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# **COVID-19 VACCINATION REQUIREMENTS PROCEDURE – Version 1**

Authorised by: CEO

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Document: COVID-19 Vaccine Requirements Procedure  
Document No.: BHI-PAC-PRO002  
Process Area: PAC

## Contents

- 1 Document Control.....1
- 2 Purpose.....1
- 3 Scope .....1
- 4 Responsibilities .....2
- 5 Definitions .....2
- 6 Procedure .....3
- 7 Related Documents .....6
  - 7.1 Documents.....6
  - 7.2 Risk/Opportunity Assessment.....6
- 8 Process Flowcharts .....6
- 9 Procedure Owner .....7
- 10 Approval Body .....7

## 1 Document Control

Version	Date	Amended by	Changes Made
1	01/21/21	B.Glover	Initial document

## 2 Purpose

The purpose of this procedure is to provide procedural guidance about the COVID-19 Vaccination Policy (Policy).

## 3 Scope

This procedure applies to –

- a) All employees, students, and visitors who attend Box Hill Institute locations.
- b) All employees and students who attend third party or public locations to undertake Box Hill Institute activities outside their ordinary place of residence.

Document: **COVID-19 Vaccine Requirements Procedure**

Document No.: **BHI-PAC-PRO002**

Process Area: **PAC**

## 4 Responsibilities

All Employees	<ul style="list-style-type: none"> <li>Provide Box Hill Institute with vaccination evidence in accordance with this Procedure and the COVID-19 Vaccination Requirements Policy.</li> </ul>
Teachers	<p>In addition to employee responsibilities, teachers are required to –</p> <ul style="list-style-type: none"> <li>Visually check all students' vaccination status on entry to class <i>and/or</i> delegate this responsibility to an appropriate BHI employee.</li> <li>Refer any non-compliant students to Course Managers for support.</li> </ul>
Managers	<p>In addition to employee responsibilities, managers must –</p> <ul style="list-style-type: none"> <li>Consult and communicate with employees under their management control regarding the vaccination requirements applicable to attend on campus or endorsed BHI activities.</li> <li>Communicate the provisions of the COVID-19 Vaccination Requirements Policy to all contractors and visitors.</li> <li>Visually check all visitors' evidence of COVID-19 vaccination status <i>and/or</i> delegate this responsibility to a team member.</li> <li>Report any non-compliance with the COVID-19 Vaccination Requirements Policy <i>and/or</i> Procedure as follows -             <ul style="list-style-type: none"> <li>Employee non-compliance – Human Resources</li> <li>Student non-compliance – Course Manager</li> <li>Contractor non-compliance – Contract Manager</li> <li>Visitor non-compliance – Human Resources</li> </ul> </li> </ul>
Students & Visitors	<p>All students and visitors must –</p> <ul style="list-style-type: none"> <li>Familiarise themselves with Box Hill Institute's policy and communications on COVID-19 vaccinations.</li> <li>Provide evidence of COVID-19 vaccination status on request when attending Box Hill Institute campuses or participating in Box Hill Institute endorsed activities.</li> </ul>
Contractors	Contractors have the same responsibilities as all employees.

## 5 Definitions

Term	Definition
BHI	Means Box Hill Institute, Centre for Adult Education and wholly owned subsidiaries
Coronavirus	A type of virus.
Coronavirus Pandemic	A worldwide spread of a new disease, in this case, the infectious disease Covid-19 caused by SARS-CoV-2 virus.
COVID-19	The disease caused by SARS-CoV-2.
Approved vaccine	Any COVID-19 vaccination that has been approved by the Therapeutic Goods Administration (TGA) or a comparable overseas regulator as determined by the TGA for use in Australia
Directionss	Any applicable public health Directions/s issued by the State or Federal Government. This includes but is not limited to obligations arising from or in pursuant to the <i>Public Health and Wellbeing Act 2008</i> (Vic) <i>and/or</i> related State or Federal regulation and statute.
Directions Exemption	An exemption from the requirement to be vaccinated in accordance with a Directions and includes a Medical Exemption. Directions

