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Document:	COVID-19 Vaccination Requirements Policy
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COVID-19 VACCINATION REQUIREMENTS POLICY - VERSION 4

Authorised by:

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1 Document Control

Version	Date	Amended by	Changes Made
1	08/11/2021	L. Simpson	Initial document
2	18/02/2022	A. Marriott	Updated to reflect Pandemic Orders
3		B. Glover	Updated policy position
4	11/08/2023	B. Glover	Updated policy position

2 Purpose

This policy sets out the processes that Box Hill Institute will take when there are COVID-19 vaccination requirements as a result of government directives or industry standards eg Health, Aged Care industries. This policy sets out the COVID-19 vaccination requirements for employees and workplace participants, including contractors and students, as it relates to their role and or course of study.

Unless there is a government directive or industry standards requiring COVID-19 vaccination, Box Hill Institute **does not require** employees or workplace participants, including contractors and students, to be vaccinated against COVID-19.

This policy complements, and should be read in conjunction with, other relevant Box Hill Institute policies and procedures as set out in Section 10 of this policy.

3 Scope

This policy applies to all employees and workplace participants of Box Hill Institute, including contractors and students, of Box Hill Institute.

4 Policy Statement

The *Occupational Health and Safety Act 2004* (OHS Act) requires that employers ensure, so far as is reasonably practicable, that they provide and maintain a safe working environment for their employees and workplace participants. The following principles underpin this policy regarding the management of COVID-19 within Box Hill Institute workplaces:

- Box Hill Institute is responsible for providing a safe working environment, consistent with the duties of employers under the OHS Act. Both infection and serious illness resulting from COVID-19 are workplace health and safety risks.
- Box Hill Institute encourages all employees and contractors to maintain their vaccination currency by having further boosters as recommended by the Australian Technical Advisory Group (ATAGI).

- Students at Box Hill Institute are not required to be vaccinated, unless this is a requirement of their employer or placement employer (where placement is a requirement of their course).
- Managers are required to ensure all employees; workplace participants and students adhere to the vaccination requirements as appropriate for their role and/or course of study.

5 Role and Industry Specific Requirements

5.1.1 Vaccination requirements

Prospective employees or workplace participants

When recruiting, the advertising and engagement documentation for employees and workplace participants will include the government directives or industry standards in relation to COVID-19 vaccinations. Additionally, the recruitment documentation will clearly state that engagement is subject to the person providing evidence to Box Hill Institute that their vaccination status is up-to-date or that they are an Excepted Person. This evidence is part of Box Hill Institute's recruitment and on boarding process. If there is no government directives, or industry standards applicable to the role, the employee or workplace participant does not need to be vaccinated against COVID-19 or provide evidence to Box Hill Institute.

Industry Requirements for students

Course documentation will include the government directives or industry standards in relation to COVID-19 vaccinations. Additionally, the course enrolment documentation will clearly state that engagement is subject to the person providing evidence to Box Hill Institute that their vaccination status is up-to-date or that they are an Excepted Person. This evidence is part of Box Hill Institute's enrolment process. If there are no government directives or industry standards applicable to the course, the student does not need to be vaccinated against COVID-19 or provide evidence to Box Hill Institute.

5.1.2 Evidence of Vaccination Status

If there is a current COVID-19 vaccination industry requirement (eg Health, Aged Care) associated with a position, the individual must provide evidence of their vaccination status. This is achieved by sending a scanned copy of an approved vaccination certificate to covidvaccinations@boxhill.edu.au, a mail box managed by the People, Culture and Transformation team. Individuals are requested to redact the Individual Healthcare Identifier (IHI) on their certificate prior to sending the certificate.

If an employee or workplace participant does not provide the required vaccination evidence, the employee or workplace participant will be treated as if they are under-vaccinated.

Information pertaining to vaccination status and evidence will be stored in a secure database maintained in accordance with the *Health Records Act 2001* and will be accessible to authorised persons only, for the purposes of implementing and ensuring compliance with this policy. Box Hill Institute will not store copies of documents with visible individual healthcare identifiers, as it is an offence to use or disclose this information

under s 26 of the *Healthcare Identifiers Act 2010* (Cth). Employees and workplace participants are encouraged to redact healthcare identifiers, where relevant, from their current COVID-19 digital certificate or other document before providing evidence of vaccination.

Where there is a vaccination requirement for student placements the evidence of vaccination status will be managed by the individual Faculty.

