



PURPOSE

This policy outlines 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.

SCOPE

This policy applies to all visitors and volunteers working on school sites. A separate policy exists for Teaching Service and school council employees.

POLICY

Requirements for schools and the Department

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:

- 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.
- Collect, record and hold vaccination information for all visitors and volunteers working on school sites who will or may be in close proximity to children, students or staff.
- 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.

Required 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)

What is vaccination information used for?

Your health information, including vaccination information, is collected, recorded, stored and used in accordance with the Health Records Act 2001 (Vic) and the Public Records Act 1973 (Vic).



Vaccination information collected about a relevant employee will be used for the purpose of complying with vaccination directions, and will only be provided to people who require the information to support compliance with the vaccination directions.

Medically 'excepted persons'

In line with vaccination directions, relevant employees may be able to show that they are an 'excepted person'.

From 18 October 2021, relevant employees who are considered 'excepted persons' under the vaccination directions can resume or continue face-to-face duties.

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 or
- 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

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).

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.

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)).

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
- casual school council employees, including casual written examination supervisors employed by school councils
- 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)

Schools do not need to collect, record or hold vaccination information for the following categories of visitors or volunteers:

- 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
- a person carrying out assessments of an oral or performance examination as part of the Victorian Certificate of Education or International Baccalaureate or a person working as a venue coordinator for those examinations
- 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.

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.



Once information that a volunteer or visitor working on school sites is fully vaccinated has been received, no further vaccination information is required.

If the school has 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 updated vaccination information will need to be collected 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.

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
- carry out assessments of an oral or performance examination as part of the Victorian Certificate of Education or International Baccalaureate or a person working as a venue coordinator for those examinations
- 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 exceptional 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:
 - issue a clear verbal direction to leave the school immediately due to the need to protect the health and safety of students and staff at the school
 - immediately notify the regional office and report the incident to ISOC on 1800 126 126
- if the person becomes aggressive or refuses to leave the school grounds the principal should direct students away from the area and immediately call Victoria Police to seek their assistance to remove the non-employee work from the grounds.
- follow up the matter by:
 - writing to the worker to clearly explain that the worker has no permission to attend the school site
 - consider whether a Trespass Warning Notice may be appropriate in the circumstances - schools may seek advice from the Legal Division
 - seek wellbeing supports for any impacted employees or students who witnessed or were involved in the exchange.

RELATED POLICIES AND RESOURCES

- [COVID-19 Vaccinations – Teaching Service and School Council Employees Policy](#)

REQUIRED METHOD OF COMMUNICATION

- School Website
- Staff newsletter
- Contractor Inductions
- School Newsletter

REVIEW CYCLE

DATE	VERSION	RATIFIED BY	NEXT REVIEW
Oct 2021	1	Portland Secondary College School Council	April 2022 or prior if required