

## MEMORANDUM

TO	Rainsforth Dix, Director Student and Campus Living
COPY TO	Sandie Dunsford, Associate Director Student Living – Infrastructure and Services
FROM	Stephanie Cottrill, Associate Director Student Living - Halls
DATE	25 January 2022
SUBJECT	<b>Summary of risk assessment - requirement for halls staff and residents to be vaccinated against COVID-19</b>

### Introduction

This paper provides a summary of the detailed COVID-19 risk assessment undertaken specifically for student accommodation to inform the University assessment of whether to mandate COVID-19 vaccination for staff and residents in student accommodation.

In October, the University made a decision to mandate COVID-19 vaccination for all student accommodation staff and residents in 2022. The University subsequently made a further decision to implement a COVID-19 vaccination mandate for all students, staff, and visitors to our campuses in 2022. This comes into effect on Monday 31 January.

The decision requires all staff and all students to be fully vaccinated if they enter University campuses or take part in face-to-face University activities. It also applies to all contractors and visitors who wish to enter University campuses. Further information and FAQs on the University vaccine mandate are available on the University [website](#).

WorkSafe's guidance for determining a mandatory requirement for COVID-19 vaccination is to conduct a detailed risk assessment and consult with staff, including the Health and Safety Representative.

The detailed risk assessment was undertaken in line with the University's Health and Safety at Work Act 2015 obligations to its staff and those affected by our undertakings, in particular the resident community who we also hold a duty of care to under the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021. We have also considered other risks as noted below.

### Student accommodation context

The context of student accommodation is a 24-hour-a-day, seven-day-a-week living environment providing housing and pastoral care to 2500 students. Hall communities are made up of 180-400 residents, most of whom are away from home for the first time and are aged 17 -20 years of age, and professional staff, including student Residential Advisors who live on site. Flats and apartments provide a smaller shared living environment serving more mature independent students.

Some workers from other organisations are based on site in catered halls including contracted catering staff throughout the day and evening, cleaning contractors who work across a range of halls throughout the day, and various infrastructure contractors responding to both planned, preventative and reactive maintenance. Contracted security guards frequently work over night in support of the 24/7 operation.

Halls of residence are also visited regularly by other University staff delivering University services to students and staff such as Mauri Ora Student Support Coordinators, the Student Interest office team, Recreation, Human Resources, Digital Solutions, and the central accommodation team based at Kelburn.

Friends and family of the residential community visit residents in the residential area and couriers and delivery services regularly come and go from hall's receptions.

## Risk assessment and consultation process

An overview of the risk assessment is below with a detailed risk assessment summary included at Appendix 1. An overview of the consultation undertaken is included at Appendix 2.

### Risk Assessment

A risk assessment was undertaken to determine how to manage the risk of serious illness or death from COVID-19 to our community and to ensure it is as low as is reasonably practicable, and to determine if COVID-19 vaccination should be required for certain roles in student accommodation.

In summary the key risks assessed are:

#### 1. Risk of staff exposure to COVID-19 if it is present in the community

Risk Assessment	Raw risk	Very High	
	Residual risk with current controls	High	
	Residual risk with vaccination	Medium	

The risk assessment identifies that the inherent or raw risk is very high due to the nature of the communal living hall environment, working with unwell residents, and the characteristics of the student cohort being social and late in the vaccination rollout.

- The risk is increased for live-in staff who are primarily student Residential Advisors.
- Every staff role in halls requires frequent exposure to the residential environment due to the nature of halls and to meet pastoral care obligations over a 24/7 operation.
- With the application of controls including PPE and safe practices, the risk to staff of exposure to COVID-19 without vaccination remains high.

Being vaccinated gives you a high degree of protection against Delta infection, and an even higher degree of protection against severe illness, hospitalisation, and death. Evidence currently shows the effectiveness of two doses of the Pfizer vaccine against illness due to Delta infection is about 88% and the protection against hospitalisation due to Delta infection about 96%. (Ministry of Health 16 August 2021)

Vaccination of staff would reduce the risk of severe illness for vaccinated staff but does not reduce staff exposure to the virus from students and others in the hall. A vaccination requirement for residents would also reduce the likelihood of exposure, which would reduce the overall risk to medium.

