



Pandemic Vaccinations Policy

- OVERVIEW
- SCOPE AND APPLICATION
- POLICY PRINCIPLES
- AUTHORITIES
- PROCEDURES
- DEFINITIONS

OVERVIEW

The University of Adelaide has a duty of care to ensure, so far as reasonably practicable, a safe workplace for all staff (and other workers) and a safe environment for students and others in the workplace. Pandemics present unique challenges and can give rise to the need to make a broad direction regarding a vaccination mandate and/or alternative controls for those whom are unvaccinated in order to manage the University's responsibilities under the [Work Health and Safety Act 2012 \(SA\)](#).

SCOPE AND APPLICATION

This policy applies to the [University Community](#). Capitalised terms have the meaning set out in the Definitions section of this policy.

POLICY PRINCIPLES

Creation of a Direction

1. The Vice-Chancellor and President can provide a formal Direction to the [University Community](#) regarding vaccination and/or alternative controls for those who remain unvaccinated where:
 - a. a pandemic has been declared by the World Health Organisation; and
 - b. there is a risk of workplace exposure to and transmission of the pandemic pathogen that represents a risk to the health and safety of members of the University Community; and
 - c. vaccines for the pandemic have been approved (provisionally or fully) by the Australian Government for a population with characteristics that are consistent with the University Community; and
 - d. the approved (provisionally or fully) vaccines are available to those affected by the Direction.
2. Any Direction will be based on a risk assessment.
3. Any Direction will be the subject of appropriate consultation processes in accordance with the requirements of the [Work Health and Safety Act 2012 \(SA\)](#) and the [Enterprise Agreement](#). Collection, use and disclosure of any personal information under a Direction must occur in compliance with the *Privacy Act 1988* (Cth).
4. A Direction made under this policy will stipulate a timeline to comply that is reasonable having regard to the circumstances and will stipulate any exemptions that may apply.

5. For the purposes of employment, a Direction made in accordance with this Policy will be considered a reasonable and lawful direction.

Communication of a Direction

6. The Direction will be broadly communicated to those affected using the available communication channels at the time it is issued e.g. email, staff/student news, website.
7. Information on the Direction will be available to prospective staff and students, to potential attendees at events where the Direction would apply, and on web site information regarding publicly accessible facilities such as the Libraries and Museums.

Non-Compliance with a Direction

8. Failure to follow a Direction may lead to:
- disciplinary action, up to and including termination of employment for staff;
 - termination of title for titleholders in accordance with the [Titleholder – Conferral of Honorary Roles Procedure](#);
 - an inability to complete the core components of a course for students resulting in a failure to be able to complete their course;
 - disciplinary action in accordance with the [Student Misconduct Policy](#).
 - being unable to contribute as a volunteer;
 - being unable to attend at the University's campuses, locations, activities or events (including graduation ceremonies).

AUTHORITIES

Key	Authority Category	Authority	Delegation Holder	Limits
Human Resources	Health Safety and Wellbeing	To issue a Direction in accordance with this Policy	Vice-Chancellor and President	Nil
Human Resources	Health Safety and Wellbeing	Authorise operational exceptions to a Direction	Chief Operating Officer	Nil

PROCEDURES

9. Creation of a Direction

Responsibility: *Vice-Chancellor and President*

- Must ensure that a risk assessment is undertaken to inform any consideration of a draft Direction. Where a risk assessment shows that vaccination and/or the directed alternative controls are a reasonably practicable solution to reduce the risk to health and safety then a Direction will be given serious consideration.
- Must ensure that any draft Direction contains specific information on:
 - whom the Direction applies to;
 - the type and/or level of vaccination and/or alternative controls required;
 - the date/s by which individuals impacted by the Direction must comply;
 - any exemptions that apply and how these will be managed; and what declaration of Evidence of Vaccination, Exemption or Testing is required.
- Must ensure that appropriate consultation is undertaken on any draft Direction in accordance with the [Enterprise Agreement](#) and the [Work Health and Safety Act 2012 \(SA\)](#).

-
- d) Must ensure that any Direction is communicated as broadly as reasonably practicable.

