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Submitted to Public Consultation of the Discussion Paper Towards the National Immunisation Strategy 2025-30
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Introduction

What is your email address?

Email:

liz.moore@amsant.org.au

What is your organisation?

Organisation:

AMSANT

What is your name?

Name:

Dr Liz Moore

Demographic Questions

Which stakeholder group best describes you?

State/territory not for profit non-government organisation, Other

Part 1: Overview of the Strategy

Which statements describe your engagement with the current National Immunisation Strategy 2019-2024?

I, or the organisation I represent, did not know about the 2019-2024 Strategy prior to this consultation., I have not engaged with the current 2019-2024 Strategy.

If you have ticked 'Other' please include any other information about your engagement with the current 2019-2024 Strategy. :

The proposed Vision of the new National Immunisation Strategy 2025-2030 (Vision) is: "To protect individuals and communities from the harms of vaccine-preventable diseases."

Overview of the Strategy - To what extent do you agree with the Vision?:

Somewhat agree

(Optional): Please provide further comments about your response, including any suggested amendments to the Vision.:

AMSANT is the peak body for community controlled health services in the Northern Territory. Equity should be included in the vision- .e.g to provide equitable protection to individuals and communities from the harms of vaccine preventable diseases.

The proposed Mission of the new National Immunisation Strategy 2025-2030 (Mission) is: "Improve vaccine uptake and reduce impact of vaccine-preventable diseases in Australia."

Overview of the Strategy - To what extent do you agree with the proposed Mission?:

Agree

(Optional): Please provide further comments about your response, including any suggested amendments to the Mission.:

If not included in the mission, equity should be included here

There are 6 proposed priority areas to achieving the proposed Vision for the new Strategy. Each of these priority areas are shown below.

Improve immunisation coverage through universal and equitable access to vaccination, with a focus on First Nations people. - Improve immunisation coverage through universal and equitable access to vaccination, with a focus on First Nations people.:

Most Important

Strengthen community engagement, acceptance and understanding of immunisation. - Strengthen community engagement, acceptance and understanding of immunisation.:

Most Important

Strengthen program governance and how we manage programs and account to the public. - Strengthen program governance and how we manage programs and account to the public.:

Very Important

Use data and evidence to target interventions, build confidence and improve outcomes. - Use data and evidence to target interventions, build confidence and improve outcomes.:

Very Important

Strengthen the immunisation workforce to work with Australia's diverse population. - Strengthen the immunisation workforce to work with Australia's diverse population.:

Most Important

Prepare for emerging infectious diseases and emergencies requiring rapid and/or targeted vaccination. - Prepare for emerging infectious diseases and emergencies requiring rapid and/or targeted vaccination.:

Very Important

(Optional): Are there any other priority areas you think should be included in the Framework?:

There could be a section on improving access to immunisation training as this is a gap currently at least in the Northern Territory with a complex and frequently changing schedule and a high turnover of staff working in very remote areas. Education on new vaccines is also required.

Part 2: Opportunities for action

There are declining trends in childhood vaccination, particularly among First Nations children. Improving access to vaccination across age groups and settings is critical to equitable service delivery and increasing coverage rates overall.

Overview of the Strategy - Priority 1 - Improve monitoring of vaccine coverage across all age cohorts, priority populations and at-risk groups. Use these data to drive performance and accountability. - Improve monitoring of vaccine coverage across all age cohorts, priority populations and at-risk groups. Use these data to drive performance and accountability.:

Very Important

Overview of the Strategy - Priority 1 - Prioritise partnership and shared decision making with First Nations communities and the Aboriginal Community Controlled Health Sector in delivering immunisation services. - Prioritise partnership and shared decision making with First Nations communities and the Aboriginal Community Controlled Health Sector in delivering immunisation services.:

Most Important

Overview of the Strategy - Priority 1 - Build collaborative partnerships with communities with low immunisation rates, drawing on successful models from COVID-19 programs, particularly those designed for disability, First Nations, and Culturally and Linguistically Diverse communities. - Build collaborative partnerships with communities with low immunisation rates, drawing on successful models from COVID-19 programs, particularly those designed for disability, First Nations, and Culturally and Linguistically Diverse communities.:

Very Important

Continue to develop and adjust vaccination strategies to protect people in aged care, and residential care for people with disability. - Continue to develop and adjust vaccination strategies to protect people in aged care, and residential care for people with disability.:

Very Important

Overview of the Strategy - Priority 1 - Make vaccines easier to access through immunisation programs and wider health system, especially primary care. - Make vaccines easier to access through immunisation programs and wider health system, especially primary care.:

Very Important

Overview of the Strategy - Priority 1 - Consider evidence-informed targets for specific vaccines or groups of people to focus national efforts during the implementation of the next National Immunisation Strategy - Consider evidence-informed targets for specific vaccines or groups of people to focus national efforts during the implementation of the next National Immunisation Strategy:

Very Important

Optional, if there any other opportunities for action that you think the Strategy should focus on to improve immunisation coverage? If yes, please note them. :

The strategy needs to learn from the deficiencies in the COVID 19 vaccination program as well as the successes, with lower COVID 19 vaccination rates and higher death rates in Aboriginal communities. There should be timely access to vaccinations including in very remote areas .

