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OVERARCHING PRINCIPLES

The health and safety of all members of the ANU community – staff, students, VaHAs, volunteers, external visitors, suppliers/contractors and commercial/retail operators – is of primary concern to the University. Every measure will be taken by both the University and each individual to ensure the risk of contracting COVID-19 is minimised as far as reasonably practical.

To accomplish this, the University takes an evidence- and risk-based approach using a hierarchy of controls to ensure that our environment is as safe as possible. It also asks that each member of the community also takes such an approach, because the actions of one can affect all.

The University will apply a holistic approach to risk assessment, by consulting with and addressing concerns raised by workers, health and safety representatives, unions, or others at the workplace.

The ultimate intent is that the University environment will be a safe place to work and study in 2022.

COVID-19 RELATED RISKS

There are two types of risk associated with acquiring COVID-19 – the risk of individual members of the ANU community contracting COVID-19, and the risk of spread of the disease via exposure on campus.

The University cannot directly control the former risk, as our people will be exposed to the virus in the general community. However, it expects all members of the ANU community to practice COVID-safe behaviours and minimise their individual risk in their daily lives away from the workplace or study space.

These Guidelines are focussed on treating the latter risk – the risk of spread of COVID-19 on campus.

THE COVID-SAFE CAMPUS ALERT SYSTEM

The COVID-safe campus alert system has been established to clarify ANU control practices to be activated as the COVID-19 situation changes in Australia, the ACT and other jurisdictions as appropriate. This will ensure the University will continue to operate in a COVID-safe manner despite changing circumstances.

The various risk levels including triggers for escalating risk, are detailed below (see Attachment 1):

- **MEDIUM RISK** (Amber) – Increase in local cases or an outbreak but no significant increase in hospitalisations. Additional public health measures in place as determined by the ACT Chief Health Officer (e.g. capacity limits, mandatory mask wearing) or by a formal Work Health and Safety Hazard and Risk Assessment (e.g. mandatory vaccination; use of high efficacy face masks).
- **HIGH RISK** (Red) – Outbreak with consequent large increase in hospitalisations. Lockdown or partial lockdown in jurisdiction. Essential workers on campus only. All others work from home or study remotely.

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1 For an overview of risk associated with different types of activities and for different levels of COVID-safe behaviour, see Greenhalgh et al. *Here’s where (and how) you are most likely to catch COVID – new study.* *The Conversation,* 11 Jan 22
The requirement to move between these stages will be determined by the Public Health Lead - COVID Response Office. The community will be alerted immediately via the ANUOK app when there is a change in level.

As indicated, the local area Work Health and Safety Hazard and Risk Assessment should inform any additional measures to the jurisdictional mandates that may be required.

**HIERARCHY OF CONTROL**

A Hierarchy of Control is *the ranking of risk controls to eliminate, or where not possible, minimise the risks as low as reasonably practicable*. There are six levels of control ranging from the highest protection/most effective to the least protection/least effective as follows:

- Elimination
- Substitution
- Isolation
- Engineering
- Administrative controls; and
- Personal Protective Equipment

All of these types of controls must be considered and implemented where feasible to ensure our workplaces are COVID-safe, noting that at present it is not possible to eliminate the risk of COVID-19 entirely.

For example, at the highest level of COVID-19 risk, elimination of individual risk of on-campus spread of COVID-19 is possible by ensuring most staff and students work or study remotely. However, even in this circumstance the risk of on-campus spread is not eliminated completely as essential workers are still required to come onto campus to work.

**TYPES OF CONTROLS**

**Substitution**

There are limited options available to implement substitution controls; however, it is known that the risk of transmission is reduced in outdoor environments. Consideration could be given to moving activities outdoors where appropriate, particularly when the risk level is at medium.

**Isolation Controls**

In this context, isolation means reducing the risk of bringing COVID-19 on to the campus by ensuring those at increased risk work or study remotely. There are three scenarios that represent increased individual risk:

**Development of COVID-19 like symptoms.** If you develop any COVID-19 like symptoms you must not go to work or classes. Stay home (or in your room), self-isolate and get tested for COVID-19, either by PCR or Rapid Antigen Test (RAT). If you return a negative test, you may resume normal activities unless otherwise directed by ACTH (see para 6).

