



Service Delivery Vaccination Policy

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Policy governance

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Executive Leadership Team

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Council

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Occupational Health and Safety Act 2004 (Vic), Public Health and Wellbeing Act 2008 (Vic), Privacy and Data Protection Act 2014 (Vic), Health Records Act 2001 (Vic), Victorian Chief Health Officer directions, International Human Rights Laws.

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Inclusive Port Phillip, Liveable Port Phillip, Vibrant Port Phillip

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Purpose and introduction

The City of Port Phillip is committed to promoting the health and wellbeing of the community, its customers and its workers. This commitment extends to the COVID-19 pandemic, where the Council must work with the community to minimise so far as is reasonably practicable, the risk of infection from COVID-19 in our offices, services, facilities or operations both now and into the future.

Council's offices, services, facilities and events operate under specific COVID-Safe plans that outline actions that we employ to eliminate the risk of introducing or contracting COVID-19 as far as reasonably practicable.

Vaccination is critical to reduce disease transmission, minimise the severity of any breakthrough infections and reduce the likelihood of severe disease. It will also assist to reduce disruption to Council services and sites, in the event that a service or site needs to be closed as a result of transmission of COVID-19 at that service or site.

The purpose of this policy is to set out the Council's approach to determining the need for customers to be vaccinated to access services provided by Council. Our goal is to minimise the risk of transmission of the COVID-19 virus between staff and customers, customers and customers and between staff and staff in different service settings.

This policy takes a risk-based approach that considers the **residual risk** of transmission after other infection controls have been deployed through the COVID-Safe plans of each service setting. Where the **residual risk** is rated as medium to high, all customers and staff in the service setting will need to be double vaccinated to attend a face-to-face service. The exceptions to this are:

- Services that Council is funded to provide, where the funder requires us to deliver the service, regardless of the vaccination status of the customer or client.
- Essential compliance based in home services (e.g. Local Laws, Animal Management) or in business services (e.g. Health inspections) that are not pre-booked and/or where an essential face-to-face service is required for a client in need. In these cases, staff will undertake a risk assessment prior to providing the service, which may include requesting customers to provide evidence of vaccination prior to entering the home or business, where this is practical.

Importantly, Council is mindful of the impact that denial of a face-to-face service may have for unvaccinated customers. Consequently, this policy will require all Council managers to identify, develop (where necessary) and promote alternative service delivery mechanisms for these customers, so that no-one is left behind. In exceptional circumstances, where an unvaccinated customer urgently requires a face-to-face service, the service may be provided by exemption on a case by case basis, after additional infection control measures have been implemented.

This policy will be reviewed and updated as further public health directions and advice are issued from the Chief Health Officer.

Outcomes

This policy aims to achieve the following outcomes:

1. Ensure compliance with prevailing CHO directions in relation to staff and customer vaccination requirements in all Council service settings.
2. Ensuring, to the extent that is reasonably practicable, the health and safety of our customers and workers while receiving and delivering services.
3. Provide assurance to customers and clients that they can access Council services in a manner that minimises the risk of COVID-19 transmission from our staff or other customers, by establishing and communicating customer vaccination requirements for different Council service settings.
4. Ensure that “no-one gets left behind” by minimising the impact of any withdrawal of face-to-face services for unvaccinated and medically exempt customers and clients by providing alternative service delivery channels and options where this is possible.
5. Provide assurance to Council service delivery staff that they can deliver services in a manner that minimises the risk of COVID-19 transmission, by establishing and communicating customer vaccination requirements for different Council service settings.
6. Ensure appropriate record keeping and management of privacy and information requirements is undertaken.

Definitions

Table 1: Definitions of terms

Term	Definition
Chief Health Officer (CHO)	Victoria’s CHO provides expert clinical and scientific advice and leadership on issues impacting public health. A State of Emergency declaration gives the Victorian CHO broad powers to act to eliminate or reduce a serious risk to public health by detaining people, restricting movement, preventing entry to premises, or providing any other directions considered reasonable to protect public health, slow the spread of infection, reduce the pressure on the health system and minimise the risks of COVID-19.
Customer	An individual, business or organisation that uses the services of the Council or is conducting business with Council on Council premises or is attending an event on Council premises.
Service	A service is an activity or related activities which are provided to the community or attended by the community and Council staff (For e.g. a Council Meeting.)



