

# Covid-19 Protection Framework – Guidance for Local Government

While best efforts have been made to ensure this document’s accuracy, if you have questions or issues of interpretation please do not hesitate to get in touch with the Local Government Response Unit: [LGCGcovid19response@dia.govt.nz](mailto:LGCGcovid19response@dia.govt.nz). This guidance is not legal advice.

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## Introduction

On 18 October 2021, Cabinet agreed to shift our approach for managing the Delta variant of COVID-19 from an elimination strategy to an approach based on minimisation and protection, and to use the COVID-19 Protection Framework (the Framework) to give effect to that new strategy. The new strategy reflects that a different approach is needed for Delta, focusing on minimising the impact of Covid-19 being present in our communities.

## What is the Covid-19 Protection Framework?

An overview of the Framework can be found here - [COVID-19-Protection-Framework-traffic-lights-summary-table.pdf \(covid19.govt.nz\)](#)

Key provisions in the Framework are set out in the [COVID-19 Public Health Response \(Protection Framework\) Order 2021](#) (under the [COVID-19 Public Health Response Act 2020](#)). These instruments are the authoritative source of information about the Framework.

To locate the rules which apply under particular traffic light colours, refer to the relevant schedule of the [COVID-19 Public Health Response \(Protection Framework\) Order 2021](#). This sets out what clauses in the Order apply, and any modifications for the colour.

- [Schedule 5 - Green \(not active\)](#)
- [Schedule 6 – Orange \(rest of New Zealand\)](#)
- [Schedule 7 - Red \(Northland, Auckland, and specified areas in North Island\)](#)

[Schedule 3](#) and [Schedule 8](#) relate to cross-boundary travel.

The Framework introduces a new flexible 3-level approach to managing COVID-19 in the community:

- Green: limited community transmission and COVID-19 case numbers are at levels the health system can manage.
- Orange: community transmission is increasing and putting pressure on the health system.
- Red: the health system is facing an unsustainable number of hospitalisations and action is needed to protect vulnerable people.

The Framework allows a greater level of freedom for vaccinated people than would be possible under the Alert Level system, and so reduces the social and economic burden of public health restrictions. It provides the tools, with public health measures and COVID-19 vaccine passes, to manage the higher public health risk to, and from, unvaccinated people.

The new Framework will provide more certainty for everyone. With high levels of vaccination, the Framework enables people to respond to COVID-19 because they know what to expect and what happens at each colour.

The Framework leverages the protections of vaccination by affording people greater freedoms when they are fully vaccinated. This will reduce the spread of COVID-19 and help to protect vulnerable populations.

The new approach is more targeted. Different elements will apply at different levels of population coverage:

- a) the levels of the Framework can be applied on a regional basis, and will depend on the levels of vaccination, population at greater risk of health impacts, health system capacities, and connection to the border in each region;
- b) localised restrictions would apply to smaller areas or suburbs within regions where there are particular high rates of spread, or spread within particularly vulnerable communities;
- c) temporary closures of or within individual workplaces or facilities (using Section 70 notices), where the isolation or closure of a workforce or education service could interrupt the spread; and
- d) isolation of individuals, who are positive cases or close contacts of positive cases, will remain central to the public health response.

Any decision to change colours will be made by Cabinet following public health advice. Assessment will be made on the following factors:

- vaccination coverage including equity considerations;
- capacity of the health and disability system to manage COVID-19 cases, including across public health, primary care, community services, and secondary care;
- testing, contact tracing and case management capacity;
- transmission of COVID-19 within the community, and how it is impacting on key communities;
- impact on the economy, society and risk populations; and
- public and business considerations.

## Public health settings

Mask, scan, pass.

While there are some additional routines to include in our days, lots of things we're already doing are important parts of the new Framework too.

At every setting of the COVID-19 Protection Framework local government should continue to promote [general public health advice](#), including:

- Get vaccinated
- Wear a face covering, encouraged at every level.
- Keep track of where you have been, turn on Bluetooth in the COVID-19 tracer app and scan QR codes. Manual record keeping should also be available at all locations.
- Wash and dry hands, cough into elbow, avoid touching your face
- Regularly disinfect surfaces - (handrails, elevator buttons etc.).
- Stay home if you're sick, get a test and isolate at home until you get the result.

## Record keeping

Record keeping involves collecting the details of all workers, customers, and visitors who visit a premise. This allows for public health officials to effectively identify people who may have been exposed to COVID-19.

Record keeping/scanning will be required at all levels. Businesses, locations or events have a legal requirement to;

- make sure safe and secure systems and processes are in place so that everyone working on or visiting the premises can scan in or provide their details for contact tracing.
- keep contact tracing records for workers, contractors, customers, and volunteers, no matter how long they are there for.
- keep a record of everyone aged 12 years or over who visits or works at the premises.
- Provide more than one way for people to record their visit, especially for people who are not able to scan QR codes.

Put QR Code posters in accessible places. Additional details on recording keeping can be found [here](#).

## Vaccinations and PCBU obligations

The goal of the Framework is minimisation and protection. High uptake of vaccinations is critical to achieving this goal. Being vaccinated is free, safe and the most effective way to keep you, your whānau, business and customers safe. It's a simple contribution to keeping all New Zealanders safe from COVID-19.

In parallel with this guidance on how council functions and services can operate under the Framework, Chief Executives (CEs) should also consider:

- As Persons Carrying out a Business or Undertaking (PCBU), CE's have an obligation under the Health and Safety at Work Act 2015 to maintain a workplace that is free

from harm, so far as reasonably practicable. As part of this, CEs need to undertake a risk assessment across their organisations to determine what positions may be required to be held by vaccinated people.

- Government is developing a simplified tool to help clarify what work should be covered by vaccinated workers. It will help you assess when it is reasonable to require vaccination for other work. This tool will be available from mid-December 2021.

## Vaccine passes

Vaccine passes will be used to restrict access to certain events and services to only vaccinated people and require relevant staff to be vaccinated. For some events, businesses and services, vaccine passes will be required to proceed with fewer restrictions (e.g. concerts, festivals), for others, it is prohibited to require vaccine passes (e.g. supermarkets, petrol stations). The use of vaccine passes otherwise is up to the organiser/PCBU, but the use of vaccine passes will enable certain businesses to continue to operate with fewer restrictions (e.g. gyms, events, hospitality).

