

COVID-19 Guideline for Managing Vulnerable Staff

WHS-PRO-GUI-006h



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1 Introduction

Queensland Work Health and Safety legislation requires the University (an Employer) to take care of the health, safety and welfare of workers at the workplace (including to and from the workplace). Some people are at greater risk of more serious illness with COVID-19. The University acknowledges there will be Staff Members who may be classified as a 'vulnerable person', and, as such will be following the Australian Government's advice for managing the risk for staff members who are classified as vulnerable to COVID-19 during the declared public health emergency. The University is also committed to, where possible, managing the risk for staff members who are involved in the care of a person who is classified as vulnerable to COVID-19.

The Queensland public health response now transitions toward 'Living with COVID-19'. The goal of 'transition to' and 'Living with COVID-19' is to limit the transmission of COVID-19 amongst vulnerable populations and to prevent severe disease and death. These measures are based on the COVID-19 CDNA National guidelines for public health units (CDNA Guidelines) and reflect a higher level of confidence that severe disease is prevented through a strong vaccination strategy, alongside other general public health and social measures such as, physical distancing, adherence to good hand and respiratory hygiene practices and mask wearing, where physical distancing cannot be maintained.

JCU will monitor relevant Health Authority advice and update internal procedures as the requirements change.

2 Who is a Vulnerable Staff Member

For the purpose of this guideline, a vulnerable person includes any Staff Member who fits into one or more of the categories identified by the Department of Health. These categories may change depending on the latest evidence. Refer to <https://www.health.gov.au/health-alerts/covid-19/advice-for-groups-at-risk/risk-factors-for-more-serious-illness-for-further-information>.

Where a Staff Member has self-identified as a vulnerable person due to another medical condition in writing, from their Treating Medical Practitioner (TMP), the University will endeavour to make reasonable adjustments, based on the specific risk in the scenario.

3 Risk Assessment

People at increased risk of severe COVID-19 illness can still work, particularly if vaccinated.

According to Queensland Health, even while COVID-19 is active in the community, vulnerable people are able to undertake normal activities, such as attending medical treatment, exercising, meeting friends and going to work. Queensland Health recommends that the vulnerable person consider wearing a mask even if it's not required, maintaining 1.5m from others where possible and avoiding large public gatherings.

JCU requires that an individual risk assessment be completed for vulnerable staff members. The risk assessment should be completed with the vulnerable staff member, the Line Manager / Supervisor together with a member of the WHS Unit and requires review and support from the Treating Medical Practitioner.

3.1 Risk Assessment Process

A risk assessment is required to identify suitable controls for a vulnerable staff member's individual work area and work tasks. A risk assessment is only required for vulnerable staff member's who are attending a JCU owned/managed worksite, i.e. if a vulnerable staff member works from a home environment through a Remote Working Arrangement, a COVID-19 risk exposure risk assessment is not likely to be required. To conduct a risk assessment the Supervisor, in consultation with the vulnerable staff member, should:

- Step 1:** Understand the vulnerable staff members' vaccination status and the local community transmission rates
- Step 2:** Identify the type of work and work travel the Staff Member is likely to perform
- Step 3:** Provide a brief summary of the role requirements
- Step 4:** Identify the current control measures in place
- Step 5:** If a particular work task requires additional controls, identify and nominate a person responsible together with an implementation date
- Step 6:** Assess the risk with control measures in place.
- Step 7:** A vulnerable staff member is to seek medical advice regarding the suitability of the workplace risk assessment.

A template for conducting this risk assessment can be found in WHS-PRO-TEM-006i COVID-19 Vulnerable Staff Member Risk Assessment Template.

Managers are encouraged to document the outcomes of the risk assessment process and subsequent working arrangements, and regularly review these throughout the pandemic. If no agreeable outcome is reached, see section 8.

4 How can we reduce exposure to COVID-19 within the workplace?

If the vulnerable staff member is attending the workplace, the following controls should be considered.

- a. *1.5 metres (physical distancing)*
 - Maintain 1.5m between people at all time is essential for minimising exposure. If a vulnerable staff member is required to conduct essential work within 1.5m (e.g. patient treatment), PPE should be considered in consultation with the vulnerable staff members doctor. Note: ensure that the vulnerable staff member understands that this is not intended to discriminate, but is a measure of protection;
 - Reduce working within an enclosed space with other people as much as is reasonably practicable:
 - If work is required within an enclosed space, reduce the time spent in the space as much as is reasonably practicable.
 - If work is required within an enclosed space, increase the distance between people as much as is reasonably practicable and in line with government advice.
- b. *Shared equipment*
 - Eliminate or reduce as much as possible sharing of equipment. If shared equipment is required, establish a cleaning regime for the item.
- c. *Cleaning*
 - Provide cleaning and disinfecting equipment to the vulnerable staff member.
- d. *Personal hygiene and responsibility*
 - Ensure the vulnerable staff member has access to hand washing / hand sanitiser at all times where there is potential exposure;
 - The vulnerable staff member should travel at quiet times and avoid crowds;
 - If the vulnerable staff member sees a crowded space it is their responsibility to not enter.
- e. *Training*
 - Provide awareness training to the vulnerable staff member on control measures;
 - Provide awareness training to the vulnerable staff member if they are required to wear PPE as part of the identified control measures.
- f. *PPE*
 - Safe and appropriate use of PPE

