



## COVID-19 Vaccinations – Visitors and Volunteers Working on School Sites

### POLICY and PROCEDURES

# Cape Clear Primary School

## Policy

The purpose of this policy is to outline the required process for schools to collect and record vaccination information for visitors and volunteers working on school sites, in accordance with the COVID-19 Mandatory Vaccination directions issued by the Victorian Chief Health Officer. For policy on vaccination requirements for teaching service staff and school council employees refer to: [COVID-19 Vaccinations – Teaching Service and School Council Employees](#).

## Summary

- Schools have obligations to ensure that people performing work in schools have received COVID-19 vaccinations when attending on site or are medically excepted persons with respect to COVID-19 vaccinations.
- The Department will collect, and schools are not required to collect, record or hold vaccination information about staff who are directly employed by the Department or a government school council, or Department staff attending school sites because the Department will collect this information.
- The Department will collect, and schools do not need to collect, record or hold vaccination information about:
  - cleaners engaged by the VSBA in metropolitan Melbourne
  - specialist technicians and other resources engaged by the Technical Support to Schools Program (TSSP)
  - the Department will ensure that only vaccinated cleaners and TSSP technicians and resources attend school premises.
- Neither the Department or schools are required to collect, record or hold vaccination information about construction services and works contractors working within a designated construction site secured separately by a contractor (for example, by fencing or hoarding) from the rest of the school site.
- School councils that engage a third party early childhood education and care operator including outside school hours care (OSHC) are not required to collect, record and hold vaccination information about the operators workers employed by external OSHC providers engaged by the school council because that information must be collected by the provider.
- Schools must collect, record and hold vaccination information for all other visitors and volunteers working on school sites who will or may be in close proximity to children, students or staff.

## Details

### Mandatory vaccination requirements

Under the COVID-19 Mandatory Vaccination (Specified Facilities) directions issued by the Victorian Chief Health Officer (vaccination directions) schools must ensure that all education workers who attend to perform work must comply with vaccination requirements.

Schools must take all reasonable steps to ensure a worker who is unvaccinated does not enter, or remain on, the school premises for the purposes of performing work at the school unless they are an excepted person.

For policy on vaccination requirements for teaching service staff and school council employees refer to: [COVID-19 Vaccinations – Teaching Service and School Council Employees](#).

The following information outlines how schools must manage the vaccination directions for all other visitors and volunteers working on school sites, including how they collect and record relevant vaccination information.

### Vaccination information

Under the vaccination directions, vaccination information is information about a person's vaccination status including whether they are fully vaccinated, partially vaccinated, medically excepted or unvaccinated. Vaccination information includes information that is derived from a record of information that was made under, or in accordance with, the Australian Immunisation Register Act 2015 (Cth) and can be shown in documents such as:

- a letter from a medical practitioner confirming the person's vaccination status or confirming the person is medically excepted
- a certificate of immunisation (for example, a COVID-19 digital certificate)
- an immunisation history statement obtained from the Australian Immunisation Register.

Only certain medical practitioners can provide a letter. For more information, refer to the following topic below: [Who is a medical practitioner?](#)

### Medically 'excepted persons'

In line with the vaccination directions, volunteers and visitors working on school sites may be able to show that they are an 'excepted person'.

From 18 October 2021, volunteers and visitors working on school sites who are considered 'excepted persons' under the vaccination directions may attend school sites to conduct their work.

This is a very limited category and applies only if the person has a certificate from an authorised medical practitioner showing that they are unable to receive a dose, or a further dose, of an approved COVID-19 vaccine due to a 'medical contraindication' or an acute medical illness (including COVID-19).

A medical contraindication must be one of the following issues related to the administration of an approved COVID-19 vaccine:

- anaphylaxis after a previous dose
- anaphylaxis to any component of the vaccine, including polysorbate or polyethylene glycol
- in relation to AstraZeneca:
  - history of capillary leak syndrome or
  - thrombosis with thrombocytopenia occurring after a previous dose
- in relation to Comirnaty (Pfizer) or Spikevax (Moderna):

- myocarditis or pericarditis attributed to a previous dose of either Comirnaty or Spikevax
- the occurrence of any other serious adverse event that has been:
  - attributed to a previous dose of a COVID-19 vaccine by an experienced immunisation provider or medical specialist (and not attributed to any another identifiable cause)
  - reported to state adverse event programs and/or the Therapeutic Goods Administration.