Where vaccine requirements are prohibited, a place/service/PCBU cannot limit the kind of service provided to patrons based on their vaccination status but they can implement other health and safety measures (e.g. making unvaccinated customers use the self-checkout counters only).

Under all settings, most businesses and public places are open to vaccinated customers. My Vaccine Pass is needed to prove you meet the vaccinations, or exemption, requirements.

Businesses, events, organisations and services can choose to have a vaccination entry requirement for customers but it's optional for many locations. Without vaccination certificates, there are strict limits on some businesses, services and activities to keep everyone safe, including possibly closing at Orange or Red.

At each traffic light level there are specified types of business or services which must make a choice whether to require vaccine passes or not, and different occupancy limits will apply. These businesses and services can change between requiring my vaccine pass and not requiring it – but you must be clear to all staff and customers about this. You will also need to have systems and processes in place to mitigate the risk of spreading COVID-19 as you alternate (e.g., cleaning high-touch surfaces and ensuring good ventilation).

It is important to note that Rapid Antigen Testing cannot be used as an alternative to My Vaccine Passes by regulated business or services (food and drink services, close proximity businesses and gyms). For those councils that wish to consider this option, it can only be used as a complementary tool for those business' and services that don't fall into the above category and should be considered in conjunction with Council's health and safety risk assessments. There is guidance on the Ministry of Health and Business.govt.nz websites. This guide in particular ([Rapid Antigen - Guide for Businesses](#)) has some useful information and may help to develop protocols for how the testing is used.

## Requirements to check and verify vaccine passes

- Vaccine passes should be sighted as soon as possible after people enter the premises – e.g. the waiter at the table, server at the counter/bouncer at the door. The check no longer has to be at point of entry, though this is ideal and should be encouraged.
- All vaccine passes need to be ‘checked’ – this can be either sighted or verified with an app.
- PCBUs are expected to take reasonable steps to ensure that each person (including workers) who enters the premises is vaccine pass compliant – this means verifying some attendees with the app – the extent to which this is undertaken at each venue will vary. For example, at large venues where it is impractical to verify every vaccine pass, a sample could be verified through spot checking.
- PCBUs can exercise their judgement as to whether a child is younger than 12 years and 3 months and therefore does not need a vaccine pass. The obligation on them is to be reasonable in their judgement. They could, for example, ask the child how old they are, for their birth date or for their school ID.

## Vaccine passes in local government businesses and premises

*This guide has been developed to assist local authorities to determine the appropriate vaccine pass requirements for council-owned or managed businesses and premises, or council-run events and gatherings.*

*As record keeping rules always apply, these are not individually referenced here. Face coverings must be worn in areas open to the public in public facilities.*

### Step 1 - Is your premises/business or service a public facility?

Public facilities are indoor (or a mix of outdoor and indoor) premises owned or managed by central or local government that are used for recreational, social, community, or cultural activities or services and that are open for the public (including where fees are charged for entry). Examples are zoos, libraries and museums. It excludes these facilities when they’re being used exclusively for an event or gathering and it excludes recreation facilities that require membership to enter.

- Yes – my premises is a public facility. There are no specified vaccine pass requirements in the Order, go to step 8 for a suggested approach to assist in making a decision on whether to use one. Capacity limits apply at red or orange, based on 1m distancing, and face covering rules apply on the parts of the premises open to the public.
- Maybe – my premises would count as a public facility but there other businesses/services in the same place (e.g. a café in a library). Go through steps 1 – 5 to determine the requirements for each separate part and then to step 6 for settings on multi-purpose facilities and how to assess the requirements for the whole premises.

- My premises is a public facility but it's only being used for an event or gathering arranged by someone else – go to step 9.
- No, my premises is not a public facility. Go to step 2.

## Step 2 - Is your premises/business or service one of the following?

The following settings (referred to as “designated premises” are prohibited from requiring proof of vaccination (either via My Vaccine Pass or other tool) as condition of entry, use or access:

### *Education:*

Use of vaccination requirements is prohibited at:

- All licensed early childhood education services and registered schools (i.e. all primary and secondary schools, including private providers) for all children, students and their parents, whanau or caregivers
  - All school hostels
  - All school transport services, for all students
  - All OSCAR programmes
  - Tertiary education organisations for secondary students to access their learning
- Note: The use of vaccine requirements is not prohibited for other events that occur on school grounds, e.g. fundraising fairs, concerts, community events where participants extend beyond staff, parents, and learners; or third-party users of education facilities;

### *Public Transport:*

Note that access to public transport is necessary to ensure access to life-preserving services. Use of vaccination requirements is prohibited for:

- All public transport (buses, trains, ferries, taxis/ubers, rental vehicles etc) apart from domestic air travel and inter-island ferries
- Note: Air travel includes small commercial operators (e.g. Sounds Air, Air Chathams)

### *Housing:*

Use of vaccination requirements to restrict access to housing is prohibited for all housing and housing support services funded directly by, or under contract to, the following state sector agencies:

- Kainga Ora – Homes and Communities
- Te Tuapapa Kura Kainga – Ministry of Housing and Urban Development
- Ara Poutama – Department of Corrections; and
- Oranga Tamariki – Ministry for Children

In addition to the above, there is a prohibition on vaccine requirements for premises used to provide emergency housing.

*Other life-preserving services:*

- All supermarkets, dairies, pharmacies and petrol stations will be prohibited from requiring proof of vaccination from customers as a condition of entry/access;

*Health and disability services:*

- The use of vaccination requirements will be prohibited for all people accessing essential health and disability services. Examples of these include (but are not limited to):

- Primary care services
- Specialist clinics
- Laboratories and imaging services
- Public and private hospitals
- Maternity care
- Hospice services
- Oral healthcare services
- Mental Health care services
- Ambulances and emergency care
- Aged residential care services
- The definition of a designated premises, includes health services that are partly or wholly funded by:
  - the Ministry of Health;
  - Oranga Tamariki – Ministry for Children;
  - the Ministry of Social Development;
  - the Department of Corrections;
  - a district health board;
  - Veterans’ Affairs New Zealand; and
  - the Accident Compensation Corporation.
- If yes – requesting vaccine passes is prohibited. Where vaccine requirements are prohibited, a place/service/PCBU cannot limit the kind of service provided to patrons based on their vaccination status but they can implement other health and safety measures (e.g. making unvaccinated customers use the self-checkout counters only).
- If no – go to step 3.
- There is a mixture of premises used for different purposes. Go through steps 1 – 5 to determine the requirements for each separate part and then to step 6 for settings on multi-purpose facilities and how to assess the requirements for the whole premises.

