



COVID-19: Implications for employers

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Since the declaration of a Public Health Emergency of International Concern on 30 January 2020 by the Director-General of the World Health Organisation (WHO), we have watched with increasing concern the spread of the coronavirus COVID-19 across the globe.¹ And now as Federal, State and Territory governments in Australia activate their health emergency response plans to contain the human impact of the spread of COVID-19, employers are strongly encouraged to plan and get ready to respond to the outbreak.

This Insight article addresses a number of the employment, safety and labour issues that will help frame and inform decision-making for both private and public sector employers in this challenging environment. In setting out the various issues that employers must navigate, we acknowledge that containing the epidemic and protecting people is the priority.

¹ On 30 January 2020, at the second meeting of the Emergency Committee (EC) convened by the WHO Director-General under the *International Health Regulations (IHR)*, the Director-General on behalf of the EC declared that the spread of the coronavirus COVID-19 satisfied the criteria to determine a Public Health Emergency of International Concern. The IHR is a legally binding international instrument on disease prevention, surveillance, control and response adopted by 196 countries. The purpose and scope of the IHR is to prevent, protect against, control and provide a public health response to the international spread of disease in ways that are commensurate with and restricted to public health risks, and which avoid unnecessary interference with international traffic and trade.



What we know, our best current view

The emerging consensus is that in addition to the terrible human cost of this virus, there will be a significant impact on the global economy, with Australia one of the more vulnerable countries.²

The impact on employers is readily understood when noting the WHO advice that all countries should be prepared for containment, including active surveillance, early detection, isolation and case management, contact tracing and prevention of onward spread of the infection. Isolation is one of the key response tools of government to contain the spread of COVID-19. Whilst some people will recover easily others may get very sick very quickly and inevitably, if there is community transmission and the infection becomes widely spread it will dramatically affect businesses.³

If COVID-19 is not contained, it is likely that the response measure of isolating affected persons and persons exposed to affected persons will become widespread. Australian health departments are instructing people who are affected or who have been exposed to affected people not to go to public places such as work, school, shopping centres, childcare or university. If there is widespread community transmission, there is a high risk that in addition to school closures, offices, mine sites and plants will be required to close.

What then should employers be doing to manage through the COVID-19 outbreak? The focus of this article is on managing and protecting your employees. There is a good chance that in circumstances where the COVID-19 outbreak reaches pandemic level your policies on leave and flexible work practices, including working from home will be tested and may not be adequate as drafted. Organisations are being encouraged to assess their capacity to manage and respond to the challenges the COVID-19 virus will present to their staff and operations.

Your considered response will be required in conjunction with the myriad of business continuity issues that will also demand attention such as interruption of supply chains, disclosure requirements, liquidity and a significant lessening of demand for services, commodities and products.

To assist your thinking and planning we have set out a guide to the likely safety, employment and labour issues, outlining the base position and then questions that you are likely to confront. Employers should, however, at all times be conscious of the particular 'rules' applying to that workplace sourced from enterprise agreements, awards, contracts, policies and the *Fair Work Act 2009*.



- 2 The coronavirus COVID-19 presents the global economy with its greatest danger since the financial crisis, according to the OECD's latest Interim Economic Outlook.
- 3 The WHO has yet to recommend travel or trade restrictions. Australia however, has placed restrictions concerning travel to and from Iran and China. Travellers arriving in Australia from China (as of 1 February 2020) or Iran (as of 1 March 2020), including transit travellers, must self-isolate at home for 14 days. Additionally, healthcare workers who have returned from Italy or South Korea must not attend their regular work in a healthcare or residential care setting for 14 days since leaving these countries.

1 Safety

This is likely to be the issue that presents the greatest challenge to many employers. Remembering first principles will help your deliberations and decision making. Where a risk to health is identified at a workplace, employers must, so far as is reasonably practicable, eliminate the risks, or otherwise minimise the risks. The type of controls required to address the risk of COVID-19 will depend on the level of risk as well as the availability and suitability of controls for each workplace.

We know that health and safety authorities are reminding all employers of basic hygiene advice concerning the provision of adequate facilities or products (such as hand sanitiser) to allow employees and other persons to maintain good hygiene practices.

But for many employers the challenges are far greater. Some industries will have specific risks that are elevated because of the nature of their work. For example, health care, aged care, airline and other travel, waste management and those involving laboratory, border, customs and quarantine work.

