

HYDRO TASMANIA COVID-19 VACCINATION POLICY [UPDATED AT 8 JUNE 2022]

Overview

This policy sets out Hydro Tasmania's approach to COVID-19 vaccinations for persons engaged by Hydro Tasmania.

This policy is based on guidance provided by the Australian Government Coronavirus (COVID-19) website, Safe Work Australia and other federal, state and territory government websites that are updated frequently. It is also based on risk assessments undertaken by Hydro Tasmania, and consultation with Hydro Tasmania staff.

This version of the policy is current as at 8 June 2022 following review and further consultation with staff.

We encourage everyone to familiarise themselves with our policy, the relevant government guidance and check regularly for updates. We'll also advise of any changes that you need to be aware of.

It is important to note that this policy and its requirements are subject to any legislation, public health order or State or Federal government direction or mandate. Any regulatory changes will be communicated to you by the Hydro Tasmania COVID-19 IMT as soon as practicable.

Why do we have a COVID-19 vaccination policy?

COVID-19 is a dangerous virus and continues to have a significant impact on all our lives and on how we operate. Catching COVID-19 can be serious, particularly for older people and those with underlying health conditions.

The risks posed by COVID-19 have changed with the rapid rise of the Delta variant which is more infectious and has more severe health effects than previous variants. The Omicron variant is also bringing new risks and it's expected that there will be further variants of COVID-19 into the future. As government imposed control measures like check-ins, mask wearing, mandatory quarantine and venue capacity limits are rolled back or removed, there is now and will continue to be widespread community transmission of COVID-19.

Hydro Tasmania recognises that COVID-19 creates health and safety risks in the workplace, and that vaccination is considered the most effective and efficient control available to combat the risks posed by COVID-19.

According to current and reliable scientific information, all COVID-19 vaccines currently available in Australia:

- are effective at preventing symptomatic infection, including from the Delta variant.
- substantially reduce the risk of serious illness or death, including from the Delta variant.
- are safe and any adverse effects are usually mild. There is a much higher risk of developing serious complications and dying from acquiring COVID-19.

While other measures, such as mask wearing, and social distancing, are demonstrated to reduce the transmission of COVID-19, the effectiveness of these measures depends on people applying them consistently or correctly. They do not provide a substitute for the constant protection offered by vaccines, nor do they reduce the risk of developing serious illness once somebody acquires an infection.

Even with high vaccine rates in the community, COVID-19 will remain a significant hazard in any

workplace in which there is a possibility that people will interact or use the same common spaces (even at separate times).

Why we think vaccination is important

Hydro Tasmania has a duty to take all reasonably practicable steps to ensure the health and safety of our people and those workers engaged by us. We conducted a COVID-19 work, health and safety risk assessment to determine the best way to minimise risks posed by COVID-19. This risk assessment tells us that vaccination is the best way to manage COVID risk. We all have a shared responsibility to take reasonable steps to help stop the spread of COVID-19 to keep ourselves, our colleagues, and other persons safe and healthy in our workplace.

Australian governments (Federal and State) have said that:

- vaccines form part of their strategies to manage COVID-19.
- vaccination means that fewer people will get COVID-19 and those that do are far less likely to be hospitalised or to die.
- even if you are vaccinated, you may still contract the virus and pass it on.

Hydro Tasmania believes vaccination is our best way to manage the risks posed by COVID-19 and that anyone who can get vaccinated should do so.

Who does this policy apply to?

This policy of mandatory COVID-19 vaccinations applies to anyone engaged by Hydro-Electric Corporation (ABN 48 072 377 158) trading as Hydro Tasmania and/or Entura (**Hydro Tasmania**) as well as anyone engaged by any group entity controlled by Hydro Tasmania, including Momentum Energy Pty Ltd and AETV Pty Ltd (but excluding anyone engaged by Entura Hydro Tasmania India Private Limited)

This includes (but might not be limited to) all employees, contractors, suppliers, volunteers, persons undertaking work placement / work experience and visitors who are granted entry on site.

For visitors, this could include entry beyond:

- speed gates at 4 Elizabeth Street, Hobart
- reception at Cambridge workshop or any other site office
- check in at Lake Pedder Wilderness Lodge.