**Individuals who test positive for COVID-19.** Individuals who test positive for COVID-19 via a Rapid Antigen Test (RAT) or PCR test must isolate in accordance with jurisdictional public health directions or orders. Information for individuals who test positive for COVID-19 is available on

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2 WHS Management System Handbook, Chapter 3.1 - Hazard Management, pg 20
4 The University has procured RATs and will be providing them free of charge to ANU community members. A governance and distribution model is under development.
Note that if you test positive by RAT you need to register this with ACT Health or NSW Health as applicable.

Individuals who test positive must notify their local area or supervisor as soon as possible. They should notify also the CRO via the ANU COVID-19 Positive Notifications form.

They will need to isolate for a period of at least 7 days. Individuals who test positive must isolate until cleared to leave isolation based on the rules of their health jurisdiction. There are no additional clearances required to return to work.

**Exposure Risk Assessment.** All individuals should be aware of their local jurisdictional approach to managing risk of exposure and adhere to these requirements. In the ACT and NSW, this includes those who are identified as household contacts of positive cases or who are at high, moderate or low risk of COVID-19 as detailed on the ACT and NSW health websites. Interpretation of exposure risk for a positive case on campus is the responsibility of the local work area. Some examples of exposure risks are provided at Attachment 2 to assist in making this assessment. The COVID Response Office (CRO) is also available to provide advice.

**Engineering Controls**

**Vaccination.** The University expects that all members of the ANU community are fully vaccinated against COVID-19. This includes a booster (or third) dose when eligible, as this provides additional protection against the Omicron variant. Vaccination reduces the risk of spread of the of the SARS-CoV-2 virus that causes COVID-19 and the development of severe disease, hospitalisation, and other complications. The University reserves the right to mandated vaccination for certain high-risk activities or areas based on a formal Work Health and Safety Hazard and Risk Assessment. It is acknowledged that some individuals are unable to be vaccinated for medical reasons and these individuals will be supported on a case-by-case basis. For more information see Vaccination Guidance at Attachment 3.

**Ventilation.** Indoor environments must be well ventilated to reduce the risk of aerosol transmission of COVID-19. Crucial to the safe operation of ANU is that heating, ventilation and air conditioning (HVAC) systems are well-maintained and operating properly; this is the responsibility of Facilities and Services. Consideration should be given to opening windows where applicable or moving events outdoors where appropriate. Ventilation enhancements have been provided to the libraries and are currently underway for the teaching spaces. Possible enhancements include increasing fresh air rates whilst the spaces are occupied, providing purge cycles following occupation, and the upgrade of filtration levels. The type of ventilation enhancements that can be implemented in a particular building are governed by the type of the existing air conditioning system.

**Cleaning requirements.** Cleaning requirements will depend on the risk level of exposure associated with a positive case in the workplace. Specific deep cleaning is not required. Cleaning should be focussed only on those areas where the positive case spent a reasonable length of time, particularly unmasked. There is no requirement to close the entire building when a positive case is identified.

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6 Note - staff who are directed to have a vaccination for work purposes, and experience an adverse reaction (injury) caused by the vaccine, may be entitled to workers compensation
Administrative controls

COVID-safe behaviours. Creation of a COVID-safe environment is underpinned by a culture in which every individual behaves in a COVID-safe manner. These behaviours include:

- Keep your distance from others where possible, particularly when indoors, and avoid crowded spaces.
  - Maximum room capacities must be adhered to
  - Masks should be worn if unable to maintain a reasonable distance from others, even if not mandated for general use
- Maintain good hygiene must be practiced at all times through frequent washing or sanitising of hands, sneezing and coughing into elbows, and cleaning up your immediate area after use. This includes wiping down desks and communal areas such as meeting rooms and kitchens.
- Use the Check in CBR app (or equivalent) to check in to each building you visit on campus.
- Monitor the situation – keep up to date with the Government health advice and the Campus Alert System risk level.

