

# **Caulfield South Primary School**

**C.S.P.S.**

## **COVID-19 Vaccinations – Visitors and Volunteers Working on School Sites**

School operations

### **Policy**

The purpose of this policy is to outline 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 and to manage the Department's vaccination requirements relating to parents and carers on school sites.

For policy on vaccination requirements for teaching service staff and school council employees refer to: [COVID-19 Vaccinations – Teaching Service and School Council Employees](#).

### **Summary**

- Schools have obligations to 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.
- The Department will collect, and schools are not required to collect, record or hold vaccination information about staff who are directly employed by the Department or a government school council, or Department staff attending school sites because the Department will collect this information.
- The Department will collect, and schools do not need to collect, record or hold vaccination information about:
  - cleaners engaged by the VSBA in metropolitan Melbourne
  - 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.
- The Department will ensure that only vaccinated cleaners and TSSP technicians and resources attend school premises.
- 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.
- School councils that engage a third party early childhood education and care operators including outside school hours care (OSHC) are not required to collect, record and hold vaccination information about the operators workers employed by external OSHC providers engaged by the school council because that information must be collected by the provider.
- Schools must collect, record and hold vaccination information for all other visitors and volunteers working on school sites.

- When collecting vaccination information from volunteers and visitors working on school sites, the following record keeping requirements apply. Schools must record at least the following information:
  - the name of the worker or individual accessing the site
  - their vaccination status
  - their vaccine appointment booking (if relevant)
  - who sighted the evidence
  - the date the evidence was sighted
  - the nature of that evidence that has been provided (for example, COVID-19 vaccine digital certificate, immunisation history statement, or medical exception letter or certificate).
- Schools do not need to collect vaccination information that is already collected unless further information is required (for example, the worker needs their second dose).
- Schools must also follow the vaccination requirements in relation to parents, carers and other adult visitors not performing work on school sites as outlined in this policy.

## Details

### Vaccination requirements

Under the COVID-19 Mandatory Vaccination (Specified Facilities) directions issued by the Victorian Chief Health Officer (vaccination directions) schools must ensure that all visitors and volunteers who attend to perform work must comply with vaccination requirements.

Schools must take all reasonable steps to ensure that unvaccinated visitors and volunteers do not enter, or remain on, the school premises for the purposes of performing work at the school unless they are an excepted person.

For policy on vaccination requirements for teaching service staff and school council employees refer to: [COVID-19 Vaccinations – Teaching Service and School Council Employees](#).

The following information outlines how schools must manage the vaccination requirements for all other visitors and volunteers working on school sites, including how they collect and record relevant vaccination information.

Schools must also ensure that parents and carers entering school buildings are vaccinated in accordance with this policy.

### 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 has received their COVID-19 vaccine(s)
- a certificate of immunisation (for example, a COVID-19 digital certificate)
- an immunisation history statement obtained from the Australian Immunisation Register
- a COVID-19 medical exemption certificate issued by the Australian Immunisation Registry.

Note: As at 12 November 2021, vaccination information relating to a medical exception must be evidenced by a COVID-19 medical exemption certificate issued by the Australian Immunisation Registry.

Only certain medical practitioners can provide a letter. For more information, refer to the topic below: Which medical practitioners are able to provide the exemption certificate?

### **Medically 'excepted persons'**

In line with the vaccination directions, parents, carers, and volunteers and visitors working on school sites may be able to show that they are an 'excepted person'. Volunteers and visitors working on school sites who are considered 'excepted persons' under the vaccination directions may attend school sites to conduct their work. Parents and carers who are considered 'excepted persons' may also enter school buildings.

This is a very limited category and applies only if the person has obtained an Australian Immunisation Register immunisation medical exemption certificate from their medical practitioner that they are unable, due to a medical contraindication or an acute medical illness (including SARS-CoV-2), to receive a dose, or a further dose, of a COVID-19 vaccine.

#### ***Which medical practitioners are able to provide the exemption certificate?***

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
- an infectious disease physician
- a clinical immunologist
- 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)
- a paediatrician
- a medical practitioner who is a fellow of the Royal Australasian College of Physicians.

This means that 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.

Managing vaccination requirements for visitors and volunteers working on school sites

#### ***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.

A template letter that school councils can use to advise contractors and other services of the vaccination information requirements (other than OSHC providers) is available at: [Template Letter School Council to Contractor Service Provider or Licensee Compliance with Vaccination Health Direction \(Word\)](#) (staff login required).

A template letter that school councils can use to inform OSHC providers about the vaccination information requirements is available at: [Template Letter School Council](#)

to [OSHC Provider Compliance with Vaccination Health Direction \(Word\)](#) (staff login required).

***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.

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)).

For further information on this process refer to: [COVID-19 Vaccinations – Teaching Service and School Council Employees](#).

2. The Department will collect and schools are not required to collect vaccination information for staff of a limited number of contractors whose contracts are managed by the Department 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.

