



COVID-19 risk assessment review: transmission in the workplace

Description: HIGH INFLUENCE AND CONTROL
Date: 30/03/2022

Hazard	Harm the hazard could cause	Inherent likelihood that the harm would occur ¹	Level of inherent risk (consequence)	Control measures currently in place	Are the controls eliminating or minimising the risk?	Unless stated the control measures are effective and fit for purpose so far as is reasonably practicable:	Comments
DOC workers becoming infected or transmitting COVID-19 from vaccinated workers by exposure to airborne transmission opportunities/ close contacts via direct contact between people (e.g., from other vaccinated workers who are often asymptomatic)	DOC workers or other visitors contracting COVID-19 (which could result in serious illness or death) and in turn transmitting to others.	All of the work activities identified under this heading in the initial risk assessment required very frequent contact with others which ranged between very frequent short duration (e.g. customers at reception/ visitor centres, working from home) to moderate duration (visiting multiple sites, working in close contact with workers, visiting outdoor areas on conservation land, meeting other agencies) and very frequent prolonged (e.g. indoor large events where DOC is in control such as Te Pukenga Atawhai). Workplace offices and some indoor events have aircon, some have the ability to open windows and doors.	High	Workers are encouraged and supported to stay home if showing symptoms or unwell.	Eliminating	My Vaccine Pass is currently no longer effective in light of high vaccination rate, high immunity from the Omicron outbreak and given the features of Omicron.	Currently, 95.1% of the NZ population are fully vaccinated which means many people may not have any symptoms, we have herd immunity and Omicron is currently the dominant variant. Omicron has broken through the vaccination barrier.
				Localised controls are available to staff to close premises as required	Eliminating		
				Localised controls are available to staff to reduce capacity in meeting rooms as required.	Minimising		
				Workers and visitors aged 12.3 years+ are required to hold a My Vaccine Pass (vaccination only) unless exempt.	Minimising		
				Cleaning and disinfecting in accordance with guidance from Ministry of Health (MoH).	Minimising		
				Frequently touched surfaces regularly cleaned.	Minimising		
				Physical distancing – workers and visitors at least 1m apart from each other.	Minimising		
				Posters on hand washing are prominent in the serviced huts and hand washing facilities are available in the bathrooms.	Minimising		
Masks to be worn inside premises ('Mask when moving'), inside vehicles (as per DOC policies and guidance)	Minimising						
See initial risk assessment for the work activities		The inherent likelihood that harm would occur in performing these work activities in a Delta environment ranged between Almost Certain (a regular occurrence) – Likely (occurs often). Following the first and second reviews of the risk assessment, there was no change to the inherent likelihood of harm nor consequence and therefore no change to the overall inherent risk ratings referred to in the risk assessment. The residual risk ratings with controls and vaccination were determined to remain at medium and for unvaccinated at high.					International borders will begin to open as from 12 April to Australian tourists and this introduces the risk of them bringing new COVID-19 variants and other seasonal illnesses such as the flu and the super cold which Australia has recently reported. ³ The MoH also advises that protection against infection with either Delta or Omicron decreases over time. A booster dose at 4 months after the end of the first dose will improve protection against Omicron particularly for protection against severe disease such as hospitalisation although does not result in as many people being hospitalised. Omicron can still cause severe illness and even death especially in people who are at risk of severe outcomes. MoH advice is that getting boosted continues to be one of the most

¹ NZ Vaccine data and statistics as at 30 March 2022: 96.3% of ages 12+ have had first doses, 95.1% of ages 12+ are fully vaccinated (3,972,660 people), 72.7% of ages 18+ have had a booster (2,578,129 people). See <https://www.health.govt.nz/news-media/news-items/15918-community-cases-817-hospitalisations-24-icu-14-deaths>
³ From 11:59pm 12 April 2022, vaccinated Australian citizens and permanent residents can enter NZ and self-test on arrival. From 11:59pm 1 May 2022, vaccinated people from countries who do not need a visa (visa waiver visitors) or visitors from other countries who already hold a valid visitor visa can enter NZ and self-test on arrival. From July 2022, vaccinated travellers arriving under the Accredited Employer Work Visa categories can enter New Zealand and self-test on arrival. From October 2022, all visa categories will reopen including visitor and student visas.

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		DOC does not have workplaces where vaccination is required by a public health order or a location where there is the possibility of contact with high-risk members of the public (e.g. aged care, education, health setting).		Air Ventilation (which exchanges old air for fresh air) – opening of windows and doors to enable free flow of air and introduce fresh air for at least 15 minutes. ²	Minimising		<p>important ways people can protect themselves from Omicron and severe illness.</p> <p>There is a much lower risk of being hospitalised if up to date with vaccinations which for Omicron includes a third of booster dose if eligible.</p> <p>As community transmission of Omicron increases, it is less likely there will be a greater risk of COVID-19 in workplaces than there is in the community.</p> <p>The MoH has reported that the country has high vaccination rates, high immunity from the Omicron outbreak and given the features of Omicron that CVCs are no longer effective unless a risk assessment otherwise determines this.</p>

