





GEPOL003

Employee COVID-19 vaccination policy

Author	Dr Joel Steingo
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Reviewed by	Prof Harry Hausler
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Contents

1	List of abbreviations.....	3
2	Introduction.....	3
3	Purpose	4
4	Scope	4
5	COVID-19 vaccination requirements	4
6	References	5
7	Disclaimer.....	6
8	Revision history	6

1 List of abbreviations and definitions

Abbreviation	Meaning
COVID-19	Coronavirus Disease 2019
EVDS	Electronic vaccine data system
PCR	Polymerase chain reaction
QA/I	Quality assurance/improvement
SOP	Standard operating procedure

2 Introduction

On 20 August 2021, the Cabinet of South Africa approved COVID-19 vaccinations for adults aged between 18 and 35 years¹. This announcement expanded access to COVID-19 vaccination for all adults in the country.

Expansion of the COVID-19 vaccination roll-out is an immensely important public health intervention to try and curb the pandemic. At the time of writing this policy, the South African Medical Research Council estimated that there had been more than 220 000 excess deaths in SA due to COVID-19 since May 2020^{2,3}.

The evidence that vaccines protect against COVID-19 is overwhelming and unequivocal. Data shows that vaccinated individuals have 50-80% lower risk of infection, 70-85% lower risk of hospitalisation and 90-95% lower risk of death from COVID-19, when compared to those who are unvaccinated^{3,4}. Furthermore, people who are vaccinated pose less risk to others if they develop breakthrough COVID-19 infection, with transmission to their contacts reduced by 50-80%^{3,5}. This reduction in transmission risk is particularly important to TB HIV Care, as many of our service beneficiaries are immunocompromised, and therefore face higher risks of severe COVID-19 disease if infected.

In addition, COVID-19 vaccinations have been proven in South Africa and globally to be extremely safe. The risk of adverse events due to vaccination (such as blood clots and inflammation of the heart muscle) is significantly lower than the risk of adverse events due to COVID-19 infection itself^{3,4}. At the time of writing this policy, not a single person had died in South Africa as a direct effect of a COVID-19 vaccine.

Based on this evidence, on 11 June 2021, the Minister of Employment and Labour released the amended Consolidated Direction on Occupational Health and Safety Measures in certain Workplaces. This directive allows employers to apply mandatory vaccination policies⁶.

Details of the processes to be followed are outlined in the relevant SOPs and job aids.

All TB HIV Care employees should read, understand and follow this policy, as well as submit proof of acknowledgement to the QA/I department via the online document management system (hard copy acknowledgement is available when access to the

online document management system is not available). Line managers are responsible for ensuring that their teams are made aware of the policies and SOPs in order to adhere to organisational standards.

3 Purpose

Consistent with TB HIV Care's mission to empower and care for communities by supporting primary health care services, it is our responsibility to protect our employees and service beneficiaries from COVID-19 using all the resources available to us. Vaccination against COVID-19 provides our greatest hope for protection of employees and the communities we serve.

4 Scope

This policy applies to all TB HIV Care employees. It is the obligation of TB HIV Care as an employer to take reasonably practicable measures to ensure a healthy and safe workplace.

5 COVID-19 vaccination requirements

Based on the strong public health and ethical imperative to vaccinate all eligible employees (outlined above), as well as the economic cost to the country of treating COVID-19-related illness and the compounding cost due to missed workdays and facility closures, TB HIV Care now mandates COVID-19 vaccination for all employees, effective 1 December 2021.

Therefore, all employees will be required to provide proof of vaccination to enter their place of work from 3 January 2022. This includes new employees who are appointed after this date, who will have to be fully vaccinated as a pre-condition of appointment.

TB HIV Care will provide the necessary support to facilitate vaccination for all its employees. This includes:

- assisting employees to register on the Electronic Vaccine Data System (EVDS) registration portal, where they require such assistance
- provision of paid time off to visit the vaccination site should employees need to be vaccinated during standard working hours
- provision of transport to and from the vaccination site, if reasonably practicable
- provision of paid time off to recover if an employee experiences side effects from the COVID-19 vaccine:
 - If the employee has available sick leave, this should be used, and proof of vaccination will serve as a valid medical certificate
 - If the employee's sick leave has been exhausted, accommodation for paid leave will be assessed on a case-by-case basis
- support with claiming against the COVID Vaccine Injury Compensation Fund in the event of severe injuries or serious harm as a result of the vaccine.

TB HIV Care acknowledges the right of employees to refuse vaccination based on medical or constitutional grounds. Medical grounds include allergic reactions to a

previous dose or a known (diagnosed) allergy to a component of the COVID-19 vaccine, or other medical conditions deemed to be contraindications to vaccination by a medical practitioner. Constitutional grounds include the right to freedom of religion or bodily integrity^{7,8}.

If, on grounds other than a medical contraindication, an employee refuses vaccination, s/he will be:

- required to provide proof of a negative COVID-19 PCR test on a weekly basis, whilst presenting for work. The testing will be done at the employee's own expense.
- provided an opportunity to ask for a consultation with a health and safety or employee representative.

If an employee is unable to vaccinate based on a valid medical contraindication, THC will endeavour to accommodate her/him to work in a low risk, low exposure environment to protect the employee and others that s/he may come into contact with as far as possible. Such an employee will be exempt from the need for weekly COVID-19 testing if they provide a valid medical certificate to THC stating that they have a medical contraindication to the vaccine.

6 References

1. Circular: COVID-19 Vaccination roll-out: Information for Vaccination Sites:19 August 2021 (<https://sacoronavirus.co.za/2021/08/20/circular-covid-19-vaccination-roll-out-information-for-vaccination-sites-19th-august-2021/>)
2. SAMRC: Report on Weekly Deaths in South Africa (<https://www.samrc.ac.za/reports/report-weekly-deaths-south-africa>)
3. Business Day: Adrian Gore: Why we are mandating vaccines for Discovery's SA-based employees (<https://www.businesslive.co.za/bd/opinion/2021-09-05-adrian-gore-why-we-are-mandating-vaccines-for-discoverys-sa-based-employees/>)
4. CDC Science Brief: COVID-19 Vaccines and Vaccination (<https://www.cdc.gov/coronavirus/2019-ncov/science/science-briefs/fully-vaccinated-people.html>)
5. Gavi: Mounting evidence suggests COVID vaccines do reduce transmission. How does this work? (<https://www.gavi.org/vaccineswork/mounting-evidence-suggests-covid-vaccines-do-reduce-transmission-how-does-work>)
6. Discovery Health: COVID-19 Mandatory Employee Vaccination Policy
7. Business Day: JACQUI REED: Mandatory vaccination: what do employers need to consider? (<https://www.businesslive.co.za/amp/bd/opinion/2021-08-25-jacqui-reed-mandatory-vaccination-what-do-employers-need-to-consider/>)
8. Daily Maverick: Can the government constitutionally require that everyone be vaccinated against Covid-19?(Part 1) (<https://www.dailymaverick.co.za/article/2021-08-20-can-the-government-constitutionally-require-that-everyone-be-vaccinated-against-covid-19-part-1/>)

7 Disclaimer

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8 Revision history

Version	Approval date	Revision history (<i>description of change</i>)	Author
1.0	6 December 2021	New policy	Dr Joel Steingo