Employers in high risk industries will need to assess the provision and use of appropriate personal protective equipment, such as gloves, gowns, masks, eye protection and respirators, and immediately review their infectious disease protocols and ensure they are up to date and disseminated to all workers.



1.1 Responsibilities at the workplace

In general terms employers must, so far as is reasonably practicable:

- a. provide and maintain a working environment that is safe and without risks to the health of employees and other persons;
- b. provide information, instruction, training or supervision as is necessary to protect all persons from risks to their health. Any information, instruction and training needs to be provided in a way that is readily understandable, so any language barriers will need to be considered;
- c. monitor the health of employees and other persons at all workplaces;
- d. monitor conditions at all workplaces; and
- e. ensure that persons other than employees are not exposed to risks to their health or safety arising from the operations of the employer.

Employees and other persons at the workplace also have responsibilities. These responsibilities are useful when reminding people why they may be required to provide certain information or be absent from the workplace. In general terms, employees and other persons must:

- a. take reasonable care for their own health and safety;
- b. take reasonable care that their acts or omissions do not adversely affect the health and safety of other persons; and
- c. co-operate, so far as reasonably able, with any reasonable instructions given by the employer so the employer can comply with its responsibilities.

1.2 The importance of assessing risk

Employers need to identify whether there is a risk to the health of employees and other persons from exposure to COVID-19 at their workplace. Identifying the level of risk can include:

- a. monitoring expert advice as the COVID-19 situation develops;
- b. reviewing the implementation of infection control policies, procedures and practices to ensure they are effective and are being followed;
- c. educating and keeping persons at the workplace up to date on new information;
- d. consulting with others with whom the employer works, particularly contractors and labour hire providers to ensure they are also being active, to the extent necessary, in managing the risk;
- e. monitoring the latest travel advice on the Smartraveller website; and
- f. considering whether work activities put other people at risk.

1.3 What controls are available to you?

Where a risk to health is identified at a workplace, employers need to select controls to manage exposure to that risk. The type of controls required will depend on the level of risk as well as the availability and suitability of controls for each workplace, and may include:

- a. providing adequate facilities or products (such as hand sanitiser) to allow employees and other persons to maintain good hygiene practices;
- b. advising employees and other persons to self-isolate at home for 14 days if they have:
 - i. been in mainland China on or after 1 February 2020;
 - ii. travelled to Iran in the past 14 days; or
 - iii. been in close contact with confirmed cases of COVID-19; and
- c. developing an infection control policy. Employers need to know how they will manage any confirmed or suspected cases at the workplace.

2 Leave entitlements

2.1 How do the usual personal/carer's leave entitlements apply to COVID-19?

With widespread isolation measures being implemented it will become common to respond to the situation where an employee or their family member is ill with the COVID-19 virus. The basic sick leave entitlements are set out in the *Fair Work Act 2009* (Cth) (**FW Act**). In Australia, national system employees, other than those engaged on a casual basis, are entitled to 10 days' paid personal/carer's leave for each year of service.⁴ The entitlement accrues on a progressive basis and many employees will have an accrual in excess of 10 days.

In the context of COVID-19 personal/carer's leave will apply:

- a. When a full or part-time employee is not fit for work because they have contracted the virus;
- b. If an employee needs to look after a family member or member of the employee's household who is sick with the virus; or
- c. If an employee needs to look after a family member or member of the employee's household because of an unexpected emergency, such as a shutdown of carer or school facilities which requires the employee to mind a healthy child or elderly member (noting that the need must be 'unexpected', as in with little or no warning, to trigger the leave entitlement, so forewarned or ongoing closures may not be covered).

There is no limit on the number of days of accrued leave that can be taken for either of these purposes.

2.2 What information are you entitled to from an employee?

Employees have to give notice to get paid for personal/carer's leave.⁵ Essentially this requires an employee to inform their employer as soon as practicable and to advise of the period or expected period of leave.

An employee must also give their employer evidence of the illness or unexpected emergency if their employer asks for it. Medical certificates or statutory declarations are typical examples of acceptable forms of evidence. While there are no strict rules on what type of evidence needs to be given, the evidence needs to satisfy a reasonable person that the employee was genuinely entitled to the personal/carer's leave.

