VACCINATION POLICY AND PROCEDURE

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VACCINATION POLICY AND PROCEDURE

Purpose and Scope

The purpose of this policy and procedure is to outline Bilingual Care's commitment to protecting the health, safety, and wellbeing of consumers, staff, volunteers, and visitors through the implementation and promotion of recommended vaccination schedules. Immunisation is a critical component of Bilingual Care's infection prevention and control program and supports Bilingual Care's obligation to deliver safe, high-quality care and services, in accordance with the *Strengthened Aged Care Standards.*

This policy applies to all consumers, employees, contractors, volunteers, and other persons connected with Bilingual Care as outlined within the A*ged Care Act 2024 (Cth)*. It ensures that all consumers, staff, volunteers, and visitors are supported and encouraged to maintain up-to-date immunisations per national guidelines and public health requirements. This policy should be read in conjunction with the *Infection Control Policy and Procedure.*

This policy and procedure is aligned with the *National Immunisation Program Schedule and* advice provided by the *Australian Government's Therapeutic Goods Administration (TGA)* and meets relevant legislation, regulations, and Standards.

Applicable Strengthened Aged Care Quality Standards

- *Standard 1: The Individual*
- *Standard 2: The Organisation*
- *Standard 3: The Care and Services*

Definitions

Aged Care Worker[1] **–** an individual employed or otherwise engaged (including as a volunteer) by the registered provider to deliver funded aged care services.[1]

Australian Immunisation Register[2] - a database that holds records of vaccinations given to people of all ages who are registered with Medicare in Australia.

Catch-up Vaccination[2] - the process of planning and scheduling vaccines for people who have missed 1 or more doses of scheduled vaccines.

Immunisation[2] - the process of inducing immunity to an infections agent by giving a vaccine.

[1] Australian Government, Aged Care Act 2024 (Cth), s152, accessed 08 October 2025, Aged Care Act 2024 - Federal Register of Legislation
[2] Australian Government Department of Health and Aged Care. 2025. *Australian Immunisation Handbook – Glossary of Technical Terms*. Accessed 08 October 2025. Available from Glossary of technical terms | The Australian Immunisation Handbook

National Immunisation Program Schedule[2] - a program in Australia that funds free vaccines for eligible people to increase immunisation rates and help reduce vaccine-preventable diseases.

Vaccination[2] **–** the administration of a vaccine. If vaccination is successful, it results in immunity.

Policy

Bilingual Care is committed to protecting the health and wellbeing of older people receiving care, our workforce and the broader community through the prevention and control of vaccine-preventable diseases. We recognise that maintaining appropriate immunisation coverage is a critical element of safe, high-quality care and a fundamental part of our infection prevention and control strategy.

Bilingual Care is dedicated to complying with relevant legislation, public health directives and the *Strengthened Aged Care Quality Standards* to foster a culture of safety, accountability and transparency. Bilingual Care's approach to immunisation is informed by the Australian Immunisation Handbook[3], state and territory health authorities and national aged care guidance. Bilingual Care will maintain accurate and confidential immunisation records, monitor compliance and respond promptly to changes in public health advice.

Bilingual Care supports its workforce by providing clear guidance, access to reliable information and assistance to meet immunisation requirements or manage medical exemptions responsibly. We also recognise the importance of protecting the rights and safety of consumers, particularly those who may be vulnerable due to various risk factors.

When infectious disease risks or outbreaks occur, Bilingual Care responds in a timely and coordinated manner to minimise harm and maintain continuity of safe care as per the *Emergency and Disaster Management Policy and Procedure and Infection Control Policy and Procedure.*

Through this policy, Bilingual Care demonstrates its commitment to maintaining a safe working and care environment, meeting regulatory obligations and supporting the health and dignity of older Australians receiving care at home.

Where the term staff is used in this policy, it includes any volunteers or associated providers (contractors) working on behalf of Bilingual Care.