Australia has several existing vaccination coverage targets embedded in national strategies.

Yes

If YES, please provide a brief reason. Are there particular groups of people and/or vaccines that you consider it important to have evidence-informed targets? Please list them and provide a brief rationale.:

All targets should be disaggregated by Aboriginal status. Adult vaccine targets should be included. A target for COVID 19 vaccination in older people and influenza vaccination in Aboriginal people is justified given high disease burden. Herpes Zoster vaccine targets could also be included.

Community confidence is integral to the acceptance, uptake and impact of immunisation programs and is positively influenced by a range of factors including codesign of programs and recommendations from health professionals.

Prioritise community partnerships and engagement design, delivery and evaluation of communication campaigns and information resource- – using appropriate national, state in and local mechanisms. - Prioritise community partnerships and engagement design, delivery and evaluation of communication campaigns and information resources, using appropriate national, state and local mechanisms.:

Very Important

Track community sentiment using behavioural insights among groups eligible for National Immunisation Program vaccines to inform communications and strategies and use this evidence to tailor policy and practice. - Track community sentiment using behavioural insights among groups eligible for National Immunisation Program vaccines to inform communications and strategies and use this evidence to tailor policy and practice.:

Very Important

Evaluate and report against the performance of vaccine awareness campaigns and other resources including performance in First Nations communities, priority populations and most remote/rural populations. - Evaluate and report against the performance of vaccine awareness campaigns and other resources including performance in First Nations communities, priority populations and most remote/rural populations.:

Very Important

Provide quality resources for a health workforce to respectfully engage with diverse individuals and communities on understanding and enabling vaccination. - Provide quality resources for a health workforce to respectfully engage with diverse individuals and communities on understanding and enabling vaccination.:

Important

Consider the feasibility of a no-fault compensation scheme for Commonwealth-funded vaccines. - Consider the feasibility of a no-fault compensation scheme for Commonwealth-funded vaccines.:

Very Important

Optional, if there are any other opportunities for action that you think the Strategy should focus on to strengthen engagement, awareness and understanding of immunisation? If yes, please note them.:

ACCHSs should be resourced to promote vaccination locally given that national and jurisdictional campaigns may have limited impact on the culturally and linguistically diverse population in the Northern Territory. Local champions are often very effective.

The governance arrangements for immunisation in Australia are robust, however, a number of advances in vaccine technology and transition of emergency immunisation programs to business-as-usual arrangements will require even stronger governance mechanisms into the future.

Shape the next intergovernmental agreement on essential vaccines to reflect shared vision of the National Immunisation Strategy. - Shape the next intergovernmental agreement on essential vaccines to reflect shared vision of the National Immunisation Strategy.:

Important

Continue to deliver the national COVID-19 vaccine response while working with stakeholders to transition the COVID-19 vaccination program to a sustainable operating model. - Continue to deliver the national COVID-19 vaccine response while working with stakeholders to transition the COVID-19 vaccination program to a sustainable operating model.:

Very Important

Strengthen accountability and generate evidence to inform improvement to programs and policy through transparent reporting against a monitoring and evaluation framework. - Strengthen accountability and generate evidence to inform improvement to programs and policy through transparent reporting against a monitoring and evaluation framework.:

Most Important

Prepare for assessment of emerging vaccine technology and for the opportunities and challenges that adopting new technologies may present to existing immunisation programs and delivery. - Prepare for assessment of emerging vaccine technology and for the opportunities and challenges that adopting new technologies may present to existing immunisation programs and delivery.:

Very Important

Optional, If there are any other opportunities for action that you think the Strategy should focus on to strengthen program governance? If yes, please note them.:

NACCHO should be represented on all key governance groups and there should be good primary health care representation as well.

What specific opportunities or challenges including those arising from advancements in vaccine technologies, delivery options and the availability of a wider range of vaccines, do you believe should be considered in shaping the new National Immunisation Strategy?:

Australia needs to be better prepared for new options that don't meet the current definition of a vaccine. There should have been a national decision to buy all the available stock of nirsevimab to protect high risk infants but this was difficult as this rx is not a traditional vaccine.

Australia uses vaccination coverage data and disease surveillance to monitor, evaluate and improve performance of Australia's immunisation activities. Increasingly, these data can be used in more powerful ways to shape the design of targeted interventions.

