, the <u>ECU Health Service</u> or through the WA Department of Health.
- 4.14. Where identified, Vaccination recommendations and requirements should be documented and communicated with the relevant parties. This may include:
  - ECU employee Vaccination recommendations and requirements incorporated in pre-employment medical assessment documentation, position descriptions and position establishment processes.
  - Specific correspondence to Workers and Students impacted by a law or government regulation.



- Contractor Vaccination recommendations and requirements incorporated into contract documentation or communicated via University correspondence.
- Student Vaccination recommendation and requirements included within course outlines, enrolment information and Work Integrated Learning guides.
- Tenant Vaccination requirements incorporated in tenancy agreements or communicated via correspondence.
- Informing Visitors to the University of any Vaccination recommendations and requirements as part of attendance instructions prior to arrival.
- Recommendation to obtain medical advice relating to Infectious Diseases and Vaccination recommendations and requirements for destination and transit countries, states and territories prior to travel included in travel procedures and guidance information for Staff and Students.

# Arranging Vaccinations

- 4.15. Workers and Students who choose to have Vaccinations as a result of their work or research tasks, travel or learning activities can access these Vaccinations through:
  - ECU Health Service
  - General Practitioners including specialist travel doctors
  - WA Department of Health
- 4.16. Where Workers or Students are unaware of their Vaccination status, or unable to provide suitable documented evidence of immunity, a medical consultation and blood serology testing can be undertaken to determine the immune status against specific Infectious Diseases. Results of serology tests confirming immunity can generally be used as evidence of immune status however Workers or Students will need to comply with any law or government regulation relating to the production of vaccination status evidence.
- 4.17. Protection against some Infectious Diseases may require a course of Vaccinations and boosters at specific timeframes to maximise immunity. This should be undertaken in accordance with the recommendations of the <u>Australian Immunisation Handbook</u> and public health advice, in consultation with a medical practitioner.

# **Declining Vaccination and Exemptions**

- 4.18. Workers and Students have the right to decline Vaccinations and can choose not to provide evidence of, or disclose, their Vaccination or immune status. Workers and Students who decline Vaccination are encouraged to consult with their medical practitioner to inform themselves of the resultant health hazard and risks related to their work, research or learning.
- 4.19. In instances where Workers and Students decline Vaccination or refuse to disclose their Vaccination or immune status, they must complete the <u>Declined Vaccination form</u> in consultation with their Manager or Supervisor.



- 4.20. Where Workers and Students hold an exemption from receiving a required Vaccination, they are responsible for advising their Manager or Supervisor and providing documentation supporting the exemption that meets Government, University or Third-Party requirements. Medical exemptions must be listed on the Australian Immunisation Register.
- 4.21. Where Vaccination or immune status cannot be confirmed, it should be assumed that the person does not have immunity to an Infectious Disease they may be exposed to. This includes where a person does not wish to provide Vaccination evidence.
- 4.22. Where Workers or Students decline Vaccination, hold an exemption or do not wish to provide evidence of or disclose their Vaccination or immune status, Managers and Supervisors are responsible for:
  - a. Discussing the situation with the Worker or Student and, where appropriate, encourage them to consult with their medical practitioner for advice.
  - b. Ensuring that WHS risk assessments are conducted taking into consideration:
    - The hazards and risks to the individual and others;
    - Applicable laws, government regulations or recommended Vaccinations for persons at increased risk of occupationally acquired vaccinepreventable diseases;
    - The nature of the person's work or learning activities and the location they are performed;
    - Whether a Staff member can perform the requirements of their role or whether a Student can complete their course requirements without being vaccinated; and
    - Any other relevant circumstances.
  - c. Considering whether there are any reasonable and practical steps that could be taken to reduce the potential risk of exposure to Infectious Diseases of the individual and of others, including altering work duties or research and learning activities where reasonable and practicable to do so.

The <u>WHS Risk Assessment Procedure</u> provides information on how to conduct a WHS risk assessment.