Procedures

General

Due to the nature of their work, Bilingual Care's staff are at increased risk of encountering, contracting, and spreading vaccine-preventable diseases (VPDs). This procedure outlines how Bilingual Care supports safe and effective vaccination practices to protect the health, safety and wellbeing of everyone involved in the delivery of in-home aged care and community support services.

Where a person is receiving services or working for Bilingual Care, they will be informed of current immunisation requirements and supported to meet these requirements in accordance

[3] Department of Health and Aged Care 2025, *Australian Immunisation Handbook*, Australian Government, accessed 08 October 2025, https://immunisationhandbook.health.gov.au/.

with public health advice, the *Australian Immunisation Handbook*[3] and the *Aged Care Act 2024 (Cth)*[4]. This includes access to free influenza and COVID-19 vaccinations, as well as any other vaccinations prescribed by legislation or public health directives[4].

Staff who are required to be vaccinated must provide evidence of up-to-date immunisation or valid medical exemption before commencing work in any location where care is delivered.

Records are maintained confidentially, are used to monitor compliance, and support outbreak response. If a staff member cannot be vaccinated, Bilingual Care will complete a risk assessment and implement alternative controls such as use of personal protective equipment or reassignment of duties, in line with infection prevention and control principles.

Consumers who wish to know more about available vaccinations, or require assistance to access vaccination, will be supported by Bilingual Care staff. Information about the benefits of vaccination is actively promoted through consumer discussions, care planning, staff training and public health materials.

If you are unsure about vaccination requirements, how to access immunisation services, or how this procedure applies to your role or care, you can speak to the Managing Director for clarification at any time.

Responsibilities

The Leadership Team is responsible for:

- maintaining a vaccination policy that complies with the *Aged Care Act 2024 (Cth) public health directives* and other legal requirements
- having in place a vaccination policy that is current, accessible and regularly promoted
- actively promoting the benefits for staff and consumers of up-to-date immunisation and regular re-vaccination (where applicable) to all staff
- providing regular training to staff on updated immunisation requirements
- providing resources for staff immunisations, record keeping, and compliance monitoring
- maintaining accurate records of immunisation in accordance with Bilingual Care's *Records and Information Management Policy and Procedure*.

The Managing Director is responsible for:

- communicating immunisation requirements to all staff during recruitment, onboarding and during employment
- maintaining accurate and confidential immunisation records, as recommended for health and aged care workers
- monitoring communicable disease alerts and provide advice during outbreaks
- conducting internal audits to monitor immunisation compliance and reporting findings to the Leadership Team
- monitoring compliance and following up with staff to ensure vaccinations are up to date prior to delivering services to consumers
- conducting risk assessments and implementing alternative control measures such as personal protective equipment or reassignment of duties where staff are unable to be immunised for medical reasons and
- providing staff with education and updates on immunisation recommendations and outbreak management.

[4] Australian Government, Aged Care Act 2024 (Cth), s153, accessed 08 October 2025, Aged Care Act 2024 - Federal Register of Legislation

All staff are responsible for:

- complying with all public health directives including any state-based directives
- providing evidence of required vaccinations (where applicable), for example - immunisation history statement or medical exemption.
- maintaining immunisation status and informing the Managing Director of any changes and
- following infection prevention and control protocols, for example hand hygiene, personal protective equipment at all times.

Consumers are responsible for:

- voluntarily providing information in relation to their vaccination status, including annual seasonal influenza vaccinations and/or COVID-19 vaccinations including the number of doses.

Risk Management

Due to the nature of their work, Bilingual Care staff are at increased risk of encountering, contracting, and spreading vaccine-preventable diseases (VPDs). The Workforce Screening and Vaccination Program, described below, sets out how Bilingual Care will work to protect staff and consumers from VPDs.

As part of Bilingual Care's risk assessment process (see the *Risk Management Policy and Procedure*), the Leadership Team will use the Workforce Immunisation Risk Matrix[5] to identify workplace tasks, locations, and other activities that are associated with an increased risk of acquiring or transmitting VPDs, as well as mitigating strategies to address identified risks to staff and consumers.

