



Ms Hope Peisley  
Assistant Secretary  
Population Health Division | Primary and Community Care Group  
Immunisation and Communicable Diseases Branch  
Australian Government Department of Health

By email: [immunisation.registers@health.gov.au](mailto:immunisation.registers@health.gov.au)

Dear Ms Peisley

**Re: Proposed amendment to the Australian Immunisation Register Act 2015**

I am writing to thank the Department of Health for the opportunity to provide feedback on the *Proposed amendment to the Australian Immunisation Register Act 2015*. As the pre-eminent and national leader of the nursing profession, the Australian College of Nursing (ACN) represents nurses who work across a variety of settings, including community and primary health care. Nurses are frontline clinicians in health promotion and preventive health, including immunisation education and provision.

After careful review, ACN supports the proposed amendment and provides the following feedback and recommendations.

**Implementation challenges**

ACN does not anticipate any significant challenges with the implementation of these changes. While there may be additional administrative duties recording into the AIR system, this can be managed easily in practice management software. Health Services and General Practices would also be familiar with this system as it is used to record childhood immunisations. This task may also be delegated to administrative staff and nurses working with patients directly or within a multidisciplinary team.

ACN recognises there is potential for administration errors when recording data. To reduce such errors, consider future use of Quick Response (QR) barcodes or data matrix codes which can be scanned into the AIR system within an individual's profile. ACN is a firm advocate for the quality use of medicines and medication use without harm (including for vaccines),<sup>1 2</sup> as well as a strong

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<sup>1</sup> Australian College of Nursing 2019. WHO Global Patient Safety Challenge – consultation draft feedback.

[file:///C:/Users/sdimitrelis/AppData/Local/Microsoft/Windows/NetCache/Content.Outlook/1ACYIWKG/20190705\\_ACN%20response\\_WHO%20Global%20Patient%20Safety%20Challenge%20Guide.pdf](file:///C:/Users/sdimitrelis/AppData/Local/Microsoft/Windows/NetCache/Content.Outlook/1ACYIWKG/20190705_ACN%20response_WHO%20Global%20Patient%20Safety%20Challenge%20Guide.pdf)

<sup>2</sup> Australian College of Nursing 2018. WHO Global Patient Safety Challenge – Medication Without Harm. Submission to the Australian Commission on Safety and Quality in Health Care <https://www.acn.edu.au/wp-content/uploads/2018/06/20180517-medications-without-harm.pdf>



proponent of the National Digital Health Strategy, supporting digital innovation that empowers health professionals to provide best practice care.<sup>3 4 5</sup>

### Proposed compliance options

ACN endorses education and support and penalty provisions.

### Additional feedback

As a national nursing organisation, ACN recognises one of its professional ethical obligations is to advocate for safe and healthy environments, and that vaccination is one means of achieving this.<sup>6</sup>

ACN welcomes the mandated reporting of vaccinations for adults in the AIR system. The central purpose of immunisation is to reduce or eliminate illness and death from vaccine preventable diseases (VPDs). This proposal has the potential to drastically improve adult vaccination rates in Australia. With our increasingly fast-paced lifestyles, it is easy for adults to forget whether they need a vaccine booster, when they last received a vaccine, or whether they have already received a specific vaccine.

While childhood immunisation rates in Australia are high due to expectations around the National Immunisation Program Schedule, this does not appear to be the case for adults. Immunisation rates for children aged 5 years and below is between 90-95%.<sup>7</sup> While the burden of VPD decreases for children under 5 years old, it increases for people aged 40 and over. The burden of VPD was also reported to be the highest among young adults (25–29 years) and the very old (>85 years).<sup>8</sup> Despite the expansion of the AIR to adults in 2016, reporting has not been mandatory, hence accurate data for adults is unreliable.<sup>9</sup> Population surveys have previously been used to estimate vaccination coverage in adults.

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<sup>3</sup> Australian College of Nursing 2017. Feedback to the Australian Digital Health Agency on the National Digital Health Strategy [https://www.acn.edu.au/wp-content/uploads/2018/03/20170203\\_final\\_digital\\_health\\_strategy\\_with\\_kw\\_signature.pdf](https://www.acn.edu.au/wp-content/uploads/2018/03/20170203_final_digital_health_strategy_with_kw_signature.pdf)

<sup>4</sup> Australian College of Nursing 2018. Submission to the Pharmaceutical Society of Australia (PSA) on the consultation for My Health Record – Guidelines for pharmacists [https://www.acn.edu.au/wp-content/uploads/2018/02/20180216\\_PSA-Submission\\_My-Health-Record.pdf](https://www.acn.edu.au/wp-content/uploads/2018/02/20180216_PSA-Submission_My-Health-Record.pdf)

<sup>5</sup> Australian College of Nursing, Health Informatics Society Australia & Nursing Informatics Australia 2017. Joint Position Statement: Nursing Informatics. <https://www.acn.edu.au/wp-content/uploads/joint-position-statement-nursing-informatics-hisa-nia.pdf>

<sup>6</sup> Nursing and Midwifery Board of Australia 2012. The ICN Code of ethics for nurses “Element 1: Nurses and people”. <https://www.nursingmidwiferyboard.gov.au/News/2018-03-01-new-codes-of-ethics-in-effect.aspx>