#### **Who is a medical practitioner?**

A medical practitioner, for the purpose of the vaccination directions, is limited to the following types of practitioners:

- a general practice registrar on an approved 3GA training placement
- a public health physician
- a general physician
- an infectious disease physician
- a clinical immunologist
- a gynaecologist
- an obstetrician
- a general practitioner who is vocationally registered
- a general practitioner who is a fellow of the Royal Australian College of General Practitioners (RACGP)
- a general practitioner who is a fellow of the Australian College of Rural and Remote Medicine (ACRRM).

This means that only medical practitioners from the list above can provide vaccination information including a letter showing evidence of vaccination or certification that a person is an excepted person under the prescribed criteria.

#### **Communicating vaccination requirements prior to attendance on site**

Schools are encouraged to inform volunteers and visitors working on school sites of the requirement to be vaccinated in advance of their attendance.

A template letter that school councils can use to advise contractors and other services of the vaccination information requirements (other than OSHC providers) is available at: [Template Letter School Council to Contractor Service Provider or Licensee Compliance with Vaccination Health Direction \(Word\)](#) (staff login required).

A template letter that school councils can use to inform OSHC providers about the vaccination information requirements is available at: [Template Letter School Council to OSHC Provider Compliance with Vaccination Health Direction \(Word\)](#) (staff login required).

#### **Collecting and recording vaccination information**

##### **Collecting vaccination information from volunteers and visitors**

There are 3 ways in which vaccination information must be collected for volunteers and visitors working on school sites who will or may be in close proximity to children, students or staff.

1. Vaccination information for staff who are directly employed by the Department or a government school council will be held on eduPay. It is not necessary for schools to collect this information directly from the following categories of employees:

- a. Principal class
- b. Teaching service
- c. Education support
- d. School council employees
- e. Department staff attending school sites (for example, regional staff, Student Support Services (SSS)).

For further information on this process refer to: [COVID-19 Vaccinations – Teaching Service and School Council Employees](#).

2. The Department will collect and schools are not required to collect vaccination information for staff of contractors whose contracts are managed centrally. This includes:

- a. cleaners engaged by the VSBA in metropolitan Melbourne
- b. specialist technicians and other resources engaged by the Technical Support to Schools Program (TSSP)  
The Department will ensure that only vaccinated cleaners and TSSP technicians and resources attend school premises.
- c. neither the Department or schools are required to collect, record or hold vaccination information about construction services and works contractors working within a designated construction site secured separately by a contractor (for example, by fencing or hoarding) from the rest of the school site.

3. Schools must collect, record and hold vaccination information for all other workers not listed in the section above and volunteers on school sites who will or may be in close proximity to children, students or staff.

For the purposes of this policy, this includes, but is not limited to:

- casual relief teachers
- providers of incursions
- Breakfast Club suppliers
- IT personnel (not engaged by school ICT and TSSP as they will be managed centrally as per above)
- students on placement
- services or works contractors not working within a designated construction site secured separately (for example, by fencing or hoarding) by a contractor from the rest of the school site (for example, for maintenance services or works)
- external therapists, NDIS providers or other allied health staff
- bus drivers and supervisors (if they enter the school premises)
- auditors
- volunteers performing volunteer work at the school (for example, parent helpers)
- all other persons contracted, engaged or requested to perform work at a school site, regardless of their employer (with the exception of those whose vaccination information will be collected by the Department as per paragraph 1 and 2).

It does not include:

- delivery personnel
- visiting parents and carers (once visitors are permitted), unless they are visiting a school to perform volunteer work (for example, parent helpers)

- workers employed by external OSHC providers engaged by the school council because that information must be collected by the provider
- visitors or volunteers working on school sites that are not, or are not likely to be, in close proximity to children, students or staff (for example, if work is performed wholly after hours and no staff or students are on site or likely to be on site).

All volunteers and visitors working on school sites listed in paragraph 3 above must provide vaccination information when attending on site. If unable to provide evidence of vaccination, they must be directed to leave the school.

If you have collected information that a volunteer or visitor working on school sites is fully vaccinated, you do not need to collect any further vaccination information from them.

If you have collected information that a volunteer or visitor working on school sites is:

- partially vaccinated
- unvaccinated but has a booking for their first dose before 25 October 2021

then you will need to collect updated vaccination information from the worker for them to attend onsite after 29 November 2021.

Only volunteers and visitors working on school sites who have provided information that they are fully vaccinated workers or excepted persons are allowed to work onsite after 29 November 2021.

It is not necessary for schools to assess the validity of medical exemption certificates.

#### **Collecting vaccination information from providers employing a number of workers**

Where a school or school council engages with a provider who employs a number of workers on school sites (for example, a Breakfast Club provider), it will be necessary for the school to request that the provider collect vaccination information from their employees and provide that information to the school. In many cases, that will mean that the provider collects all their staff's vaccination information and provides copies of these documents to the school. Operators may be reasonably requested by the school council to provide such information to evidence compliance.