It will be worth considering that attending a medical clinic may not be possible if there is a significant COVID-19 outbreak, as people are likely to be directed to stay at home in many instances and not attend a hospital or medical clinic to avoid exposing others.

2.3 What happens if an employee is required to be isolated and confined to their home or they are quarantined – are they entitled to sick leave?

The FW Act does not have specific requirements addressing this circumstance. Some employers may wish to develop policies to address this situation. An employer should consider its response to this scenario. It may include options such as:

- a. Making arrangements for remote working;
- b. If remote working is not practicable, then the response may be to suggest an employee take:
 - i. annual leave;
 - ii. any other leave available to an employee (such as long service leave or any other leave available under an award, enterprise agreement or contract of employment); or
 - iii. any other paid or unpaid leave by agreement between the employee and the employer, including personal leave.

Option three, however, may attract the risk of breaching the National Employment Standards (**NES**) to the extent the employee is using up their personal leave entitlement where they are not in fact ill, even where the employee agrees to this approach.

⁴ Casual employees have access to unpaid carer's and compassionate leave. Permanent employees can also use unpaid carer's leave once they have exhausted their paid entitlements to personal leave.

⁵ S 107 of the FW Act.

The union movement is mounting a campaign for employees to be offered special paid leave in such circumstances so that they are not disadvantaged (and to protect their personal leave accruals). We anticipate that many employers will have regard to the relevant circumstances relating to each impacted employee and put in place appropriate arrangements which are consistent with their entitlements, practices and workplace values.

2.4 Are employees required to tell employers they have been directed to isolate?

First, in our view it is reasonable to expect employees to contact their employer as soon as practicable if they are unable to attend work because they are required to be isolated at home or to enter quarantine because of exposure to COVID-19. In the circumstances of an outbreak such as this we think it is a reasonable direction to require an employee to inform you if they have been instructed to isolate or are in the category of persons within the scope of any government travel advisory.

It is also not unreasonable, and would be an appropriate safety control, to require such an employee to stay at home and not permit them to attend at the workplace.

Employers are encouraged to consider how they intend to manage these situations. It may be that it is possible to require persons who are in isolation or otherwise not able to attend work to work remotely. The situation may be more complicated in the event an employee has been working abroad or travelling for work commitments and has got stuck through no fault of their own. Employers may counter that it would be reasonable to continue to pay their salary as normal until they return (or could reasonably do so).

2.5 What if an employee wants to stay home or refuses to attend work?

You may also be asked whether an employee can stay at home in circumstances where there is no travel restriction and it is otherwise safe to attend work. The usual situation is that in this instance an employee would need to make a request to work from home (if possible) or to take some form of paid or unpaid leave, such as annual leave or long service leave. An employee is not otherwise entitled to be paid if they refuse a reasonable direction to attend work as directed.

It is prudent for employers to exercise some caution with these arrangements. In this dynamic environment you may accommodate some flexibility in managing your staffing needs, particularly if other employees become ill or have caring responsibilities. Arrangements may need to be made subject to the resourcing needs at the workplace so they can be altered at short notice. This means being upfront about how an employee's responsibilities, for example child care (including in the event of school closures), are to be managed.

If the individual refusing to come into work is pregnant or otherwise at high risk, you should tread carefully and may have to be more flexible. If someone has genuine fears about attending work, the stress of being required to do so or alternatively face disciplinary action may itself adversely affect their health.

Effectively managing these arrangements requires employers to be on top of the latest health information being provided by the relevant health departments. Each of Australia's Commonwealth, State and Territory departments are publishing information and guidance about the outbreak of COVID-19. Events are unfolding quickly and your intelligence needs to be updated to reflect the available public health advice.

2.6 Can an employer require employees to take annual or long service leave?

The FW Act expressly provides that an award may include terms requiring an employee to take paid annual leave in particular circumstances, but only if the requirement is reasonable.⁶ Similar provision is made for award-free employees.⁷

The FW Act does not provide any guidance as to what would be reasonable but the Explanatory Memorandum states that relevant considerations would include the needs of both the employee and employer's business; the timing and direction to take leave; and the reasonableness of the period of notice given to the employee to take leave.⁸

Further, the Fair Work Commission introduced a model award clause which provides that employers can direct the taking of annual leave in circumstances where an employee has accrued an excessive amount of annual leave. The model clause provides that excessive leave accruals as being at least eight weeks and ten weeks for shift workers. However, where relying on the excessive leave clause, an employer cannot direct the taking of leave so that the accrued leave is reduced to less than six weeks.⁹

⁶ S 93(3) of FW Act.

