

COVID-19 Vaccinations FAQ's

Indemnity:	
What indemnity arrangements are in place in the NHS for the administration of COVID-19 vaccinations for General Practice?	<ul style="list-style-type: none"> The Clinical Negligence Scheme for General Practice (CNSGP), if they are engaged by a GP practice to provide NHS services (i.e. a GP practice, the main business of which, is the provision of NHS primary medical services). This includes salaried GPs, locums, students and trainees, nurses, clinical pharmacists, agency workers and other practice staff. This cover extends to additional staff being brought in to help with administering vaccines under the national protocol, provided they are engaged by the Trust or practice, for example via a secondment agreement, honorary contract or volunteer agreement. These indemnity arrangements will also apply to the administration of any temporarily authorised COVID-19 vaccines.
Will I be covered from an indemnity perspective if I am using an alternative premise or location (including outside locations, e.g. practice car park)?	<ul style="list-style-type: none"> Yes. Where a GP practice is vaccinating patients under their GMS/PMS/APMS contract, and in line with the COVID-19 vaccine Enhanced Service (ES), the activity is covered by the CNSGP. This indemnity is not dependent on the location in which the services are being delivered
Will I be covered from an indemnity perspective if I administer a COVID-19 vaccination to patients that are not registered with my employing GP practice?	<ul style="list-style-type: none"> Yes. Under the COVID-19 vaccine Enhanced Service (ES) specification, the activity of vaccinating any patient who falls within this specification is covered by the CNSGP.
Legal Aspects of Delivery:	
Patient Group Directions (PGDs)	<ul style="list-style-type: none"> PGDs are written instructions for the supply or administration of medicines to groups of patients who may not be individually identified before presentation for treatment. They provide a legal framework that allows the supply and/or administration of a specified medicine(s), to a pre-defined group of patients needing prophylaxis or treatment for a condition described in the PGD, without the need for a prescription or an instruction from a prescriber.
Who can use a PGD?	<ul style="list-style-type: none"> PGDs can only be used by those registered health care professionals as listed in the legislation. These are: chiropodists and podiatrists, dental hygienists, dental therapists, dieticians, midwives, nurses, occupational therapists, optometrists, orthoptists, orthotists and prosthetists, paramedics, pharmacists, physiotherapists, radiographers and speech and language therapists. Registered healthcare professionals using a PGD must have been assessed as fully trained and competent to use them and must comply with the standards set by their professional regulatory body.
What is the National Protocol?	<ul style="list-style-type: none"> A National Protocol is a new type of instruction that was introduced to support the expanded influenza and COVID-19 Vaccination Campaign. This is a new legal mechanism which has been put in place following amendment of the Medicines Regulations. It will allow those who are registered healthcare professionals who cannot operate under a PGD, and those who are not registered

	<p>healthcare professionals, to safely administer a licensed or temporarily authorised COVID-19 or influenza vaccine.</p> <ul style="list-style-type: none"> • This protocol is being developed by PHE and will be written similarly to a PGD and would provide the flexibility to define the training and competence requirements of vaccinators. It also allows the process of administration to be split into its component parts i.e. clinical assessment and consent, preparation of the vaccine and administration of the vaccine. • All these stages can be done by one competent person (the registered healthcare professional) but in the case of large vaccination centres these tasks can be split with each person trained and authorised to complete their specific task as defined in the protocol. The clinical assessment and consent process must be undertaken by a registered healthcare professional and the preparation of the vaccine must only be undertaken and overseen by those health care professionals trained in aseptic technique and have the skills for dilution and drawing up as required by the vaccine.
Accountability:	
Who is accountable for Registered Professionals?	<ul style="list-style-type: none"> • They are accountable to their regulatory body and to their employer.
Who is accountable for non-registered workers?	<ul style="list-style-type: none"> • When administering under the National Protocol, non-registered workers are accountable to their employer. Their employer is responsible for ensuring they are suitably trained, have completed the necessary competency assessment and are provided with an appropriate level of supervision when carrying out their duties under the protocol.
Training:	
<ul style="list-style-type: none"> • All training will be sent out via the training hub for non-clinical staff. • The following competency framework should be completed after the theoretical training: https://www.gov.uk/government/publications/covid-19-vaccinator-competency-assessment-tool • All staff administering the COVID-19 vaccination will be required to undertake the following e-learning module: https://portal.e-lfh.org.uk/Catalogue/Index?HierarchyId=0_50349&programmId=50349 	
Further Reading:	
<p>https://resolution.nhs.uk/wp-content/uploads/2020/12/COVID-19-Vaccinations-NHS-Staff-Indemnity-FAQs.pdf</p> <p>https://elearning.rcgp.org.uk/pluginfile.php/149506/mod_page/content/78/Mass%20Vaccination%20at%20a%20time%20of%20COVID%20V3.1.pdf?_ga=2.266034823.965940590.1607422398-527596225.1607422398</p> <p>https://www.rcn.org.uk/clinical-topics/public-health/immunisation/immunisation-services-and-large-scale-vaccination-delivery-during-covid-19#introductionandbackground</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/941236/COVID-19_vaccination_programme_guidance_for_healthcare_workers_December_2020_V2.pdf</p>	