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Effective Date: 1 November 2021	Revision: 2	Approved by: Avanthi Parboosing / Chris Gouws
Title: Life Healthcare COVID-19 Vaccination Policy Doc. No: HR-POL-COVID:13		Approver's signature: 

## 1. Introduction

Coronavirus disease (COVID-19) is an infectious disease identified in December 2019 and caused by the SARS-CoV-2 virus. Most people infected with the virus will experience mild to moderate respiratory illness and recover without requiring special treatment. However, some will become seriously ill and require medical attention. Some will become seriously ill or die. The disease is easily transmitted from person to person and has resulted in a pandemic with hundreds of millions of people infected and millions of deaths. In South Africa, at the time of publication of the policy, nearly three million people have been infected. The disease itself and the measures to contain it have had devastating effects on the lives and livelihoods of the world's population including South Africans.

Scientific evidence confirms that COVID-19 vaccination reduces the severity of the disease. Vaccination of people also enables recovery of livelihoods and of economic activity.

Life Healthcare, as an employer, has an obligation in terms of the Occupational Health and Safety Act to take reasonable measures to ensure that the working environment is safe and without risk to the health of its employees. Thus, the Company has mandated that all employees be vaccinated against COVID-19 per the provisions of this policy.

Ensuring that the overwhelming percentage of our company's population is vaccinated will greatly reduce the risk of the virus's spread within our business and will also protect our patients, visitors, doctors, and the community at large.

This policy will comply with all applicable laws.

## 2. Scope & Purpose

This policy will apply to all employees within Life Healthcare South Africa including permanent (full-time and part-time), non-permanent (fixed-term, sessional hourly), and prospective employees per the provisions set out herein.

All reference to an employee or employees in this Policy includes all the above persons.

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Guiding principles have been included in this policy to assist with the fair and standard application of mandatory vaccination principles to be applied to Life Healthcare stakeholders including Doctors, visitors, patients, and service providers.

### 3. References

#### 3.1. External References

- 3.1.1. Occupational Health and Safety Act, 1993
- 3.1.2. Constitution of South Africa, 1996
- 3.1.3. Consolidated Direction on Occupational Health and Safety Measure in Certain Workplaces gazetted on 11 June 2021
- 3.1.4. Disaster Management Act 57 of 2002
- 3.1.5. National Institute for Communicable Diseases (NICD)
- 3.1.6. Center for Disease Control and Prevention (CDC)

#### 3.2. Internal References

- 3.2.1. Management Brief: Mandatory Vaccination
- 3.2.2. Life Healthcare COVID-19 Workplace Plan
- 3.2.3. HR-POL-Leave-01: Annual Leave Policy
- 3.2.4. HR-POL-Leave-07: Sick Leave Policy
- 3.2.5. HR-POL-COVID-03: Quarantine, Isolation and Sick Leave Policy
- 3.2.6. Employee Relations Manual

### 4. Definitions

- 4.1. Fully COVID-19 vaccinated: people are considered fully vaccinated:
  - 4.1.1. ± 2 weeks after their second dose in a 2-dose vaccination series, such as the Pfizer vaccine, or 2 weeks after a single-dose vaccine, such as Johnson & Johnson's Janssen vaccine and
  - 4.1.2. their vaccination status remains current per guidelines issued by the NICD or the South African Government from time to time.
- 4.2. Booster Vaccination: an additional dose of a vaccine which is administered to a vaccinated population or person that has completed a primary vaccination series. It is administered periodically to 'boost' the immune system.

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- 4.3. COVID-19 National Review Panel: a panel comprising senior leadership, HR professionals and medical experts appointed internally. The panel will be responsible for determining the course of action / outcome for each vaccination exemption request received in line with the provisions set out in this policy and guidelines outlined in the Management Brief.
- 4.4. COVID-19 National Steering Committee: the committee comprises Life Healthcare Executive members, subject matter experts and leaders from the operations who are responsible for the Life Healthcare mandatory COVID-19 vaccination policy and the roll-out thereof. A senior member from the National Review Panel will be invited to sit on the Steering Committee.
- 4.5. Employees: for the purposes of this policy, the term “employees” is generically used to denote permanent and non-permanent employees as specified in the scope.

## 5. Authorisation

- 5.1. Authorisation provisions are set out within this document.
- 5.2. The COVID-19 Review Panel will determine the vaccination objection / exemption process by applying applicable legislation and Company policy and procedure.
- 5.3. The COVID-19 Steering Committee will be responsible to authorise out of policy requests.