Document: **COVID-19 Vaccine Requirements  
Procedure**

Document No.: **BHI-PAC-PRO002**

Process Area: **PAC**

	Exemptions are specified by the Victorian Government from time to time and are set out in the relevant public health orders.
Fully Vaccinated	Having obtained the number of doses of an Approved Vaccine as recommended by the Australian Technical Advisory Group on Immunisation (ATAGI). For example, where a two-dose schedule is recommended by the ATAGI, a person will be considered fully vaccinated when they have received both does of the vaccine.
Medical exemption	An exemption from the requirement to be vaccinated because of a medical contraindication as determined by ATAGI (Australian Technical Advisory Group on Immunisation) clinical guidance.
Medical practitioner	(a) a general practice registrar on an approved 3GA training placement; or (b) a public health physician; or (c) an infectious disease physician; or (d) a clinical immunologist; or (e) a general practitioner who is vocationally registered; or (f) a general practitioner who is a fellow of the Royal Australian College of General Practitioners (RACGP); or (g) a general practitioner who is a fellow of the Australian College of Rural and Remote Medicine (ACRRM); or (h) a paediatrician; or (i) a medical practitioner who is a fellow of the Royal Australasian College of Physicians
Vaccination information	Information about a person's vaccination status and includes information that is derived from a record of information that was made under, or in accordance with, the <i>Australian Immunisation Register Act 2015</i> of the Commonwealth.
Visitor (for the purpose of BHI)	A person who visits Box Hill Institute for the purpose of business or duty. This includes but is not limited to volunteers, educational support person, counsellors.

## 6 Procedure

Box Hill Institute is committed to ensuring all Box Hill Institute employees, students and visitors comply with the provisions of the Covid-19 Vaccination Policy and/or Directions relevant to them.

In order to support this outcome, Box Hill Institute will adopt the following procedural principles as appropriate.

### Proof of vaccination status

All Box Hill Institute employees, students or visitors who are required to be vaccinated (whether pursuant to a Directions or as a requirement of attending Box Hill Institute locations) will be required to provide evidence acceptable to the Box Hill Institute of their vaccination status.

Where a visitor is invited to attend a BHI location, the requirements pertaining to proof of vaccination status will be communicated to them, where practicable, prior to their visit.

Document: COVID-19 Vaccine Requirements  
Procedure

Document No.: BHI-PAC-PRO002

Process Area: PAC

Box Hill Institute will accept for these purposes a copy of the person's:

- (a) COVID-19 Digital Certificate
- (b) Immunisation History Statement
- (c) Digital vaccination certificates delivered by the Services Victoria smart phone application.

Box Hill Institute may from time to time determine that other evidence is acceptable.

#### **Non-compliance with Directions and/or Policy – Box Hill Institute visitors**

Visitors to Box Hill Institute (including Box Hill Institute events which may be held at other locations) who do not agree to provide evidence of their vaccination status will be asked to leave the site they have attended.

In circumstances where visitors who do not agree to comply with the Policy do not comply with the request to leave the site they have attended, Box Hill Institute reserves the right to engage with or escalate to BHI or venue security and/or Victoria Police.

#### **Non-compliance with Directions and/or Policy – Box Hill Institute employees**

Box Hill Institute employees who have not disclosed their vaccination status on or before the relevant vaccine dates mandated by the Directions will be considered to be non-compliant with the Policy.

Employees who are non-compliant with the Policy will, because of the effect of the Directions, not be permitted to perform work on behalf of Box Hill Institute at locations other than their ordinary place of residence.

Box Hill Institute will, in circumstances where an employee is not vaccinated and is therefore not able to perform work at Box Hill Institute locations, endeavour to determine whether alternative working arrangements can be made until such time as the employee is compliant with the Policy.

In circumstances where operational requirements mean that alternative working arrangements cannot be accommodated, interim arrangements may be discussed. Such interim arrangements may include annual leave or unpaid leave, and are subject to the discretion of Box Hill Institute.

Box Hill Institute will assess each case of non-compliance on its merits, and will endeavour to resolve instances of non-compliance collaboratively with an employee. In circumstances where the non-compliance is not resolved and where no relevant exemption applies, Box Hill Institute reserves its rights to undertake a disciplinary process. A disciplinary process may result in a range of outcomes, up to and including termination of employment.

#### **Non-compliance with Directions and/or Policy – Box Hill Institute students**

Box Hill Institute students who have not disclosed their vaccination status on or before the relevant vaccine dates mandated by the Directions will be considered to be non-compliant with the Policy.

Box Hill Institute students who are non-compliant with the Policy will, because of the effect of the Directions, not be permitted to attend Box Hill Institute locations for any purpose.

Box Hill Institute will, in circumstances where a student is not vaccinated and is therefore not able to participate in study at Box Hill Institute locations, endeavour to determine whether alternative studying arrangements can be made until such time as the student is compliant with the Policy.

In circumstances where alternative study arrangements cannot be accommodated, interim arrangements may be discussed. These may include reasonable adjustments or withdrawal from the course, and are subject to the discretion of Box Hill Institute.

#### **Exemptions – Box Hill Institute employees & students**

In very limited circumstances, a Directions Exemption may apply which may mitigate the effect of non-compliance with this Policy. Circumstances in which Box Hill Institute may grant an exemption include where

**OFFICIAL**

Document: **COVID-19 Vaccine Requirements Procedure**  
Document No.: **BHI-PAC-PRO002**  
Process Area: **PAC**

- (a) A person has a valid Directions Exemption.
- (b) A person has a Medical Exemption.

