

# No Jab No Play 2020 review

## Engage Victoria consultation summary report

December 2020

Centre for Evaluation and Research Evidence

### Background

No Jab No Play legislation was introduced in Victoria on 1 January 2016 to increase vaccination rates for young children in the community while maintaining access for families to childcare and kindergarten. Victoria has a target of 95 per cent immunisation for all children under 5 years of age. This means that before enrolling a child, early childhood services in Victoria must first obtain evidence that the child is: fully immunised for their age OR; on an approved vaccination catch-up program OR; unable to be fully immunised for medical reasons.

### No Jab No Play 2020 review

To better understand the long-term impact of No Jab No Play legislation on childhood outcomes and the service system, a review of the No Jab No Play legislation was conducted between November 2019 - November 2020.

The No Jab No Play 2020 review was conducted by the Centre for Evaluation and Research Evidence (CERE).

The review objectives were to understand the impact of the No Jab No Play legislation by:

- Assessing whether the legislation is meeting its aim of improving vaccination rates while supporting children in vulnerable families to access early childhood services and be vaccinated.
- Identifying strengths and weaknesses of the implementation of the legislation, including identifying any unintended consequences, assessing degree of compliance and how well the requirements of the legislation are understood by those impacted.
- Providing recommendation how the legislation and/or its implementation can be improved to better meet its objectives, including addressing any unintended consequences and improving compliance and understanding of the legislation.

The review findings were tabled in Parliament on the 26 November 2020.

### Engagement activity to inform the review

The purpose of stakeholder engagement was to determine understanding of the No Jab No Play legislation and the perceived impact of the legislation on access to immunisation and enrolment in Early Childhood Care and Education Services (ECECS).

A number of engagement activities were undertaken to inform the No Jab No Play 2020 review, including:

- A Privacy Impact Assessment to ensure the review complied with information security standards.
- Establishment of a 'No Jab No Play Evaluation Steering Committee' comprising policy and program representatives from Department of Education and Department of Health and Human Services, sector representatives, and consumer representation.
- A consultation strategy to guide state-wide consultation and communication with stakeholders both internal and external.
- Advertising about the review using various channels including department distribution, Primary Health Networks, peak bodies, and local government.
- An online survey primarily targeting Victorian parents/carers of children aged 0-5 years of age via the Engage Victoria platform for three weeks in February 2020.

- Consultation meetings, online surveys, interviews and written feedback from internal and external stakeholders with knowledge and or experience of No Jab No Play legislation and its implementation during February to April 2020.
- Tabling of final report in Parliament on 26 November 2020.

## Engage Victoria – parent /carer survey summary feedback

- A total of 440 parents/carers of children aged 0-5 in Victoria provided feedback to the No Jab No Play review survey through the Engage Victoria platform. The response rate comprised 47.5 per cent of parents/carers of vaccinated children, and 52.5 per cent of parents/carers of unvaccinated children. Analysis of survey data was disaggregated by immunisation status of survey respondents' children.
- Parent/carers survey feedback indicated high compliance with vaccination for children aged 0-5 years attending ECECS. Respondents indicated 87 per cent of children accessing ECECS were up to date or in progress towards being up to date with vaccination. Eight out of 10 children (79 per cent) were fully vaccinated, 12 per cent unvaccinated, 7 per cent partially vaccinated, 1 per cent had a medical exemption, and 1 per cent noted as 'other' category.
- Vaccine refusers and vaccine hesitant parents/carers reported feelings of discrimination and segregation in the community.
- The 16-week grace period eligibility provision is being used by the intended priority groups of vulnerable and disadvantaged children to enrol in ECECS while catching up on vaccinations. Parents/carers reported the additional time period supported timely access to enrolment.
- According to parent survey feedback, 1 in 10 eligible families accessed the grace period provision. Feedback indicated the low utilisation of the grace period was due to most eligible families not needing the grace period, as most were up to date. One-third of parents/carers respondents were not aware of eligibility criteria which could also affect grace period utilisation.
- The distinction between Victorian No Jab No Play legislation and federal No Jab No Pay legislation was less widely known by parent/carers survey respondents, with 44 per cent of parents/carers indicating understanding that Victorian No Jab No Play legislation relating to vaccination of children and ECECS enrolment, and federal No Jab No Pay legislation relating to Centrelink Family Tax benefit.
- Parent/carers survey feedback was triangulated with evidence from other data sources to inform the overall review including: administrative data from the Australian Immunisation Register; Kindergarten Information Management System; Victorian Child and Adolescent Monitoring System; key informant interviews (N=43), key expert written submissions (N=9), workforce surveys of early childhood education care service providers (N=356) and immunisation providers (N=266); and additional data sourced from a literature review and document analysis.

## Overall review findings

### Impact of the legislation on immunisation coverage

- Aboriginal and Torres Strait Islander children aged 1 and 5 years continue to exceed the immunisation target of 95 per coverage; while 2-year-old Aboriginal and Torres Strait Islander children currently do not reach the target.
- There has been a positive effect on increased immunisation rates, with statistically significant differences evidenced between 2015 (prior to the legislation) and 2020 for all three age cohorts<sup>1</sup>.
  - 95.4 per cent immunisation coverage for 1-year-old children, a 3.4 per cent increase

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<sup>1</sup> Increased coverage cannot be solely attributed to the No Jab No Play legislation due to the No Jab No Pay legislation being implemented at the same time period in 2016.

