



**AFFILIATE**  
**2020-2021**

# COVID-19 Vaccination Policy & Record Keeping

*Employer obligations and considerations  
for aged care providers*

Workplace Relations ♦ Work Health & Safety ♦ Workplace Compliance ♦ Workplace Culture

**Anna Pannuzzo**

# Session Outline

## COVID-19 Vaccination Policy & Record Keeping

*Employer obligations and considerations  
for aged care providers*



- **Introduction**
- **Workplace Vaccination Policy**
- **Recordkeeping & Privacy**
- **Communication & Consultation**
- **Providing Info & Support**
- **Q & A**



# Introduction

# Mandatory Reporting

- Effective 15 June 2021 all **residential** aged care approved providers are required to report the COVID-19 vaccination status of their workforce.
- Effective 13 July 2021 **residential** aged care providers must also collect records of the COVID-19 vaccination status of residents.
- Effective 1 July 2021 all **home and community** aged care providers are required to be required to start keeping records of the COVID-19 vaccination status of their workforce.
- Effective 27 July all **home and community** aged care providers are required to report the COVID-19 vaccination status of their workforce.
- The new online reporting tool records de-identified data on the total number of aged care workers at each aged care service and, of those, the number of workers who have received a first dose or who are fully vaccinated against COVID-19.



# Mandatory Reporting



- The purpose of mandatory reporting:
  - **WHS / Infection Control**
  - **Risk Mitigation / Further Support**
- All residential aged care workers must have received at least the first dose of a COVID-19 vaccine by 17 September 2021. It will be a condition of employment.
- Today's session:
  - Your workplace vaccination policy, and
  - Employer obligations and considerations regarding the new reporting requirement.



# Workplace Vaccination Policy

# Vaccination Policy



- A workplace vaccination policy outlines the organisation's approach the vaccination of employees and the measures taken to reduce the work health and safety risks relating to infectious diseases such as influenza and COVID-19.
- A workplace vaccination policy supports managers, supervisors and staff to apply good work health and safety practices in your workplace by providing a consistent organisational approach to workplace vaccination.
- Your vaccination policy will usually be a component of your existing infection control policy.
- It is also a good idea to review your privacy policy, to ensure it accounts for the new reporting requirement.

# Your Vaccination Policy



## **Your vaccination policy should include:**

1. Information about your organisation's vaccination program and implementation plan
2. How you will manage communications, recordkeeping and privacy
3. Your processes for managing scenarios whereby an employee chooses not to be vaccinated
4. Employer and employee rights and responsibilities



Happy Home Residential Aged Care

## Worker Vaccination & Immunisation Policy

---

### Purpose

The purpose of this policy is...

This Policy supports recommendations within the following guidelines documents...

This Policy aligns with the following legislation...

### Scope & Requirements

All employees are required...

Employees not in compliance with this policy will be...

### Procedures

Our vaccination program and implementation plan...

Employees will be notified...

Happy Home Residential Aged Care will pay for all vaccinations...

Proof of vaccination...

Recordkeeping and privacy...

### Compliance Monitoring

Happy Home Residential Aged Care is responsible for...

### Reasonable Accommodation

Employees in need of an exemption from this ...

### Related Documents

The following documents are mandatory pursuant to...

### Supporting Information

The following information is supports...

### Definitions

The following definition(s) are relevant to

### Policy Contact

Enquiries relating to this Policy may be directed to...



# Recordkeeping & Privacy

# The Privacy Act



- Private sector employers' handling of employee records in relation to current and former employment relationships is exempt from the Australian Privacy Principles in certain circumstances.
- Not all personal information that an employer holds about an employee will be considered an employee record if it is not sufficiently related to their employment. Employers will need to bear this in mind when collecting and recording employee vaccination status data.
- Contractors, subcontractors and volunteers are not covered by the employee records exemption but will instead be governed by the restrictions in the relevant contract.

