

Covid-19 Vaccination Policy

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Purpose

- a) The purpose of the COVID-19 Vaccination Policy is to:
 - i. clarify the requirements for vaccination against COVID-19; and
 - ii. reduce the risk of employees, their families and friends, clients and business partners from acquiring and transmitting COVID-19;
- b) COVID-19 is a condition caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). COVID-19 is highly contagious and potentially fatal.
- c) 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.
- d) There is an ongoing risk of continuing introduction or transmission of COVID-19.
- e) A number of COVID-19 vaccines have been developed and made available throughout the world. The TGA has currently approved the use of COVID-19 vaccines for persons aged 12 years or older.
- f) This Policy sets out the requirements for Partners Wealth Group and associated entities and their employees with regard to a COVID-19 vaccination. COVID-19 is a highly transmissible respiratory infection, and can cause mild to severe illness, or death, especially in people at high risk. Vaccination is a currently recommended way to protect oneself against COVID-19 and its complications.
- g) In addition to the above, under Workers Health and Safety (WHS) legislation, Partners Wealth Group has a legal requirement and duty of care for the health and safety of everyone in our workplace, including visitors and we have implemented a COVID-19 vaccination policy for our workplace.
- h) This policy does not impose any legally binding obligations on Partners Wealth Group. This policy does not form part of any contract or employment or contract for service. Partners Wealth Group may vary, replace or revoke this policy at any time and without notice.

Definitions

a) For the purposes of this policy:

- i. medical contraindication certificate means a certificate issued by an Australian registered medical practitioner certifying that, because of a specified medical contradiction, the person is unable to be vaccinated against COVID-19;
- ii. Partners Wealth Group means Partners Wealth Group Pty Ltd and its related entities;
- iii. staff means any employee (whether full time, part time, casual, maximum term etc) of Partners Wealth Group as well as Partners Wealth Group's directors, contractors, volunteers and agents;
- iv. TGA means the Therapeutic Goods Administration; and
- v. a person is vaccinated against COVID-19 if a COVID-19 vaccine registered by the TGA has been administered in accordance with the advice of the TGA (including any additional/booster doses as determined by the TGA from time to time).

Scope

- a) Subject to the terms of this policy, Partners Wealth Group is requiring that all employees be vaccinated against COVID-19 when entering the office from 1 November 2021 (even if such persons are not required to be vaccinated under applicable law) as a condition of their employment or engagement, unless a reasonable accommodation is approved.
- b) In requiring staff to be vaccinated against COVID-19, Partners Wealth Group will consider any request to be exempted on a case-by-case basis. This may include any employee who is pregnant, who is nursing, who has a disability, or who has a medical condition that prevents them from safe vaccination, or who rejects vaccination because of sincerely held religious beliefs.
- c) To request a reasonable accommodation, please contact
Lyn Mellsop, People & Culture Manager lmellsop@pwg.com.au
- d) From 1 November 2021:
 - i. Staff who are not vaccinated against COVID-19 will be unable to enter the office environment and will be required to work from home until they are fully vaccinated.
 - ii. Staff who are not vaccinated against COVID-19 will not be able to have direct work-related contact with other Partners Wealth Group staff in their homes or any other venue/premise on business related matters. Meetings must be conducted virtually for business purposes.
 - iii. Staff who are not vaccinated against COVID-19 will be unable to conduct face-to-face meetings or visit sites/premises/homes/venues with clients, business partners and related professional resources. All meetings will need to be conducted virtually.
 - iv. Staff who are not vaccinated against COVID-19 will be required to attend training, conferences, team building and Partners Wealth Group social events, and any other event as directed by Partners Wealth Group, on a virtual basis only, to the extent possible. If a virtual option is not available then unvaccinated employees will be unable to attend.
 - v. The above measures do not include a staff member's social or personal interactions.

Exemption from Vaccination

- a) Depending on the particular circumstances, it may not be reasonable for certain staff members to be vaccinated against COVID-19. Subject to the relevant laws as at the time, a staff member will not be required to be vaccinated when one or more of the following applies:
- i. the staff member is unable, due to a medical contraindication, to be vaccinated against COVID-19;
 - ii. the staff member is unable to reasonably access a COVID-19 vaccine, including where the supply of the relevant vaccine is unavailable in accordance with Government guidelines and age recommendations or where the person is observing the relevant waiting period between COVID-19 vaccines; or
 - iii. an exemption applies under a relevant law in relation to the staff member.
- b) Where staff member requests an exemption from vaccinated against COVID-19 because they are unable to be vaccinated based on a medical contraindication to the COVID-19 vaccine, the exemption request must be supported by a medical contraindication certificate or such other evidence that would satisfy a reasonable person of the reason(s) for the exemption request; or
- c) Where a staff member requests an exemption due to religious or personal beliefs, the exemption request must be supported by a letter outlining their belief or reasoning.
- d) Partners Wealth Group will consider any request for an exemption on a case-by-case basis in accordance with its obligations under applicable laws (including applicable antidiscrimination legislation).
- e) If, after considering exemptions considerations raised by the staff member, Partners Wealth Group considers that it is not reasonable for a particular staff member to be vaccinated against COVID-19, Partners Wealth Group may:
- i. implement alternative arrangements (eg alternative duties); or
 - ii. grant either a temporary or permanent exemption (provided that any such exemption will be granted at Partners Wealth Group's absolute discretion and only to the extent permitted by law).