5 Mental Health Considerations

Vulnerable staff members are expected to have an increased level of stress and anxiety regarding their safe return to the workplace and the risk of contracting COVID-19. Vulnerable staff members must be included in the planning and risk assessment process, and should raise any concerns about returning to the workplace with their supervisor.

Supervisors are to ensure that the vulnerable staff member, themselves, and any other relevant person has a good understanding of the risk mitigation measures in place to help alleviate anxiety.

The mental health impact of the pandemic is predicted to be widespread, causing increased stress and anxiety in many people for a wide range of reasons. However, the majority of mental health conditions and the mental health impacts caused by COVID-19 do not fall under the classification of 'vulnerable' for the purposes of this guideline. Therefore, those with mental health conditions who are require a supported return to work should be managed independently by the Supervisor, or, if assistance is required under the WHS Health Management Procedure. Noting that severe mental illness is considered within the vulnerable classification.

6 Responsibility of Vulnerable Staff Members

As a worker, vulnerable staff members must take reasonable care of themselves. It is the responsibility of the vulnerable staff member to advise their supervisor that they are classified as vulnerable and to be actively involved in the risk assessment process. The vulnerable staff member is also responsible for following any reasonable health and safety instruction from the employer (e.g. implementing the risk assessment control measures including hand hygiene, physical distancing etc).

The vulnerable staff member is responsible for discussing their individual risk assessment and action plan with their treating medical practitioner.

7 Supporting Medical Documentation

JCU may request supporting medical documentation. WHS-PRO-FORM-006k TMP Letter – Medical Confirmation of COVID-19 Definition for Vulnerable Persons is available for those requiring confirmation that their staff member meets the criteria of a vulnerable person.

Further communication with a Vulnerable Persons treating doctor may take place once consent is provided, in line with the Health Management Procedure.

8 What if risk controls are not reasonable or agreeable

If the risks to vulnerable staff member's health and safety at the workplace cannot be effectively managed through reasonable adjustments, or the vulnerable staff member or treating practitioner do not agree with the University's proposed working conditions, then alternative arrangements are to be investigated. This process must be conducted in consultation with Human Resources and the vulnerable staff member.

9 Record keeping

Records are to be managed in a confidential file by the Supervisor and WHS Unit. Records are to be kept for 80 years in accordance with the General Retention and Disposal Schedule (Public Records Act 2002 s26). Records should be confidentially stored in the University record management system.

Schedule / Appendices

WHS-PRO-TEM-006i COVID-19 Vulnerable Staff Member Risk Assessment Template

WHS-PRO-FORM-006j COVID-19 Vulnerable Staff Member Form

WHS-PRO-FORM-006k TMP Letter – Medical Confirmation of COVID-19 Definition for Vulnerable Persons

Document Control

Version	Date	Prepared By	Comments
Version: 22-2	Approval Date: 5/7/2022	Next Review Date: 5/7/2023	Page 3 of 4

20-1	02/06/2020	WHS Unit	Guideline established.
20-2	16/06/2020	WHS Unit	Addition of WHS-PRO-FORM-006k to section 8 and schedule / appendices
20-3	14/07/2020	WHS Unit	Guideline updated in accordance with AHPPC statement 'On recommendations for managing of health risk as COVID-19 measures lift' published 6 July 2020. WHS-PRO-TEM-006i COVID-19 Vulnerable Staff Member Risk Assessment Template deleted from the guideline.
20-4	09/10/2020	WHS Unit	Major changes to 3.2 Likelihood and 6.0 Controls to reflect the Australian Government Department of Health COVID-19 Action Plan for people with an increased risk of severe illness.
20-5	01/12/2020	WHS Unit	Minor changes – updated information – deleted - is aged 65 years or over and have a chronic medical condition and is Aboriginal or Torres Strait Islander aged 50 years and over with chronic medical conditions from high risk of severe illness category.
21-1	06/08/2021	WHS Unit	Review currency of the document. Minor grammatical editing only.
21-2	15/11/2021	WHS Unit	Updated criteria for who is a vulnerable staff member and modified the risk management steps. Removed outdated advice from AHPPC
22-1	28/04/2022	WHS Unit	Changes to Section 1 in line with QLD Government Health Alert Minor change to Section 3c Updated information in Section 5
22-2	20/06/2022	WHS Unit	Updated in line with the 'living with COVID-19' government approach.