The risk assessment process should also take into account the current health context, including:

- incidence of VPDs in the community
- outbreaks and seasonal epidemics in the community and
- outbreaks of VPDs among Bilingual Care's consumers and staff

Risk Assessments must be conducted in consultation with staff, consumers, and relevant stakeholders. Identified risks must be added to Bilingual Care's *Risk Register* and monitored and reviewed based on their potential severity and likelihood. As per Bilingual Care's *Risk Management Policy and Procedure,* risks with greater impact/higher risks must be monitored and reviewed more frequently than low impact/low risks.

[5] Australian Commission on Safety and Quality in Health Care (August 2024) *Workforce Immunisation Risk Matrix*, Fact Sheet, ACSQHC, Sydney, accessed 20 August 2025, https://www.safetyandquality.gov.au/publications-and-resources/resource-library/nsqhs-standards-workforce-immunisation-risk-matrix

Table 1. Workforce Immunisation Risk Matrix

		Workforce immunity/vaccination status & access to workforce screening		
		• **All** members of the workforce have up-to-date records of their immune status/ vaccination history available **AND** • A workforce screening/ vaccination program* is in place	• Up-to-date immune status/ vaccination records are **NOT** available for all members of the workforce **AND** • A workforce screening/ vaccination program* is in place	• Up-to-date immune status/ vaccination records are **NOT** available for all members of the workforce **AND** • A workforce screening/ vaccination program* is **NOT** in place
Risk of disease exposure	No increased risk of exposure to disease or infection associated with working in the health service organisation	Low	Medium	High
	Members of the workforce have a risk of exposure to vaccine-preventable disease due to the nature of their role	Medium	High	Very high
	Hospital-based outbreak of vaccine-preventable disease (no evidence of community transmission)	Medium	High	Very high
	Community-wide outbreak of a vaccine-preventable disease	High	Very high	Very high
	Disease with no available vaccine	Very high	Very high	Very high

Low risk	Risk is managed by routine procedures. There is minimal risk of harm or injury from the risk
Medium risk	Risk is managed by specific monitoring or audit procedures. There is potential for harm or injury from the risk.
High risk	There is a serious risk that must be addressed immediately. Consequences to individuals and the organisation are high due to a high potential for harm or injury.
Very high risk	There is a serious risk that must be addressed immediately. The magnitude of the consequences to the individual and organisation of an event, should it occur, are considered very high with potentially significant harm or injury.

*Vaccination programs should include catch-up vaccination, such as annual influenza vaccination.

Workforce Immunisation Program

People who work in health care and aged care risk catching diseases that are preventable through vaccination from infected people and other contacts. They can pass these diseases on to vulnerable people in their care, such as young children or older people. If health care workers get immunised, it helps reduce these risks.

The Australian Immunisation Handbook[6] lists the immunisations recommended for health care workers. They are summarised in the table below. Bilingual Care is committed to taking all reasonable steps to encourage staff to be vaccinated.

[6] Department of Health and Aged Care 2025, *Australian Immunisation Handbook*, Australian Government, accessed 08 October 2025, https://immunisationhandbook.health.gov.au/.

Occupation	Vaccine
All health care workers • Includes all workers and students directly involved in patient care or the handling of human tissue, blood or body fluids	• Hepatitis B • Influenza • MMR (if non-immune) ** • Pertussis (dTpa) • Varicella (if non-immune)
• Health care workers who work in remote Indigenous communities or with Indigenous children in NT, Qld, SA and WA • Other specified healthcare workers in some jurisdictions	Vaccines listed for 'All health care workers', *plus hepatitis A*
• Health care workers who may be at high risk of exposure to drug-resistant cases of tuberculosis (dependent on state or territory guidelines)	Vaccines listed for 'All health care workers', *plus consider BCG*
** All adults born during or since 1966 should have evidence of either receiving 2 doses of MMR vaccine or having immunity to measles, mumps and rubella. Adults born before 1966 are considered to be immune due to extensive measles, mumps and rubella circulating widely in the community.	

