

COVID-19 Vaccination

Policy



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1 Purpose

COVID-19 is a highly transmissible respiratory infection that can cause mild to severe illness, or death, particularly for vulnerable people. It can present a workplace hazard and a risk to students and others who participate in our school community. CESA has a duty under workplace health and safety laws to ensure, as far as is reasonably practicable, the health and safety of employees, others at our workplace, and our students.

The COVID-19 vaccines approved by the Australian Government are a safe, effective, and efficient control measure available to combat the risks of serious illness from contracting COVID-19. Vaccination assists in providing individual protection and plays a role in reducing transmission to others in the workplace and school community. It is one of the available control measures for COVID-19 that enables face to face teaching in classrooms to continue.

CESA considers vaccination to be an effective safety control measure in reducing the adverse impacts of COVID-19, including:

- a. the potentially serious health impacts to individuals who contract COVID-19;
- b. impacts on operational continuity and disruptions to the education services we provide to our students; and
- c. the spread of COVID-19 in circumstances where our workers have contact and interact with each other and/or our students and their families, some of whom may be vulnerable.

2 Scope of Policy

This Policy will apply from 22 November 2022 to all CESA Staff. In this Policy, “CESA Staff” or “Staff Member” means all employees, and workplace participants, including contractors, members of religious orders, volunteers, trainees, interns, students on work placements and labour hire workers.

All CESA Staff are expected to comply with this Policy, which is lawful and reasonable. Failure to comply with this policy may result in disciplinary action, including termination of employment or termination of engagement/placement.

3 Policy

CESA strongly encourages all Staff Members to be, and remain, up to date with their COVID-19 vaccinations, in accordance with Australian Technical Advisory Group on Immunisation (**ATAGI**) Guidelines.

This Policy sets out information for CESA Staff about CESA’s requirements for vaccination against COVID-19. After engaging with our workers, and considering concerns raised as part of a consultation process, CESA believes that this policy supports the health and safety of our workers, students, and school communities, at this time.

The Policy will operate subject to any government orders and/or directions that are in place from time to time.

CESA will continue to monitor the situation with respect to the COVID-19 pandemic to determine if and when it may be necessary to make any changes to the Policy. **CESA may vary, replace, or revoke this Policy at any time and without notice to respond to emerging risks.**

4 Definitions

“Approved COVID-19 Vaccine” means a vaccine against COVID-19 that has been approved (including provisionally approved) or recognised by the Therapeutic Goods Administration (**TGA**). For the avoidance of doubt, fully vaccinated with an Approved COVID-19 Vaccine means that the complete course of vaccination has been undertaken, including any additional doses or boosters which may be applicable in accordance with Australian Technical Advisory Group on Immunisation (**ATAGI**) recommendations. The number and timing of doses differs depending on the brand of COVID-19 vaccine used. You can view a list of Australia’s approved COVID-19 vaccines on the Commonwealth Government Department of Health website here: <https://www.health.gov.au/initiatives-and-programs/covid-19-vaccines/approved-vaccines>, and recognised COVID-19 vaccines on the TGA website here: <https://www.tga.gov.au/products/covid-19/covid-19-vaccines/international-covid-19-vaccines-recognised-australia>.

“ATAGI Guidelines” means the Australian Technical Advisory Group on Immunisation clinical guidelines on COVID-19 vaccines in Australia in place from time to time.

“COVID-19” means infection and/or disease caused by the SARS-CoV-2 virus.

“Evidence of Vaccination” means a record of full COVID-19 vaccination with an Approved COVID-19 Vaccine through provision of an official Government COVID-19 digital certificate, or an Immunisation History Statement from the Australian Immunisation Register (**AIR**). If the employee was vaccinated outside Australia and cannot provide an Immunisation History Statement because they received an Approved COVID-19 Vaccine that cannot be added to the AIR, they can provide a letter from a doctor (on practice letterhead) or a suitable Vaccination Record Card that records full vaccination with an Approved COVID-19 Vaccine and includes vaccination particulars such as the type and date(s) of vaccination and a batch number.

“High-Risk Settings” means

- all CESA Special Schools/Colleges attended by students with a disability, including Our Lady of La Vang School and St Patrick’s Special School; and
- special units within mainstream schools, but only for CESA Staff who, in the performance of their role within a unit, engage in work that involves close personal contact with students with a disability such as (but not limited to) providing assistance to students with toileting, mobility, wheelchair transfer, and feeding.

“Medical Contraindication to Vaccination” means a condition that prevents a person from receiving an Approved COVID-19 Vaccine. A medical contraindication may be permanent (for example, anaphylaxis to vaccine components), or may be temporary or time-limited (for example, an acute major medical condition such as undergoing major surgery). Contraindications are outlined in formal clinical advice from the Australian Department of Health to vaccine providers based on advice from the TGA and ATAGI. Examples of circumstances which are **not** currently considered as medical contraindications under the ATAGI Guidelines (and which will accordingly not be accepted by CESA as a valid medical grounds) include (but are not limited to):

- Pregnancy;
- Past infections of COVID-19; and
- Anxiety regarding receipt of a vaccination.

“Medical Contraindication Certificate” means a certificate issued by a medical practitioner and in the form issued by the Australian Immunisation Register (IM011) that complies with ATAGI Guidelines, certifying that because of a specified medical contraindication, the person to whom the certificate has been issued cannot have an Approved COVID-19 Vaccine.

