

Frequently Asked Questions

Immunisation for Health Care Workers in South Australia Policy Directive 2017

I AM A HEALTH CARE WORKER WORKING OR PLANNING TO WORK OR STUDY IN SA HEALTH SERVICES

Why is a Health Care Worker Immunisation Policy Directive needed?

The Health Care Worker Immunisation Policy Directive is required to ensure SA Health meets legislative responsibilities and accreditation standards. SA Health has a legislative duty of care and responsibility under the *Work Health and Safety Act 2012* to protect workers and other persons against harm to their health, safety and welfare through the elimination or minimisation of risks arising from work, which includes minimising the risk of vaccine preventable diseases (VPDs) being acquired in the workplace.

For accreditation purposes, SA Health services are also required to comply with the Australian Commission on Safety and Quality in Health Care's National Safety and Quality Health Service Standards, which include the requirement for a workforce immunisation program that complies with current national guidelines.

Do other jurisdictions in Australia have similar Health Care Worker Immunisation Policy Directives?

Yes.

- > New South Wales: [Policy Directive](#) (*Occupational Assessment, Screening and Vaccination Against Specified Infectious Diseases*, January 2011).
- > Western Australia: [Operational Directive](#) (*Health Care Worker Immunisation Policy*, 2012).
- > Queensland: [Vaccination of Health Care Workers Guideline](#) (June 2017).
- > Victoria: [Vaccination for Health Care Workers](#) (2014 guideline document).
- > Northern Territory: [Staff Immunisations for Vaccine-Preventable Diseases \(2014\)](#).
- > Australian Capital Territory: [Staff Screening and Immunisation Policy](#) (2008).

Does the SA Health Immunisation Policy Directive make it compulsory for me to be vaccinated?

No. However, if your work role with SA Health involves direct or indirect contact with patients, or contact with blood or other body fluids, you are required to know if you are immune to the vaccine preventable diseases covered by the Policy Directive.

Workplace modifications may be considered for current SA Health employees who are not immune to specific diseases, after a workplace risk assessment.

I do not want to receive vaccines. This Policy Directive discriminates against me in limiting my work roles and responsibilities. How is this justified?

Health care workers have both rights and responsibilities. You have the right to refuse recommended vaccinations and the right to a safe and healthy workplace. You also have a responsibility to minimise risks to other health care workers, patients, clients and visitors in SA Health services. There may be a tension between these rights and responsibilities, and the Policy Directive seeks to achieve a balance within the context of best-practice public health and legislative and accreditation requirements.

What vaccine preventable diseases are covered by the Policy Directive?

The Policy Directive includes the vaccine preventable diseases for which immunity is recommended for health care workers in the current edition of *The Australian Immunisation Handbook*: chickenpox (varicella), pertussis (whooping cough), hepatitis A, hepatitis B, influenza, measles, mumps and rubella.

The Policy Directive also refers to the importance of having immunity against other important vaccine preventable diseases such as diphtheria, tetanus and poliomyelitis.

I am a health care worker. Can I provide a Statutory Declaration stating the vaccines I have received or stating that I am immune?

No. A Statutory Declaration is not acceptable evidence of immune status.

The purpose of the Policy Directive is for you to know your immune status to specific vaccine preventable diseases. A Statutory Declaration relies on recall of specific past infections or specific past vaccinations which may not be accurate. Documented evidence of immune status is required for measles, pertussis and hepatitis B in particular.

If I don't have records of the vaccinations I have received in the past, is it safe to have the vaccines again?

Yes. Unless you have had a severe reaction to a previous vaccine or a vaccine component, or a medical contraindication to vaccination, it is safe to have repeat doses of vaccines.

I am pregnant (or considering pregnancy). How does this Policy Directive affect me and my work?

Pertussis and influenza vaccinations are recommended for all pregnant women, including health care workers.

Pregnancy is considered a temporary contraindication to vaccination with measles, mumps, rubella (MMR) and chickenpox (varicella) vaccines as these are live vaccines. Depending on your work situation and your immune status, some work adjustments and/or work restrictions may be required during your pregnancy.

Unless you are immune, or there are ongoing medical contraindications, you should have vaccination with MMR and varicella vaccines as soon as possible after your pregnancy has ended. If you have ongoing contraindications you may be asked to have a specialist medical assessment.

I AM A CURRENT SA HEALTH EMPLOYEE

What documents will I need to produce to show evidence of immunity to these vaccine preventable diseases?

The Policy Directive requires you to have evidence of your vaccination or immune status for the vaccine preventable diseases covered by the Policy Directive. The required evidence depends on the vaccine preventable disease; it may be:

- > a history of having had the infection
- > a history of having received a course of vaccines in the past
- > documented evidence of having received the required vaccines
- > documented evidence of immunity on a blood test.

