



Workplace Vaccination Policy –Visitors (including Members)

Policy No: PF197

Policy Detail

Policy Description	A requirement to receive vaccination against the risk of COVID-19 [a severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2)] to visit a UniSuper office or site.
Policy Applies to	A person who attends the Premises (but who is not a Workplace Participant), and includes members, suppliers, clients and vendors.
Policy Owner	Chief People Officer, People

Policy Approval

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1. Introduction

- 1.1. COVID-19 is a condition caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). COVID-19 is highly contagious and potentially fatal.
- 1.2. SARS-CoV-2 can be transmitted through respiratory droplets, smaller particles (aerosols), direct physical contact with an infected individual, and indirectly through contaminated objects and surfaces. Those who have been in close contact with a person infected with COVID-19 are at highest risk of becoming infected themselves.
- 1.3. A number of cases of individuals with COVID-19 have been confirmed in Australian jurisdictions, including by means of community transmission. An ongoing risk exists of continuing exposure to or transmission of COVID-19.
- 1.4. A number of COVID-19 vaccines have been developed and made available throughout the world. The TGA has approved the use of COVID-19 vaccines for persons aged 12 years or older.
- 1.5. The purpose of this policy is to:
 - (a) clarify UniSuper's requirements for vaccination against COVID-19 in order to minimise exposure to and transmission of COVID-19 at the Premises; and
 - (b) assist UniSuper to meet its legal obligations, including in relation to work health safety and public health.
- 1.6. UniSuper will continue to monitor developments relevant to this policy and will review and update the policy where appropriate.

2. Scope

- 2.1. This policy applies to all Visitors who attend and access the Premises.
- 2.2. While this policy applies to all Visitors, the COVID-19 Vaccination Policy - Workplace Participants imposes similar obligations to those imposed under this policy to UniSuper's Workplace Participants.
- 2.3. This policy does not impose any legally binding obligations on UniSuper. UniSuper may review and amend this policy from time to time without notice.

3. Vaccination against COVID-19 generally

- 3.1. Vaccination is a core element of the Australian Government's response to the COVID-19 pandemic.
- 3.2. UniSuper's view is that:
 - (a) vaccination is the best way to protect against severe illness and death from COVID-19; and
 - (b) vaccination can prevent or minimise the risk of introduction or transmission of COVID-19 at the Premises.
- 3.3. UniSuper strongly encourages as many people as possible to become vaccinated against COVID-19. However, vaccination against COVID-19 is not without risk.
- 3.4. UniSuper encourages all Visitors to speak with their medical practitioner and consider vaccination against

COVID-19 based on individualised medical advice.

4. Visitor vaccination requirements

4.1. A Visitor must not enter or remain on the Premises unless they provide evidence that they are either:

- (a) Fully Vaccinated Against COVID-19; or
- (b) an Excepted Person.

5. Alternative arrangements for Visitors

5.1. Where Visitors are required to attend the Premises to undertake activities 'in person' (for example, the physical execution or delivery of documents), but are prevented from doing so because they do not meet the requirements in clause 4, UniSuper will take reasonable steps to make alternative arrangements.

5.2. These alternative arrangements may include:

- (a) Meeting with a Visitor at the entry of the premises to retrieve the required items, and asking the visitor to wait outside the premises while the transaction is being concluded
- (b) Asking the Visitor to deliver the required items via an alternate method such as courier or registered mail
- (c) Changing the meeting to virtual via video conference where possible

5.3. Any alternative arrangements implemented under clause 5.2 will be subject to operational requirements and any applicable laws, rules or guidelines in force at the time.

6. Basis of Visitor vaccination requirements

6.1. UniSuper's vaccination requirement in clause 4 takes into consideration a range of factors that include the following:

- (a) whether a Visitor must be vaccinated against COVID-19 under applicable laws, such as Public Health Directions;
- (b) the requirements and policies imposed by third parties with which UniSuper is bound or obligated to comply;
- (c) UniSuper's obligations under applicable laws, such as work health and safety laws;
- (d) the risk of exposure to, and transmission of, COVID-19, including the extent of community transmission of COVID-19;
- (e) the nature of UniSuper's operations and the level of in-person interactions when Visitors attend the Premises;
- (f) the degree of harm that could result from a Visitor being infected with COVID-19 (including the degree of harm that others may suffer as a result of transmission of COVID-19 from a Visitor whether that be to a Workplace Participant or the public);
- (g) the impact on UniSuper's business and operations if a Workplace Participant (or group of Workplace Participants) is required to isolate due to exposure to a person infected with COVID-

19;

- (h) the effectiveness of vaccines in reducing the risk of transmission of, and serious illness from, COVID-19;
- (i) if a Visitor has a legitimate reason for not being vaccinated against COVID-19; and
- (j) UniSuper's values and responsibilities as a corporate citizen.

