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# VACCINATION POLICY

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### 1 Purpose

The Bethanie Group Inc and Bethanie Housing Limited (collectively referred to as Bethanie) is committed to providing employees, customers, agency workers, volunteers, contractors, students, visitors and others with a safe and healthy environment.

Bethanie Group recognises that employees, agency employees and volunteers, volunteers, contractors, and students (collectively referred to as “workers”), may be at potential risk of exposure to infectious diseases while working for Bethanie.



## 2 Scope and Applicability

Who must use this policy:	This policy applies to all Bethanie workers situated at all Bethanie locations.
Why this policy is important:	This policy supports Bethanie to: <ul style="list-style-type: none"> <li>Assist to protect elderly persons who receive services from Bethanie workers from Vaccine Preventable Diseases (VPDs).</li> <li>Minimise the risk of workers contracting an infectious disease.</li> </ul>
When this policy applies:	<ul style="list-style-type: none"> <li>This policy applies to all decisions, actions, functions, and activities relating to the health, well-being and safety of workers. This includes the recruitment and appointment of workers across all Bethanie locations.</li> </ul>
Who to ask for more information:	<ul style="list-style-type: none"> <li>Bethanie Vaccinations Team via email at <a href="mailto:vaccinations@bethanie.com.au">vaccinations@bethanie.com.au</a></li> <li>General Manager Work, Health and Safety (WHS)</li> <li>Human Resources</li> <li>Your manager</li> </ul>

## 3 Definitions

Term	Definition
Infectious Disease	<b>Infectious diseases</b> (also known as communicable diseases) are caused by infectious agents and can be passed from one person or animal to another. Transmission can occur directly (through contact with bodily discharge), indirectly (for example, by sharing a drinking glass) or by means of vectors (such as mosquitoes). They are caused by bacteria, viruses, parasites or fungi or their toxic products. Examples of these communicable diseases include coronavirus, malaria, influenza and chickenpox
Vaccine preventable disease (VPD)	A <b>Vaccine Preventable Disease</b> is a disease that can be prevented, or its impact reduced through immunisation (generally with a vaccine). Vaccines stimulate the body's immune system to protect against future infection.
Vaccine	<b>Vaccines</b> are medicines that protect you against specific diseases, such as measles, influenza (influenza) or whooping cough.
Immunisation	<b>Immunisation</b> is the process of both receiving a vaccine and becoming immune to the disease as a result

## 4 Policy

### 4.1 Objectives

- To minimise the risk to workers, customers and others contracting vaccine preventable diseases (VPD), by ensuring employees and volunteers receive and maintain the appropriate vaccinations in accordance with Bethanie policy, and Australian Government Department of Health and Aged Care recommendations for aged care workers.



## 4.2 Risk Categories

Some individuals, occupations, tasks and activities are acknowledged as having a higher risk of infection than that faced by the general population.

Bethanie also recognises that there are differences in Residential Aged Care, and other Bethanie environments, such as Home Care, or Corporate Services, when assessing risk of infection and transmission.

The following categorisation of workers are to be used as a general guide to assess requirements under this policy. Work activities rather than classification shall always be considered on an individual basis when determining risk.

### 4.2.1 Category A

- Workers who directly care for customers, or who have or may potentially have contact with human tissue, blood or body fluids. This includes workers who do not provide direct care with customers but potentially have some contact with blood, body substances, infectious material in a healthcare setting, such as clinical waste, laundry, cleaning or food handling, sewage or wastewater, or any workplace setting reflective of the above risks.
- Category 'A' includes those workers who are required by Bethanie to perform the role of 'First Aid Responder'.

### 4.2.2 Category B

- Workers who have 'indirect contact' with customers or blood or body substances as part of their main work duties. They rarely have direct contact with blood or body substances but may be exposed to infections spread by airborne or droplet routes. They are unlikely to be at occupational risk from blood borne diseases.

### 4.2.3 Category C

- Workers who have minimal customer contact as part of their main work duties. Workers in this category have no greater exposure risk than the general public to diseases.

