DIVISION OF DEPUTY VICE-CHANCELLOR
AND VICE-PRESIDENT (ACADEMIC)

THE UNIVERSITY OF ADELAIDE AUSTRALIA

# STUDENTS WITH PRESCRIBED COMMUNICABLE INFECTIONS POLICY

Authorised By: This policy was approved by the Executive Director, Student & Staff Services. As from 1 January 2007, the Deputy Vice-Chancellor and Vice-President (Academic) is responsible for this policy.

> *As from 7 July 2008, custodianship of this Policy was transferred to the Vice-President (Services and Resources); on 14 May 2013 custodianship of this Policy was transferred to the Deputy Vice-Chancellor and Vice-President (Academic)*

Date Authorised: 19 August 2003

Effective Date: 19 August 2003

Last Amendment Date: 14 December 2006

Review Due Date: November 2007

TRIM File Number: F. 2003/1628

Related Documents:

- *Infectious & Communicable Diseases Policy*, available at http://www.adelaide.edu.au/policies/250
- *Infection Control Guidelines for the Prevention of Transmission of Infectious Diseases in the Health Care Setting*, Commonwealth Department of Health and Ageing, available at http://www.health.gov.au/internet/wcms/publishing.nsf/Content/icg-guidelines-index.htm
- *Public and Environmental Health Act 1987* (SA), available at http://www.parliament.sa.gov.au/
- *Dental Practice Act 2001* (SA), available at http://www.parliament.sa.gov.au/
- *Disability Action Plan,* available at http://www.adelaide.edu.au/policies/136
- *Disability Discrimination Act 1992* (Cth), available at www.comlaw.gov.au

Implementation & Review: Deputy Vice-Chancellor and Vice-President (Academic)

Superseded Documents: N/A

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## 1. Overview

The University aims to promote a pro-active public health approach to prescribed communicable infections such as HIV/AIDS, Hepatitis B and Hepatitis C. It seeks to protect members of the public from these infections and to minimise their impact on students' academic progress. The University offers understanding and practical support to students with such infections, but also recognises that some of these students will not be able to complete their chosen program.

## 2. Scope *Amended Dec 2006*

This policy applies to all applicants for and commencing students in undergraduate and postgraduate Faculty of Health Sciences programs containing a clinical component where Standard Precautions apply, and which may involve exposure-prone procedures, with the partial exception of postgraduate Nursing programs (see 5.1.3 below).

## 3. Definitions *Amended Dec 2006*

*AIDS:* Acquired Immune Deficiency Syndrome

*Applicant:* a person applying for admission to a particular clinical program.

*Clinical program:* an academic program offered by the Faculty of Health Sciences that includes a clinical training or clinical research component where Standard Precautions apply, and that may involve exposure-prone procedures. Such programs currently include, but are not limited to, the following: Bachelor of Medicine, Bachelor of Surgery (MBBS), Bachelor of Dental Surgery, Bachelor of Oral Health, Graduate Diploma in Clinical Dentistry, Dentistry Bridging Program and Bachelor of Nursing.

*Commencing student:* a person who has accepted an offer of a place in a specific clinical program, and who intends to enrol or has enrolled in courses within that program for the first time.

*DIMA:* Department of Immigration and Multicultural Affairs, the Commonwealth government's administrative arm for immigration matters.

*DDA: Disability Discrimination Act 1992* (Cth), available at www.comaw.gov.au

*Domestic applicant:* a person applying for an undergraduate or postgraduate clinical program of the University, either as an Australian or New Zealand citizen, or as the holder of Permanent Residency (PR) status in Australia.

*Domestic commencing student:* a person who has accepted an offer of a place in a specific clinical program, and who intends to enrol or has enrolled in courses within that program for the first time, either as an Australian or New Zealand citizen, or as the holder of Permanent Residency (PR) status in Australia.