⁷ S 94(5) of FW Act.

⁸ At para [382].

⁹ *Re Four Yearly Review of Modern Awards* (2015) 250 IR 119.

Importantly, as notice to the employee of the requirement to take annual leave is a common requirement in both awards and enterprise agreements and it is likely to be an element of determining the reasonableness of the direction for award-free employees, it should be considered now. This is not a simple issue to manage in the context of the uncertainty regarding the extent to which the COVID-19 virus will impact employers. One first step would be to start communication with employees, and where required, their representatives, about this option. The capacity of an employer to direct an employee to take long service leave varies according to the source of the entitlement, which may for example be State based legislation or an "award derived entitlement".¹⁰

3 How do we manage business continuity?

3.1 Flexibility and working from home

Employers should be across their policies concerning working flexibly. Many organisations are testing their capability to continue operations with the majority, or even all, of their employees working remotely. To understand how this would be implemented at your organisation you should:

- Review existing working flexibly policies – does your policy set out what is required of employees working from home? You should be looking now at how you will ensure the health and safety of people working remotely and updating your policies if necessary.
- Communicate flexible working policies and expectations around working remotely – are employees aware of various on-going obligations around confidentiality and safe work practices when working at home? In particular, it will be important to remind employees of the current processes and requirements for working safely.
- Review and test your support mechanisms for employees working remotely over extended periods.

The possibility that large numbers of employees will be required or permitted to work remotely will challenge the systems of many employers. For many, it may be a new way of working. And effective execution extends beyond your IT capabilities, which are of course critical.

3.2 Supporting well-being

Employers need to consider how they can continue to manage performance whilst supporting the well-being of their employees in what threatens to be a highly anxious environment for many. An important element will be having updated information that appropriately frames your perspective on the impact of the outbreak on your people and business.

3.3 Managing hours of work

Another consideration will be managing overtime. Compliance obligations remain important in a crisis. There will undoubtedly be occasions when requesting employees to work additional hours is necessary and reasonable. Reiterating your approach to overtime as part of your preparations should be considered.

4 Travel

4.1 Can an employer give directions about an employee's non-work related travel?

In normal circumstances an employer has little influence or control over the travel plans of employees outside of work. It is in our view different in responding responsibly to the threats posed by the COVID-19 outbreak. It is likely to be reasonable to expect employees to abide by the travel advisories of the Australian government (smartraveller.gov.au). The government updates travel advice for destinations regularly.

Employers may also choose to inform employees that when making travel plans they should understand the risks they are taking by reference to the government's travel advisories. For example, it is now a risk that efforts to control and contain the spread of COVID-19 may cause travel disruptions and restrictions.

It is also prudent for employers to remind employees who are returning from travel and feel unwell that before returning to the workplace they should call a doctor's clinic and seek medical advice. This can be framed as an expectation.

4.2 Work-related travel

The position is of course different for work-related travel. You should make sure that travel policies clearly address where employees can travel to, the reasons for travel and permission required. Employers need to be assessing the risk of requiring employees to travel (particularly overseas), even for critical meetings.

In this environment, informing employees that travel policies will be under regular review also can help communications and lessen anxiety. You should also carefully check the insurance cover now afforded for work-related travel.

10 Division 9 of Part 2-2 of the FW Act.



5 Discrimination

Amidst the anxiety about the spread of COVID-19, reports are emerging of increased discrimination against people of an ethnic or perceived ethnic background. The Australian Human Rights Commission has urged unity and not division as we respond to the outbreak. This is an important message for all of us.

It should be unnecessary to remind anyone that our discrimination laws apply in full notwithstanding the challenges presented by COVID-19. Australian anti-discrimination laws impose obligations on people not to discriminate against others on the basis of particular attributes including race, sex, family or carer's responsibilities, national extraction or social origin, when engaging in specified activities, such as employment or providing goods and services. The law of discrimination also encompasses other attribute-based conduct that causes harm, such as harassment or vilification.

