

Kalamunda Community Learning Centre (KCLC) COVID-19 Vaccination Policy

Created: December 2021

Last modified: 29 December 2021

Relevant legislation: Australian Human Rights Commission Act 1986 (Commonwealth)
Fair Work Act 2009 (Commonwealth)
Occupational Safety and Health Act 1984 (WA) to be replaced by the Work Health and Safety Act 2020 (WA) when this comes into effect
Privacy Act 1988 (Commonwealth)
Public Health Act 2016 (WA)
Emergency Management Act 2005

1. Purpose

This policy applies to all KCLC staff, volunteers, members, interns, and contractors who attend or perform work at KCLC, located at the Kalamunda Community Centre, Crescent Road, Kalamunda.

- 1.1. KCLC is deeply committed to keeping our members and our communities as safe as possible and recognises that in the current environment, COVID-19 vaccination is an essential element of our overall COVID-19 response planning.
- 1.2. The purpose of this policy is to ensure that reasonable preventative measures are taken to protect the health and safety of our workforce (paid staff and volunteers), our members, their families, our stakeholders we work with and our communities in relation to the transmission of COVID-19.
- 1.3. We recognise the medical and scientific advice that affirms the role immunisation plays in protecting the community in the event of an outbreak of COVID-19. We also recognise that the extent of protection conferred by vaccination may be subject to change due to the evolving nature of the COVID-19 virus, and therefore flexible adaptation of all policy measures is key.
- 1.4. This policy outlines KCLC's position on COVID-19 vaccinations in order to ensure that measures are implemented to:
 - 1.4.1. comply with any applicable Public Health Orders, legislation or regulations;
 - 1.4.2. mitigate risks to health and safety of all workers (paid or volunteers) and members who attend KCLC;
 - 1.4.3. mitigate risks to the health and safety of persons who come into contact with KCLC as part of their work; and
 - 1.4.4. be consistent with current Commonwealth and State health messaging regarding the national COVID-19 vaccination program, including content found on State and Commonwealth Department of Health websites.

2. Definitions

In this policy, the following terms have the meaning as set out below:

Approved Vaccine means any COVID-19 vaccination that has been registered or provisionally registered for use in Australia by the Therapeutic Goods Administration.

Fully Vaccinated means having obtained the manufacturer's recommended dosage of any Approved Vaccine. For example, where a two-dose schedule is recommended by the manufacturer, a person will be considered fully vaccinated when they have received both doses of the vaccine. This extends to obtaining booster doses as they become available in line with public health advice.

Medical Exemption means a medical exemption to an Approved Vaccine recorded on the Australian Immunisation Register and displayed on the individual's Immunisation History Statement.

Public Health Order or PHO is a public health directive made under the Public Health Act 2016 (WA).

Vaccination Certificate is The Australian Government COVID-19 digital certificate or COVID passport. KCLC will accept for these purposes a copy of Employee Immunisation History Statement, or alternatively a copy of their COVID-19 Digital Certificate (both of which can be obtained through the MyGov account portal).

Workers are individuals engaged on a monetary or volunteer basis, and includes creche staff and volunteers, tutors, members who volunteer, students, interns, contractors, board members, or any person serving on a KCLC committee or in an advisory position.

3. Policy background and Public Health Orders (PHOs)

- 3.1 There are Public Health Orders (PHOs) which apply to the Community Services sector which will limit the ability of unvaccinated employees to perform work at their workplaces. Although not all workers at KCLC are mandated under current PHOs, a large proportion of our work is performed in collaboration with our members who are deemed vulnerable people by nature of their ages (either in older age groups, and also young children who attend the creche and are currently unable to be vaccinated), and due to presence of underlying or existing health conditions (co-morbidities) and are mandated under PHOs.
- 3.2 Under the relevant PHOs, any workers (paid or unpaid) who work at a childcare facility must adhere to the following deadlines:
Group 2: First dose by 1 January 2022, fully vaccinated by 1 February 2022
- 3.3 Under the relevant PHOs, workers (paid or unpaid) and members who work at or regularly attend KCLC which support vulnerable individuals (people in older age groups and younger children who are unvaccinated) must adhere to the following deadlines:
Group 2: First dose by 1 January 2022, fully vaccinated by 1 February 2022
- 3.4 In developing this policy, the KCLC Executive surveyed and consulted with a range of our workers, including our creche staff, our tutors, duty coordinators, workgroup leaders, and regular volunteers to ensure the policy adhered with KCLC values, and was fair and reasonable in our endeavours to keep KCLC, its members, and the wider community safe.

4. KCLC direction to workers (paid or volunteer) and members

- 4.1 While the pandemic risk remains high, and as determined by public health advice for, workers and members will be required, as a condition of employment and entry to KCLC to maintain fully vaccinated status against COVID-19 unless the worker or member has a medical exemption in accordance with this policy, and approved by KCLC, as set out below.
- 4.2 Full COVID-19 vaccination status also extends to include getting booster doses of the COVID-19 vaccine as per public health guidelines.
- 4.3 From the date of this policy and on a temporary basis and until KCLC determines otherwise, only workers and members who are vaccinated against COVID-19 or comply with the requirements in section 6 below will be permitted to attend KCLC.
- 4.4 Specifically, all workers (paid or volunteer) and members will be required to be vaccinated to attend KCLC by the following timeframes:
Group 2: Fully vaccinated by 1 February 2022
- 4.5 KCLC recognises that, generally, personal health management falls outside of work and is a worker's or member's own concern. However, health related matters that are determined, through risk assessment, to have the potential to impact the health and safety of KCLC workers and members, require KCLC to take a considered policy approach. As part of the duty of care in relation to health and safety, workers and members are expected to follow these requirements.