## 2. Risk of staff spread of COVID-19 to others in the community if they have it

Risk Assessment	Raw risk	Very High	
	Residual risk with current controls	High	
	Residual risk with vaccination	Medium	

The risk assessment identifies that if a staff member were to become infected with COVID-19, there is a very high risk of spread to many others. This is due to the long duration and high frequency of contact with many people in the hall who are not required to wear a mask in their residential environment, and the rapid nature of spread by students through the entire halls community and University campuses.

Under the Health and Safety at Work Act 2015, the University is required to manage the risk of infecting others with COVID-19 through its undertakings to as low as is reasonably practicable. Under the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021 the University has a duty of care to students to have responsive health, safety, and wellbeing systems, particularly for residents considered to be at risk.

## 3. Risk to Business Continuity, student care and Pastoral Care Code compliance following a positive case

Risk Assessment	Raw risk	Very High	
	Residual risk with current controls	High	
	Residual risk with vaccination	Medium	

The risk assessment identifies very high inherent risks relating to:

- large scale displacement of students due to unavailability of one or more halls if a hall is identified as a location of interest, and
- insufficient availability of suitably trained staff.

Controls including guest restrictions, staff not working across multiple halls, and PPE controls do not sufficiently reduce the risk of the hall becoming a location of interest, potentially leading to large-scale isolation or displacement of one or more resident communities. Additionally, there is a significant business continuity risk if a staff team is required to isolate due to exposure from a student or other staff member. The hall's ability to manage risks relating to student wellbeing and behavior and to maintain staff to student ratios required under the Pastoral Care Code, would present an unattainable challenge.

### *Student population immunity as a control*

The risk of a student infecting other students or staff is higher than a staff member infecting other people.

Options to manage the risk presented by the student population are currently reliant on:

- voluntary vaccination
- wearing a face covering which is not usually required in their place of residence.

The inadequacy of these controls means the same consideration of vaccination should be applied to students residing in communal or shared University accommodation who are able to be vaccinated.

A broad range of risks were identified and assessed in the detailed risk assessment undertaken by the University. These risks inform and underpin those set out above and are outlined in Appendix 1.

## **Conclusions**

Under the Health and Safety at Work Act 2015, the University is required to manage risks to staff and others impacted by its undertakings, to a level that is as low as is reasonably practicable.

The identified risks remain high even with the full use of other controls already implemented by the University.

COVID-19 vaccination is identified as the strongest control to prevent serious illness and death from COVID-19, and a significant control to reduce the spread of the virus.

Vaccination of both the staff and resident student population would significantly reduce the risk of serious illness or death from COVID-19 to medium. Vaccination would also significantly reduce the business continuity and pastoral care risks.

Mandatory vaccination of staff and students in halls would enable those with health conditions that make them vulnerable or those that for medical reasons are not able to be vaccinated, to live in the hall environment with much less risk and a greater deal of confidence.

## Appendix 1 - Detailed risk assessment at September 2021

The risks set out below are from the detailed risk register and represented as raw and residual risk (with current controls) without showing the effect of vaccination to COVID-19. This risk assessment and controls will be updated to align with official government advice as the pandemic situation evolves over time.

### Health and Safety risks

#### Risk of staff exposure to COVID-19 if it is present in the community

##### 1. Availability of staff

Risk Assessment	Raw risk	Medium	
	Residual risk with current controls	Medium	

The risk assessment identifies a medium risk if insufficient staff are available because they are persons at higher risk of severe illness or looking after vulnerable dependents. The safety of students and workers will be impacted. For example, insufficient management, supervisors, or technical staff available. E.G Hall Managers, RA, SSC. Specialist skills not available. Sufficient time available to arrange cover for duties. Risk will be greater if there is short notice.

Established hygiene controls are used to help manage the risk.

##### 2. Persons at higher risk of severe illness

Risk Assessment	Raw risk	High	
	Residual risk with current controls	Medium	

The risk assessment identifies a high risk of a worker contracting COVID-19 if any of the conditions set out in the risk assessments are present and/or they are, for example over 70 years old with a medical condition; have a medical condition and/or compromised immunity, are pregnant. Some of these indicators may be more likely than others in a hall setting.