We have had an inquiry about ensuring that health services provided by physiotherapy practices can continue to operate within a pool or gym complex. If a designated business as described above:

A business or service in control of premises (premises A) that people must enter for the purpose of accessing designated premises, or goods or services from those designated premises:

- a) must allow them to enter premises A for that purpose; and
- b) may require them to enter premises A through identified access ways for designated premises only; and
- c) must not request them to produce a CVC or other evidence of being vaccinated against COVID-19, for the purpose of accessing designated premises.

It will be important to think about how accessible any alternative access routes will be to ensure clients can access the physio services.

### **Step 3 – Are you organising or running an event or gathering?**

#### **Gathering—**

(a) means people who are intermingling in a group but excludes people who remain at least 2 metres away from each other, so far as is reasonably practicable; and

(b) includes—

- (i) a gathering to undertake voluntary or not-for-profit sporting, recreational, social, or cultural activities;
- (ii) a gathering to undertake community club activities (except activities that occur at the same time and place as services provided under a club licence under section 21 of the Sale and Supply of Alcohol Act 2012);
- (iii) a faith-based gathering;
- (iv) a funeral or tangihanga;
- (v) a gathering held in a defined space or premises of a workplace (other than a vehicle in use as part of a public transport service) that have been hired for the exclusive use of the gathering by a person (other than the person who manages or controls the defined space or premises); but

(c) excludes a gathering for the purpose of a business or service at—

- (i) office workplaces; and
- (ii) ordinary operations at retail; and
- (iii) gyms; and
- (iv) hearings at courts and tribunals; and (v) education entities at normal operations.

#### **Event—**



(a) means an activity organised by a business or service—

(i) that is held at—

(A) commercial premises or private premises (whether indoors or outdoors); or

(B) publicly owned premises hired for the purpose of the activity; or

(C) an outdoor area where a group of customers and clients is accompanied or supervised by a worker providing services to that group (for example, a guided tour); and

(ii) for which entry is controlled (whether through ticketing, fees, registration, or any other means); and

(b) also means normal operations at cinemas, theatres, stadiums, concert venues, conference venues, casinos, and private galleries; but

(c) excludes any activity at a private dwellinghouse.

- Yes, I am organising an event or gathering – you must decide which settings to operate under as per the below table.

Category	Green	Orange	Red
Gatherings (e.g. private gatherings, weddings, places of worship, marae)	<p><b>Vaccine pass</b> – Allowed, no limit</p> <p><b>No Vaccine pass</b> - allowed up to 100 people, based on 1m distancing</p>	<p><b>Vaccine pass</b> – Allowed, no limit.</p> <p><b>No Vaccine pass</b> - allowed up to 50 people, based on 1m distancing</p>	<p><b>Vaccine pass</b> – up to 100 people, based on 1m distancing</p> <p><b>No Vaccine pass</b> - up to 25 people, based on 1m distancing</p>
Events (including event businesses)	<p><b>Vaccine pass</b> – Allowed, no limit</p> <p><b>No Vaccine pass</b> - Allowed, up to 100 people</p>	<p><b>Vaccine pass</b> – Allowed, no limit</p> <p><b>No Vaccine pass</b> - Not permitted</p>	<p><b>Vaccine pass</b> – Allowed, up to 100 people, based on 1m distancing</p> <p><b>No Vaccine pass</b> - Not permitted</p>

- No, I am not organising an event or gathering – go to step 4

#### Step 4 – Are you operating a regulated business where you are required to choose whether to use vaccine passes or to operate with more restrictions?

The following businesses and services are required in the Order to make a choice whether to operate with vaccine passes or without, and have the corresponding settings apply.

- (a) a gym (an indoors exercise facility for which access is limited to members)
- (b) a close-proximity business or service - means a business or service to the extent that it carries on activities that it cannot undertake without— (i) physical contact, or close proximity, between people; or (ii) a worker being closer than 1 metre to the client; and (b) includes a certified playgroup; but (c) excludes— (i) professional and semi-professional sports; and (ii) specified social services. Examples of close-proximity businesses and services are massage services and hairdressing services.
- (c) a food or drink business (a business or service that sells, offers, or provides food or drink for consumption to customers or clients in a workplace, such as— (i) a restaurant, cafe, bar, or club; and (ii) a soup kitchen or other place where food or drink is provided without charge; and (b) includes a business or services that sells, offers, or provides food or drink— (i) in a shopping mall; or (ii) as part of an event.)

- Yes! It is one of these. Go to step 5.
- No, it's none of these. Decisions on the use of vaccine passes are optional. Go to step 8 for a suggested approach to assist in making a decision on whether to use one.
- Not exactly, but my premises is in the same space as one of these. Go through steps 1 – 5 to determine the requirements for each separate part of the business and then to step 6 for settings on multi-purpose facilities and how to assess the requirements for the whole premises.

**Step 5 - If you are operating a regulated business as set out in step 4, you have to choose whether you will operate with a vaccine pass or not and the corresponding settings will apply.**

- Yes, I will operate by requiring a vaccine pass. (settings apply as per table below). See step 7 for what to do.
- No, I will not operate by requiring a vaccine pass. (settings apply as per table below)

Category	Green	Orange	Red
Gyms	<p><b>Vaccine pass</b> – Open</p> <p><b>No Vaccine pass</b> – Open with up to 100 people, based on 1m distancing</p>	<p><b>Vaccine pass</b> – Open</p> <p><b>No Vaccine pass</b> – Closed</p>	<p><b>Vaccine pass</b> – Open with up to 100 people, based on 1m distancing</p> <p><b>No Vaccine pass</b> – Closed</p>
Close-proximity business or service	<p><b>Vaccine pass</b> – Open</p> <p><b>No Vaccine pass</b> – 1m physical distancing required and face coverings for staff required</p>	<p><b>Vaccine pass</b> – Open</p> <p><b>No Vaccine pass</b> – Closed</p>	<p><b>Vaccine pass</b> – Open</p> <p><b>No Vaccine pass</b> – Closed</p>
Food and drink businesses	<p><b>Vaccine pass</b> – No limits</p> <p><b>No Vaccine pass</b> – up to 100 people, based on 1m distancing, seated and separated</p>	<p><b>Vaccine pass</b> – No limits</p> <p><b>No Vaccine pass</b> – Contactless only</p>	<p><b>Vaccine pass</b> – up to 100 people, based on 1m distancing, seated and separated</p> <p><b>No Vaccine pass</b> – Contactless only</p>

### Step 6 - My facility or premises is multi-purpose – how do I know what settings apply?

The above process (steps 1 – 5) will need to be undertaken for each separate part. Restrictions apply to the extent they're carried out by each business or service.