Where a school council is the approved provider of early childhood education and care, it is the responsibility of the school council as provider to collect, record and hold vaccination information. This includes copies of the immunisation history statements and medical certificates.

#### **Record keeping requirements**

When collecting vaccination information from volunteers and visitors working on school sites, the following record keeping requirements apply:

- Any information or documents that cannot be stored in eduPay must be stored on the school's admin server and not on any other third party software, web or cloud based application.
- Vaccination information (for example, certificates and letters) should be placed in a password protected folder on the school admin server with very restricted access. Any hard copy records must be similarly stored securely.
- The Department has created a 'Vaccination Documentation' folder in U drive on the school's admin server with access restricted to the principal class (principals, assistant principals, campus principals) and business managers for schools to store vaccination information for volunteers and visitors working on school sites (for example, certificates and letters).

- Access to record of vaccination information and any other related information (for example, who can and can't attend the site) should be limited to only those staff who are responsible for confirming who is authorised to attend the site, for example, the principal, A/principal, business manager.
- Vaccination information is to be retained until further notice, to meet the vaccination directions issued by the Department of Health and in line with record keeping obligations.
- Schools should provide the data collection statement to persons providing their vaccination information, refer to: [Data Collection Statement Contractors and Volunteers \(Word\)](#).

### **Exceptional circumstances**

There are very limited exceptions to the vaccination directions, and in most cases these will not apply in school settings. An unvaccinated volunteer or visitor working on school sites may be able to attend a school to:

- respond to an emergency at the facility
- fill a vacancy to provide urgent care, to maintain quality of care and/or continue essential operations at the facility due to an emergency situation or a critical unforeseen circumstance – the school must take all reasonable steps to ensure that the person is wearing personal protective equipment including a surgical mask and face shield
- provide urgent specialist clinical or medical care due to an emergency situation or a critical unforeseen circumstance.

These exceptions only apply for the time required to respond to the emergency or critical unforeseen circumstance, and the school should ensure that the unvaccinated volunteer or visiting worker leaves the facility as soon as possible.

Schools should exhaust all other options before calling on an unvaccinated person to respond to an emergency situation. This includes:

- normal procedures for ensuring continuity of care such as engaging CRTs
- following the Department's policy on [Reporting and Managing School Incidents](#) to access area-based support. This includes consulting with Regional Emergency Management staff and the relevant school education improvement leader (SEIL) prior to engaging an unvaccinated relevant employee.

If an unvaccinated visiting worker attends a school to respond to an emergency situation, the principal should provide this information when reporting the emergency to the Department's Incident Support and Operations Centre (ISOC) on [1800 126 126](#), as well as to the relevant SEIL.

### **Non-compliance with the mandatory vaccination requirements**

Schools must take reasonable steps to prevent an unvaccinated volunteer or visitor working on school sites from attending the school to perform work, unless an exception applies.

Schools may need to take the following steps to ensure that unvaccinated volunteers and visitors do not attend school sites to work:

- remind unvaccinated volunteers and visitors of the requirement to not attend school sites to work
- if an unvaccinated volunteer or visitor attends a site to work, ask them to leave the school site immediately

- if an unvaccinated volunteer or visitor refuses to leave a school site, follow the procedures outlined in the Department's [Trespass policy](#) including providing a verbal warning directing the person to leave the school due to the need to protect the health and safety of students and staff at the school and reporting the incident to the Department's ISOC on [1800 126 126](#).

Whenever a person is becoming aggressive or refuses to leave school land, the principal or school staff should immediately call Victoria Police.

A visitor or volunteer attending a school site as a parent or carer for the purposes of collecting or dropping off children is not considered to be attending for work purposes and will be subject to the same requirements as all other parents collecting or dropping off their children, refer to: [School Operations Guide \(Word\)](#) (staff login required).

## Related policies

- [COVID-19 Vaccinations – Teaching Service and School Council Employees](#)
- [Contractors – Insurance and Contract Arrangements](#)
- [Trespass](#)
- [Visitors in Schools](#)
- [Volunteers in Schools](#)
- [Volunteer OHS Management](#)
- [Working with Children and Other Suitability Checks for School Volunteers and Visitors](#)

## Relevant legislation

- [Public Health and Wellbeing Act 2008 \(Vic\)](#)
- [Public Health and Wellbeing Regulations 2019 \(Vic\)](#)

### **REVIEW**

This policy was ratified at School Council in 2021. Review to take place in 2022.