



Update: Implementation of COVID-19 Public Health Response (Vaccinations) Amendment Order 2021

Security level: IN CONFIDENCE

Report number: BEB RPT 21/054

To: Hon Chris Hipkins
Minister for COVID-19 Response

Cc: Hon Michael Wood
Minister of Transport

KEY POINTS

1. Attached is this week's report regarding the implementation of the **COVID-19 Public Health Response (Vaccinations) Amendment Order 2021**.
2. The implementation programme is being delivered by a cross-agency Senior Officials Group, chaired by the Border Executive Board and including representatives from Ministry of Health; Ministry of Transport; Ministry of Business, Innovation and Employment; Department of Prime Minister and Cabinet; Public Service Commission; Ministry of Social Development; Civil Aviation Authority; and Maritime NZ.
3. This report provides you with detail on current and emerging issues related to the implementation of the amended Vaccination Order, and how these are being responded to by Government agencies and the border sector.
4. The data included in this report was extracted from the Border Worker Testing Register by the Ministry of Health on Wednesday 22 September.
5. On the request of your Office, an overview of the Vaccination Order's monitoring and compliance system and framework is provided in Appendix 2.
6. The implementation programme is showing as AMBER overall, as anticipated, due to the number of issues under active management in the lead up to the 30 September deadline.

RECOMMENDATION:

a) That you note the contents of the attached report

Yes / No

s9(2)(a) OIA

PP Christine Stevenson
**Comptroller of Customs / Chair
Border Executive Board**

Hon Chris Hipkins
Minister for COVID-19 Response

Date: 23 September 2021

Date:

ENDS

Border Worker Vaccinations Order Amendment (BWVO Amendment): Implementation Report

Summary - Updates in bold

Overall programme status: AMBER

Date Prepared: 23 September 2021, 4.00pm

Prepared by: Morag Ingram, Border Executive Board, [REDACTED]

- Vaccination numbers across both public and private sector border workers continue to increase. Border workers continue to have priority access.
- As at 22 September, there 269 PCBUs managing 12,942 Active¹ workers on the Border Worker Testing Register (BWTR). Of those 269 PCBUs, 73% (1971) have all their workers fully vaccinated.
- Of all border workers, 96% are recorded as having received at least one dose.
 - 11,756 (91%) are recorded as fully vaccinated; 722 (5%) are recorded as having received one dose; a remaining 464 (4%) are recorded as no dose.
 - MoH is working through data anomalies on vaccination status as they arise.
- In terms of tracking against the implementation of the Vaccination Order ('the Order') by 30 September 2021, 99% of all government workers have now had at least one dose, and 95% of all privately-employed workers have had at least one dose.
- In terms of the split of government and privately-employed workers:
 - 98% of all government workers who are active on the Border are recorded as being fully vaccinated; and 24 government workers are recorded as having received one dose. 47 active government border workers working at the air and/or maritime sector or MIQF, have been recorded as unvaccinated (no dose), however following detailed interrogation of individual records, the MoH Monitoring and Compliance team has confidence that no unvaccinated government workers have been active on the border in the past two weeks.
 - 87% of all privately employed workers who are active on the Border and covered by the amended Order are recorded as being fully vaccinated; with another 698 (8%) privately-employed workers recorded as having received one dose; a remaining 417 (~4%) are recorded as no dose; however an initial review suggests the 'no dose' number requiring detailed interrogation is 370 (more detail on p2). Targeted checks are being undertaken with each PCBU around their workforce details.
- Policy advice on COVID-19 vaccines that New Zealand recognises for work at the Border was provided on 21 September 2021 to the Minister for COVID-19 Response. This advice will inform the next amendment to the Order. The timeline for the amendment will be confirmed following Ministerial decisions in relation to the policy advice.
- The VO Guidance document was re-issued following updates agreed with both your Office and sector stakeholders. The Guidance will be progressively updated as any issues are raised and resolved.
- Two supply chain exemption applications have been received as at 21 September 2021. Panel meetings on both applications have now been held, and one report has been sent to Hon Hipkins, and the other is being prepared.
- The application to the High Court for a Judicial Review of the Order was due to be heard this week, with a ruling anticipated before the 30 September deadline. Crown Law is leading the response.