SA Health has produced a [Screening Questionnaire](#) that will help in assessing your immune status. You should complete this form, and take it along with any required supporting documents, to the relevant SA Health Worker/Staff Health service (or Infection Prevention and Control Practitioner if you work in Country Health SA Local Health Network or SA Health Dental Services). You may need to have further vaccines or blood tests following this review before you are assessed as being compliant with the Policy Directive.

Who pays for the cost of any required screening tests, vaccinations or any required specialist medical assessment?

For current SA Health employees SA Health is responsible for the costs of any required screening tests, recommended vaccinations and any required specialist medical assessment (for example, for employees with medical contraindications to vaccination or other specific medical conditions) to ensure compliance with the Policy Directive.

I do not want to be vaccinated. What kind of work adjustments and/or work restrictions might be considered for my situation?

Work adjustments and/or restrictions will depend on a number of factors and therefore require a case-by-case assessment by your SA Health manager. Factors for consideration include, but are not limited to:

- > your immune status to each of the vaccine preventable diseases covered in the Policy Directive
- > health and safety considerations in your workplace
- > specific patient/client groups with whom you have contact
- > susceptibility of each of these patient/client groups to each vaccine preventable disease
- > probability of a serious illness with poor health outcomes among the patients/clients in these groups
- > availability of recommended and feasible infection control measures to minimise spread of the infection for each situation.

Following this assessment, and discussion with you, your Manager will make a decision regarding any work adjustments and/or restrictions. If a review is warranted, an Immunisation Expert Advisory Panel may be convened to review the circumstances, conduct a risk assessment and make recommendations.

I had a serious reaction to a previous vaccine and have been told I should not have this vaccine again. How does this Policy Directive affect me and my work?


If you have had an anaphylactic reaction (immediate life-threatening allergic reaction as determined by a medical practitioner) following a vaccine, or to any component of a vaccine, you should not have that vaccine or any vaccine with the same component. Depending on the actual vaccine or component, you may be able to continue to work in your current capacity within SA Health. However, you will be asked to produce documentation from a specialist doctor in relation to the anaphylactic reaction, and your circumstances may also require a review by an Immunisation Expert Advisory Panel. Alternative work placements and/or restrictions might be considered, depending on your particular situation.

I have had a full course of hepatitis B vaccine but the blood test shows I do not have a high enough level of immunity. How does this Policy Directive affect me and my work?

A small proportion of people (about 5%) do not produce protective levels of antibodies following a course of hepatitis B vaccine. If you do not have protective levels of antibody after the full hepatitis B vaccination course, then the *Australian Immunisation Handbook* recommends that you have a booster dose of vaccine and another blood test. Up to two more booster doses, or some alternative vaccination schedules, might be recommended to see if protective levels of antibody can be produced. If immunity does not occur after these further vaccinations you are not immune to hepatitis B, but in most cases, you can continue to work in your current position in SA Health. You will be given advice on what you must do if you are exposed to hepatitis B, for example, from a needle stick injury.

What is the purpose of the Immunisation Expert Advisory Panel and who sits on this Panel?

If you have not responded to a vaccine (non-responder), or you have a medical contraindication to certain vaccinations, a case-by-case assessment will be conducted by your health service management, followed by discussions with you to reach an acceptable outcome consistent with the Policy Directive. The same process will be followed for current SA Health employees who refuse recommended screening and vaccination.



If these discussions do not result in an acceptable outcome, an Immunisation Expert Advisory Panel may be convened to review your situation, conduct a risk assessment, and make recommendations regarding work adjustments and/or restrictions.

The Panel will usually comprise one or more representatives from the relevant SA Health service, an infectious diseases physician, and a public health physician from the Communicable Disease Control Branch of SA Health. The [Immunisation Expert Advisory Panel Terms of Reference and Process](#) document provides more details on the Panel composition, function, process and appeals process.

How is the health care worker represented at the Immunisation Expert Advisory Panel meeting?

The health care worker and one support person can attend the Panel hearing. The [Immunisation Expert Advisory Panel Terms of Reference and Process](#) document provides more details on health care worker representation.

What is the appeal process against recommendations made by the Immunisation Expert Advisory Panel?

Following the Panel meeting, the recommendations of the Panel will be referred to the Chief Public Health Officer for review, and a decision on whether to approve the recommendations. The decision will be communicated to the health care worker. The decisions are reviewable under the provisions of the *Work Health and Safety Act 2012*. The [Immunisation Expert Advisory Panel Terms of Reference and Process](#) document provides more details on the appeals process.

How will the privacy of my medical records be ensured and who will have access to my records?