10. Compliance with a Direction

Responsibility: *The University Community*

- a) Must comply with any Direction applicable to them made by the Vice-Chancellor and President under this Policy; including compliance with the timeframe stipulated within the Direction.
- b) Must provide verification of Vaccination, Exemption, or Testing in accordance with any applicable Direction, including as required making a declaration and showing Evidence of Vaccination, Exemption or Testing to a supervisor (for staff and title holders), a course coordinator (for students; or a supervisor for higher degree research students), or any authorised Marshals undertaking checks or audits of compliance with any Direction.

11. Managing non-Compliance with a Direction – Staff

Responsibility: *Supervisors*

- a) Ensure that staff non-compliance with any Direction is managed in accordance with the [Disciplinary Procedures for Misconduct and Serious Misconduct \(Clause 8.2\)](#) in consultation with their HR Advisor.

12. Managing non-Compliance with a Direction – Students

Responsibility: *Executive Director Student Experience*

- a) Ensure that student non-compliance with any Direction is managed in accordance with the [Student Misconduct Policy](#).

13. Managing non-Compliance with a Direction – Title Holders

Responsibility: *Head of School*

- a) Ensure that title holder non-compliance with any Direction is managed in accordance with the [Titleholder – Conferral of Honorary Roles Procedure](#) in consultation with their HR Advisor.

14. Managing non-Compliance with a Direction – Contractors

Responsibility: *Contract Managers*

- a) Ensure that contractor non-compliance with any Direction is managed in accordance with the terms of the contract.

15. Managing non-Compliance with a Direction – Volunteers

Responsibility: *Volunteer Coordinators*

- a) Ensure that volunteer non-compliance with any Direction is managed in accordance with the [University Volunteer Policy](#).

16. Managing non-Compliance with a Direction – Lessees

Responsibility: *Director Strategic Portfolio Management*

- a) Ensure that lessee non-compliance with any Direction is managed in accordance with the lease.

17. Operational exceptions

Responsibility: *Chief Operating Officer*

- a. May authorise an exception to a Direction based on a critical business need or an unforeseen circumstance where the Chief Operating Officer believes that the business need justifies an exemption.

18. Rescinding a Direction

Responsibility: *Vice-Chancellor and President*

- a) Where it is determined by the Vice-Chancellor and President that the Direction is no longer required the Direction may be rescinded and this communicated to the University Community.
- b) Must review any Direction issued:
 - i) when the pandemic for which it was issued is declared as over by the World Health Organisation; or
 - ii) at the end of each three months after issuing any Direction to ensure that it is still proportionate to the risk.

DEFINITIONS

Direction means a Direction created in accordance with the Policy.

Evidence of Vaccination means evidence of a personal vaccination digital certificate or equivalent provided through a formal government app (such as myGov or Medicare apps), a copy of a formal vaccination certificate, an immunisation history statement, or an international vaccination Certificate. For those pandemic pathogens that confer immunity after infection evidence may include antibody testing or documented history of viral infection.

Evidence of Exemption means an exemption from the requirements of a Direction in a form reasonably required by the University and set out in the relevant Direction.

Evidence of Testing means evidence of the outcome of the type of test required which may be an email or SMS from the appropriate testing authority or photographic evidence where self-administered tests, approved by the Therapeutic Goods Administration, are permitted under the Direction, or other evidence as stated in a direction.

Pandemic means an epidemic declared by the World Health Organisation (WHO) to be a pandemic.

University Community means every person who undertakes or participates in University of Adelaide related activities, uses University of Adelaide facilities and/or are employed or engaged by the University. This includes but is not limited to employees, title holders, volunteers, students, visitors or third parties engaged by the University under a contract of service or a contract for service (including occupants or co-location partners).

RMO File No.	F.
Policy Custodian	Chief Operating Officer
Responsible policy officer	Director Health, Safety and Wellbeing
Endorsed by	Vice-Chancellor's Executive on <<DATE>>
Approved by	Vice-Chancellor and President on <<DATE>>
Related Documents and Policies	Enterprise Agreement Student Misconduct Policy University Volunteer Policy Titleholder – Conferral of Honorary Roles Procedure ;

Related Legislation	Work Health and Safety Act 2012 (SA)
Superseded Policies	
Effective from	<<DATE>>
Review Date	<<DATE>>
Contact for queries about the policy	Gerald Buttfield, Director HSW, 831 36079 / 0410 422 737 gerald.buttfield@adelaide.edu.au

DRAFT POST CONSULTATION