“Up-To-Date Vaccination Status” means the definition of 'up-to-date' vaccination status, as defined by ATAGI from time to time in the '*ATAGI statement on defining 'up-to-date' status for COVID-19 vaccination*'. Currently this requires a booster dose from three months, but not later than six months, after receiving the last primary dose. ATAGI may update its definition of 'up-to-date' vaccination status in response to emerging public health evidence. If ATAGI updates its definition of 'up-to-date' vaccination status, CESA Staff will be required to comply with any updated requirements as specified by ATAGI.

5 COVID-19 Vaccination Requirements

Being vaccinated helps protect yourself, your friends, family, co-workers, and community. Individuals who receive the COVID-19 vaccine/s will help the Catholic education community in South Australia to thrive together in person. As such, CESA Staff are strongly encouraged to have and maintain an Up-To-Date Vaccination Status in accordance with the ATAGI statement. However, with the exception of CESA Staff working in High-Risk Settings, CESA Staff no longer need to be vaccinated against COVID-19 as a condition of employment.

For clarity, CESA Staff working in High-Risk Settings, must maintain an Up-To-Date Vaccination Status. This is in order to be vigilant in the care and safety of our school communities and our students with moderate to profound disability, who are particularly vulnerable and at higher risk of severe illness from COVID-19.

This vaccination requirement for Staff Members working in High-Risk Settings, may include additional vaccination doses or booster shots in accordance with ATAGI Guidelines, as and when updated from time to time. Relevant CESA Staff are required to provide evidence of Up-To-Date Vaccination Status in relation to any such additional doses or booster shots, within three months of becoming eligible and being directed in writing by CESA/the Employer.

The vaccination requirement for High-Risk Settings is a condition of employment or engagement for CESA Staff in High-Risk Settings, unless an exemption is approved in accordance with this Policy.

CESA Staff working in High-Risk Settings are required to provide evidence of vaccination in one of the following ways:

- a) Screen shot a digital COVID-19 Vaccination Certificate from a smartphone and email to the authorised person in the School/College or Human Resources Team in the People, Leadership and Culture Section (where appropriate) or;
- b) Take a photo or scan a copy of immunisation history and email to the authorised person in the School/College or Human Resources Team in the People, Leadership and Culture Section (where appropriate) or;
- c) Present medical evidence of a permanent or temporary Medical Contraindication to Vaccination from a legally qualified medical practitioner, to the authorised person in the School/College or Human Resources Team in the People, Leadership and Culture Section (where appropriate).

CESA will not store Individual Health Identifier (IHI) numbers for Workers and this information is not required to be provided. CESA Staff are encouraged to redact their IHI number from any electronic or hard copy proof of vaccination provided.

6 Transition period: High-Risk Settings

CESA Staff currently working in High-Risk Settings will be required to demonstrate to CESA that they have complied with this Policy by no later than Monday, 23 January 2023.

New or returning CESA Staff working in High-Risk Settings are required to demonstrate compliance by no later than Monday, 23 January 2023.

This ensures all CESA Staff working in High-Risk Settings will commence Term 1, 2023 with an Up-To-Date Vaccination Status (or approved exemption) in place.

7 Exemption from vaccination

CESA Staff who are unable to be vaccinated due to a temporary or permanent Medical Contraindication to Vaccination are required to apply for a temporary or ongoing exemption (as applicable).

Any applications for an exemption must be submitted to the Principal or delegate or the Human Resources Team in the People Leadership and Culture Section (where applicable).

In submitting any applications for exemption, Staff Members consent to CESA collection and disclosure of any information, which may be provided for the purposes of CESA assessing the Staff Member's request for exemption, including (but not limited to) any disclosure to an independent, third-party medical adviser which CESA may determine is reasonably necessary to assist its assessment of the Staff Member's application for an exemption.

Requests for an exemption will be assessed on a case-by-case basis, including having regard to:

- the nature and requirements of the role performed by the worker, including whether there is likely to be interaction with people with vulnerabilities in connection with their work for CESA;
- the risks of exposure (for the Staff Member and others) to COVID-19;
- any relevant laws and public health directions in place at the time and
- the overall purpose and scope of this Policy.

Given the purpose and scope of the Policy, there will be very limited (if any) circumstances in which exemptions will be granted.

Where a Staff Member seeks an exemption on the basis of a temporary medical contraindication because of a past COVID-19 infection, such requests will generally not be approved unless the Staff Member undertakes (and does) become vaccinated within three months of recovering from COVID-19, which is the period of time that the Australian Department of Health advises a person who has had COVID-19 is considered to be immune from contracting the virus (or such other period as advised by the Australian Department of Health or under ATAGI Guidelines), or they have medical evidence that they are medically prevented from receiving an approved COVID-19 vaccine for a longer period of time after recovery.

If, following the assessment, the workers is not provided with an approved exemption from the requirement to vaccinate under this Policy, they will be required to comply with this Policy. If they do not comply with this Policy, a decision regarding their ongoing employment or engagement will be made, which may include termination of employment or engagement.

8 Privacy and Records Management

CESA will take steps to ensure that information obtained pursuant to this Policy is stored securely and treated confidentially, as far as it is reasonably practicable to do so.

The collection, use and disclosure of personal and health information under this Policy will be in accordance with CESA Privacy Policy and applicable laws (including privacy and health laws). This includes evidence of vaccination and information about an inability to be vaccinated due to a medical contraindication to vaccination or seeking an exemption on other medical grounds.

9 References

[SA Health COVID-19 health information](#)

[ATAGI statement on defining 'up-to-date- status for COVID-19 vaccination](#)

[Australian Government Department of Health Approved COVID-19 vaccines website](#)

[Australian Government Department of Health Is it true? Get the facts on COVID-19 vaccines](#)

10 Revision Record

Document Title	COVID-19 Vaccination Policy
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