Category	Risk	Examples	Recommended Vaccines
A	<p><b>Direct contact with blood or body substances.</b></p> <p>This category includes all persons who have physical contact with, or potential exposure to, blood or body substances,</p>	<p>Nurses, allied health practitioners, careworkers, food and dining careworkers, therapy assistants, support workers, cleaners, laundry employees and volunteers, first aiders and employees and volunteers responsible for decontamination and disposal of contaminated materials.</p>	<p>Hepatitis B x 3 doses followed by serological confirmation of immunity.</p> <p>Influenza yearly.</p> <p>Pertussis, dTpa) within the last 10 years (and completed primary course DTPa for tetanus component).</p> <p>Measles, mumps, rubella (MMR) x 2 doses.</p> <p>Varicella x 2 doses.</p>



Category	Risk	Examples	Recommended Vaccines
B	<b>Indirect contact with blood and body substances.</b> Rarely have direct contact with blood or body substance. These employees may be exposed to infections spread by the airborne or droplet routes but are unlikely to be at occupational risk from blood borne diseases.	Kitchenhands, chefs, administration employees and volunteers, Chaplains. Domestic (Home Care), Volunteers, Village Managers, Community Housing and corporate employees and volunteers who attend sites regularly.	Influenza yearly. Pertussis (dTpa) within 10 years. Measles, mumps, rubella (MMR) x 2 doses. Varicella x 2 doses.
C	<b>Minimal customer contact.</b> Occupational groups that have no greater exposure to infectious diseases than the general public.	Corporate employees and volunteers who do not attend sites regularly	Influenza yearly

### 4.3 Influenza Vaccinations

All Bethanie employees and volunteers are required to provide evidence of their annual influenza vaccination by 31 May each year. This must demonstrate that the employees and volunteers member has had the current Australian influenza vaccine as recommended by the Australian Government Department of Health and Aged Care, usually available from April.

Evidence of vaccinations is to be provided to the [Vaccination Evidence Link](#) with your Immunisation History Statement obtained from Medicare of MyGov. In the event you are not able to access this evidence please contact [vaccinations@bethanie.com.au](mailto:vaccinations@bethanie.com.au)

Workers who are not Bethanie employees such as students who provide direct care are required to provide evidence of current influenza vaccination to their educational institution.

Labour hire employees (agency staff) are required to have a current influenza vaccination which is centrally managed by the labour hire agency under their contract agreement with Bethanie.

From December 31 each year or when influenza vaccinations are not readily available, new employees, volunteers and students are given a temporary exemption until 31 May the following year.

Employees and volunteers who had an influenza vaccination in the same calendar year but **PRIOR** to the release of the current year recommended influenza vaccine are not compliant with this policy and will need to submit evidence of vaccination with the current years recommended influenza vaccine.

For employees and volunteers who have a valid medical exemption to the influenza vaccine, updated medical evidence must be provided prior to the 31 May each year to confirm the ongoing contraindication. In cases where inconsistent information is identified regarding suitability for the influenza vaccination or criteria does not meet valid reasons for exemption, Bethanie may direct employees and volunteers to attend an independent medical specialist for updated advice.



## 4.4 COVID-19 Vaccinations

All Bethanie employees and volunteers:

Due to the risk of COVID-19 to customers and workers, Bethanie requires at least one COVID vaccination prior to employment and strongly recommends new and eligible employees and volunteers be vaccinated for COVID-19, in line with Australian Technical Advisory Group on Immunisation (ATAGI) recommendations. This is currently defined as a single primary dose for workers aged over 18 years. Booster doses for adults, depending on eligibility and health status are recommended annually and / or in line with ATAGI advice.

For workers less than 18 years of age, COVID-19 vaccinations are not required unless medically recommended due to severe immunocompromise.

It is acknowledged that some international vaccines are approved by the Australian Government, Department of Health and Aged Care. Where evidence is provided of vaccination with overseas vaccines, this will be checked to confirm:

1. The vaccine is formally recognised in Australia; and
2. The primary dose has been completed.

International COVID-19 vaccines recognised in Australia can be checked with the Therapeutic Goods Administration (TGA).