² <https://www.health.govt.nz/covid-19-novel-coronavirus/covid-19-health-advice-public/covid-19-ventilation>

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DOC vaccinated workers or visitors becoming infected or transmitting COVID-19 from unvaccinated DOC workers or unvaccinated visitors (by exposure to airborne transmission opportunities/ close contacts via direct contact between people (e.g., from others who are infected)	DOC workers – in particular vulnerable workers or other unvaccinated visitors contracting COVID-19 (which could result in serious illness or death) and in turn transmitting to others.		High	All DOC staff (unless exempt) in the workplace currently are vaccinated and required to hold a My Vaccine Pass Workers have been briefed on symptoms of COVID-19 and have been told to stay home if they are showing symptoms or unwell. If workers are a close or household contact of a COVID-19 positive case, workers are required to stay home and isolate for 7 days. Workers have been trained on appropriate measures to take	Eliminating/ Minimising Eliminating Eliminating Minimising	See above re My Vaccine Pass.	
See initial risk assessment for the work activities		Situations where staff are required to undertake medical first aid and providing direct physical assistance to others also increases the risk of infection and transmission (and harm).		Rapid Antigen Tests (RATs) will be supplied to some staff that are working alone in a remote locations and access to RAT kits is difficult logistically. ⁴ If a worker becomes unwell at work, a process is in place to isolate them and arrange for them to be sent home to receive medical attention. District teams have a completed Business continuity planning which will provide direction on process to follow. Workers don't have contact with contractors ⁵ or other DOC staff who undertake cleaning/servicing. Where worker meetings are required, they are held indoors / outdoors with 1m distancing and masks are worn. Where possible, break times are staggered to minimise the number of workers using break room at one time. Other control measures as above for workers (including masks, general cleaning, and disinfecting).	Minimising Minimising Minimising Minimising		

⁴ <http://intranet/about-DOC/covid-19-information-hub/rapid-antigen-tests-rats/>

⁵ Contractors present a similar risk profile to that of DOC staff undertaking servicing or maintenance. Contractors are required to have an appropriate COVID-19 health and safety plan to manage the risks associated with COVID-19.

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Description: Requirements set by other organisations and authorities

Date: 30/03/2022

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DOC workers becoming infected or transmitting COVID-19 by: Exposure to airborne transmission opportunities / Close contacts via direct contact between people (e.g., from others who are infected) See initial risk assessment for the work activities	Workers or other visitors contracting COVID-19 (which could result in serious illness or death) and in turn transmitting to others.	Likelihood of infection occurring remains as Almost Certain given there is very high frequency of prolonged exposure and recirculated air whether people travel domestically (air, taxi, public transport) or travel internationally.	This was previously assessed as extreme	Masks Handwashing Hand sanitiser Physical distancing – DOC workers and visitors at least 1m apart from each other. Masks to be worn inside facilities. Requirements when travelling per DOC procedures	Eliminating Eliminating Eliminating Minimising Minimising		

Description: Low influence and control: Non-DOC worksites and/or interactions with the public

Date: 30/03/2022

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DOC workers becoming infected or transmitting COVID-19 by: Exposure to airborne transmission opportunities/ Close contacts via direct contact between people (e.g., from others who are infected) See initial risk assessment for the work activities	Workers or other visitors contracting COVID-19 (which could result in serious illness or death) and in turn transmitting to others.			Workers are encouraged and supported to stay home if showing symptoms.	Eliminating		
				Localised controls are available to staff to close premises as required	Eliminating/ Minimising	See above re My Vaccine Pass	
				Localised controls are available to staff to reduce capacity in meeting rooms as required.			
				Workers and visitors aged 12.3 years+ are required to hold a My Vaccine Pass (vaccination only) unless exempt.	Minimising		
				Cleaning and disinfecting in accordance with guidance from Ministry of Health (MoH). ⁶	Minimising		
				Frequently touched surfaces regularly cleaned.	Minimising		
				Physical distancing – workers and visitors at least 1m apart from each other. Localised risk assessments are undertaken as appropriate.			

⁶ <https://www.health.govt.nz/covid-19-novel-coronavirus/covid-19-health-advice-public/covid-19-general-cleaning-and-disinfection-advice> last accessed 29 March 2022

Description: Conclusions and Recommendations – draft not completed**Date: 30/03/2022**

It is important to keep up to date with the pandemic and to adapt and as rules change.

The initial COVID-19 health and safety risk assessment for DOC workers (staff and volunteers) and workers was undertaken in a Delta environment at a time when many of the population were unvaccinated. Our initial focus and the then MoH advice was on transmission of Delta which is highly transmissible and carries a risk of harm (severe disease such as hospitalisation, severe illness, and death). The initial health and safety risk assessment was based on multiple layered control measures which included following MoH guidelines, sanitising or washing hands regularly, where practical wearing a mask and physically distancing around others and staying home if unwell. Relying on advice from MoH, the risk assessment determined that vaccination against Delta also presented a higher level of protection as a control measure and significantly moved the profile of risk down in terms of likelihood of transmission and severity of consequence. Consequently, DOC's COVID-19 Vaccination Policy which came into effect on 16 December 2021 required all DOC workers (unless exempt) to be fully vaccinated and have proof of their vaccination status by way of the My Vaccine Pass. The control measures we implemented have been effective and fit for purpose.

