



COVID-19 VACCINATION POLICY

**ON-HIRE CASUALS, MAX TERM
CONTRACTORS AND
PERMANENT CANDIDATES**

**DECEMBER
2022**

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Scope

This Policy applies to all on-hire casuals, permanent placements, and any ABN contractors of Bluefin Resources (**Bluefin**) placed with Clients on behalf of Bluefin.

This Policy is a necessary and critical response to continue to ensure the health and safety of our employees, clients, suppliers and visitors to our workplaces is at the core of what we do and how we act.

Adopting this Policy on COVID-19 vaccinations for our employees is a step we are taking in addition to the PPE and other precautions that we are already implementing in our workplaces in line with our commitment to comply with all Public Health Orders and safety laws.

This Policy is intended to comply with all Commonwealth and State laws and is based on our review of current public health guidelines.

Definitions

Worker means any on-hire casual employee, permanent placement employee and any ABN contractors placed on assignment with a Bluefin Client.

Client Site means any site operated by a client of Bluefin where an on-hire casual, permanent placement or ABN Contractor may be required to perform work on behalf of Bluefin.

Assignment means an assignment which is offered to a Bluefin Worker.

Candidate means a prospective employee of either Bluefin or a Client of Bluefin.

Assignment Vaccination Requirements

For our staff who have already received two COVID-19 vaccinations, there is no new or different activity.

We understand that several Bluefin clients may implement (or have already) mandatory COVID-19 vaccination requirements whereby workers (including Bluefin Workers) will not be permitted to work in, or physically attend a client site unless they:

1. are fully vaccinated for COVID-19, or have received one dose of vaccine and have booked an appointment to receive a second dose of vaccine: and
2. provide proof of vaccination and/or vaccination appointment to either Bluefin or the client.

Where a Bluefin client has implemented a Policy at their workplace, Bluefin will be working with the client and our workers performing an Assignment with the client to verify the vaccination status of our Bluefin Workers, to ensure that only fully vaccinated Bluefin Workers are placed with those clients.

If a Bluefin Worker is not vaccinated (and has no valid medical contraindication certificate) then that Worker will not be eligible for any Assignment for work with a Bluefin client with a mandatory vaccination policy, or for an Assignment to work at any work location where proof of vaccination is required to attend and work on site. Where necessary and appropriate, Bluefin will need to take steps to end the Assignment for the unvaccinated Worker. There will be only very limited circumstances where a worker can perform the Assignment remotely.

If an Assignment ends or is not available to a Worker who is not vaccinated (and has no valid medical contraindication certificate) Bluefin Resources will attempt to find an assignment for the Worker where mandatory vaccination is not required.

Verification of vaccination

To assist Bluefin in placing you on suitable Assignments, and to ensure compliance with this Policy, Bluefin may request or direct a Worker to provide evidence that they have been vaccinated or taken steps to comply with this Policy. Evidence that will satisfy Bluefin includes a vaccination record or confirmation of a vaccine appointment and attendance.

You should redact the Individual Health Identifier on your vaccination statement and/ or COVID-19 Digital Certificate before providing this to the Bluefin.

Bluefin will not retain the vaccination status of workers beyond a period which is necessary. Should a client require evidence of the vaccination status of a worker, Bluefin will seek your consent.

Where a Worker is required under a Public Health Order, or for a particular Assignment to be vaccinated against COVID-19 the Worker must provide evidence of vaccination to Bluefin.

A Worker who is unable to be vaccinated due to a medical contraindication must provide evidence to Bluefin of that contraindication. In the case of a temporary exemption, the Worker will be expected to comply with the above requirements as soon as practicable.

Employees who fail to provide vaccination evidence will be treated as if they are unvaccinated.

Collection, storage and disclosure of your COVID-19 vaccination information

If a Public Health Order applies to your employment, you will be required to comply with any requirement to provide vaccination information.

There are likely going to be a range of other circumstances where Bluefin asks that workers provide some proof of COVID-19 vaccination in order to collect, store and disclose proof of COVID-19 vaccination. Where that vaccination information is requested and provided it will be so that:

- Bluefin has proof of your COVID-19 vaccination status available; and
- Bluefin can disclose your COVID-19 vaccination status to any Bluefin customer who requires it as a condition of your work.

Bluefin will need to collect this information even if you do not currently work on an Assignment where proof of vaccination is required, so that – in future – you may work anywhere that proof of COVID-19 vaccination is mandated.

We are aware of our obligations as a business and an employer in respect of the collection and handling of personal information, and we would not be asking for such information from our staff if we did not consider it reasonably necessary to do so.

Our collection, handling and storage and disposal of the information will be undertaken in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth). Your vaccination information will be used to:

- facilitate you working where vaccination is required, and to prove your ability to do so;
- completing workplace Health & Safety Risk Assessments; and
- reporting workforce vaccination status where required to do so.

If Bluefin is required to provide information about your vaccination status to a client or authorised person it will provide the minimum it must, and on the basis the confidentiality and security of that data must be maintained.

Medical exemptions

There are only very limited medical reasons where a risk posed by receiving a vaccination could be greater than the risk posed by failing to be vaccinated against the COVID-19 virus. If a worker has a genuine concern about a risk to their health, they should consult with their doctor as soon as possible and then provide any medical advice or certificate to Bluefin's HR team.

If a worker, for genuine medical reasons, is unable to be vaccinated against COVID-19, please let Bluefin's HR team know.

Remote Working

Due to our WHS obligations and considering the COVID19 pandemic, Bluefin casuals who are on-hire with clients are only to perform services to our clients while within Australian States and territories.

Furthermore, our employees have a contractual obligation to perform services on behalf of Bluefin in any reasonable location as directed by Bluefin. This would include any location as outlined in a client assignment, or from home if Bluefin and the client were agreeable.

Given the pandemic and case numbers still occurring overseas, Bluefin does not consider it a reasonable request to work offshore.

Source

(Australian Government Department of Health, n.d.)

(Safe Work Australia, n.d.)

(Work Health and Safety Act 2011, n.d.)

Review

The policy will be reviewed by:

- People and Culture Director
- Director- Commercial and Operations
- CEO

Last reviewed: **02/12/2022** Date for next review: **05/02/2022**

DocuSigned by:

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Signature of Christine Wright, Group Chief Executive Officer

Date 02/12/2022