



CUSTOMS COVID-19 VACCINATION POLICY

Purpose

1. This policy works alongside all of Customs' other infection prevention and control measures to reduce the risk of exposure of COVID-19, in order to:
 - keep our people safe and well
 - protect essential services and provide business continuity
 - maintain trust and confidence in Customs by ensuring we keep our people safe and continue to do our job.

Requirement to be vaccinated

2. Customs requires:
 - all staff to be vaccinated. This means having the first vaccination by 21 January 2022 and to be double vaccinated by 11 February 2022.
 - anyone else working at a Customs' site, or visiting a Customs' site, to be vaccinated no later than 21 January 2022.
 - All Customs' staff and their eligible family members who are posted offshore to be vaccinated prior to departure.
3. The requirement to be vaccinated will be a condition of employment for new staff joining Customs.
4. This policy is based on:
 - Customs' values



What is the most important thing in the world?
It is people, it is people, it is people.

He aha te mea nui o te ao? He tāngata, he tāngata, he tāngata.



Following the right path in whatever we do.
Integrity, honesty, and passion will contribute to success.

Whāia te ara tika. Mā te tika o te mahi i roto i te pono me te aroha.
Ka eke ki ngā taumata o te ora.



Screening and protecting borders, caring for
people now and in the future.

Ārai paenga, manaaki tāngata, haere whakamua.



We seek to bring distant horizons closer, and sustain and
maintain those that have been arrived at.

Ko te pae tawhiti whāia kia tata, Ko te pae tata whakamua kia tina.

- information provided by the Ministry of Health on the safety and efficacy of the COVID-19 vaccine
- the health, safety and wellbeing of Customs people
- Customs' COVID-19 Health and Safety Risk Assessment, and
- Customs' obligations under the Health and Safety at Work Act 2015.

Health and Safety COVID-19 risk assessment

5. The approach in this policy is based on the risk an unvaccinated person poses to others.
6. Customs' COVID-19 Health and Safety Risk Assessment assumes the presence of a highly transmissible variant of COVID-19. This means the risk of being infected by COVID-19 for our people, their whānau, and those we interact with in the course of our work has increased. Customs wants to ensure staff remain safe and well and is required to do everything it reasonably can to manage the risk under the Health and Safety at Work Act 2015.
7. The health, safety and wellbeing of people has always been, and will continue to be, a top priority. Throughout the COVID-19 pandemic the Customs' Executive Board has worked to ensure actions in response to COVID-19 have been careful and considered.
8. From early 2020 Customs has applied a risk-based approach to prevent the transmission of COVID-19 to our people. Staff who interact with people arriving in New Zealand continue to use appropriate personal protective equipment, practice social distancing and undergo regular COVID-19 tests. Vaccination was mandated for frontline border workers under the COVID-19 Public Health Response (Vaccinations) Order 2021 in May 2021. In combination, these measures have proven to be effective and have protected our people working at the border who, up until recently, have been most at-risk from coming into contact with COVID-19 at work.
9. In Customs' workplaces, where staff do not come into contact with people arriving in New Zealand, a range of infection prevention and control measures have been utilised to keep people safe and well. To date, these measures have prevented the transmission of COVID-19 in Customs' office spaces.
10. The existence of highly transmissible COVID-19 variants in our communities has changed Customs' risk assessment, and it now considers that staff are at as much risk from COVID-19 in the community (and therefore at work) as our border staff were a year ago. Additionally, there is the risk of other emerging variants that may create further risk.
11. There is a risk that a highly transmissible COVID-19 variant has the potential for serious illness within the workplace, and in addition this may impact on Customs' ability to carry out its functions.
12. Customs has assessed the current risk level as high. Vaccination will reduce the risk in terms of both likelihood and consequence to medium.
13. The information received from Customs' staff not covered by the Order about their vaccination status has informed this policy. It has shown us that while levels of vaccination in Customs are high, there are unvaccinated staff across different locations and in different roles. Customs has therefore come to the view that all staff are required to be vaccinated. This is because:

- the risk posed by an unvaccinated worker is higher than the risk posed by a vaccinated worker
- a key mitigation to the risk posed by a worker who remains unvaccinated is to remove them from the workplace (which could include working from home), but this is not considered a tenable long-term solution in all cases
- it is clear that many other workplaces where Customs' staff are required to visit require, or are likely to require, vaccination. From a business continuity perspective, we are unlikely to be able to manage situations where only some team members can visit other workplaces.

