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(SOUTH AUSTRALIA) INC.

ABN 91 028 693 268

9 November 2017

The Hon. Stephen Wade

Shadow Minister for Health, Community and Wellbeing

Legislative Council

Parliament House

Stephen.wade@parliament.sa.gov.au

Dear Mr Wade

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

Thank you for your inquiry about the proposal to extend the childcare exclusion of children who do not meet immunisation requirements to preschool, and the proposal to apply the legislation to children already enrolled in early childhood education.

While the AMA(SA) strongly supports excluding children who are not vaccinated[[1]](#footnote-1) from childcare as an important evidence-based health initiative to promote high vaccination rates, we do not believe that the exclusion should be extended to pre-school.

The AMA is cautious in supporting proposals to exclude children from pre-school which, although not compulsory in South Australia, is highly recommended to prepare children for school. Clearly there are benefits in having a process that identifies children who are not fully vaccinated, particularly given the evidence suggests that, for many, this is due to parents overlooking vaccination rather than actively rejecting it. Requiring parents to produce their child’s vaccination records when enrolling them in early childhood education is a useful reminder for parents.

Yet, excluding unvaccinated children from pre-school risks creating disadvantage by giving these children a poor start to their education. Children should not be denied access to education on the basis of their parents’ decisions about immunisation. We support the position of the Australasian College of Physicians that the costs and disadvantage associated with excluding unvaccinated children from pre-school outweigh the incremental benefits of promoting vaccination.

In theory, applying the legislation to children already enrolled in early childhood education seems appropriate given the intention to reduce exposure of children to preventable diseases. However, the AMA(SA) is concerned that it may be difficult to administer such an audit and exclude children already attending early childhood education.

A better approach might be to require childcare organisation and pre-schools to advise parents about the proportion of their students vaccinated. Families would be able to decide whether a child-care centre or pre-school with a low vaccination rate is appropriate for their child.

Yours sincerely

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**Mr Joe Hooper**

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CHIEF EXECUTIVE

1. Unless they are unvaccinated for medical reasons or engaged in a catch-up vaccination program [↑](#footnote-ref-1)