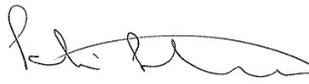




# COVID-19 Worker Vaccination Policy and Procedures

## STATEMENT

The Paraplegic & Quadriplegic Association of South Australia Ltd (PQSA) is committed to the safeguarding of our clients, and the health and wellbeing of our workers and other stakeholders. We recognise the importance of health promotion and illness prevention as an integral part of a healthy workplace; this Policy must be read in conjunction with our *Worker Vaccinations Statement*.

<p>Approved by:</p>  <p>Chief Executive Officer</p>	<p>Date: November 2021</p>
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**In this policy, 'us' 'we' or 'our' refers to The Paraplegic & Quadriplegic Association of South Australia Ltd ACN 644 670 977, which is a Company Limited by Guarantee and conducts its business through Lifestyle Support and HomeCare+ services.**

*Please note that printed copies are not able to be controlled and the Shared Drive should always be referred to for the most current version.*

## **SCOPE**

Compliance with this policy is a condition of appointment for all persons engaged to provide services on behalf of the Company.

## **DEFINITIONS**

Refer to the PQSA Policy and Procedure Definition Glossary.

## **RESPONSIBILITIES**

It is our responsibility to communicate our policies and procedures to all workers on a systematic basis. Individual Directors and Supervisors are responsible for monitoring workers' understanding of their obligations and need for compliance with policies and procedures. Workers are responsible for complying with our policies and procedures.

## **POLICY**

Further to PQSA's *Worker Vaccinations – Statement*, we are implementing specific measures in response to South Australia's Emergency Management Directions (the Directions) relating specifically to the mandating of COVID-19 vaccinations.

We take a risk management approach to maintaining the health and wellbeing of our clients and workers and, on this basis and consistent with the Directions, we are implementing the following steps:

- All workers are required to disclose their COVID-19 vaccination when requested; this information will be kept confidential but will be used in order to ensure we meet our legislative requirements as a disability services provider; we will not disclose your vaccination status to any person external to PQSA without your prior consent
- We assess each role within the company in relation to the Directions (and associated expert health and medical advice), taking into account the health and wellbeing of our clients and the intrinsic requirements of the role and we will communicate as to whether a COVID-19 vaccination is lawfully and reasonably required for each role
- We will communicate procedures (and associated expectations and timeframes) by which workers can demonstrate that they have applied for or have received an exemption from these mandates.

Notwithstanding the assessment of each role, the Direction relating to Healthcare Settings is clear that any role which requires the worker to enter a healthcare setting as part of their duties will mean that they require a COVID-19 vaccination (unless exempt).

Notwithstanding the assessment of each role, we have determined that it is generally reasonable to require any worker who has physical interaction with our clients in the workplace, to be vaccinated (unless exempt). Any exemption to this approach will be communicated accordingly.

In the delivery of our strategic and/or operational planning, we may alter any PQSA workplace which may change the intent and purpose of that workplace, including the delivery of client services onsite (and meeting the definition of a healthcare setting).

Failure to meet this requirement will be considered by PQSA to constitute a failure to comply with a lawful and reasonable direction, as well as an inability to perform the inherent requirements of a worker's role. Workers who fail to comply with this direction will be suspended from duty.

We will offer support for any worker impacted by this Policy through our Employee Assistance Program.

Consistent with our policies, we will not tolerate any vilification or harassment of workers in relation to their personal choices or circumstances in relation to vaccinations.

## **PROCEDURE**

### **COVID-19 Vaccination Evidence**

All risk-assessed workers must comply with the Directions in relation to mandated timeframes for vaccination, including first and second doses of approved vaccines, unless they meet the criteria of exemption as detailed in the Directions.

Risk-assessed and new workers will be required to provide either proof of vaccination that is satisfactory to PQSA or proof of a valid exemption in accordance with the Directions. Such proof includes a COVID-19 vaccine certificate or other form of proof as provided by the Australian Government.

Such proof must be current as determined by government/local health authorities.

### **Exemptions**

Workers who have been deemed medically exempt as detailed in the Directions, must provide us a copy of their endorsed exemption.

Where a Direction allows for workers to continue in their role during a legitimate application for a medical exemption, it is the worker's responsibility to ensure they make every reasonable effort to follow the Direction in this regard and the following procedure will apply:

- Prior to any deadline for vaccination mandate, the worker must provide written proof that an appointment has been made with a qualified health practitioner (whether by screenshot if done on app, or appointment date and time including name of Clinic and GP/specialist from the Clinic itself) and these details will be recorded.
- On a weekly basis, a list of the workers who have provided evidence of their exemption application appointment that is scheduled for that work week will be provided to their Director/Manager; the relevant Manager will follow up with the worker the day after the booked appointment to check on the status of the application.

- We will communicate regularly with each worker to ensure their exemption process is being progressed; it is the worker's responsibility to disclose the status of their application to us.
- We may suspend from duty any worker who fails to provide clear evidence that their application for exemption is being legitimately and reasonably sought and within an acceptable timeframe.

### **COVID-19 Vaccine Appointments**

Full-time and part-time employees shall be permitted to be absent from work to attend COVID-19 vaccination appointments without loss of pay during worktime if they are unable to schedule those vaccinations outside of their usual work hours.

Casual employees shall be permitted to be absent from work without pay to attend COVID-19 vaccination appointments for up to one hour for each appointment during worktime if they are unable to schedule those vaccinations outside of their usual work hours.

A worker may be required to provide evidence of the inability to schedule a COVID-19 vaccination appointment during their usual work hours.

Where a worker has a medical exemption, PQSA recognises it's Clients' right for choice and control. Where a client requests to not receive services from an unvaccinated worker, the worker will be removed from the client's team and where possible offered other shifts.

A **breach** of this policy is grounds for disciplinary action, up to and including termination of employment.

### **RELATED LEGISLATION**

- South Australian Emergency Management (Healthcare Setting Workers Vaccination No 2) (COVID-19) Direction 2021
- South Australian Emergency Management (In-home and Community Aged Care and Disability Support Workers Vaccination) (COVID-19) Direction 2021
- Work, Health and Safety Act 2012
- Work, Health and Safety Regulations 2012

### **SUPPORTING PQSA DOCUMENTATION**

- Worker Health and Wellbeing Statement
- Work, Health and Safety Management System
- Worker Vaccinations – Statement
- Workplace Bullying, Discrimination and Harassment Policy