

Document Name	COVID-19 Vaccination Policy – Victoria
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Author	General Manager People & Culture
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Next Review Date	October 2022, unless earlier review is required to manage changes in regulations.

1. Purpose

This policy is designed to respond to the provisions of the *COVID-19 Mandatory Vaccination (Workers) Directions (PH Directions)* issued by the Victorian Government's Chief Health Officer on 7 October 2021.

McColl's must comply with the PH Directions and all other regulatory requirements, irrespective of the inconvenience that they impose upon the company and its people.

2. Scope

This policy applies to all McColl's employees that live or work in Victoria.

This policy is made during a time of rapid change caused by the impacts of COVID-19 on regulatory requirements and other factors (including, but not limited to, customer and industry-wide obligations). McColl's – as a freight, transport and logistics company operating across numerous essential industries – and its people are impacted by the COVID-19 pandemic. As such, this policy is subject to change from time to time and its scope may extend beyond those covered by the PH Directions.

3. Overview

The PH Directions prohibit employers that are an essential service provider – including McColl's – from permitting "a worker who is unvaccinated to work for that employer outside the worker's ordinary place of residence" from this Friday, 15 October 2021, unless one of the limited exceptions applies under the PH Directions.

In order to validate a worker's vaccination status, the PH Direction says that employers that are an essential service provider "must collect, record and hold vaccination information about the worker."

The policy will not repeat the entire PH Directions here. For those that would like to understand the key terms more, further information is provided below in **Section 5** of this policy, or the PH Directions can be found here: <https://www.dhhs.vic.gov.au/victorias-restriction-levels-covid-19>

However, the summary for McColl's employees living or working in Victoria is:

1. If the employee has – with the approval of their manager – been, and remains able to, work from home, they may continue to do so; and
2. All other employees will need to provide McColl's with vaccination information in accordance with the PH Directions. If any of these employees are "unvaccinated" as defined in the PH Directions, they will not be authorised to work for McColl's outside their home from Friday 15 October 2021. If an employee ignores this prohibition, it will be a breach of this policy which may constitute misconduct and/or a breach of their employment agreement.

Any personal or health information received from employees will be collected, recorded, stored and disclosed if needed, in accordance with McColl's legal obligations under the PH Direction and/or other relevant laws and regulations.

McColl's understands and accepts that individual employees will have unique or challenging circumstances. If you have any issues of concern, please urgently contact your Line Manager or the McColl's HR team.

For any employees that are required to provide vaccination information and remain unvaccinated under the PH Directions, McColl's will consider how best to assist you (which may include, but is not limited to, allowing you to take leave). These decisions will be assessed by McColl's on a case-by-case basis.

4. Further information

If you have any questions about this policy or its application, please immediately contact McColl's HR Department.

McColl's appreciates the patience and understanding shown by all employees to date – this is a challenging time for everyone and McColl's will do its best to minimise the impact on our people, our customers and the company.

We note, for the information of employees only, that in response to the PH Directions some of our customers have introduced a requirement that anyone entering their sites must show proof of vaccination status. We are working through specific requirements with our customers and will discuss this with employees where relevant.

5. Victorian Public Health Directions (7 October 2021)

Below are some key words and phrases that the PH Direction defines that are relevant to his policy:

- The term "**Vaccination Information**" is general, but the PH Direction says that it "may be recorded in a variety of documents, such as a letter from a medical practitioner, a certificate of immunisation or an immunisation history statement obtained from the Australian Immunisation Register."
- The PH Direction says that the term "**unvaccinated**" means a "person [that] has not received a dose of a COVID-19 vaccine and is not an excepted person". Clause 5(2) also says that "if an employer does not hold vaccination information about a worker, the employer must treat the worker as if the worker is unvaccinated."
- A person is only eligible to be an "**excepted person**" if they hold certification from a medical practitioner that the person is unable to receive a dose, or a further dose, of a COVID-19 vaccine (Vaccine) due to:
 - a medical contraindication (which is further defined in the PH Direction); or
 - an acute medical illness (including where the person has been diagnosed with SARS-CoV-2).

In the PH Direction there are some additional, temporary exceptions for people that have not received a first or second dose of a Vaccine, but that have a booking to receive a Vaccine dose by the relevant deadlines: 22 October 2021 for the first dose, and 26 November 2021 for the second dose.



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For the avoidance of doubt, compliance with the PH Directions is required under the *Public Health and Wellbeing Act 2008* (Vic).

Again, this policy is providing an overview of the key terms only. The complete PH Directions can be found here: <https://www.dhhs.vic.gov.au/victorias-restriction-levels-covid-19>

6. Related Documents

6.1 HR047 – Company Medical Policy