

VACCINATION POLICY



ACFETM

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1. INTRODUCTION

- 1.1. In light of COVID-19, our approach to protecting employees in ACFE SA offices and facilities is always driven by the most recent evidence-based clinical research.
- 1.2. At the outset of the pandemic, there were clear recommendations on the impact of social distancing measures, hand sanitisation, and respiratory hygiene on COVID-19 prevention. Soon after, as scientific understanding advanced, so did our risk-mitigation strategies. The mandated use of masks in the workplace and public spaces was added as protection.
- 1.3. In the same spirit, vaccination is the most recent and practical approach for preventing and mitigating the severity of COVID-19 infection to date. Getting vaccinated against COVID-19 is, therefore, yet another way to prevent the spread of infection, illness, and death caused by COVID-19 disease.
- 1.4. Mandating COVID-19 vaccinations for employees, members, service providers, contractors and visitors is similar to requiring other protective measures such as masks and other social behaviour efforts such as social distancing.
- 1.5. Per the requirements and duties of the Occupational Health and Safety Act (Act 85 of 1993, as amended), and in particular the obligations contained in sections 8(1), 9(1), 12(1)(b), and 14(a) and (c), a mandatory vaccination policy protects the health and safety of the ACFE SA community and, by implication, public members who come into contact with ACFE SA employees, members, service providers, contractors and visitors, and/or otherwise participate in any activity.
- 1.6. The mandate of ACFE SA is to benefit the public and act in the public interest. As a result of this, and in the interest of greater society for the common good, ACFE SA is obligated to mitigate any harm to its stakeholders, including employees, service providers, contractors and visitors, as well as the ACFE SA's stakeholders.
- 1.7. The ACFE SA recognises that the COVID-19 pandemic has had a severe social and economic impact on the country and its people.



2. POLICY STATEMENT

- 2.1. Based on international and national best - practice and peer-reviewed research, there is enough evidence that COVID-19 vaccines:
 - 2.1.1. are both safe and effective;
 - 2.1.2. lower your chances of becoming infected with SARS-CoV-2.
 - 2.1.3. prevents the infection from spreading;
 - 2.1.4. protects against severe sickness and mortality caused by COVID-19; and
 - 2.1.5. are an effective COVID-19 preventive intervention.
- 2.2. Vaccination will allow the ACFE SA community to resume in-person and on-site events, meetings, administration, and day-to-day activities in a safe manner.
- 2.3. There is a danger of infection and outbreaks in situations where in-person and on-site events, meetings, administration, and day-to-day activities occur in big groups. This danger can be significantly decreased if all of the ACFE SA community is vaccinated.
- 2.4. When reconciling the collective right to bodily integrity with the freedom of religion, belief, and opinion, the predominant view is that collective rights take priority. This is logical, justified, and sensible in the more significant public interest.
- 2.5. In light of this, all employees, members, service providers, contractors and visitors will be required to get SARS-CoV-2 vaccinated before entering ACFE SA offices and facilities. This requirement applies to ACFE SA applicants for study or employment and visitors and service providers as defined by ACFE SA authorities.

3. PURPOSE

The purpose of the Policy is to enable the return of employees to the ACFE SA's offices whilst protecting the health and safety of the ACFE SA's community, and all others who work and/or participate in activities of the ACFE SA.

4. CONTEXT

- 4.1. The vaccination of employees, members, service providers, contractors and visitors will enable optimal access and the functioning of the ACFE SA.

- 4.2. The ACFE SA also plans to re-invigorate the members experience in 2022 by enabling more on-site social engagement.
- 4.3. The ACFE SA COVID-19 Vaccination Policy will help to protect the health and safety of the ACFE SA community and the broader public.
- 4.4. COVID-19 vaccines are proven to be safe and highly effective in reducing the risk of becoming infected with SARS-CoV-2 (the coronavirus that causes COVID-19), in preventing serious illness and death from COVID-19, and in reducing the spread of the virus.
- 4.5. In balancing the collective rights of the broader ACFE SA and surrounding community to health and safety, against individual rights to bodily integrity, freedom of religion, belief and opinion which may be limited in terms of Section 36 of the Constitution, our view, supported by experts, is that the collective right takes precedence. This is in the broader public interest and is reasonable, justifiable and rational.