COVID-19 Vaccination Recommendations

The Department of Health, Disability and Ageing recommends that all adults should consider COVID-19 vaccination depending on their age and health status.

Staff and consumers don't have to wait 6 months since their last COVID-19 infection to get a vaccination.

- All adults 75 years and older are **recommended** a COVID-19 vaccination **every 6 months**
- All adults aged 65 to 74 years are **recommended** a COVID-19 vaccination **every 12 months**, and are **eligible** for a dose **every 6 months**, following a benefit-risk assessment.
- All adults aged 18 to 64 years with severe immunocompromise are **recommended** a COVID-19 vaccination **every 12 months**, and are eligible for a dose **every 6 months**, based on benefit-risk assessment.
- All other adults aged 18 to 64 years are eligible for a dose of a COVID-19 vaccine **every 12 months** based on a benefit-risk assessment[7].

The Australian Government's COVID-19 booster eligibility checker allows individuals to answer a short set of questions to find out if they are eligible for a COVID-19 vaccine.

[7] Department of Health, Disability and Ageing 2025, *COVID-19 vaccination information for residential aged care providers*, Australian Government, accessed 08 October 2025, https://www.health.gov.au/our-work/covid-19-vaccines/information-for-aged-care-providers-workers-and-residents-about-covid-19-vaccines/residential-aged-care-service-providers

Note: The advice in the Australian Immunisation Handbook reflects recommended practice supported by strong evidence. Bilingual Care must also consider relevant NSW and Commonwealth legislation regarding mandatory vaccination programs for healthcare workers. Due to the constantly evolving nature of the COVID-19 vaccination program, clinical guidance on COVID-19 vaccines in Australia is provided on the Australian Technical Advisory Group on Immunisation's (ATAGI) website.[8]

Access to Vaccines

Aged Care Workers

Bilingual Care will ensure that all required vaccinations are accessible, promoted and documented for aged care workers in line with the requirements of Section 153 of the *Aged Care Act 2024 (Cth)* and any requirements prescribed by the *Aged Care Rules 2025*[9].

This includes the supporting and providing free access to vaccinations including:

- influenza vaccination
- COVID-19 vaccination
- any other vaccination that is prescribed by the *Aged Care Rules 2025*.

Bilingual Care will support staff to access their required vaccinations, including allowing time within shifts to attend their local pharmacy or vaccination clinic. In the event a staff member is unable to, or does not wish to receive a vaccination, Bilingual Care will work with them to explore options, subject to any Public Health directives in place and NSW and Commonwealth requirements.
Medical advice should be sought prior to immunisation especially where staff are pregnant or have specific medical conditions.

Individuals Receiving Funded Aged Care Services

Bilingual Care will support each individual to make an informed decision about vaccinations by providing accessible information, respecting their right to accept or decline, and ensuring free and convenient access to influenza, COVID-19, and other prescribed vaccines where desired. Consumer's vaccination status and preferences will be discussed as part of Bilingual Care's care planning and review processes.

Exemptions

Aged Care Workers that are unable to comply due to a medical contraindication to any vaccination will not have their employment terminated nor be discriminated against when seeking new employment.

Current and prospective healthcare workers who are unable to be vaccinated due to temporary or permanent medical contraindications to vaccination must provide documented evidence of this to Bilingual Care. Information about contraindications to immunisations can be found on the Australian Immunisation Handbook website.

[8] Department of Health, Disability and Ageing 2025, *ATAGI Clinical Guidance for COVID-19 Vaccine Providers*, Australian Government, accessed 20 August 2025, https://www.health.gov.au/our-work/covid-19-vaccines/advice-for-providers/clinical-guidance.
[9] Australian Government, Aged Care Act 2024 (Cth), s153, accessed 08 October 2025, Aged Care Act 2024 - Federal Register of Legislation

Evidence of vaccination, and any exemptions or medical advice contraindicating vaccination, must be provided to the Managing Director. Once evidence has been sighted, it must be managed as per the usual process for confidential information as per Bilingual Care's *Records and Information Management Policy and Procedure.*

Where a worker has a medical contraindication to vaccination, the health service should also assess their role and duties to ensure the health and safety of consumers, the worker and others is maintained.

