# Covid Pass Guidelines

## *This document supplements the current protocol regulating the measures for combating and containing the spread of the Covid-19 infection*

*Italian Decree Law no. 111 of 6 August 2021, "Urgent measures for the safe operation of schools and universities and social institutions, and regarding transport"*

Publication: 27 August 2021

*All the measures set out below have been adopted in accordance with the current regulatory framework and may be subject to changes in case of variations in the regulations or infection rates.*

**Contents**

## 1. Background

Italian Decree Law no. 111 of 6 August 2021 introduces <u>new measures to prevent infection</u> and compulsory **COVID-19 certification (COVID pass or "green pass")** for schools and universities. Therefore, **from 1 September 2021 until the end of the state of emergency**, in order to maintain suitable health and safety conditions during in-person university teaching and service provision, including course and degree examinations:

-   <u>**all university staff,**</u> **both academic and technical-administrative** (permanent and contract lecturers, technical and administrative staff, PhD students, medical residents, research grant and scholarship holders, contract researchers, visiting professors, attendees, attendee care-givers or guests at graduation sessions and the staff of external companies providing services within the University) **must hold a Covid-19 pass and present it for inspection on request;**
-   all undergraduate and postgraduate students, **including foreign students on international exchange programmes, must hold a Covid-19 pass and present it for inspection on request** in order to be admitted to in-person teaching and curricular activities.

For **university staff (not for students)**, failure to comply with this requirement constitutes absence without leave, and with effect from the fifth day of absence, bearing in mind the characteristics and specific nature of the services provided by teaching staff on the one hand and technical and administrative personnel on the one hand, and other persons in equivalent positions, the staff concerned will be suspended with no entitlement to any form of pay or other benefits of any description.

The note issued by the Minister for Universities and Research on 7 August 2021 confirms the instructions issued with regard both to the adoption of the safety measures and the requirements for all university staff and students to hold Covid-19 certification; it also confirms the penalties to be enforced in case of non-compliance.

All the measures to prevent and contain infection previously adopted by the University continue to apply, in particular:

-   social distancing;
-   the use of respiratory protection devices;
-   the ban on entering or remaining in University premises for anyone with respiratory symptoms or a temperature over 37.5 ºC.

As already mentioned in the Rector's Decrees and communications published on the various internal channels, UniSR has already, on several occasions, urged university staff and persons in equivalent positions, and students, to waste no time in obtaining valid Covid-19 certification if they do not yet have it.

## 2. Areas with specific restrictions

In accordance with Decree Law no. 105 of 23 July 2021, in regions classified as "white", only persons holding a Covid Pass are allowed access to the following services and activities (the list is not exhaustive):

- indoor catering services for consumption of food and drink seated at tables (e.g. canteens); in this case, the manager of the facility is responsible for checking passes and may provide take-away meals as an alternative if available;
- libraries (for spending time inside the facility, not simply access to collect/return texts);
- public competitive examinations;
- congresses and conferences.

For the greater protection of resident students, only Covid Pass holders may **enter and spend time in UniSR Halls of Residence.**

## 3. Covid Pass or equivalent forms of certification

A valid Covid-19 Pass ("Green Pass") is issued in the cases defined by art. 9, comma 2 of Decree Law no. 52 of 22 April 2021, converted into Law no. 87 of 17 June 2021, as follows:

- **vaccination against SARS-CoV-2** (on administration of the first dose of vaccine, valid from the 15th day after administration to the date programmed for completion of the vaccine cycle, or on completion of the vaccine cycle, and valid for nine months after the completion date);
- **recovery from infection with Covid-19** (valid for 6 months after the date of recovery);
- **negative antigen-detecting rapid diagnostic test or molecular test for SARS-CoV-2 virus** (valid for forty-eight hours after performance of the test);

Rules regarding the validity of Covid Passes may be subject to modification in the event of changes in the law.

**Foreign students or workers** may proceed as instructed in Ministry of Health document 0034414-30/07/2021-DGPRE-DGPRE-P regarding equivalent certifications (https://www.yesmilano.it/en/articles/latest-administrative-updates and https://www.esteri.it/mae/resource/doc/2021/07/circolare_equipollenza_certificazioni_vaccini_e_guarigione_stati_terzi.pdf).

