



Australian
College of
Nursing

Voice of influence

Ms Sue Cawcutt
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Dear Ms Cawcutt

Submission on the *Public Health (Exclusion of Unvaccinated Children from Child Care) Amendment Bill 2013*

In response to an invitation received from Trevor Ruthenberg MP, Chair of the Health and Community Services Committee (HCSC), Australian College of Nursing (ACN) welcomes the opportunity to provide a submission on the *Public Health (Exclusion of Unvaccinated Children from Child Care) Amendment Bill 2013* (the Bill).

Nurses have a pivotal role in the delivery of vaccination services. Nurse immunisers promote vaccination as part of their work and have the potential to shape the views of parents through the provision of education and evidence-based information. Given their engagement with the users of immunisation services, Australian College of Nursing (ACN) believes that nurses' perspectives on the Bill should be given full consideration. The views contained in this submission have been informed by the experience and expertise of ACN members who have worked as immunisers in a range of capacities and service environments.

Please do not hesitate to contact me for further information or discussion on this matter.

Yours sincerely,

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Australian College of Nursing submission on the *Public Health (Exclusion of Unvaccinated Children from Child Care) Amendment Bill 2013*

Introduction

Nurses are the largest health professional group in Australia and the foundation of the health care system. We have an important role in the delivery of primary health care, including providing immunisation services across the life-span. Practice nurses, maternal and child health nurses, nurse immunisers and school nurses play a direct role in immunising children, as well as co-ordinating immunisation programs and educating parents and carers. Nurses are thus well placed to present informed perspectives on immunisation policy. As a key professional nursing organisation representing nurses in Queensland and around the nation, Australian College of Nursing (ACN) welcomes the opportunity to present a nursing viewpoint on the Bill.

Purpose of the Bill

The *Public Health (Exclusion of Unvaccinated Children from Child Care) Amendment Bill 2013* (the Bill) is a private members bill tabled in the Queensland Legislative Assembly on the 23rd of May 2013 by Ms Jo-Ann Miller MP, Member for Bundamba. In her explanatory speech, Ms Miller stated that the Bill will "encourage more parents to vaccinate their children and protect them from preventable diseases" (Miller 2013). Australian College of Nursing (ACN) takes this to be the underlying purpose of the Bill. The Bill proposes to achieve this aim by giving the person in charge of a child care centre the option to refuse to enrol children who are not fully immunised in the hope that parents will vaccinate children in order to enrol them in care.

ACN's key message

ACN is in strong support of efforts to increase the immunisation rate. Immunisation is critical for the health of both the individual and the community. Fully vaccinated children are protected from the risks and life-long consequences of contracting preventable diseases, and maintaining herd immunity is the only way to protect the small number of children who cannot be vaccinated for medical reasons or for whom the vaccine is ineffective.

It is clear that some areas of Australia, including parts of Queensland, do not currently have a satisfactory immunisation rate and that measures are needed to increase the number of children receiving vaccinations on schedule. However, it is ACN's position that there are more effective ways to achieve this goal than by excluding unvaccinated children from child care and that relying purely on a legislative framework to address the issue is a flawed approach. As detailed below, it is ACN's view that legislators and policy-makers should focus on expanding programs that have had a positive impact on the vaccination rate and eliminating existing barriers to immunisation.

Limitations of the Bill

Australian College of Nursing (ACN) does not believe the proposed Bill is the optimal way of achieving improved childhood vaccination rates.

1) An uneven and inequitable policy

A significant limitation of the Bill is that its effects will be extremely variable. The Bill will allow but not require child care providers to exclude unvaccinated children. As a result, it is likely that certain child care centres will exercise the option of excluding children while others will not. This will mean that some children will remain at risk of contracting preventable diseases based on the arbitrary fact of where they enrolled in child care, an inherently inequitable outcome. There is also a risk that this effect could be amplified if some child care centres become known as centres that do not require children to be vaccinated, resulting in a concentration of unvaccinated children in those facilities.

2) A punitive approach

ACN notes that the Bill does not appear to address families who are conscientious objectors or choose not to immunise for religious reasons. In contrast, the New South Wales (NSW) *Public Health Amendment (Vaccination of Children Attending Child Care Facilities) Bill 2013* does specifically address these parents.

This suggests that the Bill's intention is to target not only parents who have fallen behind in vaccinating their children, but also parents who actively choose not to immunise. It is ACN's view that there is limited value in targeting parents who firmly oppose vaccination, particularly with measures that are likely to be perceived as punitive and which will be applied unevenly across the State.

If parents who have a deeply held belief that vaccination is harmful are forced to vaccinate their children based solely on the decision of their local child care provider, there is a significant risk that these parents will become even less receptive to immunisation education campaigns and the advice of health professionals. This is of serious concern as the Bill will only impact on vaccination in the early childhood years, and not in primary and secondary school aged children.

