

## **COVID-19 Policy – 9.9**

Queenstown Lakes Community Housing Trust

December 2021

---

### **Background**

Queenstown Lakes Community Housing Trust (QLCHT) is committed to, and takes responsibility for, the wellbeing of its employees, Trustees, contractors, clients and visitors under its care. All workers have the right to place their health and safety considerations above other priorities, i.e. safety is the first priority. The purpose of this Policy is to provide the framework to mitigate the risk of exposure to, and transmission of SARS-CoV-2 (the virus that causes COVID-19) in our workplaces.

This Policy and the associated rules, procedures and control measures will continue to be reviewed and adapted as we become accustomed to living with COVID-19. This Policy is based on the direction from the New Zealand Government, the Ministry of Health (in particular the [COVID-19 Protection Framework](#)) and published medical advice from health experts.

### **Policy**

#### **Scope**

This Policy applies to all employees, Board members, contractors and any person entering a QLCHT workplace, and is subject to any government mandate and official government health advice relating to the COVID-19 vaccine, testing and associated public health measures. It does not apply to QLCHT clients.

#### **Vaccination**

QLCHT recognises that vaccination against COVID-19 represents a significant opportunity to assist in bringing the spread and impact of the disease under control. The COVID-19 vaccines will help protect people by either preventing or reducing symptoms of COVID-19 in the person who has received the vaccine. For this reason, QLCHT strongly encourages employees and contractors to receive the vaccine as part of their national or local governmental COVID-19 vaccination program, if they can do so, as it becomes available.

QLCHT recognises and respect that some people may be unable or decide not to receive the vaccine, however if this is the choice of the individual it must be recognised that as part of this Policy this may inhibit their ability to perform their job and as such QLCHT reserves the right to take appropriate action. In addition to the above and due to the increased potential threat of serious illness posed to people identified as vulnerable regarding COVID-19 infection, QLCHT strongly encourages those people to receive the vaccination, subject to medical advice.

QLCHT recognises that the science and knowledge around the vaccines is still emerging and these guidelines may need to be updated as developments occur.

### Requirement to be vaccinated

There are four scenarios in which a current employee or contractor will be required to be fully vaccinated\* to perform a role within QLCHT:

1. Where vaccination is mandated by legislation (e.g., a government public health order);
2. Where a client or third party (e.g. project manager or land owner) determines vaccination is required to permit access to any project site, building or facility for work purposes;
3. Where QLCHT determines vaccination is necessary after carrying out a risk assessment;
4. All new employees, Board members or contractors are required to be fully vaccinated to perform a role within QLCHT. This requirement is effective immediately.

\* Fully vaccinated means receiving the recommended dosage and number of doses of COVID-19 vaccines as determined and approved by the New Zealand Medicines and Medical Devices Safety Authority (MedSafe) and shall include 'booster' doses.

### Working in QLCHT offices

The New Zealand Government's vaccination assessment tool consists of four factors as laid out below.

Factor	Lower Risk	Higher Risk
Does the worker work in an indoor space that is less than 100m <sup>2</sup> ?	No	Yes
Is it unreasonable for the worker to maintain 1 metre physical distancing from other people?	No	Yes
Is the worker in close proximity to any other person for more than 15 minutes?	No	Yes
Does the worker provide services to people who are vulnerable to COVID-19?	No	Yes

An organisation must be able to answer 'yes' to at least three factors before it would be reasonable to require vaccination for workers who carry out that work. **QLCHT answers yes to all four factors and therefore considers it reasonable that only fully vaccinated employees will be permitted to work in QLCHT offices.**

### QLCHT meetings

QLCHT Board meetings are considered workplaces, and therefore all Board members and any visitors attending these meetings in person must be fully vaccinated. If not, they reserve the right to meet via video/audio means.

### Visiting QLCHT properties

All QLCHT employees, Board members, contractors and associates who visit QLCHT homes on official QLCHT business, must wear face masks during their visits and ask the household to do the same.

### Exemptions

Where an Employee is not able to be vaccinated with an approved COVID-19 Vaccine due to a medical contraindication, they should contact their manager and provide evidence of their circumstances.

Fully vaccinated employees who are immunocompromised or 'at risk' due to their health status are encouraged to discuss their situation with their manager to ensure that their health and wellbeing is protected as far as is reasonably practicable. There will be a bespoke approach for each 'at risk' employee to ensure effective risk mitigation, which may extend to working remotely where feasible,

### Non compliance

Employees must comply with the requirements under this Policy to be fully vaccinated with an approved COVID-19 Vaccine. Employees who do not comply with the requirements of the Policy (except those granted an exemption) will be considered to have not complied with a lawful and reasonable direction. They may be subject to disciplinary action, which, in the circumstances, is likely to be termination of their employment. Given the purpose and scope of the Policy, there will be very limited (if any) circumstances in which exemptions will be granted. Employees who are unable to be vaccinated due to a temporary or permanent medical contraindication to vaccination; or are seeking an exemption from the requirement under the Policy to fully vaccinate with an approved COVID-19 vaccine on other grounds (medical or non-medical grounds), are required to inform their Manager and provide reasons in writing and evidence of their circumstances.