Workers who are not Bethanie employees such as students who provide direct care in Residential are required to provide evidence of current COVID vaccination to their educational institution.

Labour hire employees (agency staff) are required to have a current COVID vaccination which is centrally managed by the labour hire agency under their contract agreement with Bethanie.

Evidence of vaccinations is to be provided to the [Vaccination Evidence Link](#) with your Immunisation History Statement obtained from Medicare of MyGov. In the event you are not able to access this evidence please contact [vaccinations@bethanie.com.au](mailto:vaccinations@bethanie.com.au)

## 4.5 Valid Medical Exemptions

Employees and volunteers who believe they may be medically exempt from receiving a vaccination will need to speak to their GP or health professional and provide written reasonable medical evidence from an authorised Australian registered medical practitioner.

Once this has been completed, employees and volunteers must provide the evidence to Human Resources team for consideration. Roles that provide direct care towards Bethanie customers including Residential, Home Care, Bethanie Housing Limited, and Villages will accept approved valid medical exemptions registered with the Australian Immunisation Register (AIR). Medical exemptions from an authorised Australian medical practitioner will be considered on an individual basis.

Employees and volunteers with approved valid medical exemptions will need to make reasonable attempts to obtain updated medical advice to consider new vaccines approved for use by the TGA after the exemption approval date.

Bethanie may also direct employees and volunteers to attend an authorised medical practitioner of its choosing to review vaccine exemptions or submitted medical evidence when additional information is required. This is due to the risk of transmission to Bethanie customers who may be more vulnerable to the impact of infectious diseases based on their age and health status.



For roles that do not provide direct care towards Bethanie customers, a risk assessment will be completed by the WHS team to determine what additional controls may be required including role modification and personal protective equipment.

If there is an imminent and high safety risk to employees, volunteers, customers or others, possible outcomes may include unvaccinated employees and volunteers being stood down from work, redeployed (if operationally possible) or review of their ongoing employment in line with the inherent requirements of the role.

## **4.6 New or Recruiting Employees and volunteers**

New or recruiting employees and volunteers members will be made aware of their responsibilities through the screening component of the Bethanie Group recruitment process.

## **4.7 Volunteers**

Volunteers (Category B) have the same WHS responsibilities as employees employed at Bethanie. Volunteers shall co-operate with management by providing acceptable evidence regarding their vaccination status and shall adhere to any requirements to be vaccinated according to the risk categories outlined above. Volunteers shall receive communication regarding this policy prior to committing to volunteering for Bethanie.

## **4.8 Other Personnel**

Other personnel such as direct care and allied health agency workers who are engaged to provide direct care to Bethanie customers in Bethanie Aged Care Homes (ACH's) shall supply acceptable evidence of COVID-19 and influenza vaccinations as per the requirements of this policy, prior to their engagement. For agency or labour hire employees, this is managed by the labour hire agency. Evidence may be required prior to entry to site.

For all other contractors including those who undertaken repair and maintenance work in ACH's, Bethanie highly recommends COVID-19 and influenza vaccinations, but it is not mandatory. Where possible, contractors and labour hire workers who are vaccinated for COVID-19 and influenza as eligible are preferred for all Bethanie sites.

## **4.9 Employees and Volunteers who Decline to be Vaccinated**

Employees and volunteers identified in occupations requiring vaccinations who decline to undertake vaccination shall take responsibility for their decision and have this appropriately documented. These employees and volunteers shall accept that due to WHS legislation and risk to customers, employees and volunteers and others, vaccinations are required in certain occupations to prevent serious illness.

**If vaccination is an inherent requirement of the position, due to government or lawful directions, Bethanie policy or WHS controls, declining to undertake vaccination may impact on ongoing employment.**

## **4.10 Work, Health and Safety Requirements**

Employers or persons conducting a business or undertaking (PCBU) have a duty under WHS legislation to eliminate or minimise the risks associated with COVID-19 and other VPDs in the workplace, so far as is reasonably practicable. Vaccination is proven to be the most effective control in reducing the risks to workers associated with COVID-19 and other VPDs and to protect the customer cohort who due to their age, are more vulnerable to the effects of COVID-19 and other VPDs.