# Reporting Worker VAX status



- The new requirement is for weekly reporting via the My Aged Care provider portal. You will be prompted to provide de-identified employee vaccination status data:
  - total number of workers at each residential aged care service,
  - total number of workers at each service who have received a single dose of a COVID-19 vaccine,
  - total number of workers at each service who have received all required doses of a COVID-19 vaccine.
- National Aboriginal and Torres Strait Islander Flexible Aged Care Program (NATIFACP) providers who may be experiencing internet connectivity issues will be supported by the Department of Health to manually submit their data.

# Include All Workers



- Workers means all individuals, including volunteers, who access, or are reasonably likely to access the premises, e.g. nursing and personal care staff, allied health professionals, administration staff, kitchen, cleaning, laundry and garden staff.
- If an individual works across multiple sites with your organisation, you should include them in the data once for their primary site.
- You should include agency staff if their most regular and frequent shifts occur at one your residential aged care services.
- If an individual has declined to provide information on their vaccination status, you should still include them in the total number of workers at the service. (This may impact their employment status!)

# Collection & Handling



- Any personal information that you collect and maintain must adhere to privacy requirements and be kept secure.
- You are not required to collect or store workers' personal information in order to report on the vaccination status of the workforce.
- Only collect, use or distribute the minimum amount of personal information reasonably necessary to comply with government requirements and maintain a safe workplace.
- You do not need to report information on the type of vaccine (AstraZeneca or Pfizer) the worker has received or when or where the vaccination was administered. (This guideline may change!)
- If vaccination status information is collected, you must advise employees how this information will be handled.

# Collection & Handling



- Information reported to the Department of Health via the My Aged Care provider portal is high level, aggregate data.
- The information will be shared with state and territory governments to support their response to COVID-19.
- You should not provide personal details of employee vaccination status to the Department of Health.
- COVID-19 vaccination and/or disclosure of vaccination status is voluntary. From mid-Sep this will become mandatory.
- Your workers have a right to decline to provide this information without any recrimination or judgement.
- You should ensure your workers do not feel coerced or compelled to disclose information.

# Recordkeeping & Privacy

## Key Considerations



- **Collection & storage:** How will you securely handle the personal information?
- **Validation:** How you will validate employee vaccination status? Will you require proof?
- **Corrections:** How you will securely manage access to and corrections of personal information such as vaccination status?
- **Non-compliance:** The Aged Care Quality and Safety Commission will consider whether to take any regulatory action if an approved provider fails to meet these requirements.
- **Residents:** The reporting requirement now applies to the vaccination status of aged care residents.

# Recordkeeping & Privacy

## Tips



- You will need to communicate with your workers and residents how you will collect and report their personal information
- You will need to seek their agreement to confirm their COVID-19 vaccination status.
- The information you report to the Department of Health will not identify any individual.
- You should encourage your workers and residents to provide evidence of their vaccination status.
- Evidence may include:
  - a vaccination certificate or other evidence from a vaccine provider
  - an immunisation history statement from Medicare
  - a signed declaration or statement of their vaccination history which they can request from the Australian Immunisation Register
  - a record from a health practitioner.





# Communication & Consultation

# Duty to Consult



- Under OHS laws, employers who are making changes in the workplace to help slow the spread of COVID-19 must consult their workers.
- If there is a health and safety representative (HSR), they must be involved in the consultation.
- When consulting with your workforce, it is important to:
  - ✓ Have a good communication strategy
  - ✓ Have respectful conversations with your workers
  - ✓ Provide reliable, facts-based information
  - ✓ Share your organisation's stance on COVID-19 vaccination
  - ✓ Give your staff ample opportunity to respond, ask questions and discuss any concerns.

# Communication & Consultation

Sharing your organisation's stance on COVID-19 vaccination



**Sharing your organisation's stance on COVID-19 vaccination may include:**

- a review of any new or existing policies and processes, including the new data collection and reporting requirement,
- a review of relevant employer and employee rights and obligations,
- consider offering vaccination during work hours.