*Expert Panel:* South Australian Department of Human Services Panel on Healthcare Workers Infected with a Blood-Borne Virus. A part of the Communicable Disease Control Branch of the Department, the Panel provides advice on any risk to public safety associated with the work practices of a healthcare worker infected with HIV and/or Hepatitis B or C.

*Exposure-prone Procedures:* invasive procedures where there is potential for direct contact between the skin (usually finger or thumb) of the healthcare worker and sharp surgical instruments, needles or tissues (for example, spicules of bone or teeth) in body cavities or in poorly visualised or confined body sites, including the mouth of the patient. An exposure-prone procedure is any situation where there is potentially a risk of transmitting a blood-borne disease between a healthcare worker and a patient during a medical, dental or nursing procedure (*Infection Control Guidelines*, p31).

*HBV:* Hepatitis B

*HCV:* Hepatitis C

*HIV:* Human Immunodeficiency Virus, the virus that causes AIDS

*Infection Control Guidelines (ICG): Infection Control Guidelines for the Prevention of Transmission of Infectious Diseases in the Health Care Setting*, Commonwealth Department of Health and Ageing. The Guidelines have been endorsed by the Australian Health Ministers' Advisory Council (AHMAC), and are available at http://www.health.gov.au/internet/wcms/publishing.nsf/Content/icg-guidelines-index.htm The Guidelines and the *Immunisation Guidelines for Health Care Workers in South Australia* [available at http://www.dh.sa.gov.au/pehs/immunisation-index.htm] are the 2 principal reference documents for this policy.

*International applicant:* a person applying to an undergraduate or postgraduate clinical program of the University, neither as a citizen of Australia or New Zealand, nor as the holder of Permanent Residency (PR) status in Australia.

*International commencing student:* a person who has accepted an offer of a place in a specific clinical program, and who intends to enrol or has enrolled in courses within that program for the first time, neither as a citizen of Australia or New Zealand, nor as the holder of Permanent Residency (PR) status in Australia.

*Prescribed Communicable Infection (PCI):* Infection with HIV or any other viral or bacterial infection prescribed in the regulations attached to the *Dental Practice Act 2001* (SA). In addition to HIV, the current PCIs are Hepatitis B (HBV) and Hepatitis C (HCV).

*Recognised Medical Provider:* either a general practitioner or specialist doctor registered in Australia to provide medical services through Medicare, or a panel doctor approved by the Australian Government to conduct medical tests in overseas countries for immigration purposes. A complete listing of approved panel doctors in each country is available on DIMA's Website, at http://www.immi.gov.au/contacts/panel-doctors/index.htm

*Standard Precautions:* standard clinical operating procedures required to achieve a basic minimum level of infection control, recommended for the treatment and care of all patients, regardless of their perceived infection risk. They apply to all body fluids, secretions and excretions (excluding sweat, and regardless of whether they contain visible blood), non-intact skin and mucous membranes. Standard Precautions include aseptic technique, hand-washing, use of personal protective equipment, and safe systems for the handling and disposal of sharps and other possibly contaminated or infectious waste (*Infection Control Guidelines*, Part 1).

## 4. Policy Principles

### 4.1 Preventing the Transmission of PCIs

The University has an obligation and commitment to take all reasonable measures to prevent the transmission of prescribed communicable infections among students, staff members and visitors.

#### 4.1.1 Laboratory Work

Academic areas working with human blood, tissue and organs adopt Standard Precautions (see 3. Definitions above) to prevent PCI transmission, and students working in such areas are trained in infection control procedures.

### 4.1.2 Clinical Work

The University has an obligation and commitment to protecting the health of patients who access its clinical and research facilities and those of its teaching hospitals. Accordingly, the University accepts the recommendation of the *Infection Control Guidelines* that students with HIV, HBV or HCV do not perform exposure-prone or deeply invasive procedures that involve the risk of transmission of the virus to patients (Section 24.6).

