



The Royal Australasian
College of Physicians

From the President

3 September 2015

Ms Leanne Linard MP
Chair, Health and Ambulance Services Committee
Parliament House
George Street
Brisbane QLD 4000

Via Email: hasc@parliament.qld.gov.au

Dear Ms Linard

Public Health (Childcare Vaccination) and Other Legislation Amendment Bill 2015

The Royal Australasian College of Physicians (RACP) appreciates the opportunity to comment on the *Public Health (Childcare Vaccination) and Other Legislation Amendment Bill 2015*.

The RACP notes that one of the stated goals of the amendment Bill is to empower managers of approved education and care service with the option to refuse, cancel or place a condition on the enrolment or attendance of a child who is not vaccinated, or not up to date with their scheduled immunisations.

The RACP is a strong advocate of vaccination, vaccination programs, and other initiatives to promote high compliance rates of immunisation for vaccine-preventable diseases. However, the RACP does not support routinely denying children access to education and care services in the event they are not immunised. In circumstances where a lack of access or ill-informed views of vaccines have prevented vaccination, denying access to these services has the potential to entrench a child's disadvantage.

Where there is an outbreak of vaccine-preventable disease, decisions relating to transmission risk should be made by public health experts or the child's medical practitioner. It is questionable whether the administrator of a care or education service is best placed to determine whether attendance of non-vaccinated children is appropriate. This could occur during outbreaks of specific diseases, or where other factors have heightened risks to vulnerable populations attending education or care services.

A separate concern is that the Bill does not clarify who determines whether a child's vaccinations are up to date. The education or care provider will require verifiable access to the Australian Childhood Immunisation Register to confirm that children are vaccinated according the National Immunisation Program Schedule.

For more information relating to this letter, please contact Alex Lynch [REDACTED]
[REDACTED]

Yours sincerely

A handwritten signature in cursive script that reads "Side talk". The signature is enclosed within a hand-drawn, irregular loop that starts and ends at the top left of the text.

Laureate Professor Nicholas J Talley

A handwritten signature in cursive script that reads "Nicki Murdock".

Dr Nicki Murdock
Paediatrics and Child Health Division
President