An assessment will then need to be done – what's the access like? Is there shared airflow? Are there walls between spaces? Can the entrances be separate?

A business or service in control of a designated premises that people must enter for the purpose of accessing the designated premises, or goods or services from those designated premises:

- must allow them to enter the premises for that purpose; and
- may require them to enter the premises through identified access ways for designated premises only; and
- must not request them to produce a CVC or other evidence of being vaccinated against COVID-19, for the purpose of accessing designated premises.

It will be important to think about how accessible any alternative access routes will be to ensure clients can access the designated premises.

Different parts can only operate with different requirements if they can be separate with no shared airflow – the stricter rules will apply if not.

- My facility can apply different restrictions for different parts – for each part using vaccine passes go to step 7 on operating with vaccine passes.
- Parts of my premises aren't allowed to operate with vaccine passes and we can't separate them out – everywhere must operate under the 'no vaccine pass' rules (see step 5 for settings). Parts of my premise will be using vaccine passes and I can't separate out the others (e.g. a library with an open café in the middle) – the whole premises needs to operate with a vaccine pass. See step 7 for how to use vaccine passes.

## Step 7 - I will use a vaccine pass. What do I do?

### *Obligations on the individual*

- My Vaccine Pass is an official record of your COVID-19 vaccination status for use in Aotearoa New Zealand. Anyone aged 12 and over who has had two COVID-19 vaccinations administered in New Zealand, or who has been given a medical exemption, can now request a My Vaccine Pass. Your My Vaccine Pass will include your name, date of birth and a QR code. You can save this pass on a digital device, like your phone, or print a physical copy.
- People under the age of 12 years and 3 months are not required to show proof of vaccination.
- If a premises/business or service is operating with vaccine passes, a person must show their vaccine pass to gain entry to the premises.
- Information about vaccine passes is available here [My Vaccine Pass | Unite against COVID-19 \(covid19.govt.nz\)](https://www.govt.nz/my-vaccine-pass/).

### ***Obligations on the premises/business***

- Display the sign saying you're using vaccine passes.
- Download the Verifier app – information about the app is available here [NZ Pass Verifier | Ministry of Health NZ](#)
- Vaccine passes should be sighted as soon as possible after people enter the premises – e.g. the waiter at the table, server at the counter/bouncer at the door. The check no longer has to be at point of entry, though this is ideal and should be encouraged.
- All vaccine passes need to be 'checked' – this can be either sighted or verified with an app.
- PCBUs are expected to take reasonable steps to ensure that each person (including workers) who enters the premises is compliant with vaccine pass requirements – this means verifying some attendees with the app – the extent to which this is undertaken at each venue will vary. For example at large venues where it is impractical to verify every vaccine pass, a sample could be verified through spot checking.
- PCBUs can exercise their judgement as to whether a child is younger than 12 years and 3 months and therefore does not need a vaccine pass. The obligation on them is to be reasonable in their judgement. They could, for example, ask the child how old they are, for their birth date or for their school ID.
- Technical information about the verifier app is available from the Ministry of Health - <https://nzcp.covid19.health.nz/>  
[www.github.com/minhealthnz](https://www.github.com/minhealthnz)
- Provided that sequential cohorts are managed so that no intermingling of groups occurs, and rooms are ventilated and high-touch surfaces cleaned between cohorts, your business or service may switch between vaccinated and unvaccinated settings. You should have clear processes to manage this. What settings you are operating under must be made clear to all involved (staff and attendees).
- Any “regulated business or service” (food and drink service, close-proximity business or gym) must require all workers to be vaccinated (see takeaway exception below). Workers covered by the My Vaccine Pass mandate need to have their first dose by 3 December and be fully vaccinated by 17 January 2022.
- On 3 December 2021, the Government announced that if a business is solely operating as a takeaway outlet, then workers do not need to be vaccinated. This is a distinction from other regulated business and services (close proximity businesses, indoor exercise facilities like gyms, and food and drink services with an “eat in” component) where workers are required to be vaccinated regardless of whether the business chooses to require customers/clients to show a My Vaccine Pass or not.
- Where a business is opting to use vaccine passes (i.e. other than regulated business or services), they should consider if workers in those premises should also be vaccinated – refer to the Public Service Commission guidance <https://www.publicservice.govt.nz/assets/SSC-Site-Assets/Workforce-and-Talent-Management/Public-Service-workforce-guidance-for-the-COVID-19-Protection-Framework.pdf>

### **Other obligations**

- Capacity limits (based on 1m distancing) for public facilities still apply at red and orange even when using vaccine passes. Note this does not mean 1m physically distancing is legally required within the facility, but that the capacity is determined by how many people can fit if they are all 1m distanced apart.

### **Step 8 – I'm not required to make a decision on whether to use a vaccine pass, but if I want to consider it, what should I be considering as part of my decision?**

If the Order does not name you as regulated business or service that needs to decide between requiring a vaccine pass or using alternative rules, you may still decide to require a vaccine pass from those accessing your services. This will be an organisational decision for you, rather than something that is mandated by the Order.

We refer local authorities to guidance to central government agencies on the Public Service Commission website on using vaccine passes - [Public Service workforce guidance for the COVID-19 Protection Framework | Te Kawa Mataaho Public Service Commission](#). We note that there may be parts of this guidance that are less appropriate in a local government context (an example has been raised with regards to pools). The linked guidance is not binding and should be read in conjunction with the public health order and is only one component of your health and safety risk assessment.

Local authorities can and should seek their own legal advice if they need help with this assessment.

- Yes - my assessment has determined I should use a vaccine pass for my premises– go to step 7 on using vaccine passes. Capacity limits (based on 1m distancing) for public facilities still apply at red and orange even when using vaccine passes. Note this does not mean 1m physically distancing is legally required within the facility, but that the capacity is determined by how many people can fit if they are all 1m distanced apart. At orange and red, face coverings are required in the parts of premises owned by local government that are open to the public.
- No, I will not be using a vaccine pass – capacity limits for public facilities apply at red and orange (based on 1m distancing). Note this does not mean 1m physically distancing is legally required within the facility, but that the capacity is determined by how many people can fit if they are all 1m distanced apart. At orange and red, face coverings are required in the parts of premises owned by local government that are open to the public.

