

## Purpose

The purpose of this policy is to outline how Echo Interpreting will be managing risk in relation to Coronavirus (COVID-19) during key interactions within the staff environment, with the initial plan taking effect as of 14<sup>th</sup> January 2021 and continues to be reviewed regularly to reflect Government legislation. Echo Interpreting is committed to providing a safe working environment for all employees and visitors to the Echo Interpreting Office (“the Echo office”) located at CoWork Me at 245 St Kilda Road, St Kilda. We ask that anyone entering the Echo office strictly follow this policy and the guidelines implemented to enable us to provide the safest possible environment during this time. We all have a role to play in stopping the spread of COVID-19 in Victoria.

## Requirements

- All workers or visitors attending the Echo office must fill in the required details in the Echo Interpreting Workplace Attendance Register provided as well as scan a QR code. This ensures that an accurate register can be kept at all times and will not be impacted by any technological issues. This also allows any workers or visitors attending the premises to still complete the register should they not have a phone or device capable of scanning a QR code.
- Any person displaying the symptoms listed below and is feeling unwell, should not, under any circumstances, enter the Echo office. Symptoms are:
  - fever.
  - chills or sweats.
  - cough.
  - sore throat.
  - shortness of breath.
  - runny nose; and or
  - loss of sense of smell or taste.
  -
- Upon entering and during the time at the Echo office, face masks are required to be worn at all times unless the Government has advised that masks are no longer required to be worn inside. Should at any time, the requirement for masks to be worn inside be implemented again then any one onsite will be required to follow this directive. At times where wearing a mask indoors is required, a loose fitting face covering such as bandanas or scarves will not be acceptable.
- Any worker or visitor attending the Echo office must adhere to the physical distancing implementation of 1.5 metres between each person attending. All workers or visitors must maintain at least 1.5 metres of distance from one another at all times.
- Good hygiene is essential. Regular washing of hands and hand sanitizing is required. Please ensure that regular use of hand sanitizer is used after using bathroom, kitchen, or any shared general equipment in the Echo office space for example, shared office equipment and appliances.
- Avoid sharing of equipment such as phones, desks, headsets, office tools or other equipment where possible. All equipment must be frequently and regularly cleaned with the cleaning products provided.
- All equipment must be frequently and regularly cleaned and disinfected in shared spaces, including high touch communal items such as doorknobs or light switches.

Echo Interpreting use TGA approved products for their cleaning and disinfecting of the office. A copy of the SDS' (Safety Data Sheet) for any products used for COVID-19 related cleaning or preventative measures can be provided upon request.

As an organisation, we acknowledge that many of our staff do not work at or are required to attend the head office and instead work at a variety of sites and locations as required. Their safety is equally important and therefore for any staff attending onsite assignments, Echo will request the organisation provide a copy of their own COVID-19 safe plan. For in home visits, the client will be requested to follow social distancing and hygiene regulations.



# COVID Workplace Attendance Register

Echo Interpreting use a physical attendance register, as well as a QR code, to maintain a register of every person who attends the workplace (Echo office – C/O CoWork Me, 245 St Kilda Rd, St Kilda). This includes all workers (including sub- contractors) and any customers, client or visitors permitted in the workplace (including workplace inspectors).

If an employee or visitor tests positive for Coronavirus (COVID-19), a current and accurate workplace attendance register and use of QR codes will allow Echo Interpreting to immediately identify anyone who has been in close contact with that person within the prior 48 hours.

For more information regarding the definition of a close contact see: <https://www.dhhs.vic.gov.au/victorian-public-coronavirus-disease-covid-19>

## Business Details:

Business Name: Echo Interpreting  
 Site/location: C/O CoWork Me, 245 St Kilda Rd, St Kilda, Vic 3182  
 Contact Person: Danielle Don – Director of Echo Interpreting

## Copy of Physical Attendance Register Used Onsite

Workplace attendance register						
Date	First name	Phone number	Check-in time	Check-out time	Relationship with business	Area(s) visited
<i>e.g.</i> DD/MM/YY	<i>e.g. John</i>	<i>e.g. 1234 5678</i>	<i>e.g. 10am</i>	<i>e.g. 11am</i>	<i>e.g. employee, contractor, customer, client, inspector, visitor, etc.</i>	<i>e.g. warehouse, factory, office, loading dock, etc.</i>

## Overview

Echo Interpreting is committed to providing a healthy and safe working environment for all staff members and clients of the organisation.

Under Commonwealth (Commonwealth Work Health and Safety Act 2011), Victorian (Occupational Health and Safety Act 2004) legislation and additional regulations, employers are required to do all that is reasonably practicable to ensure the health and safety of employees and others at the workplace. This duty extends to the current COVID-19 pandemic, where employers must eliminate, or if that is not possible, minimize, so far as reasonably practicable, the risk of exposure to infection from COVID-19 in the workplace now and into the future.

