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30 August 2017

Communicable Disease Control Branch  
PO Box 6  
Rundle Mall SA 5000

Via Email: [HealthCommunicableDiseases@sa.gov.au](mailto:HealthCommunicableDiseases@sa.gov.au)

Dear Sir/Madam

**South Australian Public Health (Immunisation and Childhood Care Services)  
Amendment Bill 2017**

The Royal Australian College of Physicians (RACP) welcomes the opportunity to comment on the proposed South Australian Public Health (Immunisation and Childhood Care Services) Amendment Bill 2017.

The RACP is the professional medical college for over 15,000 physicians and 7,500 trainee physicians, often referred to as specialists, in Australia and New Zealand. The RACP represents a broad range of medical specialties including general medicine, paediatrics and child health. Paediatricians and other physicians are often asked for advice about vaccines and have extensive knowledge around immunisation related to their specific areas of expertise and also about child development.

The RACP is very concerned about section 96C of the draft amendment which proposes to deny attendance not only to child care, but also to pre-school, to children who do not meet Australian immunisation requirements. In the older preschool group, any incremental benefit from this proposed measure in strengthening protection against vaccine-preventable diseases (VPDs) is miniscule, as Australia has high overall rates of immunisation and children over 2 years of age have received most vaccines and boosters. This means any increase in protection for other children from exclusion of incompletely immunised children from pre-school is negligible, whereas that the detrimental effects of lack of access to early childhood education and care on a child's long-term development are potentially very large.

As paediatricians who advocate for the welfare of children, we are bound to draw attention to the enormous body of research<sup>1</sup> demonstrating the benefits of childhood education before school commencement, especially in disadvantaged households. Denial of this access is a serious matter, with likely long-term adverse consequences for the healthy development of the children involved. In this context, the risk of VPDs to fully vaccinated children from children who are under-vaccinated is often exaggerated.

<sup>1</sup> OECD (2016): Education Indicators in Focus: What are the benefits from early childhood education? Available at: <http://www.oecd-ilibrary.org/docserver/download/5jlwqvr76dbqen.pdf?expires=1502928065&id=id&accname=guest&checksum=C859CF41C1EC2A2C5AE567C579429471> (accessed 17 August 2017)

The RACP is mindful of “herd immunity” protection benefiting children who cannot respond to vaccines due to young age or compromised immunity. Accordingly, we support section 96B of the amendment bill introducing compulsory documentation of immunisation status when children enrol and attend early childhood care services.

We are also supportive of section 96 D (Requirement to provide information on outbreak of vaccine preventable disease) and section 96 F (Exemptions).

Section 96 E (Prohibition on providing early childhood care services to certain children on outbreak of vaccine preventable disease) would need to be implemented very cautiously. The Chief Public Health Officer’s role in that process is very important and should be based on the advice of appropriately qualified health professionals.

The RACP believes compulsory documentation of immunisation status and allowing prompt exclusion of under-immunised children should a case or outbreak of vaccine-preventable disease occur, provides sufficient protection to all children attending an early child care or early childhood education service. As explained above, universal exclusion of under-vaccinated children adds little or no further protection.

We strongly recommend that the South Australian Government reconsiders its plans to introduce this ‘No jab, No play’ legislation in its current form. We wish to commend to the SA Government an evidence-based alternative which would strengthen protection of all South Australian children - making full documentation of immunisation status compulsory for attendance at each new education enrolment (not just the first enrolment). If implemented at the child care, pre-school, primary and secondary school enrolment stages state-wide, this measure would significantly strengthen South Australia’s already robust protection against vaccine-preventable disease outbreaks. The world-leading Australian Immunisation Register (AIR) would facilitate the rapid updating of this documentation relatively easily, with little additional administrative burden.

Should you wish to discuss this matter further, please contact Alex Lynch, Policy Officer on [Policy@racp.edu.au](mailto:Policy@racp.edu.au) or +61 2 9256 9632. The RACP would be happy to arrange a further discussion of these issues and the evidence.

Yours sincerely

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