5.1.3 Vaccination Exceptions

Employees and workplace participants

If an employee or workplace participant believes they are medically exempt from the vaccination requirements, or that other exceptional circumstances apply preventing them from being vaccinated, they must notify the Box Hill Institute People, Culture and Transformation team (covidvaccinations@boxhill.edu.au) who will consider each exemption on a case-by-case basis. Prior to granting such permission, Box Hill Institute will carry out a risk assessment and determine measures to ensure a safe working environment. Exemptions need to be granted prior to attending Box Hill Institute's premises.

Students

If a student believes they are medically exempt from the vaccination requirements, or that other exceptional circumstances apply preventing them from being vaccinated, they must notify their Course Manager who will consider each exemption on a case-by-case basis, giving consideration to course requirements and industry standards, regarding COVID-19 vaccinations.

5.1.4 Unvaccinated without a valid exemption

Employees and Workplace Participants

Employees who do not comply with the directions outlined in this policy may be subject to disciplinary action, and/or to a show cause process relating to their capacity to undertake the role, and/or otherwise dealt with in accordance with departmental policy, which may result in termination of employment. Workplace participants may have their contract for the provision of services with the Box Hill Institute terminated.

Students

If a student is not exempt, and chooses not to be vaccinated, they must notify their Course Manager as soon as practicable, and the student will be advised of the next steps for course enrolment and or completion. Students may not be able to complete the requirements of their course, where a practical placement is included and is a requirement of the course if there are industry COVID-19 vaccination requirements.

6 Code of Conduct

All employees and students are expected to conduct themselves in a manner consistent with the Box Hill Institute Staff and Student Code of Conduct.

7 Definitions

Term	Definition
BHI	Means Box Hill Institute, Centre for Adult Education and wholly owned subsidiaries
Coronavirus or COVID-19 Pandemic	The COVID-19 pandemic, also known as the coronavirus pandemic, is an ongoing global pandemic of coronavirus disease 2019 (COVID-19) caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).
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
Directions	Any applicable public health direction 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) and/or related State or Federal regulation and statute.
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.
Proof of Vaccination	Proof of vaccination status can be demonstrated by providing – <ul style="list-style-type: none"> • COVID-19 digital certificate via the Service Victoria app • COVID-19 digital certificate saved to smartphone • Printed copy of COVID-19 digital certificate together with photo ID • Printed copy of Immunisation history statement together with photo ID • Medical exemption together with photo ID
<i>Public Health and Wellbeing Act 2008</i> (Vic)	The purpose of the <i>Public Health and Wellbeing Act 2008</i> (Vic) is to protect the public health and wellbeing of Victorians.
Student	Perspective or enrolled student in a course with Box Hill Institute
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.
Workplace Participant	Includes contractors, subcontractors, consultants, service providers, an employee of a labour hire company and other individuals employed by a third party to perform work on the Employer's behalf.

8 Related Procedures

The following procedures are linked below:

- COVID-19 Vaccination Requirements Procedure

9 Related Operating Guidelines

- NA

10 Related Forms

- NA

11 Related Legislation and Regulations

11.1 Box Hill Institute

- Code of Conduct (staff and student)

11.2 External

- Directions issued by the Chief Health Officer of Victoria (Various)
- Public Health Orders issued by the State of Victoria (Various)
- *Charter of Human Rights and Responsibilities Act 2006* (Vic)
- *Public Health and Wellbeing Amendment (State of Emergency Extension and Other Matters) Act 2020* (Vic)
- *Education Training and Reform Act 2006* (Vic)
- *Fair Work Act 2009* (Cth)
- *Occupational Health and Safety Act 2004* (Vic)
- *Privacy and Data Protection Act 2014* (Vic)
- *Privacy Act 1988* (Cth)
- *Public Health and Wellbeing Act 2008* (Vic)

12 Records

Records will be maintained in accordance with the requirements of Box Hill Institute's Records Management Policy and Procedures.

Where the privacy of individuals may otherwise be compromised, records will be kept secure and confidential.

13 Review


This policy must be reviewed no later than three years from the date of CEO endorsement. The policy will remain in force until such time as it has been reviewed and re-approved or rescinded. The policy may be withdrawn or amended as part of continuous improvement prior to the scheduled review date.

14 Responsibilities

See Covid-19 Vaccination Requirements – Procedure.

15 Policy Owner


The Executive Director People, Culture and Transformation is the owner of this policy.

Executive Director Signature	Date Endorsed	Name/Title
	9 October 2023	Aggie Kost – Executive Director People Culture & Transformation

Author's Name	Title
Bronwyn Glover	Associate Director Safety Inclusion & Wellbeing

16 Approval Body

The CEO is the approval body.

CEO's Signature	Date Endorsed	Name/Title
	31 / 10 / 2023	Grant Radford CEO