5. GENERAL PRINCIPLES

5.1. General COVID-19 Workplace Regulations

- 5.1.1. All ACFE SA employees, members, service providers, contractors and visitors must maintain precautionary health measures as required between employees, service providers, contractors and visitors within the workplace and in all common areas on ACFE SA premises.
- 5.1.2. ACFE SA will ensure a sufficient supply of sanitisers provided to employees, members, service providers, contractors and visitors and such sanitisers will be supplied at the entrances of ACFE SA offices and facilities.
- 5.1.3. All stakeholders should apply proper ventilation in ACFE SA facilities as and when possible.
- 5.1.4. All employees, members, service providers, contractors and visitors on ACFE SA premises and facilities are required to wear a mask that must cover the nose and mouth for the duration of their presence on the premises.
- 5.1.5. All ACFE SA employees, members, service providers, contractors and visitors who are not vaccinated and who are in possession of an approved exemption will be required to complete a compulsory COVID-19 screening questionnaire before entering

ACFE SA premises. ACFE SA reserves the right to screen individuals on access as and when they deem necessary.

- 5.1.6. Unvaccinated and exempted individuals wishing to access ACFE SA offices must subject themselves, for screening.

5.2. SARS COVID-19 PCR Testing

- 5.2.1. Any employees, members, service providers, contractors and visitors who suspects that they might have contracted COVID-19 should immediately inform management. The employees, service providers, contractors and visitors concerned must undergo a SARS COVID-19 PCR Test and remain in quarantine for 10 days.
- 5.2.2. During the quarantine period, an employee will be required to work from home. Should remote work be impossible or impracticable for such an employee, such an individual must apply for sick leave.
- 5.2.3. Should individuals test positive for COVID-19, they will be obligated to provide management with a copy of their test results.
- 5.2.4. Individuals that test positive for COVID-19 will not be permitted to enter ACFE SA premises or facilities before receiving a SARS COVID-19 PCR negative test result or on expiry of the 10 day isolation period.
- 5.2.5. All ACFE SA employees must stay isolated for 10 calendar days after testing positive for COVID-19.
- 5.2.6. ACFE SA employees will obtain paid sick leave for the period of isolation (subject to their available sick leave allowance), which will be subject to submitting a SARS COVID-19 PCR Test positive result.
- 5.2.7. In terms of this policy, all ACFE SA employees who should apply for leave have to follow the normal ACFE SA leave application process.

5.3. COVID-19 Vaccination

- 5.3.1. All employees wanting to obtain a COVID-19 vaccination may do so during normal ACFE SA working hours. Such arrangements will be subject to operational requirements and with the permission of the relevant manager.

5.3.2. For these purposes, attendance at vaccination sites will be regarded as paid time off, and no leave application need to be submitted. However, a manager will be able to request an employee to provide proof of vaccination to confirm that they obtained a COVID-19 vaccination. Should an employee be unable to provide proof of vaccination, they may be requested (subject to the reasons provided) to apply for vacation or unpaid leave for the period of their absence. In the event of a misrepresentation, disciplinary action may follow.

5.4. Mandatory Vaccination

5.4.1. All members of the ACFE SA community must be vaccinated regardless of whether they have been diagnosed with COVID-19 in the past. Everyone will be required to comply with the relevant national and ACFE SA COVID-19 safety protocols, including the wearing of masks.

5.4.2. Those who are not vaccinated and have been granted reasonable accommodation will be required to comply with additional protocols like daily health screening and weekly antigen testing for SARS-CoV-2 infection, irrespective of whether they are symptomatic or not.

5.4.3. Employees, service providers, contractors and visitors who are not vaccinated and who have been granted reasonable accommodation, may also be limited from participating in certain ACFE SA activities. For example, they may not be allowed to participate in activities in common spaces where social engagements occur; to attend certain activities.

5.5. Exemptions

5.5.1. ACFE SA acknowledges the existence of some legally permissible grounds for refusing a COVID-19 vaccination and desires to comply with a process that preserves the constitutional rights of all parties.

5.5.2. ACFE SA will consider the following exemptions:

5.5.2.1. Medication Objections (Section 27 of the Constitution of South Africa)

5.5.2.1.1. To effectively raise a medical objection, an employee, member, service provider, contractor and/or visitor must present a letter/report from any certified medical practitioner showing that the employee, member, service

provider, contractor and/or visitor has a medical cause or risk justifying not being vaccinated. A letter/report from a medical practitioner should contain the individual's diagnosis and prognosis, and any such individual must submit the information to ACFE SA to qualify for an exemption.

5.5.2.1.2. An employee, member, service provider, contractor and/or visitor may bring a medical objection based on the reasons outlined in Annexure A.

