



Toronto Public Health: Student Consent for Immunization

To: Program and School Services Committee

Date: 4 June, 2019

Report No.: 06-19-3657

Strategic Directions

- Create a Culture for Student and Staff Well-Being
- Build Strong Relationships and Partnerships Within School Communities to Support Student Learning and Well-Being

Recommendation

It is recommended that the report on Toronto Public Health's age of consent for immunization be received.

Context

TDSB staff has worked collaboratively with Toronto Public Health (TPH) staff in support of student health at both a system and school level over the course of the 2018-19 school year. In the fall of 2018, TPH shared their goal of implementing a change in approach to consent for immunization in order to increase immunity in Toronto. Specifically, TPH has requested that students who are 14 years of age and older (beginning in secondary school) be able to sign their own consent form during school-based vaccination clinics in the Toronto District School Board and Toronto Catholic District School Board. Information about the clinics will be provided to students, parents/guardians/caregivers in advance of the start of a school-based immunization clinic. This policy change is consistent with public health policies in the Region of Peel and York Region.

Toronto Public Health has provided the following rationale:

- Currently, students age 14, have been able to consent to vaccination in community-based immunization clinics (e.g., Flu Clinics, Hepatitis).
- This change may have a significant positive impact on the long-term health of the students by encouraging their active engagement in decisions about their health.

- There is no specific legal age of consent for immunization.
- This policy has been undertaken without significant challenges in other Ontario jurisdictions.
- In the 2017/18 school year approximately 4,500 TDSB secondary students were suspended from school for failure to meet the requirements. Allowing students to more easily access vaccines required for school attendance will support principals and schools in more efficiently implementing the requirements of the Immunization of School Pupils Act and hopefully reduce this number of suspensions and loss of time school time in future years.

Further details can be found in a letter from the Medical Officer of Health Dr. Eileen de Villa to the Director of Education John Malloy dated April 5, 2019 (Appendix A).

Staff supports the TPH request for students who are 14 years of age and older be able to sign their own consent form during school-based vaccination clinics in TDSB schools if parents/guardians/caregivers and students are informed in advance of the start of school-based immunization clinics.

Action Plan and Associated Timeline

Staff will work with TPH and families of children with complex special education needs to determine whether this approach is responsible and applicable.

TPH will provide TDSB with the resources for parents/guardians/caregivers and students about immunization and changes to their consent protocols.

Resource Implications

None

Communications Considerations

TPH will provide a letter to go out to all current TDSB parents regarding this change in consent for secondary school students. This letter will be distributed prior to the end of the school year in June 2019. This information will assist parents/guardians/caregivers in understanding the changes in the immunization process and promote related decision-making discussions with their children well in advance of the start of school-based clinics in secondary schools. TDSB will use School Connects and other approaches to communicate with parents/guardians.

Similarly, Secondary Principals will be advised of the change in policy prior to the end of June 2019. In addition, TPH School Health Liaison Nurses will continue to provide professional advice to school educators, students and caregivers on this topic.

Appendices

- Appendix A: Letter from TPH Medical Officer of Health, Dr. Eileen de Villa to TDSB Director of Education John Malloy

From

Colleen Russell-Rawlins, Associate Director of Equity, Well-Being and School Improvement, 416-397-3187, colleen.russell-rawlins@tdsb.on.ca

John Chasty, Superintendent of Student Voice, Parent and Community Engagement and Well-Being, 416-397-3187, john.chasty@tdsb.on.ca



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Medical Officer of Health

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April 5, 2019

John Malloy
Director of Education
Toronto District School Board
5050 Yonge Street
Toronto, ON, M2N 5N8

Dear Director Malloy;

Re: Ensuring Uptake of Immunizations by TDSB Students

I am writing to formally request that the Toronto District School Board (TDSB) allow students, 14 years of age and older, to provide consent to receive immunizations at Toronto Public Health (TPH) clinics. This will formalize the agreement we came to at our meeting earlier in 2019. This change at the TDSB will have a significant positive impact on the health of the students and our community.

Allowing students to access vaccines in a timely manner and at convenient locations, without requiring parental consent, will both increase their individual level of protection and support herd immunity within the TDSB schools. As we have seen recently during measles outbreaks in Vancouver, BC and Washington State, ensuring that herd immunity is maintained is critical to prevent outbreaks of vaccine preventable diseases in schools.

In the 2017/18 school year approximately 4,500 TDSB secondary students were suspended from school for failure to meet the requirements. Allowing students to more easily access vaccines required for school attendance will support principals and schools in more efficiently implementing the requirements of the *Immunization of School Pupils Act* and hopefully reduce this number of suspensions in future years.

This decision is also aligned with policies already in place at nearby Ontario schools boards such as the Peel District School Board and the York Region District School Board that support student autonomy with minimal concern from the schools, parents or students.

As we discussed at the meeting, there is no legal age of consent for medical care in Ontario's [Health Care Consent Act](#). Toronto Public Health nurses regularly assess all students to ensure they understand the vaccines they are receiving and the risks and benefits of the vaccine at TPH's [vaccine clinics](#).

Toronto Public Health will work with you and your staff to ensure principals, schools and parents are aware of this update to the way TDSB deals with consent to receive vaccinations so that parents understand the changes and can be involved in the decision making if they wish.

Thank you for your continuing support of TPH immunization programs and creating a safe environment for students and staff at your schools. If you have any questions, please reach out to Karen Beckermann, Associate Director in the Vaccine Preventable Diseases program, at 416-338-0731 or Karen.Beckermann@toronto.ca.

Yours truly,



Eileen de Villa, MD, MBA, MHSc, CCFP, FRCPC
Medical Officer of Health

copy:

Karen Beckermann, Associate Director, CDC, TPH

John Chasty, Superintendent of Education, TDSB

Dr. Michael Finkelstein, Acting-Director Communicable Disease Control and Associate Medical Officer of Health, TPH

Yvonne De Wit, Director, Healthy Communities, TPH

Colleen Russell-Rawlins, Associate Director, TDSB

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