Boost compliance with mandatory reporting to the Australian Immunisation Register (AIR), while improving the quality and accuracy of AIR data. - Boost compliance with mandatory reporting to the Australian Immunisation Register (AIR), while improving the quality and accuracy of AIR data.:

Very Important

Expand the use of high-quality data linkage to inform specific policy or programmatic questions. - Expand the use of high-quality data linkage to inform specific policy or programmatic questions.:

Important

Explore options to increase availability and accessibility of a range of timely population level vaccine coverage data from the AIR. - Explore options to increase availability and accessibility of a range of timely population level vaccine coverage data from the AIR.:

Very Important

Improve use of disease surveillance data with vaccine coverage data to better understand, respond to and mitigate risks of spread of vaccine-preventable diseases. - Improve use of disease surveillance data with vaccine coverage data to better understand, respond to and mitigate risks of spread of vaccine-preventable diseases.:

Very Important

Sustain robust vaccine safety systems including enhanced vaccine safety surveillance for new vaccine introductions. - Sustain robust vaccine safety systems including enhanced vaccine safety surveillance for new vaccine introductions.:

Most Important

Optional, if there are any other opportunities for action that you think the Strategy should focus on to leverage immunisation data? If yes, please note them.:

Data requirements for clinicians should be transparent, evidence based & not unduly onerous and there should be thorough consultation prior to implementation including with the ACCHS sector. The requirement to provide the funding source of vaccines to AIR did not meet these criteria.

The immunisation workforce is made up of many health professionals with varying roles, employment and training. Vaccination services need to be available in a diverse range of healthcare and community settings to ensure equitable access. Building a diverse workforce able to deliver culturally appropriate care on immunisation contributes to equitable access.

Continue to improve availability and distribution of health professionals who are immunisation providers or who can support delivery immunisation programs. - Continue to improve availability and distribution of health professionals who are immunisation providers or who can support delivery immunisation programs.:

Most Important

Improve cultural competence in professions and settings where vaccinations are delivered through awareness, training and appropriate resources. - Improve cultural competence in professions and settings where vaccinations are delivered through awareness, training and appropriate resources.:

Most Important

Build a more diverse immunisation workforce through support specific cadres of health professionals, including First Nations health practitioners, to work across a scope of practice that includes immunisation. - Build a more diverse immunisation workforce through support specific cadres of health professionals, including First Nations health practitioners, to work across a scope of practice that includes immunisation.:

Most Important

Optional, if there are any other opportunities for action that you think the Strategy should focus on to strengthen the immunisation workforce? If yes, please note them.:

Immunisation training is quiet arduous & theoretical and new immunisers often lack practical skill and confidence. Also the training (on line) is often not suitable for Aboriginal Health practitioners. Face to face training is required for both Aboriginal health practitioners and new immunisers

The emergence of new infectious diseases and the re-emergence of vaccine preventable diseases due to declining coverage rates pose challenges. Additional and new vaccines may be required for management of infectious disease outbreaks and/or developed in response to novel pathogens. Australian governments need to maintain ongoing readiness for emergency vaccination rollouts.

Continue to plan for emergency vaccine rollouts. - Continue to plan for emergency vaccine rollouts.:

Most Important

Strengthen immunisation research capabilities through domestic and international partnerships and funding. - Strengthen immunisation research capabilities through domestic and international partnerships and funding.:

Very Important

Maintain onshore manufacturing capacity for critical vaccines. - Maintain onshore manufacturing capacity for critical vaccines.:

Most Important

Continue Australia's contribution to strengthening immunisation in the Indo-Pacific and globally. - Continue Australia's contribution to strengthening immunisation in the Indo-Pacific and globally.:

Very Important

Optional, if there any other opportunities for action that you think the Strategy should focus on to prepare for emergencies? If yes, please note them.:

The first action is quiet limited as it is not clear what is currently being done to plan for emergency vaccinations. Considering the role of a diverse range of staff including Aboriginal health practitioners, allied health and even non clinical staff (e.g. to assist in drawing up vaccines or being credentialled to give vaccines) could assist in the next pandemic. The plans should include how to distribute vaccines in an emergency to very remote areas- COVID 19 vaccines reached remote areas to slowly in the early vaccination phase of COVID19

Part 3 Summary

Which of the following statements about the National Immunisation Strategy 2025-2030 are the most important to you?

Increase the focus on how organisations can work together to improve the effectiveness of immunisation-related activities in Australia, Improve the collaboration between state and territory governments and the federal government, Focus on emerging risks and issues (e.g. ensuring preparedness for infectious disease outbreaks), Provide a greater emphasis on the needs of priority populations, Ensure greater transparency of national and State and Territory actions to deliver priorities

(Optional) Please provide any additional feedback on the Strategy not captured in your previous responses.:

Close the Gap reforms/ Aboriginal leadership are critical. ACCHSs should be directly resourced to promote and provide vaccinations including through enhanced training for Aboriginal people. Aboriginal staff(often non clinical) were critical during the COVID 19 vaccination roll out. The strategy also needs to reflect on what hasn't worked including in high priority areas like aged care. Surge models of vaccination delivery by external providers were very expensive, , drew staff away from PHC with excessive hourly rates, and had variable levels of effectiveness and cultural safety