# COVID-19 Immunisation and Testing Policy

## Introduction

The UK government has commenced a nationwide coronavirus (COVID-19) vaccination programme and is encouraging all eligible persons to be immunised in order to reduce the spread of the infection throughout the population and to ensure that all vulnerable groups – including older people, pregnant women and those with underlying health conditions – are protected wherever possible.

COVID-19 vaccinations have already been approved for use in the UK. At the time of writing, vaccination has been offered to all adults in the UK.

[In addition, it is now possible to obtain free lateral flow tests, even if you are not symptomatic, which will help in spotting asymptomatic cases and restrict transmission further.]

## Company policy

Having fully risk assessed our organisation/business/company, we have implemented several control measures which we expect every employee to follow to reduce the risk of someone contracting or spreading the virus. Unfortunately, we are unable to fully eradicate the risk of someone contacting the virus and therefore as part of our risk assessment, we are required to consider the immunisation needs of our staff. There is also a risk, when working on our premises or when coming into contact with our service users, of transmission of the virus between colleagues and service users.

This policy is intended to reduce the risk of transmission and potentially severity of the virus by encouraging staff to take the precaution of being vaccinated when offered the opportunity under the government's vaccination programme[ and for employees to be tested for COVID-19 [either] through a local community testing initiative,[ or workplace testing], if available].

The Company wishes to support the government’s immunisation programme. To do this, we will encourage our staff to participate in the programme and to undergo COVID-19 immunisation wherever possible. At appointment, all staff will be advised in writing of the Company’s policy on COVID-19 immunisation [ and testing].

## The Company’s responsibilities

The Company recognises its duties under the Health and Safety at Work etc Act 1974 to protect, as far as is reasonably practicable, the health, safety and welfare of its staff.

[Our risk assessments have identified that some of our staff may be exposed to COVID-19 in the course of their work and should be appropriately protected.]

[We also have a responsibility to reduce the risk of infection to our service users.]

[NAME / TITLE] will have overall responsibility for this policy, which will be reviewed whenever government guidance changes or as indicated by the policy review date.

## Your responsibilities

All staff, regardless of their role, are strongly urged to protect themselves and others against the COVID-19 virus by obtaining a vaccination if available to them under the government's scheme.

Currently, it is not known if the vaccine will prevent a person from transmitting the virus to others and therefore, even if you have been vaccinated, you will be expected to continue complying with the Company’s COVID-secure measures within the workplace. Failure to do so will result in disciplinary action.

[All staff appointed to posts with service user contact will be expected to comply with the policy unless there are clear medical contra-indications or some other legitimate reason for refusal to be vaccinated.]

In most circumstances, the Company will not insist that an employee is vaccinated unless vaccination is necessary for them to carry out their role effectively, or there is a legal requirement to be vaccinated. If:

1. we determine through a risk assessment that it is necessary for you to be vaccinated in order to properly carry out your duties, or there is a legal requirement to be vaccinated;
2. you are eligible for vaccination; and
3. on our opinion, you unreasonably refuse to take up an offer of vaccination,

you may be subject to disciplinary action.

Where an employee, for whatever reason, is unable or unwilling to be vaccinated, it may be necessary for the Company to carry out an individual risk assessment for their role. Where satisfactory immunity is not achievable, the employee may need to be redeployed or their role may need to be reassessed.

The Company is committed to ensuring that, as far as is reasonably practicable, the way in which we treat our staff reflects their individual needs and does not discriminate against individuals or groups on any grounds of any protected characteristic under the Equality Act 2010. In the event that you are not able to participate in the vaccination programme for any reason, including health or religious reasons you should discuss your circumstances with [NAME/TITLE].

Further government information on the vaccination programme, including the risks and benefits of vaccination, can be found on the NHS website via the following link: [www.nhs.uk](https://www.nhs.uk/conditions/coronavirus-covid-19/coronavirus-vaccination/coronavirus-vaccine/?priority-taxon=774cee22-d896-44c1-a611-e3109cce8eae)

The Company has and will continue to take all other reasonable steps to reduce the risk of COVID-19 transmission, including a regular review of the control measures in the workplace and the provision of appropriate PPE. Immunisation is not regarded as a substitute for other precautionary steps at this present moment.

[In addition, as part of our measures to reduce the risk of transmission in the workplace, you may be [encouraged/required] to undergo a test for COVID-19 [how often?], as determined via a risk assessment of the workplace. If you unreasonably refuse to undergo a test, you may be subject to disciplinary action.]

Staff are expected to follow and adhere to safe working practices to prevent the spread of COVID-19.

All employees must follow the guidelines promoted by Public Health England, the NHS and the World Health Organisation on infection control whilst at work and in their daily lives and comply with the provisions of our Coronavirus (COVID-19) Policy.

## Data protection

Staff who have been vaccinated may be asked to produce proof of their COVID-19 vaccination [because [insert reasons why you are asking for this, e.g. in order to ensure we are complying with our own risk assessment]], a copy and/or details of which will be placed in their personnel record.

[If you have received a test result, you will be asked to provide details of the test result.]

The Company will retain confidential records of [test results and] vaccinations securely. It will keep a record of the vaccination [and COVID-19 test] status.

The Company will adhere to strict guidelines of confidentiality when handling employees’ medical information relating to vaccination.

Employee vaccination [and test] information collected by the Company will be treated as sensitive personal information in accordance with our Data Protection Policy and will be retained securely and for no longer than is necessary.