7. Testing

7.1. UniSuper may require a Visitor to be tested for COVID-19 as a pre-condition to entering the Premises if UniSuper reasonably believes the Visitor:

- (a) is infected with COVID-19; or
- (b) was exposed to a person who is or was, or is or was likely, infected with COVID-19.

8. Evidence of vaccination

8.1. Each Visitor who is required to be Fully Vaccinated Against COVID-19 must provide to UniSuper evidence of vaccination that either:

- (a) would satisfy a reasonable person; or
- (b) if specific vaccination evidence requirements apply at law (eg under a Public Health Direction), that comply with those evidence requirements.

8.2. The evidence required under clauses 8.1 includes (without limitation):

- (a) a digital vaccine certificate (e.g. via myGov or Medicare); or
- (b) evidence from the Australian Immunisation Register.

9. Privacy

9.1. The collection, use and disclosure by UniSuper of personal information (including health information) under this policy will be in accordance with UniSuper's obligations under UniSuper's Privacy Policy and applicable laws (including applicable privacy and health records laws).

9.2. UniSuper will take steps to ensure that information obtained in accordance with this policy is treated confidentially, as far as it is reasonably practicable to do so. However, nothing in this policy prohibits UniSuper from disclosing that information if the disclosure is required by law, to administer this policy or to protect the health or safety of Workplace Participants, Visitors or others.

10. Work health and safety

10.1. UniSuper has obligations under work health and safety legislation. Those obligations include:

- (a) an obligation to ensure, so far as is reasonably practicable, the health and safety of Workplace Participants and Visitors; and
- (b) eliminating or minimising, so far as is reasonably practicable, exposure to and transmission of COVID-19 at the Premises.

- 10.2. Visitors have obligations under work health and safety legislation. Visitors have a duty to take reasonable care for their own health and safety as well as the health and safety of others.
- 10.3. UniSuper will:
- (a) maintain a COVIDSafe Plan and ensure compliance with it, as far as reasonably practicable;
 - (b) comply with all applicable laws, including Public Health Directions and other government directions or requirements;
 - (c) ensure that all Visitors, Workplace Participants and others entering the Premises use a QR Code;
 - (d) provide face masks for Visitors and Workplace Participants, if required and/or requested;
 - (e) encourage social distancing where possible; and
 - (f) increase cleaning and promotion of hygienic practice throughout the Premises.
- 10.4. Each Visitor must:
- (a) familiarise themselves with the requirements under applicable law in respect of vaccination against COVID-19 and ensure they comply with any such requirements at all times;
 - (b) maintain their status as Fully Vaccinated Against COVID-19, subject to this policy;
 - (c) permit UniSuper or allow an Authorised Representative of UniSuper to verify their vaccination status (including by permitting UniSuper or the Authorised Representative to view their vaccination evidence) to permit entry to the Workplace;
 - (d) if they have COVID-19, are being tested for COVID-19, or a household member or close contact has COVID-19 and the Visitor has been at the Premises within the relevant infectious period, notify their point of contact at UniSuper (and if no such contact exists whs@unisuper.com.au);
 - (e) not attend the Premises if they or a household member are awaiting the results of a COVID-19 test and are currently isolating;
 - (f) ensure, when at the Premises, they:
 - i. practice social distancing where possible;
 - ii. maintain hygienic practices; and
 - iii. comply with the requirements of UniSuper's COVIDSafe Plan.

11. Breach of this policy

- 11.1. Each Visitor must comply with applicable laws and this policy.
- 11.2. A Visitor who does not comply with this policy will be refused access to, or removed from, the Premises.

