



VACCHO

No Jab No Play Bill 2015

VACCHO Position Statement – 143C exemption for ‘vulnerable and disadvantaged children’ reviewed

9 October 2015

VACCHO is supportive of activities to boost vaccination rates across the Victorian community and welcomes activities and policies that will support Aboriginal and Torres Strait Islander families in Victoria to access age appropriate immunisations for boorai (baby or child).

On 15 September 2015 Hon Minister J Hennessy introduced the *Public Health and Wellbeing Amendment - No Jab No Play Bill 2015* to the State Parliament.

VACCHO's position in relation to the *No Jab No Play Bill* is centered on the 143C exemption clause and is not an analysis of the overall bill. VACCHO's position is as follows:

- VACCHO acknowledges the insertion of definitions within section 3(1) of the Principal Act for “age appropriately immunised” and “early childhood services”.
- VACCHO commends the 143C exemption that enables Aboriginal and Torres Strait Islander children to enroll in early childhood education and care services if their immunisations are not up to date, which is subject to the service taking reasonable steps within 16-weeks to ensure immunisation status certificate is sought and provided by a parent.
- Although the majority of Aboriginal children do receive vaccinations appropriate for their age, timely vaccination can be an issue for some Aboriginal families in the infant years. The 143C exemption protects disadvantaged and vulnerable children and their families from further disadvantage through allowing access to education and child care while supporting individual and universal vaccination of children.

- VACCHO is concerned with some of the obligations in the amendments to the *No Jab No Play Bill* imposed on early childhood education services, including Victorian ACCHOs and Aboriginal Early Childhood services. In particular, the aligned *failure* to comply court penalty of up to \$20, 000, which Hon J Hennessy's second reading of the amendment clarified is exclusively directed at these services. Our concern is that this disproportionately targets these services as enforces of the *No Jab No Play Bill*, omits effective mechanisms to support them in this capacity and fails to distribute the burden through accountable services such as the Authorised Officers, local council or other immunisation providers.

VACCHO recommends that the implementation of the *No Jab No Play Bill* be examined prior to it being passed and that measures to ensure translation to practice including effective planning and evaluation be adopted, with particular attention paid to:

- Identifying and understanding barriers to accessing age appropriate vaccinations and responding with appropriate strategies to reduce these barriers, in particular for groups with lower vaccination coverage.
- Identification of effective strategies to support collaboration between local early childhood education and care services, local councils, immunisation providers and Authorised Officers (of the Department of Education and Training) aiming to improve vaccination rates.
- Demonstrating through successes and best practice examples strategies to support families to access age appropriate immunisations.

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- Resourcing to ensure that there is additional capacity to allow access to vaccination at all relevant immunisation providers and aligned services that adequately meets the expected increase of demand with implementation of the policy.
- Ensuring the timely reporting of vaccination to the Australian Childhood Immunisation Register (ACIR) to enable up to date immunisation records to be accessed by immunisation providers and parents/carers.
- Monitor, review and respond to the effect on early childhood education and care services of compliance with this legislation including the ability to interpret immunisation certificates provided from multiple sources.
- Monitor, review and respond to the effect on age appropriate vaccination rates, including breakdown of key disadvantaged and vulnerable groups allowed exemptions to vaccination on enrolment under sections 143C and 143D.

For further information:

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To access the No Jab No Play Bill and review its progress:

Through the State Parliament website search *Public Health and Wellbeing Amendment (No Jab No Play) Bill 2015*: <http://www.parliament.vic.gov.au/static/www.legislation.vic.gov.au-bills.html>