The ongoing rollout of Covid-19 vaccinations and boosters delivered by government bodies are important safety measures in aiding the community and organisations, including Echo Interpreting, to maintaining a healthy and safe work environment.

The duty of care we have as employers must be balanced with the legitimate rights of our employees to exercise choice about vaccination. Both Commonwealth and State governments have mandated that certain sectors of the workforce are subject to mandatory vaccination to protect vulnerable communities of people; they have also indicated that vaccination is ultimately an individual's choice.

## Why This Policy Was Created

The COVID-19 Vaccination Policy was created to outline Echo Interpreting's health and safety obligations with specificity to COVID-19 vaccinations and how this policy interacts with safety systems used by Echo Interpreting.

This policy does not replace the current CovidSafe workplace policies and should be read in conjunction with other relevant safety policies and procedures. Whilst COVID-19 vaccinations are an important step in ensuring safer workplaces they do not override the continued need for social distancing, good hand hygiene and regular cleaning and maintenance measures already in place under relevant policies, even if the complete workforce has been vaccinated.

## National COVID-19 Vaccination Rollout

The Australian Government aims to have as many people as possible vaccinated in 2021. Eligibility for vaccination is at present for 12-year-olds and over. There is anticipated approval for vaccinations to be made available to children from 5 years. The availability of boosters is to be announced shortly. Therefore, staff should keep abreast of relevant health information to understand their eligibility for both vaccination and boosters.

## Managing Vaccines in the Workplace

Employers can only require their employees to be vaccinated where:

- a specific law (such as a state or territory public health order) requires an employee to be vaccinated, or
- the requirement is permitted by an enterprise agreement, other registered agreement, or employment contract, or
- it would be lawful and reasonable for an employer to give their employees a direction to be vaccinated, which is assessed on a case-by-case basis.

The Federal Government and Fair Work Ombudsman have recently introduced a 4-Tier system to assist employers in making individual assessments about the reasonableness of any directions to mandate COVID-19 vaccinations.

## The 4-Tier System

The defined tiers are as follows, please note these tiers are not the same as COVID isolation tiers in Victoria, they are about the type of work people do:

- **Tier 1** work, where employees are required as part of their duties to interact with people with an increased risk of being infected with Coronavirus (for example, employees working in hotel quarantine or border control).
- **Tier 2** work, where employees are required to have close contact with people who are particularly vulnerable to the health impacts of Coronavirus (for example, employees working in health care or aged care).
- **Tier 3** work, where there is interaction or likely interaction between employees and other people such as customers, other employees or the public in the normal course of employment (for example, stores providing essential goods and services).
- **Tier 4** work, where employees have minimal face-to-face interaction as part of their normal employment duties (for example, where they are working from home).

It is important to note the COVID-19 pandemic doesn't automatically make it reasonable for employers to direct employees to be vaccinated against the virus. Employers will need to consider their specific situation in line with relevant Work, Health and Safety legislation, Anti-Discrimination legislation and Privacy legislation.

## Public Health Orders

Separate to the eligibility under the National COVID-19 Vaccination Rollout, employees may be covered by Federal and State/Territory government health orders, requiring mandatory vaccinations of employees in certain settings.

## Our Policy

Echo Interpreting is committed to continuously striving for a safe and healthy working environment, including taking all reasonably practicable steps required to protect staff and others from the risk of COVID-19. Our COVID-19 Vaccination Policy will continue to be informed by any applicable laws, enforceable government directions and advice issued by Commonwealth, State and Territory governments.

In limited circumstances, implementing a mandatory vaccination policy may potentially be a reasonably practicable measure that should be taken by certain employers to help ensure a safe workplace. The Federal Government has indicated that whether an employer can require their employees to be vaccinated against Coronavirus is highly fact dependent, taking account of the workplace and each employee's individual circumstances.

When assessing 'reasonableness', the following factors have been considered:

- work health and safety obligations
- the nature of each workplace (for example, the extent to which our employees need to work in public facing roles, whether social distancing is possible, and the nature of the work being undertaken)
- the extent of community transmission of COVID-19 in the location where the direction is to be given, including the risk of transmission of the Delta variant among employees, clients or other members of the community
- the effectiveness of vaccines in reducing the risk of transmission or serious illness, including the Delta variant and any possible future variants
- each employee's circumstances, including their duties and the risks associated with their work
- whether employees have a legitimate reason for not being vaccinated (for example, a medical or cultural reason)
- vaccine availability
- whether employees can work remotely
- any other related circumstances

We have taken the decision that it is lawful and reasonable for our organisation to implement a mandatory vaccination policy for workers who directly service clients/participants with a disability.