Information on accessing and printing Covid Passes is available at the links below:

- www.dgc.gov.it
- https://covid.ats-milano.it/?q=informativa_certificazione_verde_covid19

Individuals can also access their Covid Passes using the government's "IO APP".

## 4. Exemptions/Waivers - Vulnerable Individuals

The regulations regarding possession of a Covid Pass **do not apply** to people who hold exemption from vaccination **on the basis of specific medical certification issued by their General Practitioner or via other procedures defined by the regulations.** "*… certification of exemption from SARS-CoV-2 vaccination may be issued on paper and may be valid until 30 September 2021 at the latest, subject to further instructions; the duration of validity, on the basis of the relative medical assessments, will be updated when the national system for the digital issue of exemptions, enabling their digital verification, is introduced…*".

In these cases, the individuals concerned must contact the Preventive Medicine Service in order to decide on a case-by-case basis, in consultation with the relevant Management functions, whether to provide free swab tests or adopt other measures.

Children under 12 years of age do not require a Covid Pass to access activities and services for which it would otherwise be necessary.

## 5. Verification[1]: tools and authorisations

Covid Pass possession will be checked in accordance with the law and with data protection regulations.

Under the Prime Ministerial Decree dated 17 June 2021, Covid-19 certification may be verified by the managers of facilities or their formally appointed representatives using the VerificaC19 mobile app; certification holders may also be required to show ID within the legally permitted limits.

UniSR will provide permanent stations and/or mobile devices to enable trouble-free verification by the designated personnel.

The following are the Services/Departments/Areas where verification devices or apps (VerificaC19 app) will be provided:

- smartphone provided to General Services, Canova/Borromini site;
- smartphone provided to General Services, Cesano Maderno site;
- Cassinella Hall of Residence;
- Melghera Hall of Residence;
- University Preventive Medicine Service;
- UniSR DB 1 entrance;
- UniSR DB 2 entrance;
- Library;
- Student Services Front Office, DB2, 1s;

**Spot checks will also be performed on the university population by designated personnel** (i.e. staff of the General Services, Student Services, Health and Safety Service areas, etc.) and/or with the involvement of the University Preventive Medicine Service.

The instructions for use of the pass checking App are enclosed.

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[1] The specific procedures for verification of possession of a Covid Pass may be subject to specific regulations (Prime Ministerial Decree), to be published soon. The information provided may therefore be updated or supplemented in response to changes in the regulatory framework.

## 6. University Staff

The following are the procedures adopted by the University to check the Covid Passes of university staff, subject to the information provided in the introduction and in the previous points.

Since the Preventive Medicine Service plays a key role in Covid Pass verification (as it holds individuals' medical data), **a specific email address greenpass@unisr.it has been created** to facilitate the submission of documents.

| Type of contract | Covid Pass | Systematic checking | Outcome of systematic checking | Actions arising from systematic checking[2] | Spot checking[3] |
|---|---|---|---|---|---|
| **Employees and equivalent staff (administrative and technical-administrative)** | Required to access premises and to work | **Preventive Medicine Service (PMS)** Covid Pass to be consigned to the Preventive Medicine Service **by 1 September 2021** (or within 48h after return to the University, if scheduled after 1 September). The document will also be required for new recruits (again to be sent to PMS). | The names of individuals who do not meet the legal requirements will be sent to the Employer and HR Dept. for implementation of the measures enforced by the Decree. | The eligibility for exemption of vulnerable individuals or those in special circumstances will be assessed, with the involvement of the Employer, HR Dept. and Health and Safety. | Not planned. Spot checking may be performed by persons designated by UniSR. |
| **Research grant/Scholarship holders/Research Staff** | Required to access premises and to work | **Preventive Medicine Service (PMS)** Covid Pass to be consigned to the Preventive Medicine Service | The individual's name will be sent to the Employer and HR Dept. for implementation of the measures | The eligibility for exemption of vulnerable individuals or those in special circumstances | Not planned. Spot checking may be performed by persons |

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[2] If the person has had the first dose of a vaccine and is awaiting issue of their Covid Pass, or for vulnerable individuals, specific measures can be considered pending issue of the Covid Pass (e.g. remote working).