Workers have a duty under WHS legislation to take reasonable care for their own safety and health at work and to avoid harming the safety and health of other people through any act or omission.

Workers must comply with reasonable instructions provided by their PCBU in the interests of safety or health. Workers shall cooperate with the PCBU when the PCBU carries out duties under the *Work, Health and Safety Act 2020*.

## 5 Consequences of Policy Breach

- This policy is binding on Bethanie employees and volunteers, as per Section 2: Scope and Applicability.
- Roles and Responsibilities in relation to this policy are set out in Section 6 below.
- Failure to comply with the policy may constitute a breach of the Bethanie Code of Conduct and business practices.

## 6 Roles and Responsibilities

Role	Responsibilities
Managers	<ul style="list-style-type: none"> <li>• Ensure workers are provided adequate instruction, information, training and supervision regarding the risks of infection associated with their work and the control measures they must adopt.</li> <li>• Inform workers of the vaccines that will be funded and provided by Bethanie, as well as informing them of other non-funded vaccines recommended by this policy.</li> <li>• Be aware of their duty of care relating to the placement of workers who remain non-immune through failure to seroconvert, have medical contraindications to vaccination or conscientiously object.</li> <li>• Maintain security and confidentiality of information about the vaccination status of workers.</li> <li>• Ensure workers exposed to blood and body fluids is managed promptly and appropriately in accordance with the Blood and Body Fluids Exposure Procedure and reported in ARCH.</li> <li>• Monitor levels of exposure and review infection control risk assessments as necessary to ensure that the existing vaccination protocol and risk control measures remain adequate, in conjunction with Senior Management and the Clinical Care &amp; Services team</li> <li>• Ensure that 'other persons' who are directly engaged at site to undertake tasks shall supply acceptable evidence of the immunisation requirements outlined prior to their engagement.</li> </ul>
Employees and volunteers	<ul style="list-style-type: none"> <li>• Adhere to policy and any instruction or training provided regarding infection control measures.</li> <li>• If non-immune, be aware and understand their duty of care obligation to the workplace.</li> <li>• Report immediately to their manager/supervisor any accident/incident, especially one involving exposure or potential exposure to third party blood or body fluids.</li> <li>• Co-operate with management by providing details including acceptable evidence regarding their immunisation status and attending independent medical reviews if directed to do so by Bethanie.</li> </ul>



<b>Role</b>	<b>Responsibilities</b>
Human Resources	<ul style="list-style-type: none"> <li>• Ensure acceptable evidence of the immunisation status of prospective employees is obtained during the recruitment process and recorded as instructed.</li> <li>• Ensuring that the security of information about the immunisation status of employees is confidentially maintained.</li> <li>• Reviewing and assessing all workers who are unwilling or unable to be vaccinated in accordance with this Policy.</li> </ul>
Volunteer Management Team	<ul style="list-style-type: none"> <li>• Ensure acceptable evidence of the immunisation status of volunteers is obtained and recorded during the recruitment process, and on an ongoing basis as required.</li> <li>• Ensure security of information about the immunisation status of volunteers is confidentially maintained.</li> </ul>
Clinical Care and Services	<ul style="list-style-type: none"> <li>• Review the risk categorisation outlined in this policy in association with other key internal (Bethanie) and external stakeholders to ensure that risk controls remain appropriate to the risks outlined, ensuring also that protocols remain consistent with existing national guidelines.</li> </ul>
Work, Health and Safety	<ul style="list-style-type: none"> <li>• Conduct risk assessments for workers who are medically exempt from mandatory vaccinations;</li> <li>• Conduct pre-employment health assessments that include immunisation status and risk factors (i.e. immunocompromise, chronic health conditions, medications.)</li> </ul>
Vaccination Team	<ul style="list-style-type: none"> <li>• Supporting the influenza and Covid-19 Vaccination programs in accordance with Bethanie Policy, recording all vaccination records on Chris21, and providing compliance reports to management as required.</li> <li>• Ensure the security of information about the immunisation status of employees and volunteers is confidentially maintained.</li> </ul>