It is likely in our view that contracting COVID-19 would be characterised as a 'disability' for the purposes of anti-discrimination laws.¹¹

Employers will need to be on alert and be aware that conduct may be unlawful even if it arises from a genuinely held fear about the COVID-19 virus. As indicated above in regards to travel, restrictions based on government travel advisories are likely to be lawful. Arrangements based on risk assessments, which are critical in discharging an employer's duty of care to ensure a safe place of work and safe operations, are also likely to be defensible. These might include the manner in which services are provided.

What is unlawful are directions made on the basis of race or ethnicity, such as a direction to work from home or not attend work. Decisions need to be made on appropriate and reasonable grounds. Employers also need to be mindful not to breach anti-discrimination laws when implementing plans.

Employers should also reflect on whether they have taken all reasonable steps to prevent employees behaving in an unlawful manner towards fellow employees, customers, clients or members of the public. Taking reasonable steps might mean having well-publicised diversity and harassment policies, and training all staff on the issue. Managers in particular must be trained about their responsibility to identify and prevent discriminatory behaviour.

¹¹ In Canada the Ontario Human Rights Commission in 2003 issued a statement to the effect that SARS would be included in the disability ground and differential treatment of people who had or were perceived to have SARS, without appropriate medical evidence could constitute discrimination.

6 Labour

The course of the COVID-19 outbreak is very uncertain. However, as various reports from government, central banks and the OECD suggest, there are likely to be negative effects that will test the resilience of businesses. It would be prudent for companies to take a fresh look at worst-case scenarios and develop contingency strategies against each.

6.1 Managing operating costs

Planning is difficult as the events unfold because the extent and duration of the impacts are not yet known. In this environment having staged responses is likely to be more attractive than the alternatives. The priorities will be the welfare of your people, the need to retain talent and of course the need to protect the business in the long term.

The most difficult decision for some businesses will be whether or not to implement redundancies. There are a number of alternatives and supplementary steps you can consider first, including:

- Hiring – you may choose now to freeze new hires; you may also consider whether it is open to you to withdraw or amend offers of employment to candidates;
- Reducing supplementary labour – arrangements can be implemented to reduce contractors, labour hire and casual employment;
- Costs – is it possible to amend or defer salary increases, bonus, share plans?
- Rostering – can changes be made to rosters, hours of work, shift patterns, overtime arrangements?
- Can employees be redeployed?
- Are you in a situation where you must implement a stand down of employees?

Implementing any of the above measures is likely to involve various legal processes either at common law under contracts of employment, or under enterprise agreements or awards or the FW Act. The increased level of scrutiny of decisions impacting adversely on employees in such circumstances will no doubt need to be considered at length.

6.2 Consultation requirements around change

The notion of ‘consulting’ about workplace change is embedded in many workplaces through applicable industrial instruments. Employers should carefully consider whether any of the above initiatives require consultation with employees and/or their representatives prior to implementation of new or changed workplace practice and procedures.

6.3 Stand downs

Employers do not have a right to suspend performance of the obligations in the employment contract in the absence of an express right to do so conferred by the contract, industrial instrument or statute.

Employers have no common law right to stand down or send home employees for whom they cannot find work, whether because of a turndown in business or because of factors outside the employer’s control such as the outbreak of COVID-19. The power to stand down is derived from contract, awards, enterprise agreements and statute.

Many enterprise agreements will have stand down clauses to address circumstances where there is a ‘stoppage of work’ for reasons beyond the control of the employer and workers cannot be usefully employed.

For National System Employers, Part 3-5 of the FW Act offers a default power to stand down employees without pay. Under s 524(1), this arises whenever they cannot be usefully employed ‘because of industrial action (other than a lockout), a breakdown of machinery or equipment, or any ‘stoppage of work for any cause’ (possible examples include where a key supplier ceases its supply or a government health direction requires quarantining). These provisions do not apply when an enterprise agreement or contract (rare) already grants such a power.

Again, stand downs will be closely scrutinised and likely to be challenged if not implemented strictly in accordance with the applicable legal obligations. It should not be assumed that a lawful stand down is triggered in all circumstances where employees cannot be usefully employed.



