



**Ngangganawili Aboriginal Community Controlled  
Health and Medical Services Aboriginal Corporation**

**ICN 1870**

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## **COVID-19 Response: Staff Management Plan**

### **1. Policy & Rationale**

This purpose of this policy is to address identified risks that can potentially impact adversely on the running of the clinic and wider facility and/or service provision of Ngangganawili Aboriginal Health Service (NAHS) in relation to the present COVID-19 pandemic.

NAHS remains responsible for providing a safe working environment throughout the emerging COVID-19 situation. As a minimum NAHS will ensure employees adhere to personal hygiene standards, social distancing, maximum person limits, adequate cleaning standards and general steps to minimise person-to-person contact. If minimising contact is not possible, then the employer's risk assessments should indicate that they should modify, cancel or postpone the work activity.

NAHS will regularly conduct risk assessments of employee activities on the latest COVID-19 health advice and ensure that all employees and contractors are complying with all relevant guidelines and statutory requirements.

This document should be read in conjunction with the Pandemic Response Plan (Doc\_469) which details more comprehensive contingency operating plans.

### **2. Procedure**

#### **2.1 Occupational Safety & Health Obligations**

The NAHS CEO maintains a non-delegable duty of care to provide and maintain a safe workplace environment, which limits so far as is reasonably practicable, the risks to health and safety at work associated with Coronavirus, including the risk of contracting COVID-19 in the workplace or when carrying out regular duties. As such NAHS will ensure the following:

- To actively identify and monitor risks to the health and safety of our staff, contractors and the community resulting from risk of coronavirus in their workplace
- Provide adequate equipment and facilities to employees to ensure they can carry out their duties safely
- Provide information, training and supervision that is necessary to protect employees from the risks of coronavirus in the workplace



- Monitor the health and conditions of all employees and undertake risk assessments where required; and
- Inform employees of their obligation in taking reasonable care of their own health and safety with the organisation.

## **2.2 Risk minimisation strategies**

NAHS will take the following reasonably practicable actions to control the risk and subsequently the degree of harm that might result including;

- As required by the NAHS Pandemic Plan direct FIFO employees to work from home for an ongoing period as required
- Redeploying or providing alternate duties to employees who are unable to carry out their normal duties because of government regulations or a preventative risk management plan
- Providing flexible leave arrangements

Notwithstanding the above, it is recognised that for many healthcare workers the scope of alternative options will be limited. In those cases, whatever forms of risk minimisation are reasonably practicable will be utilised including but not limited to:

- Implementing controls to reduce direct contact with clients, including, enforcing social distancing of at least 1.5 metres (where practicable)
- NAHS & HACC buses to undertake transport with respect to social distancing at all times
- Provision of adequate supplies and types of relevant PPE
- Reinforcing hand washing/hand hygiene and infection control procedures
- Implementing controls to reduce environmental exposure, including increasing cleaning and disinfection of high traffic areas or shared surfaces
- Providing sufficient cleaning products and instructions for cleaning
- Providing instruction and amenities for personal hygiene and infection control
- Providing employees with information and additional training in infection prevention and control and use of personal protective equipment



## 2.3 FIFO Staff Management

2.3.1 NAHS staff who **have not been outside of WA** transiting to and from Wiluna from Perth will comply not only with the Closing the Border Directions set by the WA Government but with any instruction provided by any commercial or private airline. This will be inclusive of the following;

- Wearing of disposable surgical masks on all flights and within any airport terminal including transit across the tarmac to the plane. A fine of up to \$50,000 is in place for individuals who fail to comply. In addition to this fine any refusal by NAHS staff or contractors would result in refusal to travel on Alliance Flights.
- The mask can be removed whilst eating or drinking if seated at the time (you can still have a coffee at the airport)
- Any NAHS staff member who experiences any one of the following clinical criteria should not return to Wiluna until they have had a COVID-19 test and returned a negative result.
  - fever ( $\geq 37.50C$ ) OR history of fever (e.g. night sweats, chills), without a known source
  - an acute respiratory infection (e.g. shortness of breath, cough, sore throat, runny nose)
  - acute loss of smell or taste.

2.3.2 NAHS staff who have been **outside of WA** to a state with **no current restrictions** on entry to WA will comply not only with the Closing the Border Directions set by the WA Government but with any instruction provided by any commercial or private airline. This will be inclusive of the following;

- Wearing of disposable surgical masks on all flights and within any airport terminal including transit across the tarmac to the plane. A fine of up to \$50,000 is in place for individuals who fail to comply. In addition to this fine any refusal by NAHS staff or contractors would result in refusal to travel on Alliance Flights.
- The mask can be removed whilst eating or drinking if seated at the time
- Must comply with any State direction to undergo a COVID-19 test on arrival into WA or any other such direction which may be amended from time to time
- Any NAHS staff member who experiences any one of the following clinical criteria should not return to Wiluna until they have had a COVID-19 test and returned a negative result.
  - fever ( $\geq 37.50C$ ) OR history of fever (e.g. night sweats, chills), without a known source
  - an acute respiratory infection (e.g. shortness of breath, cough, sore throat, runny nose)



- acute loss of smell or taste.