For the purposes of this policy, these groups will collectively be referred to as “workers”.

What this means for you?

Summary

This policy sets out the requirement that (unless an exemption applies) all Hydro Tasmania workers have received the first two doses of an approved COVID-19 vaccination by 31 January 2022 in order to access Work Premises. Hydro Tasmania does not require workers to have received “booster” vaccination shots, but strongly recommends that all workers stay “up to date” with their COVID-19 vaccinations.

Hydro Tasmania requirement for workers to receive first two doses of COVID-19 vaccine

Unless exempt on one of the grounds set out in this policy, by **31 January 2022** all workers engaged by Hydro Tasmania must have received the first two doses of an approved COVID-19 vaccination, and supply Hydro Tasmania with acceptable proof of vaccination to access any Work Premises.

An “approved COVID-19 vaccination” is one that is approved for use in Australia by the Therapeutic Goods Administration. You may know about these as the “Pfizer”, “Astra-Zeneca” or “Moderna” vaccines. Others may become available over time. You should consult with your doctor about the most appropriate vaccination for your personal circumstances.

“Work Premises” is any place that a worker goes, or is likely to be, while at work for Hydro whether in

Australia or overseas, including any Hydro Tasmania vehicles.

Hydro Tasmania recommendation that workers stay “up to date” with COVID-19 vaccinations

Hydro Tasmania strongly recommends that our workers receive any boosters that are recommended by ATAGI in order to stay “up to date” with their vaccination. However, Hydro Tasmania does not require proof that workers are “up to date” to access Work Premises.

At the date of this document, “up to date”, as defined by ATAGI means:

“All individuals aged 16 years and over are recommended to receive a COVID-19 vaccine booster dose to maintain an “up-to-date” status. This booster dose is now recommended from 3 months after the last primary dose. This is called the ‘due date’.”

ATAGI’s definition of “up to date” may change over time, including by recommending further booster doses.

Acceptable forms of proof of vaccination

There are many forms of acceptable proof of vaccination status including:

- COVID-19 digital certificate.
- Immunisation history statement.
- International COVID-19 vaccination certificate.
- A copy of the COVID-19 Vaccination Record Card.
- The record of immunization from a healthcare provider or pharmacy.
- A copy of medical records documenting the vaccination.
- A copy of immunisation records from a public health or state immunisation information system.
- A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) administering the vaccine(s).

Information about your vaccination status will be stored securely and will be treated as highly confidential information.

Hydro Tasmania is committed to protecting your privacy and complying with its obligations under the *Privacy Act 1988* (Cth) and the *Personal Information Protection Act 2004* (Tas) or any other applicable privacy legislation and information regarding how Hydro Tasmania manages your personal and sensitive information can be found in Hydro Tasmania’s Privacy Policy (<https://www.hydro.com.au/privacy-policy>).

Storing your certificate

You can elect to upload your proof of vaccination to SuccessFactors where it will be stored securely. Alternatively, you can show your manager your proof of vaccination, and your vaccination status will be recorded in SuccessFactors based on the manager’s confirmation that they have viewed adequate proof of vaccination.

Exemptions to the requirement to be vaccinated against

COVID-19

Hydro Tasmania is committed to working with our people and to find reasonable and practical solutions where exemptions to the policy are requested.

We will consider each request on a case-by-case basis, taking into account the individual staff member’s circumstances.

Entitlement to exemption

A worker is entitled to an exemption from the requirement to be vaccinated under this policy if the worker:

- cannot be vaccinated against COVID-19 due to a medical contraindication or serious medical condition which prevents them being vaccinated; and
- holds a current certificate from a registered medical practitioner that the person cannot receive a vaccination due to that medical contraindication or serious medical condition; and
- provides that certificate to Hydro Tasmania by **31 January 2022** unless otherwise permitted in writing by their manager; and
- (if requested) provides Hydro Tasmania with permission for a suitable member of the Senior Leadership Team to confidentially contact and discuss the medical contraindication or serious medical condition with the medical practitioner who supplied the certificate.