Responsibilities

Table 2: Responsibilities of roles

Role	Responsibility
CEO	Policy approval and/or referral to Council for approval where this is required.
General Manager	Review and approve service delivery risk assessments and customer vaccination requirements for service settings that are not low risk and ensure that service delivery plans are in alignment with this policy, including approving the exceptions listed under this policy.
Governance	Reviews and updates this policy as per review requirements.
Level 3 Managers	Ensures the application of this policy for their specific service settings. Assesses the risk of COVID-19 infection and transmission and identifies risk controls and develops, implements and regularly reviews COVIDSafe plans for their specific service settings.
Coordinators	Provides instruction and guidance to workers about how this policy is applied in their specific service setting. Assesses the risk of COVID-19 infection and transmission and implements the risk controls.
Supervisors	Provides support to workers in the application of this policy, for their service setting. Monitors the implementation and effectiveness of risk controls.
Staff	Applies risk controls as required for their service area. Reports control failures and non-compliance as they are identified.

Scope

This policy relates to vaccination for COVID-19. It applies to all customers and clients of public-facing services and activities directly provided by Council, including services funded by State and Federal programmes.

The broad definition of “customer” under this policy, includes parties who are conducting business with Council, (for example, a State Government employee attending a meeting at a Council office)

or a person who is attending an event or activity on Council premises (for example, a person attending a Council meeting or community engagement event in person).

Out of scope

This policy **does not include** vaccination requirements for employees of Council which are covered by Council's COVID-19 Workforce Vaccination Policy. Under that policy any Council employee delivering a face-to-face service is required to be double vaccinated in accordance with CHO directions.

This policy **does not include** vaccination requirements for contractors and suppliers who are accessing Council facilities to provide a service to Council. Vaccination requirements for these parties will be set and managed through Contract Management arrangements to ensure compliance with prevailing CHO directions.

This policy **does not apply** to community, arts organisations and other services funded by Council. However, compliance with prevailing CHO directions and provision of advice to Council on any vaccination requirements that are to be applied to the recipients of the funded service will be a requirement that is included in the funding agreements between Council and these organisations. Funding agreements will be updated to reflect this requirement as soon as is practicable

This policy **does not apply** to holders of permits, licences and hirers of Council's facilities for services or activities that are not being directly provided by Council. However, compliance with prevailing CHO directions and the provision of advice to Council on any vaccination requirements that are to be applied for the event or activity being conducted under a Council issued licence, permit or hire arrangement, will be a requirement that must be met prior to the approval of any permit, licence or hire arrangement (See Attachment 3).

Policy

Mandatory vaccination

The Victorian government has made vaccination a condition of employment in specific businesses or industries. Under current directions, each business is responsible for the recording and updating of their own employee's vaccination status.

The Victorian Government has also made vaccination mandatory for customers accessing certain services. Where Council directly provides these services, Council will require customers to be vaccinated in order to physically access the service.

For settings where vaccination is not mandated by the CHO, a risk-based approach will be applied to determine the need for customers to be vaccinated prior to accessing the service.

Settings such as South Melbourne Market have a mix of businesses and mandatory requirements. To ensure compliance, Council will require each business, where vaccination is mandatory for



workers or customers, to provide assurance that they have fully implemented the CHO requirements.

Risk-based approach

This policy takes a risk-based approach that considers the **residual risk** of transmission after other infection controls have been deployed through the COVIDSafe plans of each service setting.

Services may need to be altered to meet the following low-risk scenarios:

- Distanced (>1.5m) and any duration outdoors OR
- Face-to-face (<1.5m) and short duration (1–15 min) outdoors OR
- Distanced (>1.5m) and transient (<1 min) indoors OR
- All parties are fully vaccinated due to CHO directions or voluntary vaccination

This is in addition to the established risk reduction measures for the spread of COVID-19. (See **Attachment 1** for more information).

In adopting this risk-based approach and taking all reasonably practicable measures, it is important to note that Council cannot eliminate the risk of transmission of COVID-19, and that customers contemplating receiving services must have regard to that inherent risk and apply measures they can take in reducing those risks, including vaccination.

Service delivery assessment

A Service Delivery Assessment Tool (**See Attachment 2**) is to be used by each Council service delivery manager to determine the level of risk of COVID-19 transmission. The tool incorporates the established risk factors associated with the spread of the virus.

Where the **residual risk** is rated as medium to high, customers and staff in the service setting will need to be double vaccinated to attend a face-to-face Council service or activity.

Exceptions

The exceptions to this are:

- Services that Council are funded to provide, where the funder requires us to deliver the service, regardless of the vaccination status of the customer or client.

Note:

Some State and Federally funded services provided by Council may require the provision of service regardless of the customer's vaccination status, for example maternal and child health services and aged care services. Additional risk reduction controls must be considered and implemented, for example tier 3 PPE.