[3] The Covid Pass must still be shown to access the University Halls of Residence, Library and Canteen.

| Type of contract | Covid Pass | Systematic checking | Outcome of systematic checking | Actions arising from systematic checking[2] | Spot checking[3] |
|---|---|---|---|---|---|
| | | **by 1 September 2021** (or within 48h after return to the University, if scheduled after 1 September). The document will also be required for new recruits (again to be sent to PMS). | enforced by the decree. | will be assessed, with the involvement of the Employer, HR Dept. and Health and Safety. Remote working may be considered when compatible with the type of activity. | designated by UniSR. |
| **PhD students** | Required to access premises and to work | **Preventive Medicine Service (PMS)** Covid Pass to be consigned to the Preventive Medicine Service **by 1 September 2021** (or within 48h after return to the University, if scheduled after 1 September). The document will also be required for new PhD students. | The individual's name will be sent to the Employer and HR Dept. for implementation of the measures enforced by the decree. | The eligibility for exemption of vulnerable individuals or those in special circumstances will be assessed, involving the Rector and the Director of Studies /DOS)/Tutor | Not planned. Spot checking may be performed by persons designated by UniSR. |
| **Permanent teaching staff** | Required to access premises and to work | **Preventive Medicine Service (PMS)** Covid Pass to be consigned to the Preventive | The names of individuals who do not meet the legal requirements will be sent to | The eligibility for exemption of vulnerable individuals or those in special | Not planned. Spot checking may be performed by persons |

| Type of contract | Covid Pass | Systematic checking | Outcome of systematic checking | Actions arising from systematic checking[2] | Spot checking[3] |
|---|---|---|---|---|---|
| | | Medicine Service **by 1 September 2021** (or 48h before return to the University, if scheduled after 1 September).<br><br>The document will also be required for Professors who are joining the organisation (again to be sent to PMS). | the Rector for implementation of the necessary measures. | circumstances will be assessed with the involvement of the Rector. | designated by UniSR. |
| **Contract teaching staff** | Required to access premises and to work | Individual teaching staff are required to visit a UniSR reception office when they enter the Site to have their Covid Pass checked.<br><br>For new contracts, a point will be added to the document confirming the contract (e.g. MO SPP 005) specifically stating that a Covid Pass is compulsory for accessing and using the UniSR sites. | - | - | Performed by persons designated by UniSR. |

| Type of contract | Covid Pass | Systematic checking | Outcome of systematic checking | Actions arising from systematic checking[2] | Spot checking[3] |
|---|---|---|---|---|---|
| | | Performed by persons designated by UniSR. | | | |

If the verification is performed by the PMS, the relative Exemption will specify the relative provisions (e.g. access conditional on performance of swab test to be submitted to PMS, etc.).

Individuals are responsible for having a valid Covid Pass with them when accessing the site, to allow the appropriate checks when necessary.

## 7. Undergraduate and postgraduate students

The following are the procedures adopted by the University to check the Covid Passes of undergraduate and postgraduate students.

| Type of contract | Covid Pass | Systematic checking | Outcome of systematic checking | Actions arising from systematic checking[4] | Spot checking[5] |
|---|---|---|---|---|---|
| **Undergraduate and postgraduate students (including medical residents)** | Required to access premises and to attend activities. All undergraduate and postgraduate students must hold one and | **Preventive Medicine Service (PMS)** on newly matriculated students. From this Academic Year, all newly matriculated students must fill in, and consign to the PMS, the | For newly matriculated students, the names of individuals who do not meet the legal requirements will be sent to the Rector, the Dean and the Head of the Degree Course, | If the PMS finds that students do not hold a Covid Pass, the consequent actions will be decided with the Rector and the Head of the Degree Course depending on academic circumstances. | Performed by persons designated by UniSR. |

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[4] If the person has had the first dose of a vaccine, remote working procedures may be adopted pending issue of the Covid Pass.
[5] The Covid Pass must still be shown to access the University Halls of Residence, Library and Canteen.

| Type of contract | Covid Pass | Systematic checking | Outcome of systematic checking | Actions arising from systematic checking[4] | Spot checking[5] |
|---|---|---|---|---|---|
| | must show it on request. | Vaccination Certificate and the health declaration MO 44-4 it/en (ref. PO 44). | who will decide how to proceed. | | |

For undergraduate and postgraduate students **attending practical internships** at organisations with which the University has agreements (e.g. Ospedale San Raffaele), the stated measures may be supplemented by specific provisions compulsory for access to facilities, enforced by the organisations concerned.