The risk is reduced when controls are implemented. Ministry of Health COVID-19: Advice for persons at higher risk of severe illness are followed and established hygiene controls are used.

##### 3. Availability of staff - unwell

Risk Assessment	Raw risk	High	
	Residual risk with current controls	Medium	

The risk assessment identifies a high risk if staff are unavailable because they are unwell, contracted COVID-19 or isolating due to close contact. The safety of students and workers will be impacted. For example, insufficient management, supervisors, or technical staff available. Established hygiene controls are used.

The risk is reduced by application of established hygiene controls. Advice is provided by the University's Human Resources departments, Student Health, and Regional Public Health.

##### 4. Staff resilience

Risk Assessment	Raw risk	Medium	
	Residual risk with current controls	Medium	

The risk assessment identifies a medium risk where Hall staff and Residential Advisors respond to a prolonged event involving COVID-19, they may suffer Post Traumatic Stress Disorder. This could be exacerbated by limited experience or knowledge.

The University has an Employee Assistant Programme (EAP) to support staff, a process for managing a positive COVID-19 case on campus, and Management support and Supervision is in place to help reduce the risk.

#### 5. Responding to positive COVID-19 result in hall

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	High	

The risk assessment identifies a very high risk if a positive COVID-19 case occurs within a hall and there is insufficient and/or timely guidance available for the wider community, residents and staff may be exposed to the virus due to delayed, incorrect or no response. Residents remain in hall - staff could have been working with unwell residents before symptomatic.

The risk is reduced when University guidelines are implemented for working in different COVID-19 alert levels, including action to take in event of positive COVID-19 case. Safe practices information is communicated to hall staff and residents. An infected resident should be isolated and transferred to Government MIQ facility.

#### 6. Unexpected death in a hall

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	High	

The risk assessment identifies a very high risk if staff or resident has COVID-19 symptoms which are unchecked, it may become serious or fatal and infect others in the hall.

The risk is reduced when established hygiene practices are followed. The person is transferred to MIQ or hospital. The University has a Critical Incident Procedure and process for responding to a positive COVID-19 case on campus

#### 7. Security - perimeter control

Risk Assessment	Raw risk	High	
	Residual risk with current controls	Medium	

The risk assessment identifies a high risk if hall premises are not secure. Unauthorised access may occur. An intruder has unknown health condition and may cause an infection risk to staff or residents. Residents feel unsafe.

The University has electronic security systems including CCTV and access control. Security staff and management are present. These controls reduce the residual risk.

#### 8. University staff visiting hall

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	Medium	

The risk assessment identifies a very high risk of infection if a positive COVID-19 case has been present and Student Living, Associate Directors, other Student Living or University staff attend hall premises. This group of workers are not based in halls and visit them less frequently than others who are based there.

The risk is reduced when the University's guidelines for working at the different COVID-19 levels are applied including established hygiene practices. Management staff may also work remotely.

### Risk of student exposure to COVID-19 if it is present in the community

#### 9. Mental health resulting in suicidal ideation, threat, or attempt

Risk Assessment	Raw risk	Very High/high	
	Residual risk with current controls	High/medium	

The risk assessment identifies a very high to high risk if a resident has a mental health condition which is unchecked, undiagnosed, untreated, or treatment not followed. The chance of harm to themselves or others could be exacerbated.

The risk is reduced when controls are implemented including oversight, treatment provided by Student Health and assistance from a Student Support Coordinator.

#### 10. Student resilience

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	Medium	

The risk assessment identifies a very high risk if student(s) become isolated from their peers in uncertain circumstances, any existing vulnerability will be exacerbated.

The risk is reduced when professional supports for each vulnerable student are implemented and the University has a guideline for student engagement under the different COVID-19 levels.

#### 11. Responding to an incident

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	High	

The risk assessment identifies a very high risk of exposure to COVID-19 if a resident returns to a hall after visiting a 'location of interest' or travelling from a region at a higher COVID-19, Covid Protection Framework alert level.

The risk is reduced when safe practices information communicated to hall staff and residents is followed. A manager is on call for assistance and the resident can be isolated. Guidelines are available for hall staff for responding to a positive COVID-19 case on campus and government and Student Health advice is followed. Information and advice is provided to residents on emergency actions, reporting incidents and raising health and safety concerns as required by the Pastoral Care Code.