3) A missed opportunity

It is ACN's view that this Bill will give false comfort for parents and public health campaigners concerned about falling immunisation rates. It is critical that Australia's National and State governments take advantage of current public concern about immunisation to implement policies that will be effective in increasing immunisation rates. The Bill does not address the underlying issues that are driving down the immunisation rate: a lack of parental understanding about the risks of not vaccinating and barriers to accessing immunisation services. The Queensland government currently has the public support required to properly address these issues, including by increasing funding for immunisation programs where necessary, and it is disappointing that this opportunity is apparently not being seized.

The way forward

The Bill's *Explanatory Notes* state that legislation is the only way of achieving the Bill's policy objectives. If the underlying objective of the Bill is to encourage more parents to vaccinate their children, as outlined in Ms Miller's speech, then ACN is of the view that there are in fact more effective ways of achieving this aim.

We believe that the way forward to achieve improved immunisation rates in children is to focus on the key determinants of vaccination rates: access to reliable information from trusted sources and affordable, conveniently located vaccination services. Research shows that just 3-7% of parents hold intractable views about the dangers of vaccination and that there is only a small benefit in targeting these parents (Leask 2011). In contrast, measures that target hesitant parents or poorly motivated parents, such as providing education and financial incentives and reducing barriers to immunisation could have a significant impact.

1) Improving access to information about vaccination: Education for health professionals

Hesitant parents need access to balanced, evidence-based information from trusted sources in order to make informed choices about vaccination. Health professionals are the most important resource for influencing these parents. It is acknowledged that a small number of health professionals (including medical practitioners, nurses and midwives) fail to provide parents with balanced, evidence-based information about vaccination. As a result, measures to promote vaccination uptake may need to include the education of health professionals. One measure that could be taken to improve the education that nurses and midwives receive on vaccination would be to promote an annual immunisation training schedule for Registered Midwives and Registered Nurses who work in Child and Maternal Health.

2) Remove barriers to immunisation

A number of parents who fail to be pro-active about immunising their children have responded to the financial incentives the Federal Government has in place and it is essential that these should be continued. However, more could be done to remove local cost and access barriers faced by these parents. For example, free immunisation clinics accessible by public transport could improve vaccination rates in some communities. Posting reminder letters to parents when their children are due to be vaccinated has also proven to be effective.

In addition, nurses should be assisted to gain the qualifications needed to work as nurse immunisers in Queensland, as this would be likely to have a positive impact on access to immunisation services. This is particularly critical because, according to advice from the Queensland Health Immunisation Program, all approved immunisation courses run in Queensland currently have waiting lists. Queensland should consider increasing funding for nurses and midwives to become immunisation accredited and consider routinely recognising suitable immunisation accreditation courses undertaken in other states.

In addition, Queensland's immunisation accreditation program requirements could be reviewed and aligned with the requirements of other jurisdictions. Queensland immunisation courses for registered nurses, according to our advice, appear to have relatively onerous requirements in comparison with other states, particularly in that participants must complete a clinical component. All registered nurses are required to be competent in all routes of medication administration including the drawing up and administering of injections; the purpose of immunisation courses should be to equip nurses with an understanding of the theoretical, legal and administrative aspects of vaccination.

Additional comments

It is ACN's view that relying solely on a legislative framework to address low rates of immunisation is unlikely to provide a comprehensive solution. ACN recommends that Queensland consider implementing some or all of the measures outlined above regardless of whether or not the Bill is passed. It is our view that the Bill alone will not be adequate and that additional public health measures to address immunisation rates will still be needed if the Bill becomes law.

If the Bill is passed into law, ACN strongly suggests that all immunisation accredited health professionals should be able to provide parents with vaccination certificates. As it currently stands, the Bill specifies that vaccination certificates must be provided by a doctor. Nurse immunisers have access to records from the Australian Childhood Immunisation Register (ACIR) and Queensland Health's Vaccination Information and Vaccination Administration System (VIVAS). In order to ensure that parents will not have to make a doctor's appointment to obtain a certificate, a change should be made to specify that any authorised practitioner can provide a vaccination certificate. Such a change would be consistent with the NSW *Health Amendment (Vaccination of Children Attending Child Care Facilities) Bill 2013*.

Concluding statement

ACN fully supports the motivation behind the *Public Health (Exclusion of Unvaccinated Children from Child Care) Amendment Bill 2013*. However, we believe that the approach taken by the Bill is far from optimal. The most effective way to lift the vaccination rate is to increase parents' understanding of the benefits of vaccination and to reduce the barriers they face in accessing immunisation services. Punitive measures, especially when they are applied inconsistently across the State, risk alienating parents, fostering a sense of injustice and undermining trust in vaccination programs. Even if the proposed Bill does have a positive impact on vaccination rates in childcare aged children, this effect is unlikely to be carried through to primary and secondary school aged children. The aim of immunisation policy reform should be to increase public understanding of immunisation and encourage all parents to be pro-active in vaccinating their children. The proposed Bill risks undermining both of these objectives.

References

Leask J 2011, 'Targeting the fence sitters', *Nature* 473: 443-445.

Miller J MP 2013, Speech in the Queensland Legislative Assembly, 23 May 2013, viewed 10/07/2013
<http://www.parliament.qld.gov.au/documents/tableOffice/BillMaterial/130523/pub.pdf>