7 COVID-19 Government Powers

7.1 Commonwealth Government

Depending on how serious COVID-19 becomes in Australia, the Commonwealth may gain a range of powers that could affect employers. Under the *Biosecurity Act 2015* (Cth), these powers can be used to combat a 'listed human disease'. COVID-19 was added to the list on 21 January.¹²

Most of the powers relate to individuals or places that are suspected of actually harbouring a 'listed human disease'.¹³ Government officials can impose 'human biosecurity control orders'¹⁴ on particular people which can restrict their movement or confine them to isolation.¹⁵ Failing to comply with a control order is an offence punishable by five years' imprisonment.¹⁶ Officials can also declare 'human health response zones' so that certain *classes* of people cannot enter particular areas, including specific premises such as a workplace or school.¹⁷ Response zones could be declared to prevent children going to a series of specified schools, with a civil penalty of \$6,300 for anyone who breached a condition of the declaration. The Attorney-General has already suggested that these orders could be used widely if the situation deteriorates.¹⁸ If they are used, these powers could affect the ability of many employees to send their children to school or to enter the workplace themselves.

The Government can also declare a more general 'human biosecurity emergency'. An emergency can be declared if the Health Minister is satisfied that COVID-19 poses a severe and immediate threat to human health on a nationally significant scale, and that the declaration is needed to control the spread of the disease.¹⁹ During the emergency, the Health Minister may make *general requirements*,²⁰ or direct anyone to do anything which is needed to control the spread of the disease.²¹

Relevantly for employers, the Minister may direct 'a person who is in a position to close premises, or prevent access to premises, to do so'. If an emergency were declared in response to COVID-19, the Health Minister could instruct employers to close their workplaces, or principals to shut down their schools. The Minister could also issue general requirements which require specified places to be evacuated²² or which restrict movement in specified places, such as named workplaces.²³ As long as the Minister is satisfied that each order is 'appropriate and adapted' to achieve its purpose,²⁴ and is 'no more restrictive or intrusive than is required', extensive shut-downs could occur.²⁵ Breaching an emergency requirement or direction is an offence punishable by imprisonment for five years.²⁶

7.2 State Governments

State legislation also gives public officials the power to make similar orders. The *Public Health and Wellbeing Act 2008* (Vic) empowers the Chief Health Officer to make a public health order if they believe a person has an infectious disease such as COVID-19, or has been exposed to one.²⁷ Such an order can compel a person not to do something, not to go somewhere, or not to leave home.²⁸ A civil penalty of approximately \$20,000 follows the breach of a public health order. The South Australian Government has proposed to strengthen health officials' power to quarantine people at risk of spreading COVID-19.²⁹ State governments may also have the power to shut down state schools, with New South Wales having already ordered government schools in that state to cancel overseas trips.³⁰

12 *Biosecurity (Listed Human Diseases) Amendment Determination 2020* (Cth) sch 1 s 1, inserting *Biosecurity (Listed Human Diseases) Determination 2016* (Cth) s 4(h).

13 See, e.g., *Biosecurity Act 2015* (Cth) ss 60, 113.

14 *Biosecurity Act 2015* (Cth) s 60.

15 *Biosecurity Act 2015* (Cth) ss 87(1), 97.

16 *Biosecurity Act 2015* (Cth) s 107.

17 *Biosecurity Act 2015* (Cth) ss 113(1), (3).

18 Tom McIlroy, 'Unprecedented Limitations on Movement, Event Bans Loom', [The Australian Financial Review](#) (online, 3 March 2020).

19 *Biosecurity Act 2015* (Cth) s 475(1).

20 *Biosecurity Act 2015* (Cth) s 477(1).

21 *Biosecurity Act 2015* (Cth) s 478(1).

22 *Biosecurity Act 2015* (Cth) s 477(3)(b).

23 *Biosecurity Act 2015* (Cth) s 477(3)(c).

24 *Biosecurity Act 2015* (Cth) s 478(3)(b).

25 *Biosecurity Act 2015* (Cth) s 478(3)(c).

26 *Biosecurity Act 2015* (Cth) ss 479(3)–(4).

27 *Public Health and Wellbeing Act 2008* (Vic) s 117(1).

28 *Public Health and Wellbeing Act 2008* (Vic) ss 117(5)(c)–(f).

29 'New Laws Proposed to Make It Easier to Detain or Quarantine People Exposed to Coronavirus in SA', [ABC News](#) (online, 2 March 2020).

30 Sarah Thomas, 'Coronavirus Threat Prompts NSW Government Directive to Cancel Overseas School Trips', [ABC News](#) (online, 2 March 2020).

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