## 4.2 Discrimination and PCIs

a The University aims to provide a work and study environment that is free from discrimination, and challenges views that result in discriminatory attitudes toward people with PCIs.

b The University maintains a *Disability Action Plan* (available at http://www.adelaide.edu.au/policies/136) and all staff and students must abide by its provisions.

c The *Disability Discrimination Act 1992* (Cth) [available at www.comlaw.gov.au] defines the presence in the body of organisms causing or capable of causing disease or illness as a disability [Section 4(1)]. It is unlawful for an educational authority to discriminate against a person on the grounds of his or her disability.

d However under this Act, it is not unlawful to discriminate against a person on the ground of his or her disability if:

   i the person's disability is an infectious disease; *and*

   ii the discrimination is reasonably necessary to protect public health (Section 48).

e In the area of prescribed communicable infections, the University has a responsibility to balance community needs, safe clinical practice, and legal requirements in public health and occupational health and safety.

## 4.3 Confidentiality

In accordance with the University's *Privacy Policy* (available at http://www.adelaide.edu.au/policies/62), and outside of statutory disclosure requirements, the University maintains strict confidentiality on the status of students in relation to prescribed communicable infections.

# 5. Procedures

## 5.1 Clinical Training and Research Programs

### 5.1.1 School of Dentistry Programs

It is not possible to undertake dental clinical training or research without performing exposure-prone procedures on patients. Due to the requirements of the *Dental Practice Act 2001* (SA), the University cannot allow students with a PCI to perform exposure-prone procedures on patients. Such students are thereby unable to complete the requirements of any of the clinical programs or research projects offered by the School of Dentistry – for example, Bachelor of Dental Surgery, Graduate Diploma in Clinical Dentistry, Dentistry Bridging Program.

### 5.1.2 Medical and Other Faculty of Health Sciences Programs

Other types of medical and Health Sciences clinical training and research programs do not necessarily involve performing exposure-prone procedures on patients, and so it may be possible for students with a PCI to complete the requirements of such a program – for example, Bachelor of Medicine, Bachelor of Surgery; Bachelor of Nursing.

### 5.1.3 Postgraduate Nursing Programs *Added Dec 2006*

Applicants to and commencing students in the University's postgraduate Nursing programs are subject to the PCI declaration and immunisation requirements of the health agencies that employ them, and are thereby generally exempt from the requirements of this policy. However if, as part of

their studies, students in these programs wish to complete a placement as an observer in an area that is outside their employing health agency and that involves exposure-prone procedures, they must first meet the standard PCI requirements of this policy and provide evidence to the Faculty of Health Sciences or the relevant school of their PCI status.

### 5.2 Applicants and Commencing Students in Health Sciences Clinical Programs

#### 5.2.1 All Applicants and Commencing Students *Amended Dec 2006*

a All applicants and commencing students for Faculty of Health Sciences clinical programs are required to provide the Faculty or the relevant School with written evidence of their status in relation to PCIs. This evidence must be in the form of results supplied through a recognised medical provider (see 3. Definitions above) of a blood test taken not more than one calendar month previously, and must specify:
   - Hepatitis B antigen and antibody; *and*
   - Hepatitis C antibody; *and*
   - HIV/AIDS antibody.

   Applicants who do not present this evidence will not be considered further, and commencing students may have their enrolment cancelled.

b Where there is some uncertainty or inconsistency in relation to an applicant or commencing student's PCI evidence, the University reserves the right to request additional tests and to refer the test results to a recognised medical provider or the Expert Panel for advice.

c Applicants and commencing students who do not have immunity against Hepatitis B must complete a full course of HBV vaccination.

d Applicants intending to take up deferred offers to clinical programs must provide the relevant School with recent evidence of their status in relation to PCIs, under the same terms and conditions as those in 5.2.1 to 5.2.3.

e Medical and other expenses associated with the requirements of this policy are the sole responsibility of the applicant or commencing student.

f Tuition fees already paid to the University by commencing students whose enrolment in a clinical program offered by the Faculty of Health Sciences is withdrawn on the basis of the Expert Panel's advice will be refunded in full. All other expenses that may have been incurred by such students in their application, admission and/or enrolment in a clinical program, including airfares and accommodation, will not be reimbursed.