Documentation in relation to refusal, non-response to vaccine, and medical contraindications to vaccination for health care workers who are current SA Health employees will be stored with other relevant occupational health records as an employee health record on the Health Assessment Screen (HAS) of the CHRIS system. Your records will be maintained by the relevant Worker/Staff Health services or Infection Prevention and Control Practitioners (for Country Health SA Local Health Network and SA Health Dental Services), and subject to the same limitations on access as other occupational health records. All storage and access processes will also be consistent with the Government of South Australia Cabinet Administrative Instruction Information Privacy Principles (IPPS) and State and Commonwealth Privacy legislation.

I am considering applying for another role in SA Health. Will I be required to repeat the immunisation screening process before taking up this new position?

Not usually. This Policy Directive enables a more consistent approach to health care worker immunisation across SA Health services. For the purposes of this Policy Directive, currently employed SA Health staff moving to new positions in SA Health would not be regarded as “new” employees. However, if you have not yet been assessed for your immune status, you may be asked to complete this assessment before commencing in your new role.

Once your assessment is completed and your immune status is confidentially recorded by any SA Health service, you will not be required to have any further assessment if you change to another Local Health Network or other SA Health service. However, if you were working in a situation with only indirect patient contact (risk category B), and were moving to a new role with direct patient contact (risk category A), you will then be required to know your immune status for hepatitis B.

What process will SA Health follow to transition to full compliance with the Policy Directive?

Each SA Health service will develop its own transition to full compliance with the Policy Directive for current employees over a 4 year period, with some health services expected to achieve compliance earlier than this. During the initial stages of implementation, the focus will be on staff working in higher-risk areas (as defined in the Policy Directive).

I AM CONSIDERING EMPLOYMENT WITH SA HEALTH, OR AM A STUDENT HEALTH CARE WORKER, LOCUM OR AGENCY/ CONTRACT HEALTH CARE WORKER OR VOLUNTEER HEALTH CARE WORKER

What documents will I need to produce to show evidence of immunity to these vaccine preventable diseases?

The Policy Directive requires you to have evidence of your vaccination or immune status for the vaccine preventable diseases covered by the Policy Directive. The required evidence depends on the vaccine preventable disease; it may be:

- > a history of having had the infection
- > a history of having received a course of vaccines in the past
- > documented evidence of having received the required vaccines
- > documented evidence of immunity on a blood test.

SA Health has produced a [Screening Questionnaire and Certificate of Compliance](#) that will help in assessing your immune status. You can take this completed form, along with any required supporting documents, to your own medical practice or, for students, your own medical practice or your University health service. Once your doctor or an authorised immunisation nurse has assessed your immune status for each of the vaccine preventable diseases covered by the Policy Directive, you may need to have further vaccines or blood tests before the Certificate of Compliance, which is part of the Screening Questionnaire, can be completed. This Certificate of Compliance is the most important document you will need to demonstrate compliance with the Policy Directive.

I am a student health care worker, or applying for a health care worker position in SA Health. Who pays for the cost of any required screening tests and vaccinations?

Students and non-employee health care workers are responsible for any costs incurred in assessing immune status. These costs may be minimised if your doctor or University Health Service chooses to bulk bill both for consultations and blood tests.

I am a student health care worker, or applying for a health care worker position in SA Health. How long is it going to take to get the blood tests, vaccinations and paperwork through the system before I can start my studies or work?

If you do not already have evidence of immunity for some of the vaccine preventable diseases covered by the Policy Directive, you need to allow 4 to 6 weeks for the initial assessment, results from any required blood tests, and administration of any required vaccines, before being able to commence clinical placement or work. It is important that you commence this process early.

Whether you are Australian born or an international student, an initial visit to your medical practice (usually in Australia) will be required once you have completed the [Screening Questionnaire and Certificate of Compliance](#) and collected any documentation you already have. At this first visit your doctor or an authorised immunisation nurse may be able to give you some or all of the vaccines you need and/or order any blood tests needed to assess your immunity. Blood test results will usually be available in 2 to 3 days. You may need a second visit to your medical practice to complete the assessment. Once your immune status is known for each of the vaccine preventable diseases covered by the Policy Directive, the Certificate of Compliance can be completed and given to you.

If you are a student you can use the Certificate of Compliance to make a Student Statement of Compliance with the Policy Directive with your education provider.

If you have applied for and been provisionally offered a position in SA Health, you can use this form to show evidence of immune status to authorised SA Health staff prior to the offer of employment being confirmed.

Some vaccine preventable diseases require a 2 or 3 dose course for full vaccination. The Policy Directive allows you to start a clinical placement (if a student) or start work in SA Health services (if a new employee) provided the first vaccine in the course has been given and you have given an undertaking to complete the course, have any required blood test after the course is completed, and update your records.

I am a student health care worker or applying for a health care worker position in SA Health. I've just had my first hepatitis B vaccine. Can I start my clinical placement or my SA Health employment after the first hepatitis B vaccine?

