



The Creche and Kindergarten
Association Limited

ABN 59 150 737 849

14 Edmondstone Street
Newmarket Qld 4051

Tel: (07) 3552 5333

Fax: (07) 3356 7976 or (07) 3856 5340

www.candk.asn.au

15 July 2013

Dear Health & Community Services Committee

C&K would like to respond to the proposed *Public Health (Exclusion of Unvaccinated Children from Child Care) Amendment Bill 2013*. C&K recognise and support the National Immunisation Program and concurrent health strategies to ensure Australia's youngest citizens are healthy and ready to participate in school and an active and fulfilling life.

C&K have a range of service types supporting families across Queensland. These services - Family Day Care, In-home Care, Long Day Care, Playgroups and Kindergarten –operate under a range of protective and proactive policies, procedures and systems targeted to support Queensland children to access and participate in early childhood education and care.

Many of these policies, procedures and systems aim to support families to participate in the National Immunisation Program, and to ensure children are protected and safe. Measures that C&K take to ensure children and their family's health and wellbeing are maintained include:

- WHS Policy
- Infectious Diseases and Immunisation Procedure for all service types
- Exclusion due to illness Procedure
- Provision of a conscientious objection form at enrolment for families. Information about conscientious objection/immunisation is also provided at this point.
- Infectious Childhood Illness Register
- Staff Immunisation Register
- Provision of the *Staying Healthy in Child care* (Ed 5) to families and educators to guide best practice
- *Time Out* poster/exclusion periods in all services
- Information to families and communities about immunisation and health and wellbeing for young children in each service
- C&K personnel conduct thorough risk assessment and risk control action plans to protect *all* children within services when disease outbreaks occur within the service, and within the local community.
- C&Ks procedures acknowledge *State and Commonwealth anti-discrimination legislation that requires C&K to provide an environment free from unlawful discrimination, harassment and vilification and this is particularly relevant in relation to persons in the C&K community who have an infectious disease and / or are conscientious objectors to immunisation.*

Where children come first

Patron
Her Excellency, Ms Penelope Wensley AO
The Governor of Queensland

C&K recognise and support the need to increase the national rates of children who are immunised against infection and disease. C&K are concerned that immunisation rates are declining and this has health implications for all Australians.

C&K believe that by preventing children who are not immunised from attending education and care services, based upon their immunisation status does not address the problem of declining immunisation rates. In addition, preventing children accessing services does not support the National Partnership on Universal Access to Early Childhood Education. Universal Access to Early Childhood Education is the commitment of Australian governments to ensuring that quality early childhood education is available for all Australian children in the year before they start formal schooling (<http://deewr.gov.au/universal-access-early-childhood-education>). In some locations across Queensland there may only be one early childhood service for the region, this Bill would make access to these services inequitable.

C&K does not support the proposed Bill upon the following tenets:

1. Australia is a signatory to the United Nations Convention on the Rights of the Child. Article 28 of the Convention states that children have a right to an education. C&K believe that if this Bill is passed, that young children, for a variety of reasons beyond their control, will be denied their right to a pre-school education. This is contrary to the obligations the nation has under the Convention, the current national agenda of Universal Access and C&Ks ethos of quality early childhood education and care programs for children.
2. There are areas of the state where C&K (and other ECEC providers) operate as the only early childhood service and where children have less access to health and immunisation programs. This is more evident in services located in remote regions, and in the north of Queensland. C&K are very concerned about children being denied an education based upon insufficient health programs being offered in their community, or health programs that do not offer culturally inclusive health programs or communication campaigns.
3. Immunisation in Australia is currently not compulsory. Placing a requirement on families who have children that attend an early childhood education and care program to mandate the immunisation of their child eliminates parental rights. At the moment the rights of parents to make this decision are not mandated by government.
4. It is foreseen that the Bill could have a detrimental effect on the early childhood education and care sector. Inconsistency in enrolment policy across the state will create confusion within the parent body.
5. The underlying intent of the Bill and the National Immunisation Program is to eradicate disease and disease outbreak in populations. This intent would become redundant, as it at present, does not apply to educators working in services and therefore offers no further protection for any child within the service. This approach relies heavily though upon tenet 3 and the non-compulsory nature of immunisation in Australia.
6. C&K believe that to mandate immunisation so parents can access early childhood education and care services is not inclusive of familial culture, employment status/requirements nor contemporary practice in health care.

C&K do support government/s to develop resources to increase the national rates of childhood immunisation through:

- Increasing public awareness health and wellbeing campaigns
- Increased public awareness campaigns associated with the demystification of vaccination risks
- Increasing free clinics in schools and other educational settings, including Hub services, playgroups and visiting programs
- Increasing culturally appropriate health promotion materials and public health campaigns to address vaccination and children's health and wellbeing
- Regular and consistent immunisation updates sent directly to families.
- Early childhood services be supported to provide comprehensive information to families and their local community about vaccination and disease prevention, and that
- Early childhood services develop comprehensive policy, procedure and systems to protect children who are not immunised whilst within their programs and reduce the risk of disease outbreak.

With regards,



Mel Comerford
A/CEO – Creche & Kindergarten Association Limited