Exemptions

14. In very limited situations, Customs' staff may be eligible for a medical exemption from being vaccinated against COVID-19. However, there are very few situations where vaccination is not advised and, as such, a medical exemption is expected to be rarely required. This exemption will be aligned with the criteria for medical exemptions published in the Gazette by the Director-General of Health, consistent with the COVID-19 Public Health Response (Vaccinations) Order 2021.
15. Visitors for the purposes of our staff carrying out Customs' functions e.g. witnesses attending an interview, will be allowed to visit provided the responsible manager has completed a risk assessment and put in additional controls to keep people safe.
16. Customs acknowledges that, on occasion, a staff member may need to bring a child to work. Children who are not eligible for vaccination are exempt from this policy but must be under parental or guardian control at all times.
17. Exemptions will be for a specified time, for example, recovery from clinical conditions or the availability of alternate vaccines.
18. Obtaining an exemption does not guarantee that an employee is able to return to the same work or role. Staff will be consulted in relation to their specific options.
19. It is unlikely that exemptions will be granted on any other grounds, however an exemption can be requested and each individual's situation will be considered on a case-by-case basis by the Comptroller consistent with the New Zealand Bill of Rights Act 1991 and the Human Rights Act 1993.

Implementation of this policy

20. All staff who are not covered by the Order will be asked to verify their vaccination status.
21. Staff who are unvaccinated or did not respond to the vaccination status survey will be contacted by the People and Capability team, and with the support of managers and people leaders, will:
 - work to fully understand the work they do
 - the way they work
 - the ability for them to undertake their work from an alternative location

- the availability of alternative or designed work, and
 - additional health and safety measures that could be available.
22. The purpose of this stage of the process is to understand how the risk assessment is relevant to the work that they do. Consideration will be given to what employment options might be available.
23. In good faith, Customs will ensure that staff have opportunities to respond to any proposed changes to their employment and their feedback will be taken into consideration before a final decision is made. If Customs is unable to find a solution, there may be a need to consider termination of employment. This, however, would be the last resort after a robust consultation process.
24. This process will involve the staff member's Manager and people leader and can also include a support person e.g. a union representative.

Special leave

25. Special leave is available for all staff to obtain a vaccination or, in the event staff feel unwell after a vaccination, to allow time to rest and recover. Special leave is also available for staff to have a consultation with their general medical practitioner, paid for by Customs, to discuss any concerns they may have about the vaccine.

Review of Customs COVID-19 Risk Assessment and Policy

26. Customs' Risk Assessment is dynamic and due to the current environment and the pace of change, the risk assessment will be regularly reviewed. Future reviews could include, for example, the need for booster vaccinations or the impact of rapid antigen testing.
27. This policy will be regularly reviewed. The first review will be no later than 31 March 2022.

Roles and Responsibilities

NZ Customs Service

- Comply with all required public health and social measures of the COVID-19 response while continuing to provide public services for all of New Zealand.
- Ensure compliance with all related legislative mandates.
- Develop and maintain a COVID-19 Health and Safety Risk Assessment.
- Continue to educate and engage with staff and their unions to support and encourage staff to be vaccinated.
- Require visitors, contractors, and other third parties, including government agencies, to meet vaccination certification standards to enter Customs' workplaces
- Protect the communities that Customs interacts with, and the health and safety of public servants themselves, while ensuring New Zealanders can access the services they need, in line with the COVID-19 Protection Framework.
- Ensure that other health and safety controls are in place in Customs' sites

Staff

- All staff and any other people working at a Customs' site are required to comply with this policy.
- All staff and any other people working at a Customs' site are required to follow other health and safety measures to reduce the risk of COVID-19.

Managers and people leaders

- Ensure their staff fully understand the requirements of this policy.
- Acknowledge and support staff who may require more information and time to make an informed decision on getting the vaccine.
- Support staff's choice of vaccination provider such as their own doctor.

People and Capability Group

- As the policy owner, review this policy as and when required to ensure it complies with good practice and is fit for purpose. The first review will be no later than 31 March 2022.
- Ensure vaccine status information is collected, stored and used in accordance with Customs' obligations under the Privacy Act 2020.
- Educate, expect and support staff to be vaccinated.

Definitions

- **'Vaccinated'** means two doses of the Pfizer BioNTech vaccine, or other vaccine approved by the [Ministry of Health](#)
- **'Customs' site'** means any building and its immediate surrounds where the entry is controlled by Customs. This includes all Customhouses, and operational locations solely occupied by Customs (for example, Air Cargo Inspection Facility and Sea Cargo Inspection Facility). Where Customs shares a building, the Customs' site is the area of the building that Customs has exclusive rights of occupation over. Customs' site also includes any Customs' vehicles and craft.

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Owner	DCE People and Capability
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