## Step 9 - My premises is being hired out for an event or gathering – what do I need to do?

Decisions on which settings to operate events or gatherings are the decision for the organiser – but if you are the person in control of the premises that has been hired for the event or gathering, you must ensure that they will be operating within either the vaccine pass or the non-vaccine pass settings as outlined below.

Category	Green	Orange	Red
Gatherings (e.g. private gatherings, weddings, places of worship, marae)	<p><b>Vaccine pass</b> – Allowed, no limit</p> <p><b>No Vaccine pass</b> - allowed up to 100 people, based on 1m distancing</p>	<p><b>Vaccine pass</b> – Allowed, no limit.</p> <p><b>No Vaccine pass</b> - allowed up to 50 people, based on 1m distancing</p>	<p><b>Vaccine pass</b> – up to 100 people, based on 1m distancing</p> <p><b>No Vaccine pass</b> - – up to 25 people, based on 1m distancing</p>
Events (including event businesses)	<p><b>Vaccine pass</b> – Allowed, no limit</p> <p><b>No Vaccine pass</b> - Allowed, up to 100 people</p>	<p><b>Vaccine pass</b> – Allowed, no limit</p> <p><b>No Vaccine pass</b> - Not permitted</p>	<p><b>Vaccine pass</b> – Allowed, up to 100 people, based on 1m distancing</p> <p><b>No Vaccine pass</b> - Not permitted</p>

GUIDANCE FOR TRANSITIONING THROUGH COVID PROTECTION FRAMEWORK FOR LOCAL GOVERNMENT			
CROSS-COUNCIL FUNCTIONS			
<b>Overview</b>	Action needed to protect health system – system facing unsustainable number of hospitalisations. Action needed to protect at-risk populations	Increasing community transmission with increasing pressure on health system. Whole of health system is focusing resources but can manage – primary care, public health, and hospitals. Increasing risk to at risk populations.	COVID-19 across New Zealand, including sporadic imported cases. Limited community transmission. COVID-19 hospitalisations are at a manageable level. Whole of health system is ready to respond – primary care, public health, and hospitals.
<b>Guidance for holding council meetings</b>  Note that council chambers may use vaccine passes, but the use of vaccine passes will not affect capacity.	<p><b>No Vaccine Pass</b></p> <p>Open with capacity limits based on 1m distancing.</p> <p>A <a href="#">risk-assessment</a> should be completed to determine whether vaccination is required for staff (this will exclude elected members).</p> <p>Changes made under modification orders linked to the Epidemic Notice allow for Council meetings to be conducted remotely. The current Epidemic Preparedness notice was renewed on 8 September 2021 and will last three months.</p> <p><b>Vaccine Pass</b></p>	<p><b>No Vaccine Pass</b></p> <p>Open with capacity limits based on 1m distancing.</p> <p>A <a href="#">risk-assessment</a> should be completed to determine whether vaccination is required for staff (excluding elected members).</p> <p>Changes made under modification orders linked to the Epidemic Notice allow for Council meetings to be conducted remotely. The current Epidemic Preparedness notice was renewed on 8 September 2021 and will last three months.</p> <p><b>Vaccine Pass</b></p> <p>Open with capacity limits based on 1m distancing.</p>	<p><b>No Vaccine Pass</b></p> <p>No capacity limits</p> <p>A <a href="#">risk-assessment</a> should be completed to determine whether vaccination is required for staff (excluding elected members).</p> <p>Changes made under modification orders linked to the Epidemic Notice allow for Council meetings to be conducted remotely. The current Epidemic Preparedness notice was renewed on 8 September 2021 and will last three months.</p> <p><b>Vaccine Pass</b></p>



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<p>Note that a suggested approach on making a decision to whether to use vaccine passes is included in the guidance above.</p>	<p>Open with capacity limits based on 1m distancing.</p> <p>Only vaccinated staff and vaccinated elected members present. Unvaccinated staff or elected members should be attending remotely.</p>	<p>Only vaccinated staff and vaccinated elected members present. Unvaccinated staff or elected members should be attending remotely.</p>	<p>Open with capacity limits based on 1m distancing.</p> <p>Only vaccinated staff and vaccinated elected members present. Unvaccinated staff or elected members should be attending remotely.</p>
<p><b>Council offices</b></p>	<p>Workplaces are open with working from home encouraged if appropriate to workplace</p> <p>There are no specified vaccine pass requirements in the Order, go to step 8 for a suggested approach to assist in making a decision on whether to use one.</p>	<p>There are no specified vaccine pass requirements in the Order, go to step 8 for a suggested approach to assist in making a decision on whether to use one.</p>	<p>There are no specified vaccine pass requirements in the Order, go to step 8 for a suggested approach to assist in making a decision on whether to use one.</p>
<p><b>Property and facilities management</b></p>	<p>Open</p>	<p>Open</p>	<p>Open</p>

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<b>Building and construction</b>	Open	Open	Open
<b>RMA plan-making and community consultation</b>	Workplaces are open with working from home if appropriate to workplace  Public health measures apply when interacting with members of the public e.g. use of face coverings, record keeping, hygiene	Public health measures apply when interacting with members of the public e.g. use of face coverings, record keeping, hygiene	Public health measures apply when interacting with members of the public e.g. use of face coverings, record keeping, hygiene
<b>Consenting and CME functions</b>	Working remotely is encouraged (where possible)  Public health measures apply when interacting with members of the public e.g. use of face coverings, record keeping, hygiene.	Public health measures apply when interacting with members of the public e.g. use of face coverings, record keeping, hygiene.	Public health measures apply when interacting with members of the public e.g. use of face coverings, record keeping, hygiene.