Box Hill Institute may consider a temporary exemption in circumstances where a person is required to be vaccinated pursuant to a Directions and that Directions requires them to be vaccinated by a later date than that specified in this Policy.

Box Hill Institute has no authority to issue, and will not issue, an exemption where a person is required to be vaccinated pursuant to a Directions.

In circumstances where an employee believes that they qualify for an exemption, the employee must discuss this with their manager *and/or* the General Manager of Human Resources. Box Hill Institute will consider each matter on its merits and will communicate its decision to the employee. If the decision of Box Hill Institute is that the employee is not exempt, and is non-compliant, Box Hill Institute will address the non-compliance as set out above.

In circumstances where a student believes that they qualify for an exemption, this must be raised with their course manager *and/or* the Manager of Health Safety & Wellbeing. Box Hill Institute will consider each matter on its merits and will communicate its decision to the student. If the decision of Box Hill Institute is that the student is not exempt, and is non-compliant, Box Hill Institute will address the non-compliance at its discretion.

**Management of Vaccination Evidence – record keeping and privacy**Employees

Box Hill Institute is required to collect, record, and hold vaccination information for employees.

Consent to the collection of vaccination evidence is not required if the collection is required or authorised by law, such as a Public Health Order, or where it is necessary for an employer to meet their obligations under the Victorian *Occupational Health and Safety Act 2004* (Vic).

Collected information is managed under the *Privacy and Data Protection Act 2014* (Vic) and the *Privacy Act 1988* (Cth).

Students & Visitors

Box Hill Institute is currently sighting student and visitor vaccination evidence. This approach may change in line with future government Directions and/or Box Hill Institute policies. Any change to policy impacting the collection, record and holding of information for students and visitors will be communicated in advance of implementation.

**Communication of Vaccination Requirements**

Communications linked to the management of COVID-19, including vaccination requirements, at Box Hill Institute is available on OurSpace. [Click here](#) to access the COVID-19 page on OurSpace.

**Provision of False or Misleading Information – Vaccination status**

It is an offence under Victorian statute to give information, make a statement, or produce a document which is false or misleading regarding your vaccination status. Furthermore, the provision of false or misleading information regarding vaccination status by Box Hill Institute employees may constitute a breach of Box Hill Institute's workplace health and safety policy and procedure and/or Box Hill Institute's Code of Conduct.

In circumstances where false or misleading information regarding vaccination status is given to Box Hill Institute by an employee, Box Hill Institute reserves its rights to undertake an investigative and/or disciplinary process. A disciplinary process may result in a range of outcomes, up to and including termination of employment, withdrawal from course of study or exclusion from a BHI managed site.

Document: **COVID-19 Vaccine Requirements Procedure**  
 Document No.: **BHI-PAC-PRO002**  
 Process Area: **PAC**

In circumstances where false or misleading information regarding vaccination status is given to Box Hill Institute by a student or visitor, Box Hill Institute reserves its rights to take appropriate action, including referral to the Department of Justice and Community Safety, Department of Health, Victoria Police and/or WorkSafe

## 7 Related Documents

Documents, Standards and reference material associated with this procedure include:

### 7.1 Documents

Document Identifier	Title
BHI-PAC-POL002	COVID-19 Vaccination Policy
PAC-HSW-PRO041	COVID Safe Plan
BHI-HSW-POL001	Occupational Health and Safety Policy

### 7.2 Risk/Opportunity Assessment

Risk/Opportunity	Likelihood	Severity	Assessment Method (if applicable)	Mitigation
Increased risk of COVID -19 (outbreak)	Almost Certain	Moderate	Community vaccination rates, BHI position and vaccination rates	Vaccination policy for on campus activities and endorsed activities
Loss of Talent (employees)	Possible	Moderate	Human Resources	Communications, early engagement with employees, inclusion in recruitment & on boarding
Loss of Students	Possible	Moderate	Educational Delivery	Communications, early engagement with students, inclusion in enrolment processes


## 8 Process Flowcharts

Not applicable.

Document: **COVID-19 Vaccine Requirements Procedure**  
Document No.: **BHI-PAC-PRO002**  
Process Area: **PAC**


## 9 Procedure Owner

The Executive Director People and Culture is the owner of this procedure.

Executive Director Signature	Date Endorsed	Author Title
	9 December 2021	<b>Aggie Kost Executive Director People Culture &amp; Transformation Bronwyn Glover – Manager Health Safety &amp; Wellbeing</b>

## 10 Approval Body

The CEO is the approval body.

Signature	Date
	13 December 2021