- 4.23. Where the WHS risk assessment identifies that alterations to work duties or research and learning activities are required, further assessment of the University's ability to make reasonable accommodation of these alterations should be undertaken. If the matter remains unresolved, refer to the relevant <u>People and Culture Business Partner</u> or Course Coordinator for further advice.
- 4.24. Where an ECU employee or Student:
  - cannot perform the inherent requirements of their role or complete their studies as a result of declined Vaccination, or choosing not to provide evidence of, or disclose their Vaccination or immune status;
  - b. reasonable accommodation to work duties or learning activities cannot be made; and
  - c. this is a result of law or government regulation or Third-Party Mandate,
  - the University may seek to suspend or terminate employment or enrolment.



## Changes in Immune Status

- 4.25. Where Workers or Students are aware of a change in their immune status, they are responsible for ensuring that their Manager/Supervisor is made aware of this change as soon as practicable.
- 4.26. The Manager/Supervisor is responsible for undertaking a WHS hazard risk assessment to determine the impact of the change and to determine whether additional controls are required.
- 4.27. The Worker or Student are encouraged to seek advice from a Medical Practitioner for any treatment and/or Vaccinations that may be required.

## **Responsibility for Costs associated with Immunisations**

- 4.28. Where Staff are employed in a role where Immunisation is required to gain or maintain professional registration, the associated cost of immunity screening, Vaccinations and boosters is to be borne by the individual. Otherwise, where immunity screening services, Vaccination and boosters are not publicly accessible free of charge, the reasonable cost of immunity screening, Vaccinations and boosters recommended or required for Staff are the responsibility of the School, Teaching Area or Service Centre within which the Staff member works.
- 4.29. Students are responsible for any costs associated with screening, Vaccinations and boosters recommended or required for completion of learning activities, Work Integrated Learning placements, travel and research associated with their learning at the University unless otherwise agreed by the relevant School.
- 4.30. Tenants and contractors engaged by the University are responsible for any costs associated with screening, vaccinations and boosters recommended or required for their tenancies or activities at or associated with the University. The Tenant or contractor (or their employer) is responsible for providing evidence to the University's reasonable satisfaction that all vaccination requirements have been met.
- 4.31. Volunteers are responsible for the costs associated with screening, Vaccinations and boosters recommended for voluntary activities associated with the University unless otherwise agreed with the relevant School, Teaching Area or Service Centre.

## **Record Keeping**

4.32. The University may, where lawful and reasonable, require a person to supply evidence of their immune status, including Immunisation records or exemptions, or to provide a <u>Declined Vaccination Status Form</u>. These records will be stored in accordance with the <u>ECU Record Management Policy</u>. Where these records include an individual's personal information, it will be managed in accordance with ECU's <u>Privacy Policy</u>.

Individual Healthcare Identifier numbers should be redacted by persons prior to submitting evidence to the University.



# 5. ACCOUNTABILITIES AND RESPONSIBILITIES

The Guideline Owner, the Chief Safety Officer has overall responsibility for the content of this guideline.

The Chief Safety Officer is responsible for currency of information and provision of advice relating to these guidelines.

# 6. RELATED DOCUMENTS

## Legislation

Work Health and Safety Act (WA) 2020 Public Health Act 2016 (WA)

## Policies

- Work Health and Safety Policy PL139
- Privacy Policy PL090
- <u>Records Management Policy PL057</u>

# **Operational documents and resources**

- Australian Immunisation Handbook
- Declined Vaccination Form
- WHS Risk Assessment Procedure

# 7. CONTACT INFORMATION

For queries relating to this document please contact:

Guideline Owner	Chief Safety Officer
All Enquiries Contact	Chief Safety Officer
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# 8. APPROVAL HISTORY

Guideline approved by:	Chief Safety Officer
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	New guideline (v1.0)
	June 2018:
	Updated to include information on screening, boosters, communication on changes in immune status and increased travel related vaccination content. (v2.0)
	August 2019:
	2.1: Updated links to online Australian Immunisation Handbook (v2.1)
	November 2021: updated for COVID-19 health directions and to incorporate RASCI matrix.
	February 2025: minor update for business role changes.
Next revision due:	February 2028
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ECU Internal Information