GUIDANCE FOR TRANSITIONING THROUGH COVID PROTECTION FRAMEWORK FOR LOCAL GOVERNMENT			
TERRITORIAL AUTHORITY FUNCTIONS			
	Red	Orange	Green
<b>Overview</b>	Action needed to protect health system – system facing unsustainable number of hospitalisations. Action needed to protect at-risk populations	Increasing community transmission with increasing pressure on health system. Whole of health system is focusing resources but can manage – primary care, public health, and hospitals. Increasing risk to at risk populations	COVID-19 across New Zealand, including sporadic imported cases. Limited community transmission. COVID-19 hospitalisations are at a manageable level. Whole of health system is ready to respond – primary care, public health, and hospitals
<b>Public facilities</b>	Open with capacity limits based on 1m distancing	Open with capacity limits based on 1m distancing	Open
Museums	Face coverings mandatory in public areas (pools excluded)	Face coverings mandatory in public areas (pools excluded)	Face coverings encouraged indoors (pools excluded)
Libraries	Face coverings mandatory in public areas (pools excluded)	Record keeping rule applies	Record keeping rule applies
Pools	Record keeping rule applies		
Community halls			

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<p><b>Regulatory and licensing</b></p> <ul style="list-style-type: none"> <li>Animal services</li> <li>Noise control</li> <li>Consenting functions</li> <li>Environmental health</li> </ul>	<p>Workplaces are open with working from home if appropriate to workplace. Public health measures apply when interacting with members of the public e.g. use of face coverings, record keeping.</p>	<p>Public health measures apply when interacting with members of the public e.g. use of face coverings, record keeping</p>	<p>Public health measures apply when interacting with members of the public e.g. use of face coverings, record keeping</p>
<p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>Operation and maintenance of water services</li> <li>Roading/highways</li> <li>Solid waste (not including transfer stations)</li> </ul>	<p>Normal operations – general health and safety measures apply</p>	<p>Normal operations – general health and safety measures apply</p>	<p>Normal operations – general health and safety measures apply</p>
<p><b>Outdoor services</b></p> <ul style="list-style-type: none"> <li>Cemeteries/crematoria</li> <li>Public toilets</li> <li>Playgrounds, parks, cycle parks, skate parks</li> <li>Walking/mountain bike trails</li> </ul>	<p>Normal operations unless being hired for an event or gathering.</p>	<p>Normal operations unless being hired for an event or gathering.</p> <p>MBIE guidance on accommodation services can be found <a href="#">here</a></p>	<p>Normal operations unless being hired for an event or gathering.</p>

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<p>Sports field and athletic facilities</p> <p>Campgrounds and holiday parks</p> <p>Jetties and boat ramps</p> <p>Parking services</p>	<p>MBIE guidance on accommodation services can be found here</p> <p><a href="https://www.business.govt.nz/covid-19/covid-19-protection-framework">https://www.business.govt.nz/covid-19/covid-19-protection-framework</a></p>	<p><a href="https://www.business.govt.nz/covid-19/covid-19-protection-framework">https://www.business.govt.nz/covid-19/covid-19-protection-framework</a></p>	
<p><b>Community services</b></p> <p>Social housing owned by the council</p> <p>Community and social services</p> <p>Community development</p> <p>Volunteer programmes</p>	<p>Workplaces are open with working from home if appropriate to workplace. Public health measures apply when interacting with members of the public</p>	<p>Public health measures apply when interacting with members of the public</p>	<p>Public health measures apply when interacting with members of the public</p>
<p><b>Gyms, rec centres and other membership-based businesses or services (e.g dance or martial arts studios)</b></p>	<p>Record keeping rule applies.</p> <p><b>With vaccine pass</b> Up to 100 people, based on 1m physical distancing. All staff must be vaccinated.</p> <p><b>Without vaccine pass</b> Cannot open</p>	<p>Record keeping rule applies.</p> <p><b>With vaccine pass</b> No limits. All staff must be vaccinated.</p> <p><b>Without vaccine pass</b> Cannot open</p>	<p>Record keeping rule applies.</p> <p><b>With vaccine pass</b> No limits. All staff must be vaccinated.</p> <p><b>Without vaccine pass</b> Up to 100 people, based on 1m physical distancing</p>

<b>GUIDANCE FOR TRANSITIONING THROUGH COVID PROTECTION FRAMEWORK FOR LOCAL GOVERNMENT</b>			
<b>Non customer-facing workplaces</b>	Workplaces are open with working from home if appropriate to workplace.	Open	Open
<b>REGIONAL AUTHORITY FUNCTIONS</b>			
<b>Public Transport</b>	Record keeping rule applies Face coverings mandatory Vaccine pass prohibited	Record keeping rule applies Face coverings mandatory Vaccine pass prohibited	Record keeping rule applies Face coverings mandatory Vaccine pass prohibited
<b>Natural Hazard event monitoring, response and recovery</b>	Normal operations	Normal operations	Normal operations
<b>Education programmes</b>	Link to full guidance on our <a href="#">website</a>	Link to full guidance on our <a href="#">website</a>	Link to full guidance on our <a href="#">website</a>
<b>CDEM ACTIVITY</b>			

GUIDANCE FOR TRANSITIONING THROUGH COVID PROTECTION FRAMEWORK FOR LOCAL GOVERNMENT			
<p><b>General</b></p>	<p>Workplaces are open with working from home if appropriate to workplace</p> <p>In an emergency, acute lifesaving activity including response coordination will have priority over COVID-19 public health risks.</p> <p>In a significant CDEM emergency such as post-tsunami or post-earthquake damage to physical infrastructure and communication networks may make it difficult or impossible to implement other controls such as physical distancing or remote working.</p>	<p>Open</p> <p>In an emergency, acute lifesaving activity including response coordination will have priority over COVID-19 public health risks.</p> <p>In a significant CDEM emergency such as post-tsunami or post-earthquake damage to physical infrastructure and communication networks may make it difficult or impossible to implement other controls such as physical distancing or remote working.</p>	<p>Open.</p> <p>In an emergency, acute lifesaving activity including response coordination will have priority over COVID-19 public health risks.</p> <p>In a significant CDEM emergency such as post-tsunami or post-earthquake damage to physical infrastructure and communication networks may make it difficult or impossible to implement other controls such as physical distancing or remote working.</p>
<p><b>CDEM Group ECC and Local EOCs</b></p> <p><b>These requirements should be shared with support agencies</b></p>	<p>My COVID App <b>QR Code scanning</b> supported by record keeping and rostering.</p> <p>Remote working / <b>virtual coordination centres <u>should be used where possible</u></b> or for functions/sub-functions that can do so.</p> <p>Even in physical coordination centres <b>implement virtual briefings and planning meetings where possible</b> to avoid bringing large numbers of people together.</p>	<p>My COVID App <b>QR Code scanning</b> supported by record keeping and rostering.</p> <p>Consider whether some or all functions can be undertaken via remote working / <b>virtual coordination centres</b></p> <p><b>When physically deployed staff should be cohorted by function and shift as well as location.</b> Consider how shift-changeovers can be completed remotely.</p>	<p>My COVID App <b>QR Code scanning</b> supported by record keeping and rostering</p> <p>The DHB, via its Public Health Unit, should be engaged early to provide a <b>Public Health Risk Assessment for the incident</b>, including response locations</p> <p><b>Increase ventilation in the coordination centre as far as possible.</b> Consider use of temporary shelters/marquees/awnings to provide sheltered outdoor briefing spaces</p> <p>All staff inc volunteers should complete a <b>daily COVID-19 health declaration.</b></p>

