**COVID-19 Vaccination Information Policy (Internal Use Only)**

<PRACTICE NAME> has always been an inclusive practice that welcomes everyone, this will not change.

Our business is working to keep people safe whilst also meeting our obligations under the laws of privacy and anti-discrimination, and as such we have a strict policy in regards to vaccination information in the workplace.

**The Privacy Act 1988 (Cth)**

*The Privacy Act 1988 (cth)* was developed to promote and protect the privacy of individuals personal information[[1]](#footnote-1). Businesses have obligations under the Privacy Act which include the Australian Privacy Principles (APP’s). The APP’s cover the collection, use, disclosure and storage of personal information.

‘Personal information’ under the Privacy Act is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not that information is true or not and whether or not it is recorded in a material form, this includes a person’s health information.

‘Sensitive information’ under the definition of the Privacy Act includes health information.

The privacy protections apply to a person’s COVID-19 vaccination status, as this is considered ‘sensitive information’.

**Anti-Discrimination**

At <BUSINESS NAME> we take our responsibilities under the federal discrimination legislation very seriously.

Discrimination in the workplace occurs when someone is treated less favourably than another person in the same or materially similar circumstances based on characteristics that applies to them or is assumed to apply to them.

Patients, staff and visitors will not be treated less favourably, this includes;

* In their employment;
* Access to our healthcare setting;
* Access to our health care services and goods; and
* Any other adverse action that would be deemed as less favourable treatment or disadvantage a person.

**COVID-19 Vaccination Information**

It is important that everyone at <BUSINESS NAME> is aware of the following in order to protect patients, staff and visitors:

* We are an inclusive practice that welcome all patients and visitors irrespective of their vaccination status;
* We do not deny or restrict anyone’s access to our practice based on a person’s vaccination status or any other characteristic that applies to them or is assumed to apply to them;
* Therefore, it is not necessary for us to know our patient, staff or visitors’ vaccination status and as such we do not need to ask any patients, staff or visitors about their vaccination status; and
* If we are asked for our own or other people’s vaccination status by a patient, staff or visitor, we will not disclose this information.

We understand that it is a confusing time for people, and there is genuine concern about the protection of people’s health.

However, it is also important, that whilst this is acknowledged, we remember our obligations to each other and our patients when it comes to privacy, anti-discrimination and our duty of care.

**Preventing and Minimising the Risk of Infection**

Throughout the pandemic we have had measures in place to prevent and minimise the risk of infection. These controls continue to be in place. These can be found in the <BUSINESS NAME> COVID-19 Safe Plan < and TITLE OF ANY OTHER POLICY>.

All patient, staff and visitors must continue to follow all control measures that <BUSINESS NAME> has put in place, irrespective of vaccination status.

**Staff Vaccination Information**

In the event that staff are requested to provide proof of their vaccination status, this will only be requested by <POSITION TITLE>. The <POSITION TITLE> is the only person authorised in <BUSINESS NAME> to request information about staff vaccination status.

If proof of vaccination status is requested for any reason by the <POSITION TITLE> a worker must provide proof.

In the event proof is requested, <POSITION TITLE> will determine if the proof will be copied and stored on staff files. If it is stored, this information will only be accessed by <POSITION TITLE>. This information will not be disclosed or shared with a third party, other than an authorised officer who evidences the appropriate authority.

**Authorised Officer Visit**

If <BUSINESS NAME> are visited by an authorised officer asking about our COVID safe plan, policies, control measures and/or vaccination information, all enquiries must be directed to <POSITION TITLE> only. An authorised officer may be a Police Offcier, an SA Health Compliance Officer or a Safe Work SA Representative.

If <POSITION TITLE> is not available at the time of the visit, please take the details of the official person *(including, with permission, a photocopy of their identification)* and reassure them that <POSITION TITLE> will get back to them at their earliest convenience.

If <POSITION TITLE> is available, before working with the authorised officer they must request the authorised officer’s certificate of authority.

Once the authority has been confirmed, it is important that <POSITION TITLE> complies with the authorised officers’ requests and provides them with the information they require.

**Support with Answering Questions**

Please find below some useful language that may help you if you are asked specific questions about vaccination status:

If you are personally asked to disclose *your* vaccination status by a patient, staff or visitor a response option is:

*‘I am unable to disclose my personal information to you as this is sensitive information and would breach our policy’*

If you are asked to disclose the vaccination status of *other* staff in the practice a response option is:

*‘**I am unable to disclose the personal information of our staff as this is sensitive information and would breach our policy, however please be reassured that we are doing everything that is reasonably practicable to ensure the safety of our patients, staff and visitors’.*

If a patient or visitor offers for their vaccination status (verbally or documented) one response option is;

*‘Thank you but that is not necessary, that is your personal information’.*

It is possible that you may have a patient that is insistent that they will only come to a practice where they are reassured that all patients, staff or visitors are vaccinated. A response option is:

*I am unable to disclose the personal information of our patient, staff and visitors as this is sensitive information and would breach our policy, however we have taken every step possible to ensure the safety of everyone here at the practice. If you choose not to come to our practice because I am unable to give you the information you are requesting, we understand your choice, and will always be here for you if you change your mind.*

1. <https://www.legislation.gov.au/Details/C2021C00139> [↑](#footnote-ref-1)