For the purposes of this policy, this includes, but is not limited to:

- casual relief teachers engaged through an agency
- providers of incursions
- Breakfast Club suppliers
- IT personnel (not engaged by school ICT and TSSP as they will be managed centrally as per above)
- pre-service teachers 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, Assessments Australia staff 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 as per paragraph 1 and 2).

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.

All volunteers and visitors working on school sites listed in paragraph 3 above must provide vaccination information prior to or when attending on site. If unable to provide evidence of vaccination, they must be directed to leave the school.

A [template vaccination status register \(Word\)](#) (staff login required) is available as an optional tool for schools to use to collect and record vaccination status information for visitors and volunteers working on school sites, refer to the section on record keeping procedures and requirements below.

If you have collected information that a volunteer or visitor working on school sites is fully vaccinated, you do not need to collect any further vaccination information from them.

If you have collected information that a volunteer or visitor working on school sites is partially vaccinated then you will need to collect updated vaccination information 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.

#### ***Casual written examination supervisors employed by school councils***

Casual school council employees are expected to upload their vaccination information through the eduPay system.

Casual written examination supervisors may need to be engaged by school councils at short notice to be able to cover assessment period requirements.

Where a casual school council employee is unable to access eduPay in a timely manner, schools may collect this information directly from employees to allow assessment to proceed. Information should be collected in accordance with the record keeping procedures and requirements below.

Casual school council employees are still required to provide their vaccination information through eduPay at the earliest opportunity.

#### ***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 procedures and requirements***

Schools must have procedures in place for collecting, recording and storing vaccination information.

When collecting vaccination information from volunteers and visitors working on school sites, the following record keeping requirements apply:

- Schools must record at least the following information:
  - the name of the worker or individual accessing the site
  - their vaccination status
  - their vaccine appointment booking (if relevant)
  - who sighted the evidence
  - the date the evidence was sighted
  - the nature of that evidence (for example, COVID-19 vaccine digital certificate, immunisation history statement, or medical exception letter or certificate).
- Any information or documents collected from visitors and volunteers working on school sites 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.
- Schools should provide the data collection statement to persons providing their vaccination information, refer to: [Data Collection Statement Contractors and Volunteers \(Word\)](#).

Schools are encouraged to maintain a vaccination register for visitors and volunteers managed at the school-level, which lists the name of the person, whether or not the required information has been provided and whether any updated information needs to be provided at a later date (for example, for persons who are only partially vaccinated). A [template vaccination status register \(Word\)](#) (staff login required) can be used to ensure visitors and volunteers working on a school site are not asked multiple times for information they have already provided,

### ***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.

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, refer to: [School Operations Guide \(Word\)](#) (staff login required).

### **Vaccination requirements for parents, carers and other visitors not performing work**

All parents, carers and other visitors attending schools, including for drop off and pick up must also adhere to physical distancing, density limits, face mask requirements and practise respiratory etiquette and good hand hygiene.

Parents, carers and other adult visitors not performing work who enter school buildings must check in using the QR code and schools must sight vaccination information, but do not need to collect, record or hold the information.

Parents, carers and other adult visitors who enter school buildings must also have had at least one dose of COVID-19 vaccine and must have had two doses of COVID-19 vaccine by 29 November 2021 or have a valid medical exception with the following limited exceptions:

- when attending to administer medical treatment to their own child when the treatment cannot be administered by the school
- when attending to collect their child who is unwell and cannot leave the school building unaccompanied by their parent/carer
- when attending for a momentary period that does not involve any sustained contact with staff or students, for example, to collect a completed art project or similar.

This vaccination requirement applies to all school activities inside school buildings, including but not limited to tours, graduations, kindergarten transition activities. Parents, carers and other adult visitors attending an outdoor event or gathering held at schools, such as a fete or school production, are also required to be fully vaccinated. In these instances, parents, carers and adult visitors must check in using the QR codes (located at suitable entry points for outdoor events and gatherings) and schools must sight vaccination information.

Meetings and other discussions (such as Student Support Group meetings) with parents and carers who do not meet vaccination requirements should be held virtually.

Parents and carers attending school sites for drop off and pick up who do not enter school buildings do not need to comply with vaccination requirements.

Any parent/carer who needs to access an early childhood education and care service (including OSHC) via the main entrance of a government school building is required to check in using the Victorian Government QR Code Service but do not need to show their vaccination status.

### **External providers using or hiring school facilities outside of school hours**

External providers who use or hire school facilities outside of school hours are responsible for ensuring that use aligns with the Open Premises Directions including vaccination requirements.

## **Related policies**

- COVID-19 Vaccinations – Teaching Service and School Council Employees
- Contractors – Insurance and Contract Arrangements
- Trespass
- Visitors in Schools
- Volunteers in Schools
- Volunteer OHS Management
- Working with Children and Other Suitability Checks for School Volunteers and Visitors

## **Relevant legislation**

- Public Health and Wellbeing Act 2008 (Vic)
- Public Health and Wellbeing Regulations 2019 (Vic)

Policy last updated 15 November 2021