



COVID-19 Vaccination Policy

Prepared by: Executive – People and Culture

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Section 1 – Purpose

- (1) Citywide has a legal duty under workplace health and safety laws to take reasonably practicable steps to ensure the health and safety of all of our employees, as well as other persons affected by our operations (such as customers, suppliers and members of the public). In doing this, we must control hazards, in so far as reasonably practicable, within the workplace.
- (2) The purpose of this policy is to provide our approach to how we will mitigate risks associated with the health impacts of COVID-19.

Section 2 – Background

- (3) We are obliged to implement controls to eliminate, or if that is not reasonably practicable, minimise the risk that COVID-19 presents within, or near, places where we work or provide services. The possibility that a worker or a visitor will attend a Citywide site with COVID-19, or become infected at that site, is a hazard that could have devastating consequences for our workers, customers and visitors. According to government health advice, getting vaccinated against COVID-19 is a safe and readily available way to mitigate the risks of infection – Citywide accepts this advice.

Section 3 – Scope

- (4) This policy applies to all Citywide workers (including employees, contractors, labour hire workers and volunteers) and any person attending any Citywide site ('visitor').

Section 4 – Definitions

- (5) For the purpose of this policy, the following definitions apply:

We or Citywide means the Citywide Group.

Worker has its meaning given in paragraph 4.

Vaccination information is information about a person's vaccination status, which may be recorded in a letter from an appropriate, authorised medical practitioner, a certificate of immunisation or an immunisation history statement obtained from the Australian Immunisation Register.

Vaccination requirements means the requirements relating to COVID-19 vaccination in paragraphs 7, 9 and 10, as applicable, and related requirements regarding the provision of medical information or exemption certification in paragraphs 12, 13 and 15.

A person is considered to be **fully vaccinated** if the person has received two doses of a COVID-19 vaccine and any booster doses as required as communicated by us in writing.

Citywide assets includes all Citywide assets but excluding those provided for single person use (i.e. not shared between workers), such as laptops, mobile phones and small power tools.

Citywide site includes Citywide offices, work sites, depots, vehicles, and any other sites where a Citywide activity (such as a professional development activity or a function) takes place.

Section 5 – Policy

Our Approach

- (6) We expect – and urge – all Citywide workers and visitors to participate in the national COVID-19 vaccination program, noting that vaccination must be undertaken on the advice of an appropriate medical practitioner.
- (7) Citywide’s stated aim is to have all Citywide employees fully vaccinated, and from **26th November 2021**, we shall not permit any Citywide worker or visitor to access any Citywide site or use Citywide assets unless they are fully vaccinated, and can demonstrate (if required by Citywide) that they are. An exemption is available on medical grounds under paragraph 12.
- (8) Any Executive may, in consultation with Executive – People & Culture, provide an extension in writing to the date specified in paragraph 7 to a Citywide worker for a reasonable period to enable the worker to be fully vaccinated, where the worker can demonstrate that the worker intends to but, due to circumstances beyond the worker’s reasonable control, is unable to be fully vaccinated by such date. The Executive must promptly notify the COVID-19 Officer after each extension is provided by that Executive, to enable the COVID-19 Officer to record the extension in the relevant register.
- (9) We require all Citywide workers to comply with any applicable Citywide customer requirements relating to COVID-19 vaccination that Citywide accepts as being reasonable.
- (10) We require all Citywide workers and visitors to comply with any applicable legal requirements that relate to COVID-19 vaccination, including those arising from public health orders.
- (11) If there is any inconsistency between the vaccination requirements in paragraphs 7, 9 and 10, then the vaccination requirement with the highest vaccination requirement will apply.

Medical Exemption

- (12) Citywide workers and visitors may be exempted from the vaccination requirements if they provide us with written certification, based on established medical grounds (according to current ATAGI clinical guidance) and issued by an appropriate, authorised medical practitioner, that the worker or visitor has a medical condition that prevents them taking COVID-19 vaccination.
- (13) We reserve the right to request or require further medical information including seeking assessment of the medical exemption by an independent medical practitioner.

Risk Assessment

- (14) We have undertaken an extensive risk assessment to inform the position we have taken with respect to this policy. The requirement (subject to any valid medical exemption) for Citywide workers and visitors to be fully vaccinated against COVID-19 to access Citywide sites or use Citywide assets is consistent with our legal obligations to control the risks of infection in our workplace. This requirement is in addition to other applicable controls such as social distancing, good hygiene, mask use and other steps required by government agencies or law or as may be implemented by Citywide from time to time.

Privacy

- (15) In implementing this policy, we will be required to collect vaccination information from Citywide workers and visitors affected by this policy or, in the case of exemption, supporting medical information. We need this information to comply with our work health and safety obligations and to meet the reasonable requirements of our customers. If the information is not provided, then we may be unable to conclude that the person is fully vaccinated or exempted.

- (16) We will only use or disclose this information collected from Citywide workers and visitors for the purpose of implementing and administering this policy.
- (17) We may need to disclose Citywide workers vaccination status to our customers to meet their reasonable requirements. If so, we will require the recipient of the information to deal with the information in accordance with privacy laws. In addition, we may need to disclose medical information of workers seeking exemptions to an independent medical practitioner for assessment.
- (18) We will endeavour to ensure information about vaccination information and medical information relating to an exemption is kept secure and only used for the purposes of giving effect to this policy. We will permanently delete this information when the information is no longer required for purposes of this policy.

Refusal to Provide Vaccination Information or Medical Exemption

- (19) The following applies if a worker does not meet the vaccination requirements and is unable to meaningfully perform their usual duties or services as a result:
 - (a) If the worker is not an employee (such as a contractor or labour-hire worker), then the worker's service will no longer be required by Citywide.
 - (b) If the worker is a Citywide employee, then we will consult with the employee and explore ways for them to continue working, either in their current role or a suitable alternative role where the risk of infection might be less. This will be difficult in roles where the employee:
 - (i) Has regular interaction with customers and/or other members of the public;
 - (ii) Works with vulnerable people and communities, such as in medical facilities, aged care homes, schools, shopping centres, and Indigenous communities;
 - (iii) Is required to work closely or interact with other workers, such as travelling in vehicles together;
 - (iv) Is required to use a shared Citywide asset such as a Citywide vehicle; and/or
 - (v) Is required as part of their role to interact and engage with other Citywide employees in person, even if only from time to time.
 - (c) If we cannot find a way under paragraph 19(b) for the employee to continue working, their ongoing employment at Citywide may be untenable.

Supporting Employee Access to Vaccinations

- (20) We will support all reasonable efforts made on the part of our employees to obtain a COVID-19 vaccination, particularly during peak vaccination periods where access to appointments may be limited. Employees are encouraged to take the earliest possible opportunity to attend to their vaccination. Where appointments fall during work hours' managers and supervisors are encouraged to support the employees in their endeavours to attend a vaccination appointment.
- (21) Citywide employees can take time off to get a vaccination during work hours, without the need to take leave after getting approval from their leader or manager. Where an employee is fully vaccinated and has taken annual leave to get vaccinated, we will reinstate that half or full annual leave day (as applicable).

Section 6 – Associated Documentation

This policy should be read in conjunction with the employment contract and relevant associated policies, including our Code of Conduct, and processes. All relevant polices can be found on the company intranet (SharePoint).

Section 7 – Key Stakeholders

Stakeholder	RACI
Board	C
CEO	A
Executive People & Culture	R
Executive	A
General Group Managers	A
Business Managers/Head of Function	A
People & Culture Business Partners	C
Employees	I
R = Responsible, A = Accountable, C = Consult, I = Inform	