Yes. The Policy Directive is clear that you can start a clinical placement (if a student) or start work (if a new employee) provided you have received the first hepatitis B vaccine, given an undertaking to complete the full course of vaccination, have the blood test to check immunity after the last vaccine in the course, and then update your immunisation record.

I have had a full course of hepatitis B vaccine but the blood test shows I do not have a high enough level of immunity.

Can I still apply to study to be a health care worker?

Yes.

I'm already studying. Will I be offered a clinical placement in SA Health services?

You may be offered a clinical placement after a risk assessment of the proposed clinical placement.

Can I apply for a health care worker position in SA Health?

Yes, subject to a risk assessment of the actual work you will be expected to do.

A small proportion of people (about 5%) do not produce protective levels of antibodies following a course of hepatitis B vaccine. If you do not have protective levels of antibody after the full hepatitis B vaccination course, then *The Australian Immunisation Handbook* recommends that you have a booster dose of vaccine and another blood test. Up to two more booster doses, or some alternative vaccination schedules, might be recommended to see if protective levels of antibody can be produced. If immunity does not occur after these further vaccinations, you will be advised that you are not immune to hepatitis B. You will be given advice on what you must do if you are exposed to hepatitis B, for example from a needle stick injury.

I am a locum or agency health care worker and may work in SA Health services. How does this Policy Directive affect me and my work?

Locum or agency health care workers providing health care in SA Health services are expected to be compliant with the Policy Directive. Your locum service or agency will need to put in place a process to assess your immune status. This can be done by asking you to complete the [Screening Questionnaire and Certificate of Compliance](#) and taking this, along with any available supporting documentation to your own medical practice, or medical practice recommended by your locum service or agency. The doctor or an authorised immunisation nurse will be able to determine what additional blood tests and vaccines, if any, are needed for you to be compliant with the Policy Directive.

Your locum service provider or agency will require you to indicate that you are compliant with the Policy Directive, and record this information according to their own business processes and protocols as part of their own due diligence. You should keep the Certificate of Compliance form signed by your doctor as evidence of your compliance with the Policy Directive.

I am a student health care worker or a health care worker applying for a position in SA Health. I had a serious reaction to a previous vaccine and have been told I should not have this vaccine ever again. Can I still apply for a health care worker course of study, undertake a clinical placement in SA Health services or seek a position in SA Health?

Yes, but subject to a risk assessment process. If you have had an anaphylactic reaction (immediate life-threatening allergic reaction as determined by a medical practitioner) following a vaccine, or to any component of a vaccine, you should not have that vaccine or any vaccine with the same component. Depending on the actual vaccine or component, you may be able to plan a career as a health care worker, undertake a clinical placement in SA Health services, and be able to work in SA Health, but should only do so after having specialist medical advice related to your reaction to vaccination (and keep records of this advice), and counselling in relation to career choices.

I am applying for a position in SA Health. How will the privacy of my medical records be ensured?

If you are offered a position in SA Health, all documentation in relation to your immune status for the vaccine preventable diseases covered by the Policy Directive will be stored with other relevant occupational health records as an employee health record on the Health Assessment Screen (HAS) of the CHRIS system. Your records will be maintained by the relevant Worker/Staff Health services or Infection Prevention and Control Practitioners (for Country Health SA Local Health Network and SA Health Dental Services), and subject to the same limitations on access as other occupational health records. All storage and access processes will also be consistent with the Government of South Australia Cabinet Administrative Instruction Information Privacy Principles (IPPS) and State and Commonwealth Privacy legislation.

I am a student health care worker. How will the privacy of my medical records be ensured?

The Policy Directive requires you to make a Student Statement of Compliance with your education provider. If your education provider retains a copy of this Statement, this will follow your education provider's stated privacy and confidentiality requirements in relation to storage and access of records.

You should keep the original documents you provided to your doctor to assess your immune status, and in particular, the Certificate of Compliance. These documents do not need to be seen by your education provider or by SA Health, unless required as part of a random audit process. If a random audit is conducted, you will be asked to supply a certified copy of your Certificate of Compliance to your education provider, for auditing by authorised SA Health staff.

I am a student health care worker. I have heard SA Health will conduct random audits of students to check compliance with the Immunisation Policy Directive. How will this be done and what measures will be in place to protect my privacy?

The Student Statement of Compliance includes consent for the Certificate of Compliance form to be seen by SA Health staff, who are authorised to conduct a random audit of your compliance with the Policy Directive. If you are randomly selected for the audit and refuse to participate, you will not be offered clinical placements in SA Health facilities, or if clinical placement has commenced, you will be required to withdraw from that clinical placement.

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For more information

**Specialist Services
Communicable Disease Control Branch
Level 3, 11 Hindmarsh Square
ADELAIDE SA 5000**

Telephone:
www.sahealth.sa.gov.au

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