- 4.6 In the current COVID-19 pandemic environment, KCLC recognises the critical importance of a significant level of the population being vaccinated to reduce the spread, severity, and fatal impacts of the virus.
- 4.7 As of 1 February 2022, it will be a requirement that all KCLC workers and members must be fully vaccinated against COVID-19 to attend KCLC, unless they have been granted a medical exemption, and approved by KCLC, in accordance with this policy.

5. Evidence of vaccination and consent to disclose

- 5.1 In order for KCLC to permit a worker or member to attend KCLC by the relevant timeframes listed above in sections 3 and 4, workers and members must first:
- 5.1.1 provide evidence in the form of a COVID-19 Vaccination Certificate, or alternative evidence that KCLC deems to be acceptable, of being fully vaccinated unless an exemption has been provided in accordance with this policy;
 - 5.1.2 consent to KCLC collecting information about the worker's or member's vaccination status and, if required by public health directions, evidence of their vaccination status; and
 - 5.1.3 consent to KCLC disclosing the worker's or member's vaccination status and evidence of that status to relevant State government agencies only in the event that this is specifically required by public health directions.
- 5.2 These documents must be sighted by an authorised representative of KCLC and the declaration signed by each worker or member.
- 5.3 If a worker or member does not provide KCLC with evidence of their COVID-19 vaccination status and consent to collect and disclose that status, this policy serves as a direction to that worker or member not to attend KCLC in line with this policy unless otherwise directed by KCLC.
- 5.4 Prior to commencing attendance at KCLC, all workers and members are required to provide evidence of full COVID-19 vaccination or valid exemption in accordance with this policy.

6. Exemptions

- 6.1 KCLC understands that not all workers or members will be able to receive an Approved Vaccine, including due to medical conditions for which there is a medical exemption to receiving any of the Approved Vaccines. Further information on medical exemptions can be found at <https://www.servicesaustralia.gov.au/immunisation-medical-exemptions?context=22436>
- 6.2 Any worker or member who has such a medical condition is required to provide medical evidence satisfactory to KCLC of the medical condition and the reason for which they are unable to receive any of the Approved Vaccines.
- 6.3 Any medical certificate provided in this respect must be issued by a duly qualified medical practitioner with a current and valid registration and must clearly identify the medical condition and specify that the employee's medical condition gives rise to a medical exemption with respect to all Approved Vaccines. Where a PHO applies, exemptions can only be granted in accordance with the terms of the applicable PHO.
- 6.4 KCLC reserves the right to contact the issuing medical practitioner to verify the authenticity of any such medical certificates.
- 6.5 Requests for an exemption will be considered by KCLC on a case-by-case basis.
- 6.6 In order to ensure the health and safety of workers and members at KCLC, individuals granted an exemption may be subject to conditions or restrictions, such as non-attendance in certain classes.

7. Confidential Register

- 7.1 Any information provided to KCLC in accordance with this policy will be treated confidentially, and will be used only for ensuring compliance with this policy.

- 7.2 KCLC will keep a confidential register of the vaccination status of all workers and members who are required to have an immunisation. Any worker or member will be able to view the information we hold on their vaccination status upon request.
- 7.3 Any worker or member who provides information to KCLC in accordance with this policy is expected to provide accurate and truthful information. Failure to do so will be considered serious breach of KCLC policy and may result in termination of membership.

8. Assistance

- 8.1 KCLC understands that some workers and members may have a hesitancy to vaccinate on the advice of medical and government orders due to historical injustices. While KCLC is deeply empathetic to these institutional impacts, we are committed to ensuring the safest possible learning environment and community centre for our workers (paid and volunteer) our members, and the children who attend creche.
- 8.2 Where possible, KCLC will assist workers and members to access accurate and culturally appropriate advice regarding vaccines via:
- A support person
 - A community or cultural leader or consumer peak body who champions vaccination; and
 - Providing access to the LinkWest Employee Assistance Program.
- Workers and members can also use widely available resources, either online at www.rollupwa.gov.au or by telephone, 13 COVID (13 26 843).

9. Compliance

- 9.1 KCLC will take all reasonable and pro-active steps to ensure our workers and members are fully informed and supported to be fully vaccinated.
- 9.2 KCLC will issue an email to our workers and members regarding our intent to implement the policy and provide an option to view the policy.
- 9.3 Workers or members of KCLC who refuse to be vaccinated or provide evidence of vaccination and do not have an approved medical exemption, will not be permitted to attend classes at KCLC or enrol children in the creche. Compliance with this policy is a condition of accessing KCLC.

10. Operation of the policy

KCLC will be continuously monitoring and assessing the operation of this policy in line with the latest information from Government and health authorities. KCLC may amend, withdraw or replace this policy from time to time at its sole discretion.

11. Recruitment and new members

All new workers (paid or volunteer) recruited to KCLC and new KCLC members will be made aware of KCLC's Vaccination policy.

12. Version Control

Version: 1
Date: 29 December 2021
Approved By: KCLC Executive
Amendment: Newly created policy