This review notes (as set out in the first and second reviews we have conducted) that since the risk assessment was conducted, Delta has been overtaken by the Omicron BA.2 sublineage in New Zealand and it is increasingly widespread in New Zealand with the Omicron peak in Auckland recently with smaller waves expected. This means the COVID-19 risk profile has moved. Experts are advising that the emergence of Omicron, an even more highly transmissible COVID-19 variant means that a threat exists for both vaccinated and unvaccinated people; the MoH advises that people who are fully vaccinated have less protection against transmission of Omicron than for Delta, but that vaccination still offers some protection. The MoH also advises that protection against infection with either Delta or Omicron decreases over time. A booster dose at 4 months after the end of the first dose will improve protection against Omicron particularly for protection against severe disease such as hospitalisation although does not result in as many people being hospitalised. Omicron can still cause severe illness and even death especially in people who are at risk of severe outcomes. MoH advice is that getting boosted continues to be one of the most important ways people can protect themselves from Omicron and severe illness. There is a much lower risk of being hospitalised if up to date with vaccinations which for Omicron includes a third of booster dose if eligible. As community transmission of Omicron increases, it is less likely there will be a greater risk of COVID-19 in DOC visitor accommodation than there is in the community.

Some specialist medical and scientific experts including the MoH advise that New Zealanders need to plan for and expect further variants as the COVID-19 virus will continue to adapt to survive, and they warn us that Omicron is not to be underestimated as the impact on the body or the impact of long COVID-19 is not fully understood.

Border controls have recently changed, and the Government no longer requires incoming vaccinated New Zealanders and other vaccinated travellers to self-isolate on entry to New Zealand. Australian tourists who are vaccinated will be able to travel to New Zealand from 12 April 2022. These changes introduce an increased level of risk to New Zealanders as these people may be asymptomatic, but they bring with them the risk of seasonal illnesses including the super cold some Australians are experiencing.

Changes have also been made to the way close and household contacts are managed by MoH under Omicron Phase 3 Red which increases the likelihood of an infectious people being in the community, and hence increasing transmission in the community but significantly this also increases population or herd immunity.

The Government has recently announced that CVCs⁷ will no longer be a requirement at any traffic light setting after 4 April 2022 at 11:59pm. This is irrespective of what traffic light setting is in place past this date. The technology for My Vaccine Passes will remain available (and is being updated to include boosters) but there will be no mandate requiring its use. The rationale for this change is that we have moved past the point where CVCs are most effective. This approach is being taken by the Government in light of the high vaccination rate (currently 95.1% of eligible New Zealanders are vaccinated which means many people may not have symptoms at all but still be able to pass on the virus to others), there are high levels of acquired immunity from the Omicron outbreak and given the features of Omicron. Omicron BA.2 breaks through the vaccination barrier. However, MoH advise that vaccination (including boosters) continues to be strongly recommended as one of the key public health measures and it provides significant benefits. The Government has indicated that My Vaccine Passes could become mandatory again in the future if there are different variants or circumstances change.

DOC is still able to close its workplaces where there is a high risk that is not easily mitigated and is required to work with iwi, communities, and campsite managers to assess risk for specific sites and support them regarding restrictions or closures needed for public safety.

We cannot predict the future with any certainty as to how the pandemic will unfold. We act on best, most up to date official information available, remain vigilant, keep the health and safety risk assessment under review and ourselves briefed on most up to date health advice from the MoH.

Considering the matters referred to above and bearing in mind we are entering the winter season which usually means fewer people in our accommodation (some of which will be seasonally closed), this review supports retention of all existing control measures in DOC accommodation that is open to the public and/or our workers except for the requirement to provide proof of vaccination status for entry. The rapidly changing nature of COVID-19 means we should retain the ability to require My Vaccine Passes in the future.

Recommendations:

- (1) Unvaccinated workers and contractors to DOC workplaces no longer be required to provide proof of vaccination status with a My Vaccine Pass.
- (2) Retention of the current Vaccination Policy and the ability to use CVCs as part of health and safety. To this end, it is recommended that the Vaccination Policy be suspended as of 4 April 2022 at 11:59pm to coincide with the Government's roll back of My Vaccine Passes.
- (3) Use of alternative controls, additional controls transitioning unvaccinated staff (and vaccinated who have been working off-site) into the workforce
- (4) Localised risk assessments re control measures relevant to each workplace
- (5) Continue to monitor official health advice and observe current health risk levels in the community.
- (6) Undertake the formal review of the risk assessment referred to in the Vaccination Policy as scheduled on 31 May 2022 (unless there is a need to undertake this sooner).
- (7)

⁷ CVC means a COVID-19 vaccination certificate issued under [clause 8](#) or [9](#) of the COVID-19 Public Health Response (COVID-19 Vaccination Certificate) Order 2021.

APPENDIX

Hierarchy of Controls