Under the Public Health Order Directions issued on October 6<sup>th</sup> 2021, any worker that works in connection with Echo Interpreting's services need to provide evidence of vaccination. With such broad definition in the order, all Victorian staff and volunteers are covered by this directive.

Echo Interpreting will conduct risk assessments to ensure we are mitigating health and safety risks for unvaccinated and at-risk staff on an individual level. Whilst staff working from home may not need to be vaccinated under this policy, Echo Interpreting may determine that vaccination is required to be able to return or attend the office.

Echo Interpreting will continually review workplace health and safety practices and medical guidance to assess the reasonableness of mandatory vaccinations in line with the above factors.

## Exemptions

Exemptions from the policy requirements outlined above will be considered on a case-by-case basis, for example medical grounds exemptions will be considered for employees who are unable to receive the vaccine due to health or cultural reasons.

Those employees who have concerns about being vaccinated should immediately speak to the Human Resources Manager to raise their concerns.

Employees should not ignore the need to immediately raise concerns if it is felt that there will be an inability to comply with the requirements of the vaccination policy to ensure that we are able to consider alternatives that may be available to both parties.

## Proof of Vaccination

All Interpreters, Notetakers, Participation Assistants and all other staff are asked to provide evidence of their vaccination status in line with a lawful and reasonable direction.

Evidence of vaccination will only be requested by Echo Interpreting if the request is considered lawful and reasonable based on the circumstances of the request, for example when a client utilizing the services of Echo Interpreting, in line with lawful and reasonable direction, requires only fully vaccinated individuals to deliver the service. If an employee who is requested to provide such evidence has any concerns, they should immediately speak with the Human Resources Manager.

Following the mandated areas for vaccination from the Chief Health Officer of Victoria, Echo Interpreting has asked Interpreters, Notetakers and Participation Assistants to provide proof of vaccination that complies with privacy obligations as this information is securely housed and only accessed by the HR Manager. Staff acknowledge and understand that their proof of vaccination or medical exemption will be kept on file and not shared with external parties. In the absence of mandatory vaccination requirement or health orders employers must assess the reasonableness of the request for this information.

Echo Interpreting ensures that consent is obtained from the staff member when collecting this information. However, it is noted that consent to collect is not required if the collection is required or authorised by law (for example in situations where a public health order applies or where it is necessary for the employer to meet their obligations under Federal or State Work Health Safety laws). It is to be noted that the Victorian Government's directives on October 1<sup>st</sup> and 6<sup>th</sup> 2021 allow Echo Interpreting to request and hold evidence of vaccination for Victorian staff who fall under those orders.

Echo Interpreting is aware of, and complies with, its privacy obligations under the Commonwealth Privacy Act 1998 and the Victorian Policy and Data Protection Act 2014. We will continue to do so in our collection of proof of vaccination.

## Our Expectations of Others

It is important all staff, visitors, suppliers, and contractors must comply with our safety policies and accept responsibility for their individual actions in helping us achieve a COVIDSafe workplace. This extends to the uptake of the COVID -19 vaccination as per this policy, and all other COVIDSafe measures which have been implemented to mitigate the spread of the COVID-19. Importantly, Echo Interpreting reserves the right to ask as to the vaccination status of visitors, suppliers and contractors where appropriate. We respect that we cannot keep proof of the vaccination status of the aforementioned groups under current privacy laws.

## Treatment of Unvaccinated Staff

There is a commitment by Echo Interpreting to the safety and health of all employees. Unvaccinated staff are at higher risk of COVID infection and may pose a risk to colleagues with underlying health conditions if infected. Thus, Echo Interpreting has an obligation to fully protect unvaccinated staff whilst at the same time protecting colleagues with underlying health conditions. If Echo Interpreting determines that an unvaccinated staff members role requires them to work onsite, Echo Interpreting may mandate vaccination subject to the conditions already set out in this policy. If the directive is not followed this may result in disciplinary action including termination where appropriate.

In circumstances where Echo Interpreting allows an unvaccinated staff member onsite, a comprehensive risk assessment will be required with input from the employee, the Human Resources Manager and CEO.

## More Information

Please contact the Human Resources Manager when requiring further information, or if queries and/or concerns need to be raised.

## Objectives

The objective of this policy is to ensure that employees and any other individuals understand and are aware of the treatment of COVID-19 vaccinations by Echo Interpreting to enable the safety, health and wellbeing of all staff and stakeholders.

## Scope

This policy applies to all employees of Echo Interpreting, as well as all others outlined within the policy. All individuals working for Echo Interpreting are required to be familiar and to comply with the obligations set out in the policy.

## References

Fair Work Ombudsman  
Victorian Public Health Order Directions No 51  
COVID Vaccination Mandatory Workers Public Health Order No 4

## Relevant Documents

COVID Safe Plan  
COVID Workplace Attendance Register  
Privacy Policy  
Occupational Health and Safety Register