- Essential compliance based in home services (e.g. Local Laws, Animal Management) or in business services (e.g. Health inspections) that are not pre-booked and/or where an essential face-to-face service is required for a client in need. In these cases, staff will

undertake a risk assessment prior to providing the service, which may include requesting customers to provide evidence of vaccination prior to entering the home or business, where this is practical.

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Fully vaccinated customers

For the purposes of this policy, customers are considered to be fully vaccinated against COVID-19 for the purposes of attending a Council service or activity if the customer:

- Has received both doses of the COVID-19 vaccine and acceptable evidence of vaccination status has been provided to Council by the customer, or
- Has a valid medical exemption to COVID-19 vaccination issued by an authorised medical practitioner, or
- Is aged under 16.

Alternate service provision and right of service

Council recognises the essential right to a service of Council's customers and must balance this against its responsibility for the health and wellbeing of all its customers.

To achieve this balance, service managers are required under this policy to develop and deliver alternate service delivery for unvaccinated customers who are unable to access face-to-face services, wherever this is reasonable and not cost prohibitive. Examples include online and click and collect type services.

In exceptional circumstances, unvaccinated customers who require an essential and urgent face-to-face service may receive the service if a risk reduction plan indicates that the face-to-face service can be delivered safely. Services delivered in these circumstances will require the direct approval of the relevant General Manager.

Proof of vaccination

All persons who are required to be vaccinated under this policy will be required to provide evidence acceptable to Council on their vaccination status.

The Council will accept for these purposes a copy of the person's:

- COVID-19 Digital Certificate
- Immunisation History Statement
- Digital vaccination certificates delivered by the Services Victoria application
- A valid medical exemption
- Proof of age for a child under 16.

Council will investigate ways to assist our community and customers who are facing challenges with obtaining proof of vaccination.



Council will establish processes for verifying vaccination status in three ways, depending on the nature of the service:

1. **Walk in services** – processes will be established to sight the proof of vaccination on entry to the service. Council will not record an individual customer's vaccination status in these service settings, but, may record the fact that all customers who have entered or accessed the service provided proof of vaccination.
2. **Pre-booked or regular services** - processes will be established by the service to sight proof of vaccination either on first entry to the service or ahead of the booked service.

For regular service users and for ease of future service, Council; with the consent of the customer, will offer to keep a confidential record that they have verified the customer's vaccination status on the customer's record for that service. Copies of vaccination certificates will not be stored by Council, instead Council will record the fact that the customer's vaccination status has been verified by a Council staff member. This will enable the customer to use the service in the future without providing proof of vaccination each time they access that service.

Note: Where it is part of the risk mitigation plan, service managers may require customers to change from a walk-in service to a pre-booked service.

Example 1: Requiring people attending a face-to-face meeting with staff at a Council administrative office to provide proof of vaccination prior to attending the meeting.

Example 2: Requiring people who previously could attend a Council meeting without booking, to pre-book and provide proof of vaccination prior to attending a Council meeting in person.

3. **Councillors or staff attending a community meeting or other face-to-face event** –

Councillors or staff attending the meeting may require the meeting organiser to validate the vaccination status of those attending the meeting, prior to agreeing to physically attend the meeting. In circumstances where this is not possible, Councillors and staff may elect to attend the meeting on-line if hybrid arrangements are available.

Information privacy

Council values and recognises the need to comply with relevant privacy legislation and will ensure that any customer records that contain details of a customer's vaccination status are managed in accordance with this legislation and Council's record management and information privacy policy. This includes limiting staff who have access to the record to the minimum number required.

Council will not provide personal customer information; including a customer's vaccination status to other customers or parties without the express and prior, written consent of the customer.

To provide assurance to customers who receive services in a group setting, Council may communicate to a group of customers accessing a group service, that all customers attending the group are double vaccinated.

Policy review and implementation

This policy and associated service delivery plans will be updated and reviewed as required to reflect prevailing CHO directions and/or other regulatory or legislative requirements.

Service managers will be asked to collect information on the service impacts of this policy and this will be collated and reported to Council at 6 monthly intervals.

Customer communication

Communications to customers on service changes as a result of this policy will occur at both a service level and a wider community level.

Service Level Communications

Service Managers are responsible for direct communication of these policy requirements to the customers of the service they are managing. Where possible, all customers will be advised of changes to the service as a result of this policy ahead of the changes occurring.

Community Level Communications

Council will communicate to and inform the community about this policy through its media channels and website.

Council will publish a list of all services, access requirements and alternative service delivery options on its website and this will be regularly updated as required.

Complaints

Customers who wish to make a complaint in relation to access to service under this policy may lodge a complaint with Council under Council's Complaints Policy.