### Risk of spread of COVID-19 to others in the community if they have it

#### 12. Bubbles and control of gatherings

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	High	

The risk assessment identifies a very high risk of COVID-19 transmission where large groups of residents gather. Transmission of the COVID-19 virus may occur through aerosols, which could remain airborne or settle on surfaces. This could then contaminate resident groups.

This may also prevent the University from providing residents with healthy and safe learning environments, and accessible learning environments where they can connect with others, build relationships, support each other, and welcome their friends, families, and whanau.

The risk is reduced when physical distancing and group and bubble controls are implemented. Surfaces are kept clean to prevent persons touching droplets which have settled. Areas are ventilated. Some halls have mechanical ventilation systems. Signage is displayed to ask people with symptoms consistent of COVID-19 not to enter.

### 13. Re-entry to halls and university

Risk Assessment	Raw risk	High	
	Residual risk with current controls	Medium	

The risk assessment identifies a high risk of the University being unable to provide a robust and fair process for residents to return to their accommodation following circumstances out of their control. For example, lock down in line with COVID-19 Covid Protection Framework alert levels. Student's study may be interrupted, and the University will not comply with requirements of the Pastoral Care Code.

The University has arrangements for returning to halls, in line with government and TEC guidelines which, when implemented reduce the risk.

Comment: Since this assessment the University response has been to respond to individual cases. The traffic light system has superseded this.

### 14. Vulnerability of out-lying student accommodation

Risk Assessment	Raw risk	High	
	Residual risk with current controls	Medium	

The risk assessment identifies a high risk of an incident occurring in the Kelburn Flats. These premises are individual properties and separate from large hall of residence. Tenants are young and inexperienced leading to higher potential and probability for an incident to occur if they are not familiar with COVID-19 response procedures. The risk may be increased due to staff isolation and less frequent contact with others.

The risk is reduced through application of safe practices. This information is communicated to hall staff and residents. University guidelines for operating at different alert levels is communicated to affected people also.

### 15. Application of safe hygiene and distancing practices

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	High	

The risk assessment identifies a very high risk if staff and residents do not apply safe practices. A positive case of COVID-19 could affect others. This will be exacerbated if controls including gatherings and bubbles are not adhered to. E.g., if residents leave halls and do not behave in a COVID-19 safe manner outside of their halls the likelihood of contracting and transmitting COVID-19 will be increased.

Safe practices information is communicated to hall staff and residents including established hygiene controls. Regular cleaning, increased frequency of cleaning in shared bathroom facilities, and special cleaning is undertaken where required to help reduce the risk.

## 16. Unsafe behavior

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	High	

The risk assessment identifies a very high risk if residents do not follow University guidelines and practices for COVID-19 safety if it is in the community. They will put themselves and others at risk.

The risk is reduced through communication of safe practices information to hall staff and residents. Halls are monitored by hall management and Residential Advisors.

## 17. Large scale displacement - place of interest (Business continuity risk also)

Risk Assessment	Raw risk	High	
	Residual risk with current controls	Medium	

The risk assessment identifies a high risk if a hall becomes unavailable due to contamination from COVID-19 the hall will be a 'location of interest' and the University will be unable to provide safety and welfare facilities to residents who are displaced.

The risk could be exacerbated if the unavailable hall is Weir House. Additional consideration is required in line with the Pastoral Care Code for residents under 18 years.

The risk is reduced through the application of special cleaning processes, isolation of infected residents and the Student Living Critical Incident plan. Spare capacity may be available at other halls.

Comment: under the traffic light system and with the Omicron variant, this risk has been superseded by the risk of rapid community spread resulting in isolation of floors and possible lock down of affected halls.

## 18. Working extended hours

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	Medium	

The risk assessment identifies that if staff need to work long hours or shift patterns with shorter than desired rest periods due to insufficient staff cover, this could cause fatigue in workers leading to increased probability for error resulting in harm.

The risk is reduced by adequate rest between shifts and temporary reduced shift duration on site (flexible work arrangements).

## Business Continuity Management risks

### Risk to Business Continuity, student care and Pastoral Care Code compliance following a positive case

#### 19. Availability of halls (Refer large scale displacement – place of interest risk also)

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	Medium	

The risk assessment identifies a very high risk if one or multiple halls become unavailable and insufficient accommodation is available at remaining halls students will be displaced. Future students may choose not to enroll at the University.

