



Public Health (Exclusion of Unvaccinated Children from Child Care) Amendment Bill 2013

Centacare Child Care Services Submission, July 2013

Introduction

Centacare is the social services arm of the Catholic Archdiocese of Brisbane which broadly covers South East Queensland. Operating for over 50 years, this not for profit organisation supports approximately 50,000 people each year through child care, family relationships, disability services, respite and in-house care, community aged care, employment services and pastoral ministries.

We regard child care as a key plank of family support measures designed to support the wellbeing of families. Access to high quality, affordable child care services is an integral component of family policy which supports both paid work and caring responsibilities.

Centacare Child Care Services employs over 1000 staff who provide care to close to 6,500 children at any one time and support 13,000 families through over 90 Outside School Hours Care Services, 2 Family Day Care Schemes and 10 Long Day Care Centres and 7 Kindergartens. Many of these services have been operating for over 20 years so we have extensive experience in the child care sector and have lived through many changes.

We would like to make the following submission to the Health and Community Services Committee on the Public Health (Exclusion of Unvaccinated Children from Child Care) Amendment Bill 2013.

General Comments:

Centacare Child Care Services supports the proposed amendment to the Public Health Act 2005 to refuse an enrolment or exclude a child from a particular activity if a child is not fully immunised. We believe it is in the interests of the health of all other children enrolled and staff working in a service and for the common good of the broader community. The Bill places responsibility with the service providers to ensure the health and wellbeing of children attending a service, however allows professional judgement to form a part of executing this responsibility.

Recommendations:

Currently the application of the proposed changes is included in the supporting document rather than the Bill itself. In our experience such applications and definitions not directly specified in the legislation tend to get lost over time. This has in the past lead to authorised officers working in the relevant Department to apply personal interpretation on the application of the legislation.

We would therefore suggest that the clause "the changes apply only to child care facilities (including pre-schools and kindergartens) and not to primary or secondary schools" be specifically included in the Bill.

We would further recommend that this clause should specify the inclusion of Family Day Care as our experience would indicate that this type of care tends to cause confusion in application if it is not specified explicitly. We believe that given that the main age group cared for in these schemes is similar to that of centre based child care centres that they should be captured by the proposed amendments.

Finally this clause needs to also be expanded to exclude School Age Care services. At present it specifically exclude primary and secondary schools however it is not practical to apply a standard to School Age Care services that does not apply to schools. Over the last few years, with the implementation of various versions of child care legislation, we have seen that unless the position and relevance to School Age Care service is explicitly stated it becomes a matter of personal interpretation and therefore contention.

Yours sincerely



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