Essential workers. If the Campus Alert System is elevated to high risk (red), all staff and students are expected to work or study from home. The exception are those deemed to be ‘essential workers’. Each College or Division is to determine individuals who are essential workers in accordance with the guidance provided at Attachment 4.

PPE

Mask wearing. Masks should be worn at all times when in indoor public spaces when a mandatory mask order is in place or when indicated by local area Work Health and Safety Hazard and Risk Assessment. This means face masks are mandatory in all ANU indoor spaces including work-spaces and teaching spaces. Key principles are as follows:

- Masks should have at least three layers of material.
- The best protection for both individuals and others is offered by particulate filter respirators (PFRs) such as the P2, N95, or KF94. While not required for all situations, the US Centers for Disease Control and Prevention (CDC) now recommends considering PFRs for use in certain higher risk situations where greater protection may be required, as detailed on the CDC website.
- Masks with valves are not permissible as protection from COVID-19.
- Individuals should ensure that masks are fitted appropriately to the wearer with a tight fit around the nose and mouth to increase effectiveness of wearing a mask.
- It is an individual responsibility to provide your own mask when these are required in accordance with Public Health Directions. However, masks may be issued to individuals as PPE if required based on the local area Work Health and Safety Hazard and Risk Assessment.
- The University may choose to make available a quantity of PFRs to members of the University community when available and appropriate, when there is a mandate to wear masks in public spaces.
- Masks can be removed in certain situations in accordance with public health guidance, such as when eating or drinking, when a person is alone in a work area, and/or when it is necessary for the activity the person is performing. It should be noted, however, that this

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8 Number, distribution method and cost of these respirators is still under consideration. While these masks are technically disposable, anecdotal evidence suggests that they can be reused for a prolonged period if exposed to UV light and carefully handled and stored.
does increase the risk to the individual. If there is an option to wear a mask or eat outdoors, this is preferred.

**SPECIFIC WORK AREAS OR CIRCUMSTANCES**

While the above guidelines are applicable to the entire University and its community, the application of these principles to individual work areas and circumstances must still be based on a detailed Work Health and Safety Hazard and Risk Assessment\(^\text{10}\) undertaken by the local business area. Every business area must use these overarching principles to inform their local plans.

**COMCARE IMPLICATIONS**

The University is required to notify Comcare of all confirmed COVID-19 cases that are work-related and arise from the business or undertaking of the employer (PCBU), as required under section 37 of the WHS Act 2011. The incident must present a serious risk to a person’s health or safety, and this usually occurs after close exposure with a COVID-19 infected person. All incidents should be reported via the University’s workplace safety incident and hazard reporting tool Figtree. Further information is available on the [Comcare website](https://www.comcare.gov.au) or contact [whs@anu.edu.au](mailto:whs@anu.edu.au).

**ATTACHMENTS**

1. COVID-safe Campus Alert System
2. Examples of exposure risk assessments
3. Vaccination guidance
4. Essential Workers: Guidelines for decision makers

\(^{10}\) WHS Management System Handbook Chapter 3.1 Hazard Management
Attachment 1 to ANU COVID-safe Guidelines 2022 – COVID-safe Campus Alert System

**HIGH RISK** – Outbreak with consequent large increase in hospitalisations
- Lockdown or partial lockdown (work from home; study online)

**MEDIUM RISK** – Increase in local cases or an outbreak; no significant increase in hospitalisations
- Requirement for extra public health measures as determined by CHO and/or local area Work Health and Safety Hazard and Risk Assessment

**COVID Normal** – Baseline COVID in the community
- General COVID-safe measures
### Attachment 2 to ANU COVID-safe Guidelines 2022 – Examples of Exposure Risk Assessments

