

Interim Position – Customer Vaccination

1. Purpose

This document provides an outline of the risk assessment approach informing the interim customer vaccination position (in effect from 3rd December until at least 17th January 2022)

2. Role of risk assessment in determining a position on vaccination

Government guidance (released 27 November 2021) confirmed that Local Government can determine whether a public facility or service can implement a vaccination mandate, and that it is possible to do so if a) a risk assessment has been completed and b) the risk assessment determines the risk is unacceptably high to staff and or customers without vaccination pass requirements.

By way of comparison the public service commission guidance notes:

As a general principle, agencies should require the use of a Vaccine Pass as a condition of entry for visitors, (other than recipients of a service) including for contractors to the workplace.

3. Risk assessment scope and approach

Each customer facing service within Auckland Council completed a risk assessment. The risk assessment related to different customer facing scenarios, including:

- Council delivered services not vaccination mandated under the Covid-19 Protection Framework (for example libraries, arts facilities, visitor centres, service centres)
- Council delivered services with a vaccination mandate under the Covid-19 Protection Framework (for example Gyms and Early Childhood Education Centres)
- Services council runs commercially (not mentioned in the Covid-19 Protection framework (for example Waste Transfer stations, Holiday Parks, Baches, Lodges and camping)
- Services which council provides under legislation that are not vaccination mandated under the Covid-19 Protection Framework (for example animal control, noise control)

The risk assessments were aligned to the approach and factors considered in the Auckland Council staff vaccination Policy risk assessment. This means that the risk assessments aligned to a comprehensive view of risk and environment, consequence, probability and control effectiveness including (but not limited to) the specific exposures relating to customers. This meant the following baseline assumptions were incorporated into the risk assessment for these services:

- We should seek to lower risk of transmission as low as is practicably and feasibly possible
- All staff providing these services would be vaccinated by the 17th January 2022
- A residual risk of MEDIUM was acceptable, providing adequate active monitoring controls are put in place

4. Risk assessment conclusions

The conclusion of the risk assessments are as follows for the scenario of a service being provided primarily indoors or within a confined space:

- For public facing staff¹ – risk of transmission between customer to staff or staff to customer – **MEDIUM**
- For vaccinated customers – risk of transmission between customer and staff and vice versa – **MEDIUM**
- For unvaccinated customers² - risk of transmission between person to person (including staff and customers) - **HIGH**

The introduction of a vaccination mandate to services is the only control that would reduce the risk from HIGH to MEDIUM for our unvaccinated customers where services were provided indoors or within a confined space.

When applying a test for practicability and feasibility of implementing a vaccination certificate requirement for these services for this reason, the advice from those providing these services is that it is a practicable and reasonable control to implement. Providing that:

- The enforcement of a vaccination certificate did not fall to staff (providing by additional security controls for example entry gates or security staff)
- If the vaccination certificate requirement was not possible to 'stand up' by the 3rd December (when we move to red in the COVID protection framework), then that service would open once the vaccination certificate processes could be stood up
- If there are elements of a service which cannot reasonably operate under vaccination certification requirements, then a version of that service will be made available for unvaccinated customers wherever possible (for example digital provision, moving the service to outside, requiring bookings to limit numbers – as well as public health controls).
- This is an interim position while we at the highest risk context (red in the CPF), and a more permanent policy would be developed in consultation with Elected Members and the community

Based on the outputs of the risk assessment (including consideration of the practicality and feasibility of controls), we have therefore recommended to the Executive Lead Team (ELT) to establish an interim position to require vaccination certificates for customers of Auckland Council services provided indoors or within a confined space – effective from 3rd of December 2021 to at least 17th January 2022.

¹ With the assumption of vaccinated workforce as per staff vaccination policy

² Including unvaccinated by choice, my medical exemption or by age group (for example under 12s)

5. Risk Assessment Matrix

Risk Matrix Settings			
Likelihood		Consequence	
1 Rare	Highly unlikely, but may occur in exceptional circumstances	1 Insignificant	Injury requires first aid treatment or pain and discomfort requiring intervention, e.g. workstation assessment.
2 Unlikely	Not expected, but some possibility it could occur at some time	2 Minor	Injury or illness requires medical treatment or other registered practitioner.
3 Possible	Might occur at some time – similar occurrences are known to have happened	3 Moderate	Injury or illness results in time lost from work for one day/shift or more. Notice is issued by regulator or Health and Safety Representative.
4 Likely	Will probably occur at some time in most circumstances	4 Major	Injury or illness results in 30 days lost time, or a permanent disability. Organisational breaches law resulting in prosecution and penalties.
5 Almost Certain	Expected to occur in most circumstances	5 Extreme	One or more fatalities. Considerable penalties and prosecutions, multiple lawsuits and prison terms.

Risk Matrix						
Consequences	5 Extreme	Medium	High	High	Critical	Critical
	4 Major	Medium	Medium	High	High	Critical
	3 Moderate	Low	Medium	Medium	High	High
	2 Minor	Low	Low	Medium	Medium	Medium
	1 Insignificant	Low	Low	Low	Medium	Medium
	1 Rare	2 Unlikely	3 Possible	4 Likely	5 Almost Certain	
	Likelihood					