



COVID-19 Vaccinations – Visitors and Volunteers on School Sites

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 Pandemic COVID-19 Mandatory Vaccination (Specified Facilities) Orders (Vaccination Orders) issued by the Minister for Health and to manage the Department of Education and Training'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 vaccination information about staff who are directly employed by the department or department staff attending school sites, and schools are not required to collect, record or hold 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.
- 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 (that is, if the vaccination information is incomplete as it shows the worker needs their second or third 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 Pandemic COVID-19 Mandatory Vaccination (Specified Facilities) Orders (Vaccination Orders) issued by the Minister for Health 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 Orders, vaccination information is information relating to a person's vaccination status. 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.

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 Register.

Medically 'excepted persons'

In line with the Vaccination Orders, 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 Orders 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.

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 (DOCX) (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 (DOCX) (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)

References:

- workers employed by external OSHC providers engaged by the school council because that information must be collected by the provider
- parents accessing maternal child health services located on school sites.

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 (DOCX) 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 until 25 February 2022, after which time information about third dose vaccination will be required.

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.

Only volunteers and visitors working on school sites who have provided information that they have had their third dose or are excepted persons are allowed to work onsite after 25 February 2022. For visitors and volunteers working on school sites that became fully vaccinated after 25 October 2021, the deadline is 15 March 2022

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 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.
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- 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 (DOCX) .

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 (DOCX) 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 Orders, 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.

References:

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 volunteers or visitors who do not meet the vaccination requirements from working on school sites or from attending the school to perform work, unless an exception applies.

Schools may need to take the following steps to ensure that volunteers and visitors who do not meet the vaccination requirements do not attend school sites to work:

- remind volunteers and visitors who do not meet the vaccination requirements of the requirement to not attend school sites to work
- if they attend 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 a volunteer or visitor who does not meet the vaccination requirements 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 them from the grounds
- follow up the matter by:
 - writing to volunteers and visitors who do not meet the vaccination requirements to clearly explain that they have 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 (DOCX) (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 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 (excluding students who visit a school to complete a secondary school subject, such as a VET subject) 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 (excluding students who visit a school to complete a secondary school subject) who enter school buildings must have had 2 doses of COVID-19 vaccine 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.

Parents, carers and other adult visitors not performing work need to show evidence of vaccination when entering a school building. This would include activities such as tours and kindergarten transition.

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

Parents, carers and other adult visitors attending a gathering at school, such as a fete, school play or other school ceremony, whether indoors or outdoors, need to show evidence of vaccination on arrival.

When parents and carers do not meet vaccination requirements, the school should hold meetings and other discussions (such as Student Support Group meetings) virtually.

Parents and carers who need to access an early childhood education and care service (including Outside School Hours Care) via the main entrance of a government school building need to check-in using the QR code, but do not need to show their vaccination status.

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

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. Refer to the School Operations Guide (staff login required) for more information.

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)

This policy was updated in line with the February 28th 2022 School Operations Guide.