**GUIDANCE FOR TRANSITIONING THROUGH COVID PROTECTION FRAMEWORK FOR LOCAL GOVERNMENT**

The DHB, via its Public Health Unit, should be engaged early to provide a **Public Health Risk Assessment for the incident**, including response locations

**When physically deployed staff should be cohorted by function and shift as well as location.** Consider how shift-changeovers can be completed remotely.

**Staff to wear face coverings**

**Increase ventilation in the coordination centre as far as possible.** Consider use of temporary shelters/marquees/awnings to provide sheltered outdoor briefing spaces

**Routine saliva-based PCR asymptomatic surveillance ([www.salivatesting.co.nz](http://www.salivatesting.co.nz)) or point of care Rapid Antigen Testing should be considered** for key-staff and at-risk staff. Where access to lab-based PCR testing is compromised consider moving to daily Rapid Antigen Testing.

All staff inc volunteers should complete a **daily COVID-19 health declaration.**

Even in physical coordination centres consider **implementing virtual briefings and planning meetings where possible** to avoid bringing large numbers of people together.

The DHB, via its Public Health Unit, should be engaged early to provide a **Public Health Risk Assessment for the incident**, including response locations

**Staff to wear face coverings**

**Increase ventilation in the coordination centre as far as possible.** Consider use of temporary shelters/marquees/awnings to provide sheltered outdoor briefing space

All staff inc volunteers should complete a **daily COVID-19 health declaration.**



GUIDANCE FOR TRANSITIONING THROUGH COVID PROTECTION FRAMEWORK FOR LOCAL GOVERNMENT			
<p><b>Response field operations including Civil Defence (Welfare) Centres</b></p>	<p><b>Staff should be cohorted by location.</b> Consider how shift-changeovers can be completed remotely.</p> <p><b>Do not mix field, Civil Defence (Welfare) Centre and coordination centre staff</b> implement virtual briefings</p> <p><b>Staff to wear face coverings</b></p>	<p><b>Staff should be cohorted.</b> Consider how shift-changeovers can be completed remotely.</p> <p><b>Do not mix field, Civil Defence (Welfare) Centre and coordination centre staff</b> implement virtual briefings</p> <p><b>Staff to wear face coverings</b></p> <p>All staff inc volunteers should complete a <b>daily COVID-19 health declaration.</b></p>	<p>Normal Operations apply</p> <p>All staff inc volunteers should complete a <b>daily COVID-19 health declaration.</b></p>
<p><b>Vaccination for staff, support agencies and managed volunteers</b></p>	<p>A <a href="#">risk-assessment</a> should be completed to determine whether vaccination is required across CDEM settings such as Coordination Centres, Field Operations and Emergency Welfare services staff including volunteers.</p> <p>Any risk-assessment should be cognisant of the difficulty in implementing and maintaining other COVID-19 control measures in an emergency.</p> <p>The risk assessment should recognise that COVID-19 vaccination is a two-dose regime, at least three weeks apart and if used as a control must be implemented prior to the event.</p>	<p>A <a href="#">risk-assessment</a> should be completed to determine whether vaccination is required across Coordination Centre, Field Operations and Emergency Welfare services staff including volunteers.</p> <p>A precautionary approach and the potential for the CPF level to escalate, either as a result of the emergency or other factors, should be considered.</p>	<p>A <a href="#">risk-assessment</a> should be completed to determine whether vaccination is required across Coordination Centre, Field Operations and Emergency Welfare services staff including volunteers.</p> <p>A precautionary approach and the potential for the CPF level to escalate, either as a result of the emergency or other factors, should be considered.</p>

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<b>Staff surveillance and testing</b>	<p><b>Consider routine asymptomatic surveillance for staff</b> (twice weekly Monday and Wednesday saliva-based PCR and / or Rapid Antigen Testing).</p> <p>Work with your DHB to <b>ensure critical response staff have priority access to symptomatic community PCR testing</b></p>	<p>Asymptomatic surveillance testing not recommended.</p> <p>Work with your DHB to <b>ensure critical response staff have priority access to symptomatic community PCR testing</b></p>	<p>Asymptomatic surveillance testing not recommended.</p> <p>Work with your DHB to <b>ensure critical response staff have priority access to symptomatic community PCR testing</b></p>
<p><b><i>People do not need to show proof of vaccination status when accessing essential services</i></b> including food banks, housing and housing support services. <b><i>This includes Civil Defence (Welfare) Centres and Civil Defence Welfare Emergency Accommodation.</i></b></p> <p>Asking whether people are willing to confirm their vaccine status and whether they have been isolating or quarantining at home could be considered an additional tool for risk management but cannot be used to deny service or provide a different level of service</p>			
<b>CDEM coordinated emergency welfare services</b>	<p><u>General</u></p> <p><b>Record keeping/scanning required</b></p> <p>Activate <b>additional facilities</b> where possible to reduce density.</p> <p><b>Consider allocating at least one Civil Defence Welfare Centre to COVID-19 positive cases</b></p> <p><u>For staff, including volunteers</u></p>	<p><u>General</u></p> <p><b>Record keeping/scanning required</b></p> <p>Activate <b>additional facilities</b> where possible to reduce density.</p> <p><b>Consider allocating at least one Civil Defence Welfare Centre to COVID-19 positive cases</b></p> <p><u>For staff, including volunteers</u></p> <p>A risk assessment for vaccination should be undertaken.</p>	<p><u>General</u></p> <p><b>Record keeping/scanning required</b></p> <p>Activate <b>additional facilities</b> where possible to reduce density.</p> <p><b>Consider allocating at least one Civil Defence Welfare Centre to COVID-19 positive cases</b></p> <p><u>For staff, including volunteers</u></p> <p>A risk assessment for vaccination should be undertaken.</p>