Issues

Action	Status	Responsible	Notes
Employment Relations	Under control	Hannah O'Donnell (MSD) Anna Cassie (PSC) Shane Kinley (MBIE)	No substantive update. All comments remain relevant. <ul style="list-style-type: none"> • MSD continues to be available to support impacted workers to look for and prepare for other work - MSD's support includes assistance to update CVs and find jobs that match their skills. PCBUs are being advised weekly of the support available and how to access it. The Port Industry Association shared information through their network that sets out the support MSD can provide to impacted workers, as well as to PCBUs looking to fill vacancies left by unvaccinated staff departing after 30 September.
Prioritisation and delivery of Border Worker vaccinations	Under control	Taylor Sanders (MoH)	No substantive update. All comments remain relevant. <ul style="list-style-type: none"> • Prioritisation of border workers continues with onsite vaccinations at some Ports and access to a wide range of community vaccination clinics regionally. • Onsite vaccination clinics at ports continue at Auckland, Tauranga, Tairāwhiti, Hawkes Bay, Capital and Coast DHBs. • Furthermore, due to extra priority vaccination capacity being opened up for essential workers, port workers have even more choices about clinic locations they can access, such as drive-through vaccination sites. • Translated vaccination education materials have been provided to ports, especially resources for Pacific peoples. Other resources have included FAQs, posters for cafeterias, vaccine booking instructions, education webinars and videos, and offers of face-to-face question and answer sessions with health experts.
Maritime workers	Some Issues	Sharyn Forsyth (Maritime NZ)	No substantive update. All comments remain relevant. <ul style="list-style-type: none"> • Maritime NZ is aware of small groups of workers who continue to express their stance against mandatory vaccinations.

¹ Active workers are defined as those who have worked at a port/border in the last 14 days.
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		Alison Cossar (MoH)	<ul style="list-style-type: none"> Additional feedback has been received from the sector and industry on the published VO Guidance document. This been collated and MoH has revised the Guidance to provide further clarity to 'on or around ships'. Vaccination rates for workers at ports continue to show steady improvement. Recent small rises amongst some PCBUs are likely to be as a result of recent clarification within the VO Guidance document. The timing of the clarification of the Guidance means that at least one PCBU will be unable to complete a fair employment process with those workers prior to 30 September. It is likely they will be seeking a Supply Chain Exemption in this instance. The request from workers to have access to an alternative vaccine is being considered as part of the advice being prepared for the Minister in the proposed quarterly amendments to the Order. At this point in time, an alternative vaccine will not be available before 30 September. PCBUs have the option of applying for the Supply Chain Exemption noting that any application must still meet the criteria as set out, ie supply chain disruption. PCBUs are being encouraged to continue to plan for compliance in time for the 30 September deadline.
Reporting	Under control	Priti Patel (MoH) Jo Pugh (MoH)	<ul style="list-style-type: none"> MoH has developed a Vaccination compliance flag to identify when workers are complying with the Order, which is now live for government workers and will go live for private employers on 1 October 2021. MoH is progressing work on developing a new BW vaccinations dashboard aligned to the BWTR dashboard with requirements gathered and wireframes now developed. This is now with the developers. Under the Order, PCBUs are required to manually request access to their employees' vaccination status on BWTR. This is the subject of ongoing communication to PCBUs by the BWTR team in MOH and through sector engagement. Regularised reporting is now available and shared on request to the Minister's Office, and in this document.
Alignment of BWTR data with other reporting systems in MOH and MIQ	Some issues	Jo Pugh (MoH) Matt Gibbs (MIQ)	<ul style="list-style-type: none"> Data quality issues which impact the BWTR data and accuracy of reporting are being worked through with the Covid Vaccination Immunisation Programme and BWTR reporting team. A plan has been developed to track and manage to resolution some issues. These include: <ul style="list-style-type: none"> redefining business rules on Active workers which will provide more accurate reporting of workers active at a Border site, creating a government worker classification field to enable targeted reporting, creating a permanent solution for data matching issues between MIQ and BWTR, reviewing how multiple NHI numbers for a worker are resolved in the BWTR, and identifying options to enable better reporting of a worker's region of employment/site for both vaccination and testing purposes. Data quality issues can result from a number of reasons, including: human error at time of data entry (for example by the PCBU, or by the vaccinator in the field); individuals having duplicate NHI numbers; duplicate entries in the BWTR caused by staff working at multiple organisations. Other reasons which may continue to account for differences in reporting include where individuals have self-identified as border workers at time of vaccination but who have not been registered in the BWTR; OR who are recorded as Active in the BWTR because they are new to the BWTR but not Active at a border site in the last 14 days. In the meantime, MoH is undertaking manual workarounds to ensure alignment between CIR and BWTR, as well as MIQ and BTWR workers records. All teams are confident this process captures the errors as and when identified. However, this does result in the data that is reported not being as up-to-date as MIQ PCBUs and stakeholders expect. Further, some PCBUs continue to interpret the Required Testing Order and Vaccination Order more widely than is strictly required, in order for their workers are prompted to be tested/vaccinated. This has now resulted in these workers, who may not be in scope of the amended Vaccination Order, contributing to unvaccinated numbers reported from the BWTR. Equally some PCBUs are intentionally putting their workers on the BWTR as a mechanism to see their vaccination status and manage work rosters, when technically those workers may not all be captured by the Vaccination Order. Education and engagement on application of the Order is ongoing. This reflects the ever-changing size, complexity and composition of the border workforce – including the continuing rotation and turnover of staff within the workforce. This means the data needs to be considered as a 'snapshot' taken at a point in time.
Supply Chain Exemption	Under control	Shelley Tucker (MOT)	<ul style="list-style-type: none"> Two supply chain exemption applications have been received as at 21 September 2021. Panel meetings on each application have occurred. One report is due to the Minister's Office this week, and the second will follow next week. As each application must be reviewed and considered on its own merit, the process to assess and consider applications requires a minimum timeframe of two weeks. The sector has been advised that any exemption applications received from now will not be assessed nor decisions taken and communicated by 30 September deadline. There is a group of aviation and port workers who are Pfizer-hesitant but not vaccine hesitant. At this stage the Order only allows for the Pfizer vaccine. It is possible further supply chain exemption requests may be received from some of these workers – noting that the nature of the exemption (supply chain) means that the PCBU applying for the exemption would need to evidence the supply chain disruption that would occur should the worker be taken out of the supply chain.
Identifying in-scope Border Workers	Some issues	Matt Gibbs (MIQ) Sharyn Forsyth (Maritime NZ)	<p>MIQ</p> <ul style="list-style-type: none"> No substantive update.

