



11 March 2020

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Via email

Dear Ms James

Re: IEC's response to COVID-19

Impact English College Pty Ltd ("IEC") has engaged and instructed the Victorian Chamber of Commerce and Industry ("Victorian Chamber" or "we") – of which IEC is a member – to represent and assist it in a number of workplace and industrial relations matters. We are in receipt of your correspondence dated 5 March 2020, addressed to Mr Chris Burgess.

Please note, Mr Burgess has retired from IEC. IEC's contact person for such matters is now Mong Jeun (also an IEC Director). Be that as it may, please direct any future correspondence to both Ms Jeun and myself. Regarding your 5 March 2020 correspondence, we respond on IEC's behalf as follows:

IEC appreciates the Independent Education Union (Victorian Tasmania) ("IEU") bringing several of these matters to its attention and seeking IEC's respective views on them. It almost goes without saying that coronavirus disease, COVID-19 is an unprecedented global event which has raised a number of employment-related questions. Naturally, there is very little precedent on which to base the answers to such questions and IEC intends to take a pragmatic, commonsense approach to most matters that arise.

The IEC management team has been discussing COVID-19 related matters several times per week (approximately 3-4) to ensure and maintain a safe environment for IEC's staff and students. Issues are also discussed with staff members and students via weekly meetings or weekly notices (as a minimum standard) and/or as considered reasonably necessary in between. Fortunately, there are no known cases of COVID-19 in the college community, including staff members, students, host families and/or other stakeholders.

For the sake of context, please find **enclosed** with this response:

- the posters displayed throughout the college regarding self-isolation, COVID-19 symptoms, and methods to maximise hygiene and minimise the spread of infection;
- an email from IEC Academic Manager Melbourne, Jill Kinsey, to IEC managers and Directors regarding:
 - steps taken to educate students on how to detect symptoms early, maximise hygiene and minimise the spread of infection;

- new cleaning measures and directives given to IEC's cleaners; and
- newly introduced disinfectant products throughout the college; and
- an Australian Government Department of Health ("DoH") information sheet, which is but a fraction of the information IEC has sought regarding this matter.

Regarding your question "*What advice are you providing to staff about risk assessments in Colleges where there might be a heightened risk of direct or indirect contact with persons who have been exposed to the Covid-19 virus*", staff members have been informed (and are fully aware) of IEC's processes. Specifically, all students are asked where they have travelled from (and/or for a run-down of their travelling history). If necessary, students are directed to self-isolate for 14 days before attending the college and to acquire a medical certificate confirming they no longer have any symptoms or pose a risk to others. Staff members have also been told to be aware of COVID-19 symptoms and have them direct students to seek medical attention immediately.

Following the recommendations of State and Federal health authorities, IEC has also:

- encouraged staff members and students to stay home and seek medical advice if they feel unwell at any stage (and for staff members to continually remind students of this);
- encouraged staff members and students to isolate themselves for 14 days after travelling/transiting from higher risk countries as classified by the Australian Government;
- encouraged staff members and students to isolate themselves for 14 days if they have been in close contact with a confirmed case of COVID-19; and
- developed and displayed easy to understand posters (as referred to above) to encourage, remind and educate staff members and students of this ever-present risk.

Further to this, staff members have been specifically informed of the following:

- during orientation students will be:
 - shown how to practice good cough, sneeze and hand hygiene – staff member Emilia will demonstrate to sneeze and cough on their sleeves and to not cover their mouth with hands;
 - encouraged to buy a thermometer and to check their own temperature for 14 days if they have just arrived from overseas and/or are concerned about their health; and
 - directed to let staff members know straight away if they have arrived from overseas and have cold/flu-like symptoms;
- cleaners have been directed to thoroughly wipe all surfaces, including classroom desks, with disinfectant cleaning products. PM teachers are also directed to not have chairs on top of their desks at the end of the day (they used to do so to help cleaners vacuum easily), so cleaners can have easy access to desk tops; and
- disinfectant products, including spray, disinfectant wipes and hand sanitizers have been ordered. The disinfectant wipes and hand sanitizers have been placed in staff rooms and the resource room on level 2, and student kitchen areas throughout the college. The disinfectant spray (when it arrives) will be used in classrooms.

Regarding your question "*What advice are you providing to staff about steps that should be taken to ensure compliance with the DoH advices, and otherwise minimise and control risk at each workplace?*", see above. Further, IEC has provided (and continues to provide) hygiene and self-

isolation guidance to its students and advised staff members to check the DoH website regularly in order to get the most up-to-date information on the issue, since the situation is constantly changing. Staff members are informed of this during the weekly meetings/notices and/or impromptu catch ups regarding this matter. We are instructed IEC plans to send out another email this week to all staff members regarding the steps it is taking to minimise risks.