## **7 Related Documents**

<b>Legislation</b>
<i>Work, Health and Safety Act 2020</i>
<i>Work, Health and Safety Regulations 2022</i>
<b>Governance frameworks &amp; policies</b>
<i>Workplace Health and Safety Policy</i>
<i>Workplace Health and Safety Framework</i>
<i>Employees and volunteers Vaccination Procedure</i>
<i>Employees and volunteers Vaccination Exemption Record</i>
<i>Exposure to Bloody and Bodily Fluids Procedure</i>
<b>Standards</b>
<i>Standard 7. Human Resources</i>
<i>Standard 8. Organisational Governance.</i>
<b>References</b>
<i>Managing COVID-19 risks in the workplace (8 July 2024) WorkSafe WA website</i>



## 8 Document Control

Approved by	Executive Team Meeting	Next Review	21 February 2026
Document Owner or Author	GM - WHS	Review Cycle	12 monthly
Version Number	4.9	Version Date	21 February 2025
Description of Change	Reviewed and transfer to new template		
Positions Consulted	General Manager - Clinical Care and Services, Operational Leadership Team		
Key Words	Vaccinations, exemptions, infectious disease, vaccine preventable disease, vaccine, immunisation, COVID, influenza, booster.		
Previous Versions	Description of Changes	Position	Date
1.0	Immunisation Policy introduced and approved by Executive Team	Safety Manager	12 Dec 2016
2.0	Immunisation Policy reviewed and changes were made and approved by the Crisis Management Team Title changed to Employees and volunteers Vaccination Policy Mandatory influenza vaccination and COVID-19 vaccination included	GM-WHS	15 Sept 2021
2.1	Employees and volunteers Vaccination Policy reviewed, and changes were made - approved by Crisis Management Team Section COVID-19 Vaccinations: inclusion of information on COVID-19 third dose or booster vaccines.	GM-WHS	13 Jan 2022
3.0	Employees and volunteers Vaccination Policy reviewed, and changes were made - approved by Chief People, Culture and Brand, noted by Crisis Management Team. Volunteers section updated: Volunteers will receive communication regarding this policy; Other Personnel section title updated: Other Personnel including contractors and agency/labour hire; Other Personnel section updated: Inclusion of "work related activities in Bethanie Aged Care Homes (ACH's); Inclusion of "this includes contractors for repair and maintenance work"; Employees and volunteers with medical exemptions section update: Inclusion of "medical exemptions need to be approved by the WA Chief Health Officer and registered with the Australian Immunisation Registry"; and Inclusion of a risk assessment to be completed to determine any additional controls for employees and volunteers with medical exemptions.	GM-WHS	21 Feb 2022
4.0	Employees and volunteers vaccination policy reviewed and updated to reflect the influenza vaccination mandatory requirement for 2022	GM-WHS	6 May 2022
4.1	Employees and volunteers Vaccination policy reviewed and updated to reflect the changes to the Home Care Order	GM-WHS	13 Jun 2022
4.2	Employees and volunteers Vaccination policy reviewed and updated to reflect the temporary exemptions for mandated employees and volunteers infected with COVID-19	GM-WHS	29 Jun 2022
4.3	Updated	GM-WHS	7 Nov 2022
4.4	Updated	GM-WHS	24 Nov 2022



4.5	Updated	GM-WHS	16 Mar 2022
4.6	Updated	GM-WHS	24 May 2023
4.7	Vaccination status for students and young volunteers updated	GM-WHS	31 July 2023
4.8	Moved to new policy template; Extensive changes made to align with ATAGI recommendations for COVID-19 vaccination schedule; Change of word staff to employees and volunteers; Updated worker risk categories; Change to one COVID vaccination requirement for new employees; and Change to influenza vaccination requirements where staff starting after 31 December, will be given temporary exemption until 31 May the following year. Stat	GM-WHS	18 February 2025