

Risk assessment of My Vaccine Pass Mandate at UC

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Purpose of Paper

The purpose of this paper is to provide a risk assessment for UC implementing a My Vaccine Pass (CVC) mandate under all settings on campus.

Executive Summary

This paper provides a risk analysis based on risk to people's health, for the implementation of a My Vaccine Pass (CVC) mandate at UC at all levels. The proposed CVC mandate would be implemented by way of a new policy, that takes due account of UC's obligations under the New Zealand Bill of Rights Act 1993 (NZBORA) and the Education and Training Act 2020.

A CVC mandate would reduce the health risk to people at UC. A CVC mandate is consistent with UC's health and safety policy requires that UC take *all reasonably practicable steps* to protect people. The Health and Safety at Work Act 2015 prescribes a primary duty of care for UC to ensure, so far as is reasonably practicable, that the health and safety of people is not put at risk from work carried out as part of the conduct of the business or undertaking.

The key risk categories have been assessed for scenarios where a CVC mandate is and isn't implemented, and risk precedence is tabulated in Table 1 below based on UC risk appetite.

Scenario	Risk category	Risk precedence	
No CVC mandate	Health and safety	1	<i>Least tolerated</i>
No CVC mandate	Teaching quality	2	
CVC mandate	Financial	3	<i>Most tolerated</i>
CVC mandate	Reputation	4	

Table 1, Risk precedence

Table 1 shows that the two least tolerable risks occur where no CVC mandate is implemented. The calculation of health risk is based on advice from UC Professor Michael Plank. Professor Plank is currently engaged by MBIE to provide mathematical modelling support for the all-of-government COVID-19 response.

The risk of implementing a CVC mandate including potential financial and reputation impacts are more acceptable than potential impacts to health and teaching quality.

A risk may arise from UC refusing enrolment under the Education and Training Act 2020 and the protections under the New Zealand Bill of Rights Act 1993.

Background

COVID-19 is a highly transmissible virus that can spread exponentially. It is expected that as internal and external borders open the virus will increasingly spread, particularly as schools reopen in 2022. It is also expected that the Canterbury area will be subject to the *red setting* of the *COVID-19 Public Health Response (Protection Framework) Order 2021*, in the order of several months. There are two key risks to UC created by COVID-19:

- Impact to health of staff and students, due to spread of COVID on UC campus or during UC related activities
- Impact to quality of teaching, due to disruptive availability and reduced access to campus

The risk posed to others by an unvaccinated person is about 10 times higher than the risk posed by a fully vaccinated person¹. Canterbury is a highly vaccinated population, As of 14 January:

- 96% of the population within the Canterbury DHB are fully vaccinated
- 1,594 of about 1,700 continuing UC staff have advised they are fully vaccinated²

There are several situations already in place at UC where CVC compliance is required, these include the below:

- Any event or gathering at UC
- Roles that have been risk assessed, and require CVC compliance
- Entry to UCSA close contact businesses
- Qualifications that require placement in the community including schools, early childhood centres and medical facilities
- Any overnight stays at UC field research stations
- Student residential accommodation

Implementation of a CVC mandate is consistent with UC's Health and Safety policy, which requires *"..so far as is reasonably practicable that the health, safety, and wellbeing of everyone is not put at risk from the work or other activities carried out as part of the University's operations."*

Definition of CVC Mandate at UC

For the purposes of this paper, a CVC mandate would be applied by a policy that requires for CVC verification will be required at UC's campus at all levels (green, orange and red). CVC verification would be defined as per part 2, clause 78 of the protection framework, which requires systems and processes to verify CVC compliance, so far as is reasonably practicable in relation to a reasonable number of people at campus.