Employees will be required to submit this information via the process in place at the relevant time, which will be notified to employees. Requests for exemption will be assessed on a case-by-case basis, including having regard to the nature and requirements of the employee's role, including whether there is likely to be interaction with people with vulnerabilities in connection with their employment; the risks of exposure (for the Employee and others) to COVID-19; and the overall purpose and scope of the Policy.

The assessment will be based on the employee's current role and may need to be assessed again if the employee changes roles within QLCHT. As vaccination against COVID-19 (and evidence of vaccination) is a current requirement of all roles within QLCHT, redeployment opportunities will be very limited and will only be possible where there is an existing vacancy.

If, following this assessment, the employee is provided an approved exemption from the requirement to vaccinate against COVID-19 under this Policy, the employee will be required to comply with any additional controls communicated to them as part of the exemption or thereafter (e.g. regular testing and other non- pharmacological methods such as mask wearing, physical distancing, and restriction of movement).

### Employer responsibilities

QLCHT will remain informed of vaccine science and developments through established and reputable sources. Managers are responsible for:

1. Ensuring employees are aware of the requirement to be fully vaccinated with an approved COVID-19 Vaccine and provide evidence of vaccination under the Policy;
2. Ensuring job advertisements and recruitment processes set out the requirement to be fully vaccinated with an approved COVID-19 Vaccine and provide evidence of vaccination under the Policy;

3. Managing requests for leave associated with COVID-19 vaccination;
4. Consulting internally in any of the following instances:
  - a. An employee notifies them that they have a medical contraindication to Vaccination and wish to seek an exemption from complying with the Policy,
  - b. An employee notifies them that they wish to seek an exemption from complying with the Policy on other grounds,
  - c. An employee refuses to fully vaccinate with an approved COVID-19 Vaccine and/or provide evidence of vaccination under the Policy.
5. The handling of any information associated with people's health or wellbeing sensitively and in accordance with QLCHT's Privacy Policy.

#### Employee responsibilities

Employees are responsible for:

1. Being fully vaccinated with an approved COVID-19 Vaccine and providing evidence of vaccination on or before the compliance date;
2. Notifying their manager if they wish to seek an exemption from complying with the Policy and notifying their manager if they are otherwise unwilling or unable to comply with the Policy.

All new employees of QLCHT must be fully vaccinated with an approved COVID-19 vaccine and provide evidence of vaccination before they commence employment. Should an applicant for new employment indicate that they wish to seek an exemption from the requirement under the Policy to fully vaccinate with an approved COVID-19 vaccine on medical or other grounds, they will need to provide evidence of their circumstances upon request. New employees must undertake vaccination against COVID-19, and any required screening and/or medical assessments, at their own expense.

#### Client / third party requirements

QLCHT will comply with client / third party requests for QLCHT employees and contractors to be fully vaccinated, whether this is because of government mandate or the client's / third party's own decision. Where necessary, QLCHT will discuss the request with the client / third party to understand the limitations being placed on our people.

QLCHT will endeavour to provide aggregated information on vaccination status to clients / third parties by confirming that QLCHT people are fully vaccinated, rather than by providing a list of names or any other details, unless required to do so. QLCHT will ensure that QLCHT's Privacy protocols are in place when officially responding to such requests. No individual's vaccination status will be released without that individual's permission.

QLCHT employees and contractors may be required to show proof of vaccination status when entering client/third party premises/sites using My Vaccine Passes. QLCHT encourages employees and contractors to obtain their My Vaccine Pass and carry it with them whilst at work.

### Risk Assessments

Risk assessments may be workplace-specific, role-specific, project-specific or client-specific. Depending on the assessed level of risk, the risk assessment shall be reviewed or completed by QLCHT Board, management or individual employees.

The risk assessment will help determine the appropriate control measures for the workplace, role and task, such as the requirement to be fully vaccinated.

Risk assessments may change over time, as circumstances and the pandemic change, however QLCHT will ultimately decide what restrictions may be required in specific circumstances.

### Visitors to QLCHT offices

To keep QLCHT people and workplace as safe as practicable, all visitors to QLCHT offices are required to wear face masks and encouraged to be fully vaccinated, however if they are not vaccinated, then they must confirm that they have not (in the previous 14 days) been:

1. Subject to a positive COVID-19 test;
2. Unwell with flu-like symptoms;
3. Self-isolating;
4. In contact with a confirmed case of COVID-19.

### Engagement of suppliers

Where QLCHT engages a supplier (including sub-consultants or contractors/sub-contractors) to undertake work as described by the four vaccination requirement scenarios, the supplier must only provide fully vaccinated workers for tasks that involve face-to-face interaction with QLCHT employees, clients or others under QLCHT's care. Engaged sub-consultant/s or sub-contractor/s must confirm that this is the case. QLCHT may request evidence of vaccination in line with legal and privacy requirements.

### COVID-19 testing

As testing methods improve and become more widespread, employees may be required, either by New Zealand legislation, a client / third party or by QLCHT, to be tested for COVID-19 as part of ongoing health monitoring. QLCHT employees and contractors are to partake in the testing regime and provide verification of the test results.

### Further Information

If you have any queries about this COVID-19 Policy, please contact:

The Executive Officer

Email address: [Julie@qlcht.org.nz](mailto:Julie@qlcht.org.nz)

Postal Address: PO Box 1748, Queenstown, 9348