## 6. Provisions

- 6.1. This vaccination policy considers the employer’s obligation to ensure a safe working environment in terms of the Occupational Health and Safety Act, 1993, and an individual’s right to bodily integrity and freedom of belief, religion, and opinion, in terms of the SA Constitution, 1996.
- 6.2. The nature of Life Healthcare’s business and operational requirements presents a significant risk of infection and transmission of COVID-19 while at work. In addition, Life Healthcare has an obligation to the community to ensure the continuation of the provision of healthcare services. Life Healthcare has therefore established that all employees have been identified for mandatory COVID-19 vaccination.

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- 6.3. Prospective new employees joining Life Healthcare will only be offered employment upon the presentation of proof of full COVID-19 vaccination.
- 6.4. All Life Healthcare employees must be fully vaccinated against COVID-19 per the timelines as follows: -
  - 6.4.1. Head Office employees: 1 December 2021
  - 6.4.2. Business operations: within the first 6 months of 2022
- 6.5. Employees will be provided with paid-time off to go and receive the COVID-19 vaccination, where required.
- 6.6. Each employee will be required to provide the Company with a copy of their vaccination certificate, either paper copy or digital format will be accepted.
- 6.7. Only fully **COVID-19** vaccinated employees will be granted access to Life Healthcare premises unless formal exemption has been granted in terms of this policy.
- 6.8. Persons may experience certain side effects after having the vaccination which are normal signs that the body is building protection / immunity. Common side effects may include symptoms which are similar to COVID-19 illness such as fever, chills, tiredness and headaches.
- 6.9. In the event that these symptoms affect the employee's ability to do daily activities, normal sick leave may be applied for. The employee will not be required to produce a doctor's note in this regard, as long as proof of vaccination has been provided to the line manager.
- 6.10. Important to note is that a cough, shortness of breath, runny nose (rhinorrhoea), sore throat, or loss of taste or smell are not consistent with post-vaccination symptoms, and instead may be symptoms of COVID-19 or another infection and the necessary precautions should be taken. Please refer to the Quarantine, Isolation and Sick Leave Policy in this regard.
- 6.11. Positive COVID-19 test results, if performed, should not be attributed to the COVID-19 vaccine, as the vaccination does not influence the results of these tests. Please refer to the Quarantine, Isolation and Sick Leave Policy in this regard.

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## 6.12. Employees who object to being COVID-19 vaccinated

- 6.12.1. Life Healthcare employees do have a right to refuse to be vaccinated based on constitutional or medical grounds and the right to consult with a medical expert, health and safety, worker and / or trade union representative in this regard.
- 6.12.2. Objections based on medical grounds must include a report from a registered medical practitioner.
- 6.12.3. Objections based on constitutional grounds must be clarified and substantiated in writing.
- 6.12.4. It is a condition of employment to be COVID-19 vaccinated. Formal objections to being vaccinated will be presented to the applicable COVID-19 Review Panel for consideration and for further consultation with the individual concerned.
- 6.12.5. All reasonable steps will be taken to accommodate such employees without compromising the health and safety of the other employees in the workplace.
- 6.12.6. Reasonable accommodation measures will be guided by the Code of Good Practice on the Employment of People with Disabilities drafted in terms of the Employment Act, 1998 (Item 6) and other relevant legislation.

## 6.13. Payment for the COVID-19 Vaccine

- 6.13.1. The vaccination is provided free of charge in South Africa.
- 6.13.2. The vaccine is included in prescribed minimum benefits under the medical aid schemes.

## 6.14. Booster vaccinations

- 6.14.1. This section of the policy will be updated following guidance from the NICD and / or South African Government.

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6.15. Life Healthcare employees must continue to observe the health and safety protocols as prescribed by the Disaster Management Regulations, e.g., social distancing and wearing personal protective equipment whilst at the workplace.

6.16. Life Healthcare Stakeholders: Guiding Principles (TBC)

- 6.16.1. Doctors / Allied Professionals
- 6.16.2. Patients
- 6.16.3. Visitors
- 6.16.4. Service Providers: Security, Catering, Maintenance etc.

## 7. Notes

7.1. None

## 8. Record keeping requirements

Doc No.	Document Name	Retention Location	Retention Period	Disposal authority
	Consultation Documentation	Local File	3 years post termination of employee	None
	Letter of Appointment	Central File		
	Written objection to being vaccinated	Local File		
	Disciplinary records	Local File		

## 9. Document history

Rev	Date	Revision description	Revised by	Approved by
2	November 2021	<ul style="list-style-type: none"> <li>• Clarified that fully vaccinated status requires status to be current per guidelines from NICD / Government.</li> <li>• Removed sentence requiring prospective employees to have booster shots as this caused confusion for current employees' vs prospective employees.</li> </ul>	J Hemphill	A Parboosing / C Gouws
1	November 2021	Removed pregnant employee concession clause. Pregnant employees will go through the objection process.	J Hemphill	A Parboosing / C Gouws
0	October 2021	New Document	J Hemphill	A Parboosing / C Gouws

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## 10. List of Appendices / Forms attached

10.1. None