

# SPEAKOUT

THE MAGAZINE FOR AUSTRALIAN SPEECH PATHOLOGISTS

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## Addressing COVID-19 vaccination in your practice

COVID-19 vaccination is one factor among a range of practical COVID-19 control measures currently available to help mitigate the risk of exposure to COVID-19 in the workplace. While there are currently no public health orders requiring mandatory COVID-19 vaccination, speech pathologists who are carrying out work within high-risk workplace settings, such as disability or aged care residential facilities, should expect at a minimum to be strongly encouraged by their employer to receive the vaccine.

There will likely be some healthcare and community service employers who have reasonable grounds to mandate the COVID-19 vaccine in their workplace. While this is a legally complex matter, speech pathologists who are employees should be prepared to potentially encounter a workplace mandate on COVID-19 vaccination at some stage.

As COVID-19 vaccination is a new development in mitigating the risk of coronavirus in the workplace, private practice owners should refer to their change management strategy. This may include assessing the potential impact of COVID-19 vaccinations on your people and culture, consulting with your employees and providing support.

### Key considerations for appropriately addressing COVID-19 vaccinations in your practice

#### Vaccination policy

While Work, Health & Safety (WHS) laws do not require

employers to implement a policy around the COVID-19 vaccine, it is advisable from an HR standpoint that private practice owners review and update their organisational WHS policies regarding infection control, including COVID-19 requirements. This may include developing a vaccination policy or reviewing an existing vaccination policy.

A tailored vaccination policy is the appropriate way for private practice owners to establish their approach to COVID-19 vaccination and provide clear guidance to their staff. The policy could be a stand-alone document, or it could be linked to other relevant workplace literature e.g. other policies, employment contracts or Enterprise Bargaining Agreements. It should include the organisation's position and expectations regarding employee vaccination, and processes for providing information, vaccinating staff, record-keeping, managing refusals, and other employment factors.

Speech pathologists who are employees should read the organisation's vaccination policy and make sure that they understand it. It is important to raise any questions or concerns you may have about the policy with your employer.

#### Communication and consultation

Regular, clear communication is essential for managing successful workplace relationships and maintaining a positive workplace culture. Effective communication, however, is more than just a courteous action or advantageous skill. Under WHS laws, employers have

# in practice

a duty to consult with their employees on decisions that affect their health, safety and welfare at work.

It is critical that private practice owners have a good communication plan for managing workplace discussions around COVID-19 vaccination. The plan should include reliable, facts-based information on:

- relevant vaccine-preventable diseases and why vaccination is important in your practice,
- the types of vaccines available, including information on safety and effectiveness,
- when/where/how employees can receive the COVID-19 vaccine,
- how to access additional information and support.

SPA members can access information about the COVID-19 vaccines and vaccination program in Australia from the [COVID-19 vaccination page](#) on the SPA website.

Importantly, the communication plan should also share the business's stance on COVID-19 vaccination. This may include reviewing the vaccination policy, relevant employer and employee rights and obligations, and other consideration such as offering vaccination during work hours.

Staff must be given ample opportunity to respond, ask questions and discuss any concerns.

Practice owners should keep a record of the communication and consultation process, including what documents are provided and how questions are addressed.

## People who can't have the vaccine or choose against vaccination

Some people may choose not to be vaccinated for various reasons ranging from ideological to religious or medical. Practice owners should take all reasonable steps to encourage unvaccinated employees to receive the recommended COVID-19 vaccines, but it is also important to respectfully engage with employees who choose not to, and find out their reasons.

Where employees have a health or medical reason for not wanting a vaccination, practice owners may have an obligation under the Disability Discrimination Act to make reasonable adjustments. Where employees refuse the

vaccine for personal reasons, practice owners require a well-structured and informative communication strategy that supports the position taken by the business. This should include ample opportunity for the employee to voice their questions or concerns.

Practice owners should take unvaccinated employees into consideration when revising policies and doing risk assessments.

In general, we would advise against taking disciplinary action based on an employee choosing to not get the COVID-19 vaccination. Implementing proper communication and consultation is the most suitable approach, along with continuing to ensure COVIDSafe practices in your workplace i.e. hygiene, cleaning, physical distancing, PPE and contact tracing. The details and options for managing vaccination refusals may change if your practice takes steps to lawfully mandate COVID-19 vaccination for some or all staff. If this is the case, practice owners should seek tailored advice.

The guidance in this article was provided by WorkPlacePLUS and is general in nature. Members are advised to seek advice if they have questions.

WorkPlacePLUS are one organisation who could provide this advice alongside support to review or develop your HR protocols to ensure they suit the unique circumstances of your practice, for example, tailoring a vaccination policy, communication strategy, change management strategy, or employment agreements.

All SPA members, including practice owners and employees/contractors receive special member benefits with WorkPlacePLUS for support with HR & IR issues affecting your practice. For more information, contact Anna on (03) 9492 0958 or visit [www.WorkPlacePLUS.com.au](http://www.WorkPlacePLUS.com.au).



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