Attachment 1 Risk reduction measures

The following are established risk reduction measures for the spread of COVID-19:



- Vaccination: of staff and customers
- Alternative service delivery such as online or telephone services
- Modifying service delivery such as outdoors
- Minimising the duration of interaction with the client/customer
- Physically distancing from the clients or customers during service delivery;
- Minimising the frequency of interaction and/or number of customers
- Applying the prevailing CHO directions; e.g. density quotients for public space, office space
- Use of face masks and other PPE
- Increasing ventilation
- Cleaning of touch points
- Applying work bubbles where practicable
- Considering furniture layout and apply density quotients for indoor facilities to support physical distancing; and
- Screening questions for customers/clients re: symptoms and exposure prior to service.



Attachment 2 Service delivery assessment tool

Go to the intranet for an editable copy.

Service Delivery Assessment		Low-risk scenario		
Division:		Distanced (>1.5m) and any duration outdoors OR		
Department:		Face-to-face (<1.5m) and short duration (1–15 min) outdoors OR		
Team:		Distanced (>1.5m) and transient (<1 min) indoors OR		
Manager/Coordinator: (Completing Assessment)		All parties are fully vaccinated due to CHO directions or voluntary vaccination		
		Service 1	Service 2	Service 3
1	Describe the service or activity			
COVIDSafe Plan				
2	COVIDSafe Plan A COVIDSafe Plan remains a requirement for all services. What COVIDSafe initiatives are in place or need to be to minimise the risk of transmission of COVID-19? (e.g. distancing, PPE, cleaning, hand sanitisers, screening of customers, ventilation, change to leasing agreements)			
Vaccination Status				
3	Vaccination status Refer to Customer Vaccination Status Guidelines and the tab below Is collecting vaccination status of customers possible or practicable?			
4	How will you check vaccination status or customers? Examples: - sited prior (upon booking) - sited prior, record retained for future use - sited on entry / commencement of service - not requested as mandatory under CHO direction			
5	Nominated the Manager who will have access to sighting customer vaccination status records			
6	Will children who are not eligible to receive the COVID-19 vaccination access the service?			
Risk Assessment				



7	<p>Is the service low-risk? (Yes/No) (Refer to the Low-risk scenario table above)</p>			
For services which are not in this low-risk scenario, consider the following:				
8	<p>Service is funded externally Is there a requirement to continue the service regardless of the vaccination status of customer(s) due to government funding agreements?</p>			
9	<p>Alternative Service Delivery Method If the customer(s) is not vaccinated or vaccination status cannot be determined, is there a reasonable and sustainable alternative service delivery method available?</p>			
10	<p>Describe the alternative delivery method(s) if available? (e.g. online, vaccinated representative)</p>			
11	<p>Is the service able to continue as an exemption under the policy? - essential service - GM or CEO approval sought and obtained</p>			
12	<p>Provide information for why the service should continue</p>			
13	<p>What additional resources and support is required to implement the policy, sight vaccination status of customers or deliver alternative service delivery options or different ways of working?</p>			
14	<p>Identify and describe any potential issues</p>			
Outcome				
15	<p>Outcome Service is either: - low risk, - externally funded, - can be provided via a non-contact method - has received policy exemption. Otherwise service can only continue in person to fully vaccinated customers. (Record Outcome and reason)</p>			
Communication Plan				
16	<p>What communications will your service provide directly to customers?</p>			
17	<p>What information would be helpful to include in corporate communications?</p>			

Attachment 3 Requirements for hirers, permits and licences

Requirements to be met prior to the approval of hire arrangements:

Community Centres

- Completed COVID Safe Checklist – including a requirement to provide a COVID Check-In Marshal
- Provide own QR code
- Confirmation that a risk assessment has been undertaken
- Public Liability Insurance
- Confirmation Terms and Conditions have been read and understood

Town Halls

- Completed COVID Safe Checklist – including a requirement to provide a COVID Check-In Marshal
- Use of Council QR code
- Copy of completed Risk Assessment
- Public Liability Insurance
- Confirmation Terms and Conditions have been read and understood

Note - Council Duty Officers and Security contractors are in attendance at these events.

Additional Obligations for Re-opening at 80% double vaccinated:

- The COVID Safe Checklist will have to include an obligation for the nominated COVID Check-in Marshal to be responsible for:
 - Verification of double vaccination status of patrons prior to entry
 - Verification of under 16 identification to enable access for unvaccinated children
 - Verification of patrons identifying with medical exemption prior to entry

Note – where our facilities are hired during work hours and occupied by Council staff (e.g. SKTH auditorium), double vaccination of attendees will be required.

Requirements to be met prior to the approval of any permits and licences:

- COVIDSafe Plan including details of how the CHO directions will be met.
- Assurance that mandatory vaccination requirements have been complied with.