<sup>7</sup> Australian Institute of Health and Welfare 2018. Australia’s health: 7.2 Immunisation and vaccination. <https://www.aihw.gov.au/getmedia/31858178-69f7-47de-b9d1-e3329d774d9e/aihw-aus-221-chapter-7-2.pdf.aspx>

<sup>8</sup> Australian Institute of Health and Welfare 2018. The burden of vaccine preventable diseases in Australia – summary. <https://www.aihw.gov.au/getmedia/ec9c16e9-970c-404e-9bfe-5e2541583f85/aihw-phe-242.pdf.aspx?inline=true>

<sup>9</sup> Australian Institute of Health and Welfare 2018. Australia’s health: 7.2 Immunisation and vaccination. <https://www.aihw.gov.au/getmedia/31858178-69f7-47de-b9d1-e3329d774d9e/aihw-aus-221-chapter-7-2.pdf.aspx>

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#### Canberra

PO Box 219, Deakin West ACT 2600  
freecall 1800 061 660 (charges apply to mobile phones)  
t 02 6283 3400 | f 02 6282 3565

#### Sydney

PO Box 650, Parramatta NSW 2124  
freecall 1800 265 534 (charges apply to mobile phones)  
t 02 9745 7500 | f 02 6282 3565

[www.acn.edu.au](http://www.acn.edu.au)

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## Recommendations

### 1. Recognise nurses as immunisation providers.

The consultation paper lists medical practitioners; Aboriginal health workers; Aboriginal health services; commercial providers; community health services; councils; Flying Doctor Services; hospitals; pharmacies; public health units; medical practices.

Registered nurses who have undertaken nurse immuniser training are legally qualified to administer vaccines provided they do so within the legislative and regulatory framework in their state or territory jurisdiction. ACN has developed a Position Statement<sup>10</sup> and an accompanying Discussion Paper<sup>11</sup> to highlight the significant contribution nurses make to immunisation programs as an important preventive health measure for the Australian community.

The Nursing and Midwifery Board of Australia (NMBA) regulates nursing practice and sets two key standards for the nursing profession: the ICN Code of Ethics for Nurses (2012) and the Code of Conduct for Nurses (2018). These codes clearly establish the expectation that all nurses have an obligation to protect the public, with the example of vaccination highlighted as an important way to achieve that aim. The Code of Conduct for Nurses explicitly states that all nurses are expected to play a significant role in immunisation advocacy and delivery (2018, Section 7.2.c).

### 2. Improve immunisation rates amongst Indigenous populations.

Vaccine preventable burden rate among Indigenous Australians was reported to be 4.1 times the rate for non-Indigenous Australians.<sup>12</sup> In 2016, the national immunisation rates among Indigenous children aged 1 and 2 were lower than the rates for all children; however higher for 5-year-olds (95.2% compared with 93.2%).<sup>13</sup>

ACN suggests greater collaboration between the Australian Government and Aboriginal health care workers, to improve immunisation rates and reduce the burden of VPD in this vulnerable population group. Alert systems in the AIR for vulnerable populations could also prove beneficial.

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<sup>10</sup> Australian College of Nursing 2019. Position statement: Nurses, immunisation and health. <https://www.acn.edu.au/wp-content/uploads/position-statement-nurses-immunisation-and-health.pdf>

<sup>11</sup> Australian College of Nursing 2019. Discussion paper: Nurses, immunisation and health. <https://www.acn.edu.au/wp-content/uploads/discussion-paper-nurses-immunisation-and-health.pdf>

<sup>12</sup> Australian Institute of Health and Welfare 2018. The burden of vaccine preventable diseases in Australia-summary. <https://www.aihw.gov.au/getmedia/ec9c16e9-970c-404e-9bfe-5e2541583f85/aihw-phe-242.pdf.aspx?inline=true>

<sup>13</sup> Australian Institute of Health and Welfare 2018. Australia's health: 7.2 Immunisation and vaccination. <https://www.aihw.gov.au/getmedia/31858178-69f7-47de-b9d1-e3329d774d9e/aihw-aus-221-chapter-7-2.pdf.aspx>

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**3. Clarity around AIR system reminders.**

The AIR system can evidently send reminders, as seen through the childhood and adolescent National Immunisation Program.<sup>14</sup> Certain older age groups should also receive reminders, including those recommended to receive the Shingles (herpes zoster), pertussis, pneumococcal and influenza vaccine.<sup>15</sup>

The use of alert systems can provide older individuals with the information required to stay up-to-date with their vaccine status – including whether they require boosters or catch-up doses.

The Australian College of Nursing is a strong collective voice for nurses in all health care settings. Together, we increase the quality of patient care for all Australians. Our mission is advancing nurse leadership to enhance health care.

If you have any questions please do not hesitate to get in touch with me, Dr Carolyn Stapleton FACN, Director– Policy, Strategy and Advocacy.

Yours sincerely

A handwritten signature in cursive script that reads "Carolyn Stapleton".

Dr Carolyn Stapleton FACN  
Director – Policy and Advocacy  
Australian College of Nursing

15 November 2020

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<sup>14</sup> Central and Eastern Sydney Primary Health Network 2019. Reminder letters for children and adolescents overdue for vaccination. <https://www.cesphn.org.au/news/latest-updates/3419-reminder-letters-for-children-and-adolescents-overdue-for-vaccination>

<sup>15</sup> Department of Health 2020. Immunisation for adults. <https://www.health.gov.au/health-topics/immunisation/immunisation-throughout-life/immunisation-for-adults>

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