A CVC mandate would not preclude enrolment to UC, but if a course included activity that required a student to access campus, then they would not be able to complete that course.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/103967/7/Vaccine_surveillance_report_-_week_49.pdf

² Based on data staff have entered into Assura

COVID-19 Health Risk to UC People

To estimate COVID-19 risk, UC Professor Michael Plank was consulted. Professor Plank is currently engaged by MBIE to provide mathematical modelling support for the all-of-government COVID-19 response. Professor Plank has provided the below advice:

The primary risk created by COVID-19 is to people's health. It is estimated that with a vaccination rate of 85% of students and 90% of staff, there is a 10-25% chance of fatality, where transmission may have occurred on campus and a >75% chance of severe illness. With 100% of people on campus vaccinated, this reduces to a 0-10% chance of fatality and a 25-75% chance of severe illness.

The covid risk is calculated in Table 2 below for scenarios where a CVC mandate is and isn't implemented.

#	Risk	Impact	likelihood	Rating	Impact type
1	No-CVC mandate scenario risk of severe illness to COVID transmission on campus, based on vaccination rate of 85% of students and 90% of staff	Major	Likely	Major	Harm: Serious harm event
2	CVC mandate scenario risk of severe illness to COVID transmission on campus, based on vaccination rate of 100% people on campus	Major	Good possibility	Significant	Harm: Serious harm event

Table 2, COVID-19 health risk to UC people

Risk #1 and risk #2 have the same impact rating: severe illness due to COVID transmission on UC campus. Risk #2 has a reduced rating as the likelihood of severe illness is reduced due to a CVC mandate.

Risk to UC Teaching Quality due to no CVC Mandate

The risk to UC teaching has been considered by the BAU COVID steering group. The key risks are summarised in Table 3 below. These risks occur only where UC operates without a CVC mandate.

#	Risk	Impact	likelihood	Rating	Impact type
3	Inability to deliver acceptable teaching due to loss of teaching capacity with staff absence and hesitancy due to lack of confidence in campus operating without a CVC mandate	Significant	Almost certain	Major	Operational: Undesirable reduction of staff and students in a course or undesired loss of an academic course
4	Internal reputational risk of highly vaccinated UC population dissatisfied with lack of CVC mandate becoming increasingly uncomfortable and resistant to sharing campus with non-CVC	Significant	Likely	Significant	Reputational: Event that involves PVC/AVC management time
5	Inability to deliver acceptable teaching due to disproportionate planning complexity in providing equitable teaching to CVC and non-CVC students for transitions between red and orange settings during semesters	Significant	Likely	Significant	Operational: Undesirable reduction of staff and students in a course or undesired loss of an academic course

Table 3, Key risks to teaching due to no CVC mandate

Risk #3 occurs where teaching relies on staff who are resistant to work on campus where they may be exposed to unvaccinated people. Where they insist on remote work or make themselves unavailable, the teaching will be impacted, particularly where there are *single points of failure* with highly specialised staff relied on in some courses.

Risk #4 occurs where staff become increasingly uncomfortable with potential exposure to unvaccinated people, and this creates a significant management issue.

Risk #5 occurs where course planning is required to provide an equitable teaching for non-CVC students who will not be able to access campus in the red setting. Providing for dual schedules creates a significant cost and resource issue that may not be resolvable.

The aggregate risk to teaching quality without a CVC mandate can be described as Major.

Risk Precedence of CVC Mandate Scenarios

The precedence of risk is detailed in Table 4 below.

Scenario	Risk category	Risk	Risk appetite	Risk precedence	
No CVC mandate	Health and safety	Major	Low	1	<i>Least tolerated</i>
No CVC mandate	Teaching quality	Major	Low to Moderate	2	
CVC mandate	Financial	Moderate	Moderate	3	<i>Most tolerated</i>
CVC mandate	Reputation	Minor	Moderate	4	

Table 4, Risk precedence of CVC mandate and no CVC mandate scenarios

Risk precedence is determined by applying risk appetite to the aggregated risks. As indicated in Table 4, the two highest risks to UC occur in the scenario where UC does not implement a CVC mandate.