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	<p><b>A risk assessment for vaccination should be undertaken.</b></p> <p><b>Face coverings to be worn</b></p> <p>All staff inc volunteers should complete a <b>daily COVID-19 health declaration.</b></p> <p><b><u>For the public</u></b></p> <p><b>Face coverings strongly recommended</b></p> <p><b>On reception or in the field COVID-19 health declaration</b> to identify symptomatic/case contacts/those isolating or quarantine at home</p> <p>Consider the ability to manage separately or stream low-risk and high-risk COVID-19 exposure</p>	<p><b>Face coverings to be worn</b></p> <p>All staff inc volunteers should complete a <b>daily COVID-19 health declaration.</b></p> <p><b><u>For the public</u></b></p> <p><b>Face coverings encouraged</b></p> <p><b>On reception or in the field COVID-19 health declaration</b> to identify symptomatic/case contacts/those isolating or quarantine at home</p> <p>Consider the ability to manage separately or stream low-risk and high-risk COVID-19 exposure</p>	<p><b>Face coverings to be worn</b></p> <p>All staff inc volunteers should complete a <b>daily COVID-19 health declaration.</b></p> <p><b><u>For the public</u></b></p> <p><b>Face coverings encouraged</b></p> <p><b>On reception or in the field undertake a COVID-19 health declaration</b> to identify symptomatic/case contacts/those isolating or quarantine at home.</p> <p>Consider the ability to manage separately or stream low-risk and high-risk COVID-19 exposure</p>
<p><b>CEG and Joint Committee meetings</b></p>	<p><b>No Vaccine Pass</b></p> <p>Open with capacity limits based on 1m distancing.</p> <p>A <a href="#">risk-assessment</a> should be completed to determine whether vaccination is required for staff (this will exclude elected members).</p>	<p><b>No Vaccine Pass</b></p> <p>Open with capacity limits based on 1m distancing.</p> <p>A <a href="#">risk-assessment</a> should be completed to determine whether vaccination is required for staff (excluding elected members).</p>	<p><b>No Vaccine Pass</b></p> <p>No capacity limits</p> <p>A <a href="#">risk-assessment</a> should be completed to determine whether vaccination is required for staff (excluding elected members).</p>

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<p>Note that a suggested approach on making a decision to whether to use vaccine passes is included in the guidance above.</p>	<p>Changes made under modification orders linked to the Epidemic Notice allow for Council meetings to be conducted remotely. The current Epidemic Preparedness notice was renewed on 8 September 2021 and will last three months.</p> <p><b>Vaccine Pass</b></p> <p>Open with capacity limits based on 1m distancing.</p> <p>Only vaccinated staff and vaccinated elected members present. Unvaccinated staff or elected members should be attending remotely.</p>	<p>Changes made under modification orders linked to the Epidemic Notice allow for Council meetings to be conducted remotely. The current Epidemic Preparedness notice was renewed on 8 September 2021 and will last three months.</p> <p><b>Vaccine Pass</b></p> <p>Open with capacity limits based on 1m distancing.</p> <p>Only vaccinated staff and vaccinated elected members present. Unvaccinated staff or elected members should be attending remotely.</p>	<p>Changes made under modification orders linked to the Epidemic Notice allow for Council meetings to be conducted remotely. The current Epidemic Preparedness notice was renewed on 8 September 2021 and will last three months.</p> <p><b>Vaccine Pass</b></p> <p>Open with capacity limits based on 1m distancing.</p> <p>Only vaccinated staff and vaccinated elected members present. Unvaccinated staff or elected members should be attending remotely.</p>
<p><b>National, regional and local meetings, working groups, training and exercising</b></p>	<p>National travel under the CPF is permitted (noting that there is a transition period for Auckland region requires vaccine certificate or negative PCR test from 15 December 2021 to 17 January 2022)</p>		
	<p><b>Manage as public event</b> – refer to settings on page 8.</p>	<p><b>Manage as public event</b> – refer to settings on page 8.</p>	<p><b>Manage as public event</b> – refer to settings on page 8.</p>

	All participants should complete a <b>daily COVID-19 health declaration</b> .	All participants should complete a <b>daily COVID-19 health declaration</b> .	If vaccination certificates are NOT used up to 100 people, based on 1m distancing, seated and separated.
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## Other Guidance on the COVID-19 Protection Framework

Below is a list of some guidance on the COVID-19 Protection Framework that has been created by other agencies and organisations.

Government Agency	Guidance information
<b>Ministry of Business, Innovation and Employment</b>	<ul style="list-style-type: none"> <li>• <a href="https://business.govt.nz">COVID-19 Protection Framework — business.govt.nz</a></li> <li>• <a href="https://business.govt.nz">Close contact services — business.govt.nz</a></li> </ul>
<b>Ministry of Primary Industries</b>	<ul style="list-style-type: none"> <li>• <a href="https://mpi.govt.nz">Operating under the COVID-19 Protection Framework: Guidance for primary sector businesses   COVID-19 (coronavirus) information and advice   NZ Government (mpi.govt.nz)</a></li> </ul>
<b>Public Service Commission</b>	<ul style="list-style-type: none"> <li>• <a href="https://psc.govt.nz">COVID-19 Public Sector Workforce Guidelines   Te Kawa Mataaho Public Service Commission</a></li> <li>• <a href="https://psc.govt.nz">Public Service workforce guidance for the COVID-19 Protection Framework   Te Kawa Mataaho Public Service Commission</a></li> </ul>

<b>Te Manatū Waka Ministry of Transport</b>	<ul style="list-style-type: none"><li>• <a href="#">COVID-19 transport information   Ministry of Transport</a></li><li>• <a href="#">Microsoft Word - MOT CPF Guidance for Transport Operators 26 Nov 21 - DRAFT WEBSITE VERSION (002).docx</a></li></ul>
<b>Unite against COVID-19</b>	<ul style="list-style-type: none"><li>• <a href="#">Care in the community   Unite against COVID-19 (covid19.govt.nz)</a></li></ul>
<b>Work &amp; Income</b>	<ul style="list-style-type: none"><li>• <a href="#">COVID-19 - Work and Income</a></li></ul>
<b>Worksafe</b>	<ul style="list-style-type: none"><li>• <a href="#">Novel coronavirus (COVID-19)   WorkSafe</a></li></ul>