<table>
<thead>
<tr>
<th>Risk</th>
<th>Example Activity</th>
<th>Required actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>No additional risk</td>
<td>- In the same building but had no contact with positive case</td>
<td>Follow directions from ACT Health outlined <a href="#">here</a>.</td>
</tr>
<tr>
<td>Low</td>
<td>- Limited contact (physically distanced) with positive case in the campus building, both case and other staff wearing masks.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Attended a work meeting with the positive case for &lt; 1 hour duration, everyone was wearing masks, capacity limits were adhered and ventilation was enhanced.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Conducted standard work activities and had intermittent contact throughout the work shift; all staff were wearing masks and using appropriate social distancing.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Shared an enclosed office with a positive case for 2-4 hours, but all staff were wearing masks in the work area, using appropriate social distancing and were fully vaccinated (3 doses).</td>
<td></td>
</tr>
<tr>
<td>Moderate</td>
<td>- Shared an enclosed office with a positive case for 2-4 hours, but all staff were wearing masks in the work area, using appropriate social distancing but not fully vaccinated.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Attended a meeting with a positive case, physical distancing was not observed, ventilation was not enhanced, individual and/or case were not wearing masks for entire duration</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Delivered or attended a lecture or tutorial duration, where a positive case was present.</td>
<td></td>
</tr>
</tbody>
</table>
| High | • Extremely close physical contact for any length of time without masks  
• Spent 4 hours or more in the same enclosed space (e.g. an office) and masks were not worn for the entire period  
• |
Attachment 3 to ANU COVID-safe Guidelines 2022 – Vaccination Guidance

Background

Vaccination is one of a suite of measures that reduce the risk associated with the COVID-19. Vaccination reduces the risk of spread of the of the SARS-CoV-2 virus that causes COVID-19 and the development of severe disease, hospitalisation, and other complications. With the emergence of the Omicron variant, it has become apparent that individuals who are double vaccinated are still at risk of developing COVID-19, although still have very good protection against severe disease. There is strong evidence that booster doses of COVID-19 vaccines enhance protection against symptomatic disease due to the Omicron variant\(^{11}\).

While some jurisdictions have mandated vaccination for certain sectors or activities such as higher education, the ACT Government is not taking this approach for universities. However, businesses are free to mandate vaccination where they deem appropriate. In the ACT, the University of Canberra is requiring vaccination for anyone on campus in 2021 and Charles Sturt University is mandating vaccination across all their campuses, including the ACT campus.

This document outlines the activities for which vaccination is expected as a control measure to ensure the safety of the ANU community and collaborators.

Scope

All University related activity performed by staff, students, volunteers, or contractors where COVID-19 is an identified hazard.

Guiding Principles

1. The University is committed to the safety of all staff and students
2. The University expects all staff and students to comply with any mandatory vaccination requirements of the State, Territory or Country. This includes the requirement for all health care workers to be fully vaccinated.
3. Vaccination is just one control in a hierarchy of controls to mitigate COVID-19 risks but is arguably the single most important risk mitigator.
4. The University expects that all members of the ANU community are fully vaccinated against COVID-19. This includes a booster (or third) dose when eligible.
5. While vaccination is not mandatory across all activities, there are some circumstances where other risk control measures such as masks, social distancing, and increased hygiene are not sufficient to reduce the risk of COVID-19 impacts without the use of vaccination. This will be determined by a formal Work Health and Safety Hazard and Risk Assessment (see paragraph below). This is consistent with ACT Government guidance.
6. If an individual is unable to be vaccinated for medical reasons and the activity is key to their employment or learning, a full risk assessment must be undertaken and approved by HR (for staff) or the Registrar (students).

Situations where vaccination may be mandated

Where government mandates do not apply, the University may still expect vaccination based on a formal Work Health and Safety Hazard and Risk Assessment. In these circumstances, consideration could be given to making vaccination mandatory if all other control measures are unable to adequately mitigate the risk of COVID-19 transmission. The decision maker in each circumstance will be the risk owner.