		Shelley Tucker (MOT)	<p>Maritime sector</p> <p>No substantive update. All comments remain relevant.</p> <ul style="list-style-type: none"> Ongoing sector engagement to support education and awareness of contractors/sub-contractors of port companies, in particular small employers/PCBUs (<10 employees) newly in-scope of the amended Order. Maritime NZ has compiled a list of possible contractors (c400) who may board ships. Engagement via email and webinar is continuing. Multiple joint meetings are being held with representatives from across the sector, including with the port companies, stevedoring companies, unions and associations. Cross agency approach to work through any barriers to vaccination of their workforces, or process questions related to unvaccinated workers, for example, stevedore companies have been provided with regional MSD contacts to support workers choosing not to get vaccinated in finding other employment opportunities. <p>Aviation sector</p> <ul style="list-style-type: none"> Multiple stakeholders continue to seek assistance with the intended meaning of the term “layover” as used in the Order. Several phone meetings this week have followed the reissuing of guidance last week by MoH.
Monitoring of privately-employed workers	Under control	Jo Pugh (MoH) Priti Patel (MoH)	<ul style="list-style-type: none"> As at 22 September, 87% of all privately-employed workers who are active on the Border and covered by the <u>amended Vaccination Order</u> (which comes into effect on 30 September), are recorded as being fully vaccinated; with another 698 (~8%) privately-employed workers recorded as having received one dose; a remaining 417 (≤5%) are recorded as no dose. An <u>initial</u> review of these 417 recorded ‘no dose’ privately-employed workers suggests that: <ul style="list-style-type: none"> 21 need to be NHI matched 19 are recorded as MIQF workers – with vetting underway with MBIE MIQ’s records. s9(2)(b)(ii) OIA Of the remaining 370 recorded ‘no dose’ privately-employed workers, more than 75% (282) come from just 14 employers across both the air and maritime sectors. As with the monitoring process followed for government workers (noted below), targeted outreach is underway with each PCBU around their workforce details and a detailed breakdown of this data is outlined on page 8 below.
Monitoring and Compliance – government workers	Under control	Jo Pugh (MoH) Matt Gibbs (MIQ)	<ul style="list-style-type: none"> As at 22 September, 98% of all government workers who are active on the Border are recorded as being fully vaccinated, with 24 government workers recorded as having received one dose. As at 22 September, of the government workers covered by the <u>amended Vaccination Order</u> (which came into effect on 26 August), there are 48 workers recorded on the BWTR as having no dose. Following a manual review of these workers’ records in the COVID Immunisation Register (CIR), as well as direct outreach and engagement with PCBUs and individual workers: <ul style="list-style-type: none"> 36 have in fact had 2 doses but need to be correctly matched in the BWTR to their vaccination records. s9(2)(b)(ii) OIA 4 workers (as mentioned last week) are believed by the MoH Monitoring and Compliance team to have been incorrectly indicated as working at the border. Work is ongoing with their employer to correct the attendance information. 4 have been referred to MBIE to check on, 2 of these are not NHI-matched yet.