2.3.3 NAHS staff who have been **outside of WA** to a state with **CURRENT BORDER CLOSURES or restrictions** must comply with the following requirements **prior to** their travel:

- Notify the Policy & Compliance Manager of the planned dates for re-entry to WA, the address their return trip will originate from and any additional cross border transit stops to enable an Essential Services Worker exemption to be applied for from the Chief Health Officer (WA Department of Health).
- Once an Essential Services Worker exemption letter has been obtained the employee is to apply for a G2G entry pass via the app or at <https://www.g2gpass.com.au/apply>
- FIFO employees are not residents of Wiluna and must not use their Wiluna staff accomodation address for the purpose of obtaining a G2G pass.
- The Employee must be willing to comply with any State direction to undergo a COVID-19 test upon their return into WA, and at any other time within the first 14 days back in WA, or to follow any other such direction which may be amended from time to time
- If requested to do so be prepared to provide evidence of a negative COVID-19 test prior to their return to WA.

2.3.4 NAHS staff who have been **outside of WA** to a state with **CURRENT BORDER CLOSURES or restrictions** must comply with the following requirements **upon return to WA**:

- The Employee must be willing to comply with any State direction to undergo a COVID-19 test upon their arrival into WA, and at any other time within the first 14 days back in WA, or to follow any other such direction from the CHO which may be amended from time to time
- Where a person, subject to a quarantine direction, needs to engage in transport services, all people in the vehicle (including the driver) are required to wear a face mask.
- Be prepared to self-quarantine at a suitable premises in Perth for 14 days after re-entering WA
- If travelling by car to Wiluna the most direct route must be taken and stops minimised during the travel. Return trips to Wiluna should not include shopping at any other regional centre or town on route.
- The Employee must be willing to comply with any other State Direction issued by the WA Government or CHO which may be issued from time to time

Any questions regarding management of FIFO staff re-entering WA from interstate should be directed to the Policy and Compliance Manager in the first instance.



## **2.4 Navigation of privacy laws in the workplace**

If a NAHS employee is diagnosed with COVID-19 or is thought to potentially have the disease, this is considered health information that is regulated by privacy laws and such information should be treated with the same regard as any other information of a patient of NAHS in compliance with the Confidentiality and Privacy of Personal Information Policy (Doc\_004).

- The collection of health information must be reasonably necessary for a lawful purpose that directly relates to NAHS functions or activities. The information collected must be relevant and not excessive.

## **2.5 Notification to other staff of a co-worker with a positive COVID-19 diagnosis**

In relation to COVID-19, as a communicable disease, the purpose of collecting personal information from a staff member is to prevent or manage the risk related to COVID-19 and to ensure that necessary precautions can be taken in relation to that individual and any other individuals that may be at risk. In these circumstances, personal information (including sensitive information) may be used or disclosed for this purpose as it falls within the primary purpose of collection (The Office of the Australian Information Commissioner, 2019). It is always preferable to be open with employees, and the employee knows more than the employer in terms of who they have been in close contact with, however the employee must agree to the disclosure. Any such disclosure must be necessary to lessen or prevent a serious threat to life or health and the NAHS CEO must reasonably believe that the disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any other individual, or to public health or safety.

## **2.6 Working from home**

- Assessment should also be undertaken of the conditions that employees would operate in at home, a checklist for Work From Home will be made available
- Managers should arrange for regular monitoring of the mental health and wellbeing of staff working or self-isolating remotely a priority, and referrals made to the Employee Assistance Program (EAP) as required.



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### **3. Non-compliance with this Policy and Procedure**

- 3.1 Failure to comply with this policy may result in;
- Increased risk of transmission of COVID-19 to the people of Wiluna, and other staff and/or contractors
  - Breakdown in trust between the patient and care provider, and the broader community
- 3.2 Any staff non-compliance with this policy may result in disciplinary action, up to and including, termination of the employment contract.
- 3.3 This policy applies to all employees, Accredited Clinicians and other contractors otherwise engaged to work at NAHS.
- 3.4 This policy will be revised by the Policy & Compliance Manager every 3 years or when any need arises for its review.

### **4. Evidence Base**

- *Occupational Safety and Health Act 1984 (WA)*
- Government of Western Australia, Department of Health. Licensing and Accreditation Regulatory Unit. October 2017. Licensing Standards For the Arrangements for Management, Staffing and Equipment - Nursing Post.
- AS/NZS 5050-2010. Business continuity - Managing disruption-related risk
- AS/NZS ISO 31000:2018. Risk management - Principles and guidelines
- West Australian Government, *Emergency Management Act 2005(WA)*, Closure and Restriction (Limit the Spread) Directions (No 10)

### **5. Related Documents**

- Doc\_469 Pandemic Response Plan
- Doc\_470 Pandemic Response Communication Plan
- Doc\_460 Business Continuity and Disaster Recovery Plan
- Doc\_429 Occupational Safety & Health Policy
- Doc\_004 Confidentiality and Privacy of Personal Information Policy