Evidence of a medical contraindication or serious medical conditions will be stored securely and will be treated as highly confidential and sensitive information. As noted above, information regarding how Hydro Tasmania manages your personal and sensitive information can be found in Hydro Tasmania's Privacy Policy (<https://www.hydro.com.au/privacy-policy>).

Discretionary exemptions may be granted on other grounds on a 'case by case' basis

On request Hydro Tasmania may, in its absolute discretion and at any time, reasonably grant an exemption to a worker on any other grounds on a 'case by case' basis.

In relation to any request made under this section:

- The worker must always act in good faith and for genuine reasons and provide adequate detail of those reasons; and
- Hydro Tasmania will consider each request for such exemption in good faith; and
- Hydro Tasmania may (in its absolute discretion and without limitation):
 - seek further information from the worker or any expert who may be able to assist consider the issue.
 - approve the request (including on any condition); or
 - not approve any application.

It is not possible to exhaustively list the factors that will be considered by Hydro Tasmania in this policy as each case will be different and considered on its own merit.

However, generally, requests for discretionary exemptions will not be granted unless there is a clear and objectively reasonable basis for the exemption considering the reasons why vaccination is so important. For example, a general distrust of vaccines or personal desire not to be vaccinated will not be sufficient reasons for an exemption to this policy.

Exemptions may be granted on a temporary or permanent basis and subject to any reasonable conditions that Hydro Tasmania considers appropriate

Employees must be aware that where requests are made which are not for honest and genuine reasons this may lead to further action under Hydro Tasmania's Discipline Procedure.

What will normally be involved when an exemption is granted?

Exemptions will require alternative control measures to be taken by the relevant employee which may include, as an example, wearing masks in the workplace or rapid antigen testing prior to entering a work site. The most appropriate measures will be determined based on the worker's individual circumstances.

Time off for vaccination

We support flexible working practices. Please discuss with your manager what options are available to you to allow time during work hours to get vaccinated, including receiving any boosters to stay "up to date" with your vaccination.

If you experience side effects after your vaccination and are not well enough to work, you can access personal leave in accordance with our policies and your entitlements.

Outcomes in the event of non-compliance

Recent staff surveys demonstrate that we currently have a high rate of vaccination across our workers and that there is broad support for a mandatory vaccination policy in respect of the first two doses of a COVID-19 vaccination.

Ultimately Hydro Tasmania accepts that the choice to be vaccinated rests with each individual.

If you do not have an approved exemption or you have not provided evidence of vaccination as required under this policy:

- you will not be permitted to enter or remain on any Hydro Tasmania premises after **31 January 2022**; and
- Hydro Tasmania will commence a process to understand why there has not been compliance, which may include commencing a process in accordance with Hydro Tasmania's Discipline Procedure.

In cases of workers choosing not to provide evidence of vaccination, our preference is to work with each individual to understand their concerns and where possible, find practical solutions.

In the first place your immediate manager will meet with you for a discussion to try to understand the reasons behind your choice and whether you have any reasonable basis to seek an exemption from the application of this policy. After this, Hydro Tasmania may commence the process under the Discipline Policy. This may lead to outcomes up to and including the termination of your employment.

A note on vaccine safety

Information available from reliable scientific sources (including all major western governments, scientific organisations, and medical professionals) is that vaccines are safe and effective for protection against illness caused by COVID-19. As such, individual concerns about vaccine safety, no matter how strongly these are held, will not be sufficient grounds to warrant exemption from this policy unless accompanied by a medical certification of a contraindication as detailed above.

If you have concerns or questions about vaccine safety, we recommend that you speak to your medical practitioner.

You may also find accurate and up-to-date information about COVID-19 vaccines from official government sources, such as the Australian Department of Health or the Tasmanian Coronavirus website (<https://www.coronavirus.tas.gov.au/>).

Review date and Changes to this policy

Hydro Tasmania will review this policy before 31 December 2022 to consider any changes in legislation, the broader environment, including new variants, changes to booster requirements and community vaccination rates.

We may review this policy before that time if, for example, our risk assessments, government guidance or client requirements require modification to the policy.

This policy may be amended or withdrawn by us at our discretion and does not form part of your contract of employment.

Date	8 June 2022
Approved	Acting Chief Executive Officer
Version	2