Appendix 1 Overview of vaccination rates of active border workers:
 Data extracted from the BWTR at 8.00am, Wednesday 22 September, active workers only.

Table 1a Vaccination rates of active workers by workforce group							Table 1b Vaccination % of active workers by workforce group				Table 1c Vaccination % of active workers by government workers or privately employed workers			
Workforce type	No dose		One dose		2 doses		Workforce type	No dose	One dose	2 doses	Type of workers	No dose	One dose	2 doses
	Govt	Private	Govt	Private	Govt	Private								
Aircrew							Aircrew	≤5%	≤5%	95%	Govt	≤5%	≤5%	98%
Airport	16	88	≤10	108	101	1570	Airport	≤5%	≤5%	92%	Private	≤5%	8%	87%
MIQF	27	38	15	122	260	3548	MIQF	≤5%	≤5%	97%				
Port	≤10	263	0	446	54	2158	Port	9%	15%	76%				
Other	0	≤10	0	10	227	14	Other	≤5%	≤5%	94%				
Unknown	0	≤10	0	0	16	27	Unknown	12%	0%	88%				
Total	47	417	24	698	391	7843	Total	≤5%	≤5%	91%				

Comments		Comments	
<p>We are continuing to see an increase in privately-employed workers vaccinated, with unvaccinated active border workers now just over 400 nationwide, 8 days out from the deadline. Note the actual numbers are in fact much lower than recorded on the BWTR, as has been confirmed by manual review of information, engagement with PCBUs and identifying NHI matching issues.</p> <p>We are also aware that of those workers as showing as no dose, at least 55 are showing as booked* for a vaccination.</p> <p>We have also seen an overall increase in numbers in the BWTR as new PCBUs and workers have come onto the BWTR.</p> <p>Note: *Booked means booked through bookmyvaccine, however someone could have booked under a NHI or booked without an NHI or booked locally, not through bookmyvaccine</p> <p>Note: to ensure no information can be identifiable, all data counts of ten (10) or less are recorded as ≤10.</p>		<p>Port workers continue to be the largest proportion of unvaccinated workers in the BWTR, however there are now only 263 recorded as unvaccinated with at least 45 showing as booked* for a vaccination.</p> <p>Note: *Booked means booked through bookmyvaccine, however someone could have booked under a NHI or booked without an NHI or booked locally not through bookmyvaccine</p> <p>Note: to ensure no information can be identifiable, all percentage counts of five (5) or less are recorded as ≤5.</p>	

Table 2 Summary status by PCBUs by workforce group with no dose active workers – privately employed			
Border Workforce - Airport		Border Workforce - Port	
Employer	No dose	Employer	No dose
			This week
			Last week
s9(2)(ba)(ii) OIA	≤10	s9(2)(ba)(ii) OIA	≤10
	≤10		≤10
	25		41
	≤10		≤10
	≤10		≤10
	≤10		≤10
	≤10		≤10
	≤10		≤10
	≤10		≤10
	≤10		≤10
	≤10		49
	≤10		55
	≤10		≤10
	≤10		28
	≤10		55
	≤10		17
	≤10		16
	≤10		≤10
	≤10		≤10
	≤10		≤10
	≤10		≤10
	≤10		≤10
	≤10		≤10
	≤10		≤10

Border Workforce - Aircrew				
Employer	No dose			
s9(2)(ba)(ii) OIA	s9(2)(ba)(ii) OIA		≤10	≤10
			≤10	≤10
Border Workforce - MIQF				
s9(2)(ba)(ii) OIA	36		20	22
	≤10		≤10	≤10
Border Workforce - Other				
s9(2)(ba)(ii) OIA	≤10		≤10	≤10
	≤10		≤10	≤10
Border Workforce - Unknown				
s9(2)(ba)(ii) OIA	≤10		22	33
	≤10		≤10	≤10
	≤10		15	21
	≤10		≤10	

Comments

*See commentary on previous pages regarding data accuracy, particularly as it relates to the recorded government worker figures.

