



Government of **Western Australia**
Department of **Health**

Your Ref:
Our Ref:
Contact:

Mr Chris Dawson
Commissioner of Police
State Emergency Coordinator
Western Australia Police Force

Dear Commissioner Dawson

MANDATORY VACCINATION FOR SCHOOL LEAVERS EVENT

Thank you for your letter of 22 September 2021 seeking advice regarding mandatory vaccination as a condition of entry to the School Leavers event to be held in Dunsborough in November 2021.

I note that Western Australia's (WA) largest School Leavers event occurs in Dunsborough each year at the end of November, which attracts around 9,000 school leavers celebrating their graduation. This year's event is scheduled to be held from Monday 22 November to Friday 26 November 2021 inclusive, and includes a program of structured activities for attendees, including concerts, dances and parties. Each year, the key focus of Government agencies involved with the leavers event is to minimise harm and to ensure a safe event for school leavers and the local community of the South West.

In 2020, the School Leavers event occurred between 23 and 26 November 2020 and was supported by multiple agencies and up to 350 volunteers. At that time, COVID-19 vaccinations were not available and, to mitigate the risk of COVID-19, the event was permitted to proceed, subject to compliance with the relevant 'Closure and Restriction (Limit the Spread) Directions', issued under the *Emergency Management Act 2005*. These Directions required compliance with the 2 square metre rule, 60% maximum occupancy, conditions imposed around hygiene, use of event marshals and physical distancing around facilities and the event area.

On 23 June 2021, based on my advice, WA moved to Phase 5 of the COVID-19 Roadmap. The 'Closure and Restriction (Limit the Spread) Directions' were revoked, which removed physical distancing and capacity limits. To continue keeping WA safe, the requirements for mandatory contact registers, COVID Safety Plans for businesses, COVID Event Plans for large-scale events and WA's controlled borders were retained.

Current modelling shows that WA remains one of the most susceptible of all the larger jurisdictions to a major outbreak, due to the increased numbers of people moving around in our society and the mixing between non-family groups. This susceptibility has continued to increase in recent modelling. This has been complicated by the emergence of new variants of concern, most notably the Delta variant, which has increased transmissibility by between 35 and 70%, has been implicated in the recent New South Wales and Victorian outbreaks, and is now the dominant strains around the world. Consideration must therefore be given to the appropriate risk mitigation strategies to be employed in the management of the School Leavers event.

From a public health perspective, the School Leavers event poses unique challenges, both from the number of attendees and the mixing of non-household groups, particularly in areas of little social distancing. In the event of a COVID-19 outbreak, such a setting could facilitate extensive viral transmission, both via droplet and aerosol spread, by allowing large numbers of people to gather and mix, with proximity crowding. While this could be partially mitigated by requiring physical distancing at the event, physical distancing during travel to and from the event, particularly by public transport, would be impossible to implement and control, with very high levels of close contact and mixing. In addition, there are multiple areas containing amusements and food stalls, which are expected to have high frequency contact surfaces, where infectious respiratory droplets are more likely to settle and contaminate other visitors. This has the potential to result in high transmission of the COVID-19 virus if present. There are also temporal risks, where an infected person may visit multiple venues, resulting in multiple transmission events. This represents a significant risk to the ability to respond to an outbreak and, therefore, the spread of disease. Finally, given the numbers involved, the likely paucity of good contact data, and the likely interactions both inside and outside the venue, contact tracing beyond the immediate groups of friends will be extremely difficult.

In addition, should a transmission event occur, this could reasonably be expected to impact staff and volunteers at the event. Transmission of COVID-19 to the police, event staff and volunteers has the potential to cause serious illness in staff and volunteers, their families and members of the community. Immunisation is the most effective intervention for the prevention of disease and therefore the prevention of the implications you have detailed.

Public Health Grounds

There are good public health grounds for mandating the COVID-19 vaccine if the following conditions are met:

1. **There is a serious public health risk** - So far, there have been over 4.77 million deaths attributed to COVID-19 globally (as of 1 October 2021) and 233 million cases. While Australia has been relatively protected due to effective public health measures, COVID-19 disease continues to cause major outbreaks in many parts of the world, including in New South Wales and Victoria in recent weeks. Even among survivors, there is emerging evidence that there may be long-term consequences for those who have been infected but survived, even from mild disease. 'Long COVID-19' health implications may present a grave future public health problem.

To 4 October 2021, 33.7% of 17 and 18-year-olds have received their first dose of a COVID-19 vaccine in WA and only 11.9% are fully vaccinated. Should a COVID-19 transmission event occur, there is a very high risk of spread of COVID-19 based on this data. Vaccination of event attendees and personnel, combined with the other risk mitigation measures currently implemented, will greatly mitigate this serious public health risk.

- 2. The vaccine is safe and effective** – All Western Australians are currently being offered the Pfizer COVID-19 vaccine, which has completed a rigorous safety evaluation prior to registration by the Therapeutic Goods Administration (TGA). In addition, the vaccine has been given safely around the world in hundreds of millions of doses, while only producing transitory, mostly mild, side-effects. Recent studies in the United Kingdom have shown the Pfizer vaccine to be highly effective in preventing clinical disease generally and serious disease particularly. The Pfizer vaccine has been demonstrated to be effective in preventing infection in individuals and subsequently reducing community spread to others in the community, particularly those who are more vulnerable, such as those who can't be vaccinated on medical grounds.
- 3. The mandating of the vaccine is proportionate.** According to the principle of proportionality, additional measures are justified when the restrictions placed on individuals are both minimised and proportionate to the expected advantages offered by the more coercive policy. Although voluntary compliance by event attendees and support personnel would be preferable to mandates, the current lack of uptake of the vaccine leaves limited options. Unvaccinated persons who may spread COVID-19 can cause tremendous harm, particularly in the more vulnerable groups and more remote areas of Western Australia.

The preferred option is that unvaccinated attendees and workers not be allowed to attend the event or work in areas that require direct contact with the attendees. This still allows choice by the individual not to take the vaccine. This approach to mandating the vaccine is proportionate to the risk, the efforts made to encourage the voluntary uptake of the vaccine and the benefits achieved. As the event is now 7 weeks away, it may be logistically difficult for attendees and staff to achieve full vaccination in the time available. On this basis, I recommend that staff and attendees should have received at least their first dose of a COVID-19 vaccination.

It should be noted that, under this model, unvaccinated leavers will not be permitted to attend the event and therefore will not be eligible to attend either the Leavers entertainment zone at night or the Beachfest, leaving them at their own devices, with little supervision, which may result in them engaging in house parties and other varied risk-taking behaviours. This has the potential to create increased demand for Police and ambulance responses in the community. I recommend that this is factored into the planning for the event.

I am of the view, as the Chief Health Officer, that, for the reasons outlined above, the benefits outweigh the risks of mandatory vaccination of the 2021 School Leavers event attendees and personnel. I further recommend that mandatory vaccination be required by way of Directions issued under the *Public Health Act 2016*. This would require all School Leavers event attendees and personnel to be vaccinated on or before Monday 22 November 2021.

Yours sincerely



Dr Andrew Robertson CSC, PSM
CHIEF HEALTH OFFICER

05 October 2021