

# Vaccination as a Condition of Deployment

Frequently Asked Questions (FAQ) for Pre-registration Nursing and Midwifery and Allied Health Profession Students

This FAQ has been developed to respond to some of the questions asked by students in relation to vaccination as a condition of deployment. This is a live FAQ and will be reviewed and updated in order to provide advice and guidance. We will continue to work with the Council of Deans of Health who are also looking at a number of issues and plan to offer some support and information.

The government has enacted legislation that requires all those working in services regulated by the Care Quality Commission (CQC) in England who have face-to-face contact with service users, to provide evidence that they have been fