



Department of Health and Social Care – Distributing vaccines and treatments for Covid-19 and flu

Council of Deans of Health written submission – September 2020

The Council of Deans of Health is grateful for the opportunity to contribute to this consultation. The Council represents the 87 UK university faculties engaged in education and research for nursing, midwifery, and the allied health professions.

Consultation response

The Council of Deans of Health understands that if, and when, a vaccine for Covid-19 becomes available an expanded workforce will be needed to administer this as quickly as possible.

Deployment of healthcare students

The Council is opposed to healthcare students being deployed to administer any Covid-19 or flu vaccine. Students are not members of the registered healthcare workforce. Their student status is critical to ensuring that they have adequate time and supervision to focus on their studies and to graduate and gain professional registration in a timely manner. Many healthcare students have already seen Covid-19 profoundly affect their studies. Deployment to administer either a Covid-19 or flu vaccine would have further negative impacts on student progression and completion, at a time when expanding the registered healthcare workforce is a key government priority.

If healthcare students were deployed to administer these vaccinations, they would need:

- to be supervised in line with the supervision requirements of healthcare professional regulators.
- full insurance and indemnity cover.

Any breaches of national protocol during vaccination could have implications for professional registration and a student's fitness to practise.

We are concerned that this consultation refers to expanding the workforce to administer the flu vaccine until 1 April 2022. The healthcare student population should not have their studies disrupted and be routinely deployed to administer the flu vaccine on an annual basis.

The consultation indicates that it would be up to individual governments in the devolved nations to make decisions about the mobilisation of healthcare students. We recommend that a UK-wide approach to the non-deployment of healthcare students is adopted.

Our objection to students being part of the workforce to administer any Covid-19 or flu vaccine would not limit students from undertaking this role outside of their studies in their own time as healthcare assistants or in other support worker roles.

Other comments

- The consultation does not specify the delegation and supervision requirements for the registered healthcare workforce not currently covered by patient group directions (PGDs) were they to administer these vaccines.
- Appropriate training and support would need to be given to non-registered individuals working within any new national protocol to administer these vaccines.
- The Council notes that a non-registered healthcare professional would benefit from the same immunity from civil liability as a registered professional administering an unlicensed vaccine.

For more information contact:

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