

30 April 2021

Mr Julian Simmonds MP
Chair
Joint Committee on Law Enforcement
Parliament of Australia

Via online submission

Dear Mr Simmonds

MIGA submission – COVID vaccine fraud & security risks

As a medical defence organisation and medical / professional indemnity insurer, MIGA appreciates the opportunity to provide a submission to the Committee's inquiry into COVID vaccine related fraud and security risks. It focuses on term of reference (e), namely measures to respond to these risks.

For its over 36,000 members and clients across the country, MIGA has been extensively involved in advising, assisting, educating and advocating for them in the context of the COVID vaccine roll-out. It has an [extensive online Q&A on vaccine issues](#), provides advice directly to members and clients, and has been engaged closely with the Commonwealth Government and other stakeholders on indemnity, liability, medico-legal, Medicare and other practical issues associated with the roll-out.

MIGA recognises the imperative of ensuring appropriate COVID vaccines reach their intended recipients in a safe and timely way. It is concerned to ensure that risks of vaccine fraud and security issues do not lead to unreasonable, impractical or unfair burdens being imposed on doctors, nurses and others involved in delivering the COVID vaccines through GP clinics, hospitals and immunisation centres.

The roll-out has imposed extensive and complex obligations on doctors, nurses and healthcare entities. These cover a wide range of issues such as staffing, facilities, equipment, training, booking, eligibility assessment, consent, observation, record-keeping, reporting, Medicare billing and follow-up.

Notably the roll-out already imposes greater expectations on doctors, nurses and other healthcare providers to assess vaccine eligibility than is the case for vaccinations generally. These eligibility assessments are generally broader than those required for other aspects of healthcare. There are significant time pressures and funding limitations for healthcare providers involved in delivering COVID vaccinations.

Additional obligations and expectations should not be imposed on doctors, nurses and other healthcare providers delivering COVID vaccines to minimise the risks of vaccine-related fraud and security issues. These are issues best left to those well-placed to address them from a holistic perspective, namely governments, regulators and law enforcement bodies.

Yours faithfully

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