We continue to see an uplift of privately-employed workers getting vaccinated with 86% fully vaccinated and 94% now having had at least one dose. We are continuing to prioritise engagement with PCBUs and sectors with larger groups of unvaccinated workers. We are expecting to see new PCBUs and workers come onto the BWTR each week.

Note: to ensure no information can be identifiable, all data counts of ten (10) or less are recorded as ≤10.

NOTE

Around 1% of workers have multiple DHBs leading to some double counting. This will be addressed in future reporting

Data extracted and count data as at 8:00am, 22 September. Vaccination status as at 9pm, 21 September. Active workers only.

No dose means either the worker has not had any doses, or they cannot be matched in the CIR for another reason.

An Active employee in the BWTR is defined as someone who has worked within the last 14 days. Data is sourced from the Border Worker Testing Register to reflect active border worker staff. These figures exclude inactive border workers and individuals who have self-identified as border workers at time of vaccination but have not been registered in the BWTR.

There may be instances of duplicates in the BWTR caused by border workers employed by multiple organisations.

Data quality is heavily dependent on uploads from PCBUs, and inaccurate details (such as full name or DoB) may mean matches with CIR are not possible.

Ongoing data maintenance and cleansing is being conducted by the PCBUs and new staff are added as they come online. As the data is cleansed and updated - including the addition and removal of staff as the workforce evolves - the numbers will continue to change.

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Appendix 2 Overview of the Vaccination Order’s monitoring and compliance system and framework:

Vaccinations Order Monitoring and Compliance System and Framework			
Compliance and Monitoring System			
<p>The Border Worker Testing Register (BWTR) is key tool that PCBUs are required to use to maintain records of employees who carry out certain work under the Vaccination Order and who are therefore required to be vaccinated to undertake that work. The BWTR is linked to the COVID Immunisation Register (CIR), the central COVID vaccination database, and the two systems automatically update the vaccination status of border workers.</p> <p>The BWTR system helps PCBUs/employers to meet their obligations under the Vaccination Order by providing them visibility of a worker’s vaccination status. The BWTR system enables PCBUs/employers:</p> <ul style="list-style-type: none"> to maintain records that can be easily accessed and converted into written form; and provides visibility on a worker’s vaccination status, and, where applicable, the timeframes for when they are required to be vaccinated. <p>Mandatory use of the BWTR by PCBUs also assists to:</p> <ul style="list-style-type: none"> increase the accuracy of data held on testing frequency due to its automated function anonymously linking affected worker test results to their NHI (National Health Index) number; and support COVID case investigation, as it facilitates early detection of potential transmission linked to an affected worker during contact tracing by generating a list of close or casual work contacts who might also have been exposed to the same source of the virus. 			
Roles and responsibilities under the Vaccinations Order			
<p>The Ministry of Health (the Ministry) is the responsible agency for monitoring overall compliance against the Vaccination Order (VO). WorkSafe is the agency responsible for enforcement actions referred to them by the Ministry or others. The overall compliance framework in relation to the Order requires the operation of 4 key components.</p>			
Ministry of Health	WorkSafe New Zealand	PCBU/Employer	Individual Worker
<p>The responsible agency for monitoring both PCBU and individual compliance to the Order.</p> <p>The framework in place was approved by the Border Executive Board and is similar to that in place for the Required Testing Order.</p>	<p>The enforcement agency on MoH’s behalf.</p>	<p>Responsible for ensuring their workers comply with the Order, including ensuring only vaccinated workers undertake certain work or are deployed to undertake certain work.</p> <p>PCBUs are also responsible for ensuring records on the BWTR are up-to-date.</p> <p>Employers may also ask their workers directly to ensure a copy of the individual’s vaccination certificate is kept on file.</p> <p>If workers decide not to get vaccinated, employers will need to engage with the individual to consider any other work they could undertake within the organisation (redeployment).</p>	<p>Required to update their employer or PCBU with the information needed to ensure vaccination obligations are met.</p> <p>Employers may also ask workers directly to provide a copy of their vaccination certificate to be kept on file.</p> <p>If decide not to get vaccinated, workers will need to engage with their employer to consider any other work they could undertake within the organisation (redeployment).</p> <p>If an agreement can’t be reached, and the appropriate employment processes have been followed, the Ministry of Social Development is available with support services to find alternative employment.</p>
Monitoring and compliance activity			