Potential higher risk situations may include, but are not limited to:
1. Living in ANU residences
2. Working with primarily unvaccinated population, such as children, who are not eligible for vaccination or in areas where vaccination rate is low
3. Teaching activities
4. Travel and work in remote communities
5. Working with individuals who are more vulnerable to COVID-19
6. Travel, both domestic and international

In accordance with Chapter 3.1. Hazard Management of the WHS handbook, local areas will need to undertake and document relevant stakeholder consultation on the risk assessment for mandating vaccination.
Attachment 4 to ANU COVID-safe Guidelines 2022 – Essential Workers: Guidelines for decision makers

Background
The ANU has created a COVID-safe Campus Alert System to clarify ANU control practices to be activated as the COVID-19 situation changes in Australia and the ACT. These guidelines provide instruction for local business areas to determine which staff members or activities should be categorised as “essential” in a lockdown or at High risk level.

Principles
1. The core business of the ANU is to undertake research and to educate our students. Any definition of Essential must include the continuation of these two core elements
2. All staff are essential to the operation of the University. For the purposes of the remainder of this guide Essential Staff and Services are those that cannot be performed remotely, rescheduled or deferred
3. It is understood that for most staff members, some but not all elements of their work can be performed remotely. This should be taken into consideration when determining which activities are to be undertaken on campus.
4. The relevant Federal, State or Territory rules on occupancy density and time limits on potential exposure should guide decisions as to how many and for how long people are allowed in buildings and work spaces at any one time. Any relevant Federal, State or Territory guidance on definitions that describe Essential Services and Staff must be adhered to.
5. Other key activities that must be considered in determining Essential personnel and Services include:
   a. Continuation of critical and/or Essential Services that must be completed on-site
   b. Maintaining integrity of infrastructure, property or systems on-site
   c. Necessary on-campus work to maintain the safety and wellbeing of students, faculty and staff
   d. The welfare of animals, plants, cadavers and specimens

The COVID-safe Campus Alert System Level
The COVID-safe Campus Alert System applies on a whole of campus basis rather than at a precinct or building basis.

At lower levels within the ANU COVID-safe Campus Alert System, the campus remains accessible and there are few access controls placed on staff and students. At all times staff and students must follow the correct hygiene protocols and university guidelines.

At increasing levels of risk, vulnerable staff and students should work and study from home. Decision-making delegates (discussed below) should consider a level of access control and monitoring of vulnerable staff and students, given the risk involved.

It is expected that decision-making delegates introduce additional approval processes for campus access including steps consistent with the increased level of risk (e.g. staff and students wearing full PPE to continue research experiments). Access control methods may be considered to restrict access to the campus. As the COVID threat levels escalate risk assessments must reflect this change and management controls should be implemented to monitor campus access.

Decision-making delegation and process
Each College Dean and Service Division Director is responsible for the determination as to which of its personnel and activities are essential on campus during the COVID-19 pandemic at risk levels High.
This determination should be done in advance as part of business continuity planning.

The process to provide access to the campus at High levels includes:

1. Areas and staff that wish to be considered as Essential must provide a Risk Assessment outlining the work they intend to perform on campus and the method in which that work will be completed, using COVID-safe practices. Information should be reviewed and approved prior to submission.
2. Information within colleges and research schools to be submitted to the College Dean for approval.
3. Information for other areas to be submitted to COO, DVCA, DVCR or DVCSUE for approval.
4. If approved by 2 or 3 above, Risk Assessment for each activity on campus during the period must be conducted and have sufficient, specific and appropriate controls implemented.

The risk assessment must be managed in accordance to the WHS Management System Handbook Chapter 3.1. However, the approval authority during the time of high or extreme risk levels changes to the Director of the School/Division for all risk assessments. In addition:

   a. A COVID-19 Control Adherence Inspection must be conducted at least weekly for each area with workers on campus by that local area using the local Risk Assessments and the COVID-Safe Campus Alert System to ensure controls are adhered to at all times during on campus operation; and
   b. Non-compliance to the local Risk Assessment and the COVID-Safe Campus Alert System must to be addressed immediately.

In considering the approval of a request, all delegates are required to comply with State and Territory regulations in action at the time.

Staff members or groups may be designated essential on a case by case basis, based on the nature of the emergency and/or the availability of staff and resources.