The risk is reduced by monitoring of applications and oversight by the University Accommodation Governance Board to discuss ebbs and flows in accommodation requirements.

## 20. Functionality of premises

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	Medium	

The risk assessment identifies a very high risk if Student Living accommodation buildings are not fit for purpose, negative impact will result on student experience and perception of halls.

The risk is reduced by the University's Asset management plan, appropriate budget allocation and capital projects.

## 21. Equipment and plant not maintained

Risk Assessment	Raw risk	Very high	
	Residual risk with current controls	High	

The risk assessment identifies a very high risk if safety equipment and plant is not maintained in halls, the BWOF could expire. Plant and equipment could become unreliable and may fail when in service resulting in loss. Plant and equipment include the following:

- Lifts
- Lighting
- HVAC
- Plumbing, water heaters
- Catering equipment
- Fire safety systems
- Security systems, access control and CCTV

The risk is reduced by essential works being undertaken. Contractors have safe work practices including minimum number of people engaged to complete a task. Workplace safety and relevant COVID-19 alert level arrangements are applied. Tasks are completed remotely where possible.

## 22. Financial loss due to early termination of contract

Risk Assessment	Raw risk	High	
	Residual risk with current controls	High	

The risk assessment identifies a high risk of a resident terminating their contract due to COVID-19 lock down arrangements.

## Appendix 2 - Consultation

### 1. Current Staff

Meetings were held with Heads of Halls, Deputy Heads of Halls and Night Managers as part of forming the risk assessment. Further discussions were led by Heads of Halls with other staff.

A summary of the key risks assessed is below.

Four questions were put to staff with options of 'prefer not to say'. The questionnaire and feedback summary is attached as Appendix 1.

In addition to consulting with the Health and Safety Representative, because of the personal nature of vaccinations, all University halls permanent staff members and all Residential Advisors (RAs) employed by the university who have been interviewed and offered to return in 2022 were consulted. An anonymous online form was used to enable individual views to be considered freely.

#### *Consultation results:*

71% of permanent staff responded

- All except two respondents supported mandatory vaccination for hall staff roles.
- All except one staff member supported mandatory vaccination of residents who are able to be vaccinated.
- Most staff prefer to work with vaccinated colleagues.
- Regardless of other exceptions, all responding staff were either partially or fully vaccinated.

71% of RAs returning in 2022 responded. RAs were in agreement other than one exception. The exception supported mandatory staff vaccination regardless of other views expressed.

- All respondents supported mandatory vaccination for hall staff roles.
- 9/10 respondents supported mandatory vaccination for residents who are able to be vaccinated, one did not support this in principle.
- 9/10 respondents prefer to work alongside vaccinated staff. One was comfortable working with unvaccinated colleagues.
- 9/10 respondents were either partially or fully vaccinated, one respondent preferred not to say.

The Health and Safety Representative was in support of consultation of each staff member and the process used, and in support overall of mandatory vaccination for staff and students.

### 2. TEU

The TEU is supportive of the proposed approach for student accommodation as long as there are redeployment options available within the University.

#### **Comment:**

- Redeployment of any current staff who refuse vaccination - the University will work through a process for redeployment elsewhere within the University.

### 3. Students

A preliminary discussion with VUWSA's Engagement Vice-President and President-elect also provided early indication that VUWSA would be likely to support mandatory vaccination for both hall staff and students who are able to be vaccinated.

The VUWSA President then raised the matter with the Student Assembly and there is general support, with more detailed discussions with Maori, Pasifika and disability students needed.

Specific questions raised by the Student Assembly:

1. Will this decision involve Whānau House? If so, I recommend that this decision is not made until proper discussion is had with Ngai Tauira – the Maori students' association on the matter.

**Comment:** Yes, the issue has been brought to their attention.

2. Will the vaccinations extend to staff, students, and external contractors within halls of residence? (Including caterers, night managers, and other external staff).

**Comment:** Yes, this will progress within the next 2-4 weeks.

3. Has there been any movement as to whether partner halls will be included in this?

**Comment:** This will also apply to them.