- 93.1 per cent immunisation coverage for 2-year-old children, a 3.7 per cent increase<sup>2</sup>
- 96.2 per cent immunisation coverage for 5-year-old children, a 3.3 per cent increase.
- Victoria was the first and only jurisdiction to exceed the 95 per cent immunisation coverage target for 5-year-old children in 2019.
- Lowest coverage immunisation areas have improved since 2016. Eighty per cent of the local government areas with lowest coverage before 2016 have now exceeded the 95 per cent target.
- Current immunisation coverage is low at the highest and lowest ends of the socioeconomic continuum. Parent/carer survey and interview feedback indicated the federal No Jab No Pay legislation was more likely to influence parent/carer decision to vaccinate than No Jab No Play for low income families because of added financial incentive to receive tax and income incentives.
- Consistent, responsive and frequent information can influence vaccine-hesitant parent/carer behaviour, as well as prompt pro-vaccination parents to vaccinate their children.
- There has been a 50 per cent decrease in medical exemptions since the introduction of the legislation, between 2016 and 2020.

### **Impact of legislation on enrolment and vulnerable children in ECECS settings**

- Funded kindergarten enrolments in Victoria steadily increased from 74,149 children in 2015, to 79,505 children in 2019, which included increased enrolments in children from Aboriginal and Torres Strait Islander communities and children from culturally and linguistically diverse families.
- A low proportion of eligible families accessing the grace period, primarily due to a lack of awareness of eligibility criteria.
- Limited clarity around how early childhood settings should support the legislation after the ending of the 16-week grace period.

### **Unintended consequences / challenges of the legislation and its implementation**

- A very small minority of parents/carers use the grace period as a loophole to obtain access to childcare while not intending to immunise their children.
- Increased workloads of ECECS and immunisation providers to meet legislative requirements.
- Vaccine refusers and vaccine hesitant parents/carers report feelings of discrimination and segregation in the community.

### **Legislation strengths**

- Amendments to the legislation specifying that the Immunisation History Statement from the Australian Immunisation Register is the only documentation accepted by early childhood settings has provided clarity for the sector.
- The grace period provision supported compliance families experiencing vulnerability and disadvantage by enabling enrolment while supporting parents/carers to catch up on vaccinations.
- A large proportion of parents/carers are willing to comply with the legislation due to pro-vaccination beliefs within the community.

### **Legislation weaknesses**

- The legislation does not influence parents/carers who are strongly opposed to vaccination.

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<sup>2</sup> Predictive modelling forecasts the 2-year-old cohort is on track to achieve the 95 per cent target rate in 2021, but not for Aboriginal and Torres Strait Islander children.

- Uncertainty among early childhood settings on their expected role in instances of non-compliance, especially at the end of the grace period.
- Parent/carer understanding of the legislation relating to grace period eligibility is low. There is also confusion between state and federal immunisation legislation.
- Complexities with catch up immunisation for children born overseas.

## Review recommendations

The review made 10 recommendations to facilitate sustained immunisation coverage for Victoria:

### **Improving compliance and understanding**

- Retain the grace period provision with current eligibility criteria to continue supporting vulnerable and disadvantaged children to access early childhood education.
- Strengthen existing early childhood education immunisation guidelines about grace period provisions.
- Pilot and evaluate an Immunisation Advanced Vaccination Support Program model(s) to support families to update their child's vaccinations enrolled under the grace period.

### **Addressing unintended consequences / challenges**

- Strengthen existing immunisation reminder systems to incorporate a range of communication methods to maximise immunisation coverage.
- Expand community education and advocacy about benefits and risks of immunisation, including promoting department websites with validated information.
- Investigate alternative approaches in supported playgroup settings that can be put in place outside the No Jab No Play legislative framework.
- Strengthen existing immunisation record keeping functions by implementing a state-wide immunisation monitoring system.
- Undertake continuous improvement of early childhood education settings' data reporting on an annual basis to monitor the impact of immunisation on enrolment and participation.

### **Addressing legislation / exemption challenges**

- Strengthen specialist referral pathways to support the immunisation exemption process for families in complex special cases requiring further support to comply with legislative requirements.
- Allocate additional resourcing for immunisation providers to support catch-up plan development and respond to emerging changes in model of immunisation delivery for priority cohorts (including Aboriginal and Torres Strait Islander and culturally and linguistically diverse families).

## Next steps

A separate committee, the No Jab No Play Working Group, with representatives from the Department of Health and Human Services and the Department of Education and Training, will oversee implementation of recommendations that are supported by Government and/or Parliament.

## Acknowledgement

The CERE evaluation team would like to acknowledge and thank the parents/carers who contributed to providing feedback to inform the No Jab No Play legislation review through the Engage Victoria platform and interviews. Key findings from all stakeholders contributing to the review will inform future immunisation policy, reform, and system improvement.