Regarding your question as to “*appropriate instructions to the College communities to minimise contact and risk?*”, see above. Further, we are instructed:

- host families (of new arrivals (students)) are strictly banned from placing IEC students in residences with students from the countries on the Government’s travel ban list for a minimum period of 14 days from the date the other students arrive in Australia;
- new starters (students) are directed to provide their travel/flight/arrival details to IEC during orientation to cross-check if there was any student on the same plane with a passenger who tested positive to COVID-19 (with such details being kept and continually checked against any newly identified cases); and
- students from a country newly added to the travel ban list are contacted and advised to self-isolate.

Regarding your question as to “*minimising potential exposure on overseas exchanges, trips and excursions*”, IEC has cancelled all marketing trips to Korea, Thailand and Taiwan which were planned for February and March 2020. IEC’s participation in an Agent Workshop in Auckland and an Agents’ Familiarisation Trip to Melbourne in late March 2020 have also been cancelled. There is a trip to Japan planned to take place in May 2020. This is, however, being closely monitored and may also be cancelled closer to the date.

Regarding your question as to “*payment in the event that there is a requirement for any staff member to undergo a period of quarantine? That is, should staff be provided with paid leave*”, it will largely depend on the reason(s) for why a staff member has been quarantined and the staff member’s employment type. If the staff member is ordered by a Government body to be quarantined or the staff member chooses to self-isolate/quarantine, IEC will consider any paid personal leave and/or annual leave requests made by the staff member. Approval of such a request may be contingent upon the staff member’s medical status and/or whether he/she is infected; has self-isolated/quarantined in an effort to avoid infection; or has been made to isolate in accordance with DoH guidelines/directions.

If, however, the staff member is a casual staff member or permanent staff member who has exhausted his/her paid leave balance(s), the staff member will either be placed on unpaid personal leave (if he/she is infected or required by the DoH to be isolated); or, for casual staff members who are not infected or required by the DoH to be isolated, be removed from the teaching roster until they advise IEC they are available to work – which will be considered as per standard IEC policy and procedure.

On the other hand, in the event a staff member is quarantined (and directed to stay home) by IEC as a safety measure and/or due to a reasonable suspicion a staff member may be exhibiting signs of COVID-19, the type of leave taken (if any) will have to be determined based on the specific circumstances, including the reasons as to why IEC has decided to make such a direction (i.e. travel, possible exposure, proven exposure, symptoms exhibited etc.). As a rule of thumb, though,

permanent staff members will be entitled to paid leave from IEC until they are fit to return to work or unless it is found they are infected (in which case the staff member's absence will then revert to paid or unpaid personal leave, however the case may be).

Regarding your question as to “*what should happen in the event that there is a requirement for the College to close or in the event of other interruptions? Should staff be provided with alternative duties and work arrangements or paid leave*”, again, this will have to be considered if such a hypothetical scenario becomes a genuine reality. As you'd be well aware, the DoH's advice and response to this matter is evolving on a daily basis. It would be inappropriate for IEC to set out any absolute commitments at such a dynamic time. IEC will, of course, explore alternative avenues to keep its staff members actively employed (such as being offered alternate duties if possible) and staff members with paid leave will have the ability to apply to take such leave. IEC is unable, however, to provide anything more specific than that at this time.

Lastly, regarding your question as to “*what should happen in the event that a staff member becomes infected? Should they be entitled to paid leave? Would this be special leave, personal (sick) leave or infectious diseases leave?*”, IEC would most likely consider the staff member to be unfit to perform the inherent requirements of his/her role. As such, the staff member would be placed on personal leave until he/she is deemed medically fit and safe to return to the workplace. The personal leave would be paid for staff members who have a paid personal leave entitlement and unpaid personal leave for those who do not (such as casual staff members). IEC does not have any plans to create and/or provide an entitlement to 'special leave' or 'infectious diseases leave'. This may, however, become an entitlement created by the Government.

IEC reiterates that this is an unprecedented global event which continues to evolve on a daily basis. Long term commitments should not and, indeed, cannot be made – especially regarding hypothetical scenarios. IEC will continue to closely monitor the situation and work with its staff to implement strategies that protect staff members, students and the college as a whole.

Should you have any other questions or concerns, please let us know.

Yours faithfully



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