<p><i>Proactive Work</i></p> <p>This comprises of</p> <ul style="list-style-type: none"> • Broad education and engagement • Targeted education and engagement against vaccination timeframes – transitional and ongoing for new workers • Verification of data against information held in the CIR and with PCBUs for unvaccinated workers • Targeted engagement and monitoring activity with PCBUs with unvaccinated workers. <p>Education and Engagement</p> <p>Leading up the deadlines in the Order, there has been a significant amount of broad and targeted education undertaken by MoH, DHBs, clinical experts and other government agencies, with the sectors concerned, including sector meetings, newsletters, targeted vaccination bulletins, published guidance and collateral relating to vaccine efficacy produced and disseminated in several languages.</p> <p>MoH will check the BWTR and CIR for vaccination status, including checks with MIQF as appropriate. Where there are unvaccinated workers showing on the BWTR, MoH will contact the relevant PCBU about the accuracy of data and actions required to comply. MoH is required to make the records of noncompliant affected persons available to WorkSafe</p> <p>Specific monitoring and engagement</p> <p>Last week the MoH Compliance and Monitoring team contacted all PCBUs of unvaccinated privately-employed workers (at the time 493 workers) reminding them of their duties and seeking information about their plans for each person who remains unvaccinated.</p> <p>65 of 149 private employers on the BWTR have all their privately employed active border workforce fully vaccinated.</p> <p>As at 22 September, there were 72 of 269 PCBUs on the BWTR who are showing as having unvaccinated workers.</p> <p>However more than 75% of the unvaccinated workers fall within 15 PCBUs representing both the air and</p>	<p><i>Reactive Work</i></p> <p>WorkSafe has a broad COVID-19 role under the relevant Alert Level requirements / Orders and the Health and Safety at Work Act 2015 (HSWA), taking an educate first approach. If a business or service then fails to make the changes, enforcement action is considered.</p> <p>WorkSafe interventions are triggered by referrals e.g from MoH, internal staff, by members of the public, through unions and through the AOG Compliance Hub</p> <p>Once WorkSafe gets a referral, interventions are tailored based on several factors including risk profile and history of compliance. Again, the focus is on educating first. Often, compliance can be achieved through a phone call or a 'remote workplace assessment'.</p> <p>WorkSafe will balance enforcement of the Vaccination Order with the other duties on PCBUs (e.g. supporting surveillance testing, distancing etc). From time-to-time WorkSafe may be required to prioritise activity based on risk / harm profiles. At the highest level, COVID-19 activity in high-risk border settings would likely take precedence over lower-level compliance, such as QR code display in retail.</p> <p>From time-to-time WorkSafe undertakes more complex interventions, such as the Complex Assessment of the Port of Tauranga. This work is normally reserved for high-risk settings (e.g. border) where there are multiple hazards, concerns and PCBUs in operation. The Port of Tauranga assessment looked broadly at COVID-19 compliance e.g. availability of testing, physical distancing etc) following concerns raised by unions and workers.</p> <p>The types of things WorkSafe commonly looks at are:</p> <ul style="list-style-type: none"> • PCBU systems and processes • whether reasonable steps had been taken to ensure compliance • training provided / expectation-setting • record-keeping, policies and documentation • worker engagement, participation and representation processes. 	<p><i>Proactive Work</i></p> <p>Leading up to the deadlines in the Order, a key responsibility of a PCBU is to engage with an unvaccinated worker to consider any other work they could undertake within their organisation (redeployment).</p> <p>Guidelines have been developed by MBIE to support employers navigate potential employment law requirements.</p> <p>The PCBU also must ensure that no unvaccinated workers undertake or are deployed to undertake (e.g at another location) certain work. This could include, for example, actively reviewing the BWTR and adjusting rosters.</p> <p>The PCBU must also have clear information, and provide this to MoH on request, for how they will manage workers who decide not to get vaccinated and ensure no worker undertakes certain work after the specific timeframes.</p> <p>s9(2)(b)(ii) OIA</p> <p>[Redacted text]</p>	<p>N/A</p>
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	s9(2)(g)(i) OIA [Redacted]	other PCBUs that they have complied with the Order, without giving specific information on individuals. If a PCBU is concerned that employees of another PCBU deployed into their workplace have not been vaccinated, they can choose to restrict access to their workplace on the basis they are not assured Order has been complied with.	
Opportunities			
	s9(2)(f)(iv) OIA [Redacted]		Explore mechanisms to provide border workers with an easy method of confirming their vaccination status if they choose to share it, eg development of a digital vaccination record/app.

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