Vaccine Refusal

In certain cases, vaccinations required via Public Health Directions may not allow for objections to vaccination by aged care workers for non-medical reasons. In this instance, staff who may be vaccine hesitant or choose not to be vaccinated where it is required should be encouraged to speak to trusted medical professionals about vaccination and encouraged to access reputable and reliable information about vaccination and vaccines and managed on a case-by-case basis.

Training and Education

Bilingual Care is committed to actively promote the benefits of vaccination to consumers and staff through education, health information materials and discussions during care planning and team meetings.

Refer to Bilingual Care's *Training and Development Policy and Procedure* for further information on staff training requirements. In combination with training and education in relation to immunisation, all staff must be trained and undertake refresher training in preventable disease risk mitigation strategies including infection prevention and control, including hand hygiene practices, respiratory hygiene, and cough etiquette.

Relevant hygiene resources (such as immunisation information and flyers) and information (such as the materials provided by the National Immunisation Program Schedule[10]) will also be provided to staff and consumers.

Reporting Requirements and Record Management

All staff must be fully immunised and provide evidence of up-to-date immunisation as per Bilingual Care's vaccination requirements identified through the risk assessment process. Vaccination status must be confirmed prior to commencing work that involves increased risk of exposure to VPDs. The Australian Immunisation Handbook[11] provides the details of recognised VPDs in Australia.

The Managing Director is responsible for ensuring Bilingual Care has up to date records of the immunisation status and vaccination history of all staff and consumers. Bilingual Care is responsible for maintaining records, either in written or electronic form for a minimum of 7 years from the date the record is received.[12]

[10] Department of Health, Disability and Ageing 2025, *Immunisation Resources*, Australian Government, accessed 08 October 2025, https://www.health.gov.au/topics/immunisation/immunisation-resources

[11] Department of Health and Aged Care 2023, *Australian Immunisation Handbook*, Australian Government, accessed 08 October 2025, https://immunisationhandbook.health.gov.au/.

[12] Australian Government, Aged Care Act 2024 (Cth), s154.10, accessed 16 October 2025, Aged Care Act 2024 - Federal Register of Legislation

Visitor Screening

Bilingual Care promotes vaccination for all visitors, particularly for:

- COVID-19
- Influenza
- Other seasonal or outbreak-related illnesses (e.g. RSV)

Vaccination is not mandatory unless required by state or territory public health orders. Visitors are encouraged to stay up to date with vaccinations and may be provided with educational materials and reminders.

Communication about Vaccination Information

Vaccination information will be shared via newsletters and emails and provided during care assessment planning and review meetings.

Failure to Comply

Any breach of this Policy may result in disciplinary action, including dismissal, as per Bilingual Care's *Performance Management Policy and Procedure*.

Supporting Documents

Documents relevant to this policy and procedure include:

- *Infection Control Policy and Procedures*
- *Risk Management Policy and Procedure*
- *Privacy and Confidentiality Policy and Procedure*
- *Records and Information Management Policy and Procedure*
- *Work Health and Safety Policy and Procedure*
- *Training and Development Policy and Procedure*
- *Staff Code of Conduct*
- *Aged Care Code of Conduct*
- *Statement of Right*

Monitoring and Review

This Policy and Procedure will be reviewed at least every two years by the Leadership Team. Reviews will incorporate staff, consumer, and other stakeholder feedback.

Bilingual Care's *Continuous Improvement Plan* will be used to record improvements identified and monitor the progress of their implementation. Where relevant, this information will be considered as part of Bilingual Care's service planning and delivery processes.

DOCUMENT CONTROL

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