PWG responsibilities

PWG will:

- a) provide paid leave to allow an employee to receive their vaccination;
- b) if additional leave is required due any side effects of the COVID-19 Vaccination, at the discretion of your Director and/or People & Culture Manager further COVID-19 leave may be granted (or personal leave where appropriate and supported by evidence);
- c) ensure that all clients and visitors to the Partners Wealth Group office do not enter the restricted office area (entrances where access pass required) unless they can provide evidence of being fully vaccinated;
- d) provide and maintain a COVID-19 Safety Management Plan to be communicated to all employees;
- e) ensure that all employees, clients and visitors entering the premises use the QR Code;
- f) provide face masks for employees, if required and/or requested;
- g) encourage social distancing where possible; and
- h) increase cleaning and promotion of hygienic practice throughout the office.

Staff responsibilities

Staff will:

- a) ensure that they maintain their fully vaccinated against COVID-19 status during their employment tenure with Partners Wealth Group, subject to this policy.
- b) Upon vaccination, at all times, provide updated information on administered doses to People & Culture Manager (see Notification and evidence below).
- c) not invite clients, visitor or family members into the restricted area of the office without evidence of being fully vaccinated.
- d) allow Partners Wealth Group Management to confirm an employee's vaccination status to a client, if legally required and/or requested.
- e) immediately inform the People & Culture Manager and/or Director if they have COVID-19, are being tested for COVID-19 or a household member or close contact has COVID-19 or is being tested for COVID-19.
- f) must not come into the office if they or a household member are awaiting the results of a COVID-19 test. Staff must work from home until a negative result has been received by the staff member. This result must be provided to the People & Culture Manager prior to returning to the office.
- g) practice social distancing where possible.
- h) maintain hygienic practices when in the office, including regularly wiping down their desk and hardware with antibacterial wipes provided.
- i) ensure desk space is kept clean and tidy and ensuring that dirty cups, glasses, crockery and cutlery is not left on desks overnight and is placed in the dishwashers provided.
- j) The above responsibilities are applicable during business hours and after hours including weekends.

Notification and evidence

- a) If a staff member is otherwise required by Partners Wealth Group under this policy to be vaccinated against COVID-19, they must provide Partners Wealth Group evidence that would satisfy a reasonable person that they have been vaccinated against COVID-19. This may include (without limitation):
- i. digital vaccine certificate (eg via myGov or Medicare);
 - ii. evidence from the Australian Immunisation Register;
 - iii. medical certificate; and/or
 - iv. a statutory declaration.

Privacy

- a) The collection, use and disclosure of personal and health information under this policy will be in accordance with Partners Wealth Group's obligations under Partners Wealth Group's Privacy Policy and applicable laws (including privacy and health laws).
- b) Partners Wealth Group 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 shall prohibit Partners Wealth Group from disclosing such information if the disclosure is required by law or is otherwise necessary to protect the health or safety of staff members and other persons.

Work health and safety

- a) Partners Wealth Group has obligations under work health and safety legislation including an obligation to ensure, so far as is reasonably practicable, the health and safety of its staff and other persons at the workplace. This includes eliminating or minimising, so far as is reasonably practicable, exposure to and transmission of COVID-19 in the workplace.
- b) Staff members have obligations under work health and safety legislation. Staff members have a duty to take reasonable care for their own health and safety as well as the health and safety of others. Staff members must comply with Partners Wealth Group's lawful and reasonable instructions including any reasonable policy or procedure relating to workplace health and safety.
- c) This policy should be read in conjunction with Partners Wealth Group's Work Health and Safety Policy.

No victimisation

- a) Partners Wealth Group does not tolerate unlawful discrimination, harassment, workplace bullying or victimisation and is intent on doing all that is reasonably practicable to prevent such behaviour at the workplace. This includes where such unlawful discrimination, harassment, workplace bullying or victimisation is because a person has or has not been vaccinated against COVID-19 (including the type of vaccine the person was given).
- b) This policy should be read in conjunction with Partners Wealth Group's EEO, Discrimination, Bullying and Harassment Policy.

Breach of this policy

- a) Employees who breach this policy may be placed on unpaid leave until they are in compliance with the workplace policy.
- b) Breach of this policy may result in disciplinary action up to and including termination of employment or engagement summarily (ie without notice).

If you have any questions about this policy, please contact your Manager or People & Culture Manager.