Individuals are responsible for having a valid Covid Pass with them when accessing the site, to allow the appropriate checks when necessary.

## 8. Staff of external companies working on UniSR premises

The employees and associates of companies which provide services on UniSR premises must hold a Covid Pass in order to access the site. The legal representative must therefore send the UniSR contract manager a personal declaration of certification (under art. 46 and 47 of Presidential Decree no. 445/2020) covering all their employees/associates who may access the premises. **In person, if authorised, or with the involvement of the designated staff,** the UniSR contract manager may perform spot checks to verify the accuracy of the declarations submitted and may suspend the service in the event of breach of the legal requirements.

The following is an example of the communication which each contract manager may send to the companies with which he/she does business.

*"In accordance with Decree Law no. 111 of 6 August 2021, "Urgent measures for the safe operation of schools and universities and social institutions, and regarding transport", please note that with effect from 1 September 2021 and until the end of the state of the emergency, subject to changes in the legal framework, staff assigned to work on the UniSR premises must hold a Covid Pass in order to access and work at the site.*

*You are therefore kindly requested:*

- *to send a personal declaration of certification (in accordance with art. 46 and 47 of Presidential Decree no. 445/2000), signed by your legal representative, certifying that your employees/associates assigned to work on the premises of UniSR hold Covid Passes, via email to XXXXXXXX (insert your email address);*
- *to notify the person or persons concerned that they must be prepared to exhibit their Covid Pass if requested in order to remain on the premises …"*

## 9. Additional measures for final examinations

In addition to the existing measures, with effect from 1 September, in order to attend the final examinations for bachelor's degrees, PhDs, specialisation diplomas, master's degrees and proficiency courses, candidates, members of the examining board, members of the public and any other professionals must hold Covid-19 certification.

Covid Passes will be checked by reception staff using the Italian pass checking app in offline mode and without saving personal data on the checker's device.

The lack of a valid Covid Pass cannot be claimed by candidates or examining board members as grounds for asking for the discussion of the dissertation and/or the award of the qualification to be carried out remotely.

## 10. Management of checks

The specific procedures for verification of possession of a Covid Pass may be subject to specific legal requirements, to be published soon. Pending further guidance, checks may be performed as described below.

At present, except for the Preventive Medicine Service, which may add the Covid Pass to the individual's medical record, staff assigned to check Covid certification may do so by **scanning the two-dimensional bar code using the mobile app which only verifies the authenticity, validity and integrity of the certification and shows the identity of the person concerned, without displaying the information on the basis of which the Pass was issued.**

All staff checking Covid Passes must clearly display their UniSR identity badge.

During checking the following situations may arise, and must be recorded in the specific attached document.

The **person exhibits a paper or digital Covid Pass, and the check is successful.** Everything is in order: in this case, simply enter the successful check and the category of person (teacher, student, external, etc.) in the register of checks.

The person spot checked states that they do not have a Covid Pass because they have vulnerable status or are a foreign student. In this case, alternative certification must be shown.

The person spot checked **shows their Covid Pass but it cannot be scanned (technical problems).** Retry several times and record the person's name in the register for further checks.

The person spot checked **refuses to show their Covid Pass without giving a specific reason.** In this case, the person cannot access the facility/area and/or must be asked to leave the premises. **If serious problems arise, report the person's name to their Employer (in case of workers or equivalent) or the Rector (in the case of undergraduate or postgraduate students) for the necessary measures, also notifying the Preventive Medicine Service if necessary.**

**The person authorised to perform checks may only ask to see ID if the Covid Pass shown is clearly inconsistent with the person being checked.**

The register of checks must be emailed to spp@unisr.it, also to enable the swift identification of any situations requiring the adoption of health protection measures.

## Annexes

Annex 1: Instructions for use of the pass checking App

Annex 2: Spot check register (for internal use)

Milan, 27 August 2021