



Hon Trevor Ruthenberg MP
Chair - Health and Community Services Committee
Queensland Parliament

Dear Hon Ruthenberg

**Re: The Public Health (Exclusion of Unvaccinated Children from Child Care)
Amendment Bill 2013**

The Australian College of Children and Young People's Nurses (ACCYPN) welcomes the opportunity to comment on the above Bill.

ACCYPN supports vaccination of children as per the Australian Childhood Immunisation Schedule as a key prevention strategy for the prevention of childhood vaccine preventable diseases.

The reason for parents not vaccinating is varied. Some parents have concerns that early vaccination of infants is related to Sudden Infant Death Syndrome (SIDS). The possibility of the DTP (diphtheria-tetanus-pertussis) vaccination being linked to SIDS has been discussed periodically because a small number of deaths have occurred within a few days of immunisation. However, the peak age distribution for SIDS coincides with the timing for an infant's first immunisation (Henderson-Smart, Ponsonby & Murphy 1998). A series of reviews and studies have consistently found no association between SIDS deaths and DTP vaccination (American Academy of Pediatrics Task force on Sudden Infant Death Syndrome 2005; Vennemann et al. 2007).

There has been no change in epidemiology of SIDS since the age of the first immunisation was moved from 3 to 2 months of age, which supports evidence demonstrating that immunisation is not associated with infant death (Henderson-Smart, Ponsonby & Murphy 1998; SIDS and Kids 2012).

The evidence from many large studies world-wide shows overwhelmingly that immunisation is actually associated with a decreased risk of SIDS (Vennemann et al. 2007).

Parents are advised to immunise their babies according to the national vaccination schedule (SIDS and Kids 2012) and this is supported by ACCYPN.

ACCYPN supports the exclusion of unvaccinated children from education and child care services.

ACCYPN members consider there could be challengers in the application of the Legislation. These include:

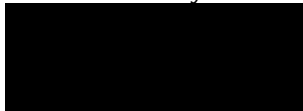
- Vaccination schedules can be complex (especially if a child has a catch-up schedule) and there is a risk this could be misinterpreted by a non-health professional. This could result in a child being excluded unnecessarily.



- Rather than exclusion once a child is in the education setting, the alternative is that the criteria for entry is a complete vaccination schedule. If an unvaccinated child is in the education or pre-school setting for a month before exclusion, they are at risk themselves and place other children at risk.
- The application of this Legislation is optional as per the explanatory notes of the Bill. This could present a problem particularly where choice of child care is limited. Parents may want their child to attend a facility where all the children are vaccinated but the Director may choose not to follow the Legislation.
- There is a risk a Child Care Director will opt not to apply the Legislation as the application of the Legislation (checking immunisation status at key times) is too resource intensive and complex.

Once again, thank you for the opportunity to comment and I apologise for the late response.

Yours sincerely



Dr Jan Pratt AM
Chairperson BOD ACCYPN

References

American Academy of Pediatrics, Task Force on Sudden Infant Death Syndrome. (2005) The changing concepts of Sudden Infant Death Syndrome: Diagnostic coding shifts, controversies regarding the sleeping environment, and new variables to consider in reducing the risk. Implications for infant sleeping environment and sleep position. *Pediatrics*, 116(5): 1245-1255.

Henderson-Smart D, Ponsonby AL, Murphy E. (1998) Reducing the risk of SIDS: A review of the scientific literature. *Journal of Paediatrics and Child Health* 34(3): 213-219.

Vennemann M, Höffgen M, Bajanowski T, Hense H, Mitchell E. (2007) Do immunisations reduce the risk for SIDS? A meta-analysis. *Vaccine* 25(26): 4875-9.

SIDS and Kids. National Scientific Advisory Group (NSAG). 2012. Information Statement: Immunisation. Melbourne, National SIDS Council of Australia. This information statement was first posted in June, 2008.