12. Definitions

12.1. For the purposes of this policy:

- (a) Authorised Representative means a person who has been given approval to view vaccination evidence from our Concierge team.
- (b) **COVID-19 Vaccine** means a vaccine to protect a person against COVID-19 that:
 - i. has been registered or provisionally registered by the TGA; or
 - ii. has been approved by a comparable overseas regulator, as determined by the TGA under regulation 16DA(3) of the Therapeutic Goods Regulation 1990 (Cth);
- (b) **Excepted Person** means a person that:
 - i. holds an Australian Immunisation Register immunisation medical exemption form that:
 - A. is completed and signed by the person's medical practitioner; and
 - B. states that person is unable to receive a dose, or a further dose, of a COVID-19 Vaccine due to a medical contraindication; or
 - ii. holds an Australian Immunisation Register immunisation medical exemption form that:
 - A. is completed and signed by the person's medical practitioner; and
 - B. states that the person is unable to receive a dose, or a further dose, of a COVID-19 Vaccine due to an acute medical illness (including where the person has been diagnosed with COVID-19);
- (c) **a person is Fully Vaccinated Against COVID-19** if the person has received two doses of a COVID-19 Vaccine (and any booster doses as approved by the TGA);
- (d) **Premises** means UniSuper's premises at any of the following locations:
 - i. UniSuper corporate offices located at:
 - A. Level 1, 385 Bourke Street, Melbourne, VIC 3000;
 - B. Level 1, 40 Marcus Clarke Street, Canberra, ACT 2601;
 - C. UniSuper Centre - North Terrace, 228-231 North Terrace, Adelaide SA 5000;
 - D. UniSuper Centre - Adelaide, Level 8, 1 King William Street, Adelaide SA 5000;
 - E. Gateway Building Level 17, 1 Macquarie Place, Circular Quay, Sydney NSW 2001;
 - F. Level 16, 300 Queens Street, Brisbane, QLD 4000;
 - G. Level 15, 140 St Georges Terrace, Perth, WA 6000;
 - ii. UniSuper offices or places of operation located at the universities and tertiary education institutions set out in Schedule 1 to this policy, and such other universities or tertiary education institutions at which UniSuper may operate from time to time;
 - iii. any other premises or place of work which UniSuper may operate from time to time;

- (e) **TGA** means the Therapeutic Goods Administration;
- (f) **UniSuper** means UniSuper Management Pty Ltd ACN 006 961 799 and its related bodies corporate, or any one of them;
- (g) **Visitor** mean a person who attends the Premises (but who is not a Workplace Participant), and includes suppliers, clients, vendors and members; and
- (h) **Workplace Participant** means all officers, directors, employees (whether permanent, maximum term, or casual) and contractors of UniSuper and all labour hire workers placed at UniSuper.

13. Further information

13.1. If a Visitor requires further information about this policy and how it applies to them, they should contact the People Governance Adviser - WHS Team (whs@unisuper.com.au).

13.2. For further information, please refer to:

- (a) Victoria - <https://www.dhhs.vic.gov.au/victorias-restriction-levels-covid-19>
- (b) New South Wales - <https://www.health.nsw.gov.au/Infectious/covid-19/Pages/public-health-orders.aspx>
- (c) Australian Capital Territory - <https://www.covid19.act.gov.au/act-status-and-response/act-public-health-directions>
- (d) Queensland - <https://www.health.qld.gov.au/system-governance/legislation/cho-public-health-directions-under-expanded-public-health-act-powers>
- (e) Western Australia - <https://www.wa.gov.au/government/document-collections/covid-19-coronavirus-western-australia-declaration-of-state-of-emergency-and-public-health-emergency-declarations>
- (f) South Australia - <https://www.covid-19.sa.gov.au/emergency-declarations>
- (g) Tasmania - <https://www.coronavirus.tas.gov.au/resources#Current-Directions>
- (h) Northern Territory - <https://coronavirus.nt.gov.au/chief-health-officer-directions>

Schedule 1 - University and Tertiary Education Facilities

- Victoria University
- RMIT University
- The University of Melbourne
- Swinburne University of Technology
- Deakin University
- La Trobe University
- Monash University

- Charles Sturt University
- Australian National University
- University of Tasmania
- Flinders University
- The University of Wollongong
- Western Sydney University
- University of Sydney
- University of New South Wales
- Macquarie University
- Australian Catholic University
- University of Newcastle
- Bond University
- University of Queensland
- QUT
- Curtin University
- Murdoch University
- The University of Western Australia
- Edith Cowan University