#### 5.2.2 Domestic Applicants and Commencing Students

Domestic applicants and commencing students in clinical programs are only required to provide evidence of their PCI status once they have been made an offer to a clinical program. Those who test positive for a PCI will have their results referred to the Expert Panel for assessment.

i If the Panel advises the Executive Dean of the Faculty of Health Sciences, or nominee, that particular PCI-positive applicants or commencing students can safely undertake the clinical component of their chosen program without modification, or can safely undertake it with the implementation of specified reasonable modifications and/or medical treatment programs, the application and enrolment process will continue in the normal way.

ii If the Panel advises that particular PCI-positive applicants cannot safely undertake the clinical component, the admissions process for their chosen program will be immediately terminated. Other program preferences, if any, may then be considered.

iii If the Panel advises that particular PCI-positive commencing students cannot safely undertake the clinical component, they will be withdrawn from any courses in which they have enrolled.

#### 5.2.3 International Applicants and Commencing Students *Added Dec 2006*

International applicants are required to undertake a PCI test before the scheduled date of their entry selection interview, so that they are aware of their own PCI status. At the interview, they are required

to sign a declaration confirming that they are aware of their PCI status, that they do not have a PCI and that they understand that, should their application be successful, they will be further tested for PCIs when they arrive in Adelaide. These PCI requirements are repeated in offer letters.

Those who test positive for a PCI will have their results referred to the Expert Panel for assessment.

i If the Panel advises the Executive Dean of the Faculty of Health Sciences, or nominee, that particular PCI-positive applicants or commencing students can safely undertake the clinical component of their chosen program without modification, or can safely undertake it with the implementation of specified reasonable modifications and/or medical treatment programs, the admissions and enrolment process will continue in the normal way.

ii If the Panel advises that particular PCI-positive applicants cannot safely undertake the clinical component, the admissions process for their chosen program will be immediately terminated, and they will not be made an offer. Other program preferences, if any, may then be considered.

iii If the Panel advises that particular PCI-positive commencing students cannot safely undertake the clinical component, they will be withdrawn from any courses in which they have enrolled.

### 5.3 Current Students in Health Sciences Clinical Programs

#### 5.3.1 School of Dentistry Programs

a Under the *Dental Practice Act 2001* (SA), all School of Dentistry students are required to register with the Dental Board of South Australia. School of Dentistry students who become aware of having a PCI are required to notify the Dental Board, as are their treating doctors. Such students are strongly advised to discuss their situation with the Dean with a view to receiving appropriate counselling on treatment and study/career options, and are encouraged to bring a support person with them.

b Where a student in a clinical program offered by the School of Dentistry becomes aware of having a PCI, and on the advice of the Expert Panel cannot safely undertake the required clinical training or research, the Executive Dean will withdraw his or her enrolment in the program.

#### 5.3.2 Medical and Other Health Sciences Programs

a A student in a clinical program offered by the Faculty of Health Sciences who becomes aware of having a PCI is strongly advised to discuss the situation with the Executive Dean. The student is encouraged to bring a support person with them.

b The Executive Dean will provide appropriate counselling on options regarding treatment and study/career paths, and will consider reasonable modifications, in consultation with the Expert Panel and relevant staff of the University's teaching hospitals, to allow him or her to complete the clinical program. However if the Expert Panel advises that the student cannot safely undertake the required clinical training or research, the Executive Dean will withdraw his or her enrolment in the program.