5.5.2.1.3. Conditions for precaution and consideration before vaccination is required:

- a. Long COVID-19;
- b. Bleeding disorders and Anticoagulation medication;
- c. Female (18 to 49) with diagnosed blood clotting risk;
- d. History of Myocarditis or Pericarditis;
- e. Pregnancy or breastfeeding (only on the recommendation of a Gynaecologist);
- f. History of Multisystem Inflammatory Syndrome (child or adult);
- g. History of Heparin-induced Thrombocytopenia;
- h. Dermal fillers;
- i. History of Guillain-Barré syndrome;
- j. Immunosuppressive disorders (like HIV, cancer or being on immunosuppressive therapy)

5.5.2.1.4. The following conditions are not regarded as contraindications or require precautions:

- a. Common allergies (pet, food, medication, etc.)

5.5.2.1.5. The ACFE SA agrees to keep all medical information secret and confidential.

5.5.2.2. Religious Objections (Section 15 of the Constitution of South Africa):

- a. If any employees, members, service providers, contractors and visitors have religious objections to having a COVID-19 vaccination, they should acquire a declaration from their religious leader outlining the nature of the faith and the precise religious teaching that supports the disagreement. The offered rationale must be credible and recognised as an established doctrine inside an existing religious body.

5.5.2.3. Natural Immunity Objection:

- 5.5.2.3.1. If any employees, members, service providers, contractors and visitors can demonstrate that they have recently tested positive for SARS COVID-19 PCR test results, they may seek a deferral exemption based on natural immunity. Natural immunity might last up to three months. According to current National Development of Health standards, individuals who have had COVID-19 should wait 30 days after recovering from sickness before being vaccinated.
- 5.5.2.3.2. If an employee, members, service providers, contractors and visitors wishes to prolong this deferral period by three months, they must provide a SARS COVID-19 PCR or an authorised antibody blood test result. A pathology report and/or a South African Health Products Regulatory Authority (SAHPRA) approved antibody test will be accepted by ACFE SA if accompanied by a statement, which employees, members, service providers, contractors and visitors may obtain from service providers (such as Clicks and Dischem). To verify that COVID-19 antibodies are still present, these tests must be performed at an individual's expense or are free at any government testing centre.
- 5.5.2.3.3. Employees, members, service providers, contractors and visitors who wish to take advantage of this exemption must furnish ACFE SA with a copy of their positive SARS COVID-19 SAHPRA authorised antibody blood test report. Any such exemption will simply postpone or extend the applicant's compulsory vaccination deadline. This objection will not be treated as an absolute or permanent exemption from the mandatory vaccination requirement.
- 5.5.2.4. Other Legally Acceptable Exemption
- a. Employees, members, service providers, contractors and visitors who believe they have a legally acceptable exemption (including a possible reasonable accommodation approved by their relevant manager) may apply for Exemption or Deferral by completing Annexure B and

attaching an affidavit detailing the grounds for their legal objection and the justification for it.

- 5.5.3. Subject to the outcome, any applicant who applied for an exemption or deferral from getting the COVID-19 vaccination will be expected to comply with section 3.3.4.
- 5.5.4. All employees, members, service providers, contractors and visitors who desire to request an exemption or delay from getting the COVID-19 vaccination must follow the following rules until their application is approved:
 - 5.5.4.1. Submit proof of a weekly SARS COVID-19 PCR test to the competent authorities at their own expense. These SARS COVID-19 PCR tests should be provided weekly by all employees, members, service providers, contractors and visitors who have not been vaccinated by Insert date of implementation. These tests may be carried out during ordinary working hours (unless another justification for exemption has been authorised by the relevant authorities).
 - 5.5.4.2. Provide a SARS COVID-19 PCR negative test before returning to work after a 24-hour absence. These tests are available throughout regular business hours.
- 5.5.5. Any employee applicant who wishes to claim one of the following exemptions must submit the applicable Application for Exemption Form to the appropriate authorities.
- 5.5.6. Where an Application for Exemption Form requires an employee, member, service provider, contractor and visitor to obtain supporting documents or the signature of a duly appointed expert and/or religious leader to support the Application for Exemption Form, such obligation, as well as the costs associated with it, will be borne by the applicant. ACFE SA will handle these applications based on the content of the application form and the accompanying documentation submitted.
- 5.5.7. As part of the Exemption process, an applicant will be given the option to participate in voluntary individual counselling if they so want.

- 5.5.8. If ACFE SA feels that the grounds offered in the Application for Exemption are not credible, acceptable, or accurate, ACFE SA will be allowed to question the reasons presented.
- 5.5.9. If the application is approved, the individual will be expected to follow any health and safety regulations that the government may impose from time to time and any further steps that may be judged essential in the circumstances, such as the necessity to wear an N95 mask.
- 5.5.10. If such an application is denied, the employee, member, service provider, contractor and/or visitor will be given fourteen (14) calendar days to complete voluntary individual counselling and furnish ACFE SA with documentation of obtaining the first immunisation.