

Mike Haslam and Aisling Fox  
Department of Health and Social Care  
By email: [Workforce\\_Consultations@dhsc.gov.uk](mailto:Workforce_Consultations@dhsc.gov.uk)

22 October 2021

Dear Mr Haslam and Ms Fox,

## **GPhC response to ‘Making vaccination a condition of deployment in the health and wider social care sector’**

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in Great Britain. Our role is to protect, promote and maintain the health, safety and wellbeing of patients and the public who use pharmaceutical services in England, Scotland, and Wales.

We have a statutory role in relation to ‘system’ regulation (as we regulate registered pharmacies) as well as ‘professional’ regulation of individual pharmacists and pharmacy technicians. Our main work includes:

- setting standards for the education and training of pharmacists, pharmacy technicians and pharmacy support staff, and approving and accrediting their qualifications and training
- maintaining a register of pharmacists, pharmacy technicians and pharmacies
- setting the standards that pharmacy professionals must meet throughout their careers
- investigating concerns that pharmacy professionals are not meeting our standards, and taking action to restrict their ability to practise when this is necessary to protect patients and the public or to uphold public confidence in pharmacy
- setting standards for registered pharmacies which require them to provide a safe and effective service to patients
- inspecting registered pharmacies to check if they are meeting our standards.

We welcome the opportunity to respond to the consultation: ‘Making vaccination a condition of deployment in the health and wider social care sector’. While we have not responded to the consultation questions individually, we would like to comment more generally on your proposal to introduce mandatory vaccines.

We recognise that there is an existing statutory requirement for those working or volunteering in care homes to be vaccinated against COVID-19, to protect vulnerable people; and that the requirement is a

condition of deployment. We are responding to your current consultation, to seek views on whether to extend COVID-19 and flu vaccination requirements, as a condition of deployment, to the providers of other healthcare activities regulated by the CQC. We note that you are not consulting on a proposal to extend COVID-19 and flu vaccination requirements, as a condition of deployment, to those pharmacies regulated by the GPhC.

### **Comments**

Pharmacists, pharmacy technicians, and pharmacy staff have all played an important role in the delivery of both COVID and flu vaccinations and in providing invaluable care and support to patients and the public throughout the pandemic.

We fully support full vaccine uptake amongst healthcare workers, including pharmacists and pharmacy technicians (many of whom work in CQC regulated settings). Getting vaccinated is clearly something that should be done by all pharmacy professionals, although we do not support making vaccination a mandatory legal requirement. We actively encourage and expect our registrants to get COVID and flu vaccinations at the earliest opportunity, unless they are medically exempt, and ask them to encourage other members of their team to get vaccinated as well. We recognise the importance of vaccinations, particularly for people working in frontline roles, as they are at greater risk of exposure. For healthcare workers, getting vaccinated protects the individual, their family, and colleagues, as well as patients and the public.

While we understand the aim of mandatory vaccination is to protect patients, the introduction of mandatory staff vaccination would raise complex employment, legal, ethical, and practical questions, many of which may have unintended consequences for patient safety. For example, we have reservations about placing duties on employers to only deploy fully vaccinated staff. Under mandatory vaccination, staff may be suspended or dismissed if they choose not to be vaccinated, but they may also choose to leave. It is important for the safe and effective provision of pharmacy services, to have enough suitably qualified and skilled staff. This is particularly important given the ongoing pressures across healthcare services.

Pharmacy professionals must provide person-centred care (please see our [\*\*Standards for pharmacy professionals\*\*](#)), and need to obtain consent to provide care and pharmacy services. Requesting a pharmacy professional to administer vaccines to unwilling recipients raises concerns around consent (please see our [\*\*guidance on consent\*\*](#)) for both the patient and the pharmacy professional. Having mandatory vaccinations could be seen as denying individuals the right to refuse health care treatment.

From a practical perspective, if mandatory vaccination is introduced there would be a need for a transition period, to make sure that all staff are given the opportunity to get vaccinated; time would also be needed for employers to check and record vaccination status (including booster vaccinations if that is also made mandatory).

We are also aware that vaccine uptake varies according to certain factors, including ethnicity and socioeconomic status; we feel that making vaccination a requirement for deployment could therefore serve to reinforce existing inequalities.

We believe there are alternative, non-statutory measures which can continue to be used and increased to encourage vaccine uptake. For example, communicating the benefits of vaccination; providing

evidence of the safety, efficacy, and effectiveness of the vaccines; identifying and removing barriers to accessing the vaccine; continuing to invest in individual conversations, using targeted campaigns, and messages from spiritual leaders or vaccine champions. These have the benefit of achieving the desired aim of protecting patients while avoiding the potential negative consequences set out above. In parallel, we would also emphasise that, as with those who are medically exempt, it is essential for those healthcare providers who choose not to be vaccinated, to take all necessary steps to make sure that they follow advice, including on infection prevention and control, to minimise any risk to patients that they may pose.

Yours sincerely

A handwritten signature in black ink, appearing to read "Duncan Rudkin". The signature is written in a cursive, flowing style.

**Duncan Rudkin**  
**Chief Executive & Registrar**