### 5.4 Refunds

#### 5.4.1 Refunds for International Students

Tuition fees already paid to the University by current students whose enrolment in a clinical program offered by the Faculty of Health Sciences is withdrawn on the basis of the Expert Panel's advice will be subject to the relevant provisions of:

- *Refund Policy for International Students*, available at http://www.adelaide.edu.au/policies/61
- *Refund of Tuition Fees in Special Circumstances Policy*, available at http://www.adelaide.edu.au/policies/683/

### 5.4.2 Refunds for Domestic Students

Tuition fees already paid to the University by current domestic students whose enrolment in a clinical program offered by the Faculty of Health Sciences is withdrawn on the basis of the Expert Panel's advice will be subject to the relevant provisions of:

- *Student Tuition Fees Policy*, available at http://www.adelaide.edu.au/policies/20
- *Remissions Policy – Remission of Commonwealth Assistance and Re-crediting of Student Learning Entitlement in Special Circumstances*, available at http://www.adelaide.edu.au/policies/67/
- *Refund of Tuition Fees in Special Circumstances Policy*, available at http://www.adelaide.edu.au/policies/683/

### 5.5 Counselling and Transfer Arrangements

a Students who cannot safely undertake the required clinical training or research and are precluded under the provisions of this policy from completing their chosen clinical program, will receive support and counselling from the Faculty of Health Sciences. The Executive Dean or nominee will negotiate with the University's Manager, Student Administration, or the International Office, as appropriate, regarding possible program transfer arrangements.

b Additional counselling is available through the Parklands Medical Centre (North Terrace campus), the Adelaide University Union, Student Support Services, or the Communicable Diseases Unit of the SA Department of Human Services (refer to Section 24.6 of *Infection Control Guidelines*).

## 6. Responsibilities

| AREA/POSITION | RESPONSIBILITY |
|---|---|
| Manager, Student Administration International Office | • Refer to and provide access to the *Students with Prescribed Communicable Infections Policy* in University publications and promotional material involving Faculty of Health Sciences programs that include a clinical component |
| Executive Dean, Faculty of Health Sciences, or nominee | • Implement infection control procedures and Standard Precautions<br>• Determine whether reasonable modifications are possible for PCI-positive students in Faculty of Health Sciences clinical programs not offered by the School of Dentistry<br>• Determine where offers to and enrolments in School of Dentistry programs should be withdrawn or cancelled<br>• In cases of preclusion on the basis of a PCI, negotiate with the Manager, Student Administration or International Admissions regarding possible program transfer options<br>• Counsel students with a PCI and refer them to appropriate support agencies |
| Area Administrators, Health Sciences | • Ensure that all publications for prospective and current students make clear the policy PCI-positive students and include reference to the *Students with Prescribed Communicable Infections Policy* |
| All applicants to Faculty of Heatlh Sciences clinical programs, with the | • Provide relevant School with written evidence of their status in relation to PCIs |

| AREA/POSITION | RESPONSIBILITY |
|---|---|
| partial exception of postgraduate Nursing programs (see 5.1.3 above) | |
| All applicants and commencing and continuing students in Faculty of Health Sciences clinical programs | • Be aware of their HIV, HBV and HCV infection status |
| All students in Faculty of Health Sciences clinical programs who test positive for HIV, HBV or HCV | • Notify relevant School or Faculty staff of their infection status |
| All staff and students of the University | • Follow procedures that prevent the transmission of infectious diseases<br>• Adhere to the non-discriminatory provisions of this policy and the University's *Disability Action Plan* |

7. Implementation and Review: Faculty of Health Sciences, Admissions Office, International Office

8. Delegations of Authority

| Key | Authority Category | Authority | Delegation Holder | Limits |
|---|---|---|---|---|
| Academic | Admissions | Approve applicants' compliance with PCI admissions requirements for Health Sciences clinical programs | Executive Dean of Faculty of Health Sciences | Recommendation of Expert Panel |

9. Communication

a Relevant provisions of the *Students with Prescribed Communicable Infections Policy* will be included or referred to in all University publications related to Faculty of Health Sciences programs with a standard clinical component that may involve exposure-prone procedures.

b This policy is available on the University's Policies Website at http://www.adelaide.edu.au/policies/591/