Happy Home Residential Aged Care

## Memorandum

To: All Employees  
Re: Changes to our WHS Infection Control Policy  
Date: 15 June 2021

---

Happy Home Residential Aged Care is committed to ensuring the health and safety of all staff and therefore encourages you to receive the COVID-19 vaccination, as outlined in our infection control policy. Health advice and information on how to get vaccinated can be accessed [here](#).

As of 15 June 2021, the Australian Government now requires all residential aged care approved providers to report the COVID-19 vaccination status of their workforce via My Aged Care on a weekly basis. Happy Home Residential Aged Care has reviewed and updated our WHS infection control policy in accordance with this new requirement.

Please find attached a copy of our revised WHS infection control policy.

Details on our new process for collecting and reporting your vaccination status are outlined in our revised WHS infection control policy. All records will be handled securely and will remain private and confidential.

A fact sheet for all workers on the new reporting requirement can be accessed [here](#).

Two team information sessions are being offered:

**When:** Friday 25<sup>th</sup> June at 9am and again at 4pm

**Where:** The meeting room.

In the meantime, if you have any questions or concerns in relation to this matter, please contact Zhang San, HR Manager, on (02) 999-9999.

Yours sincerely

Yannis Papadopoulos  
CEO  
Happy Home Residential Aged Care





# Providing Info & Support

# Reliable, Facts-Based Resources



## **When providing reliable, facts-based information, include:**

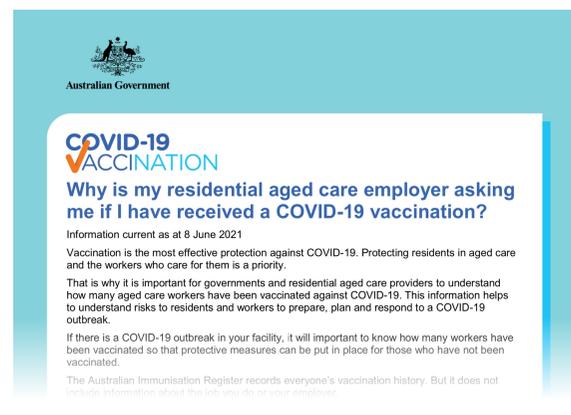
- Relevant vaccine-preventable diseases and why vaccination is important in your organisation.
- The types of vaccines available, including information on safety and effectiveness.
- When/where/how your workers can receive the COVID-19 vaccine.
- Why their vaccination status is being collected, including as part of your facility's COVID-19 preparedness and planning.
- A reminder of workers' rights e.g. that COVID-19 vaccination and disclosure is currently voluntary (SA excluded) but from 17 September COVID-19 vaccination will become a condition of employment.
- Where they can find additional information and support.

# Government Fact Sheets



Provide your workers with the following government fact sheets:

- “Why is my residential aged care employer asking me if I have received a COVID-19 vaccination?”
- “Why is my home and community aged care employer asking me if I have received a COVID-19 vaccination?”



# Health.gov.au



## Where can your employees get more information on COVID-19 vaccination?

The health.gov.au (DHHS) web site should be your first point of reference

[Information for residential aged care workers about COVID-19 vaccines](#) provides range of resources, for example:

- Making an informed decision about the COVID-19 vaccine
- Information on COVID-19 Pfizer (COMINARTY) vaccine
- Information on COVID-19 AstraZeneca vaccine
- Information sheets available in several languages

# Emotional Support



- Workplace change can be distressing for some employees.
- Discussions or requirements regarding personal information or vaccinations can also be triggering for some people.
- Make sure your staff know how to access support, such as an Employee Assistance Program (EAP).
- Immediate 24 Hour Crisis Support:
  - Lifeline on 13 11 14
  - Suicide Call Back Service on 1300 659 467
- Coronavirus Mental Wellbeing Support Service - call 1800 512 348
  - Chat online <https://cmwssonline.beyondblue.org.au/#/chat/start>



# Thank You

**Anna Pannuzzo**

(03) 9492 0958 | [info@workplaceplus.com.au](mailto:info@workplaceplus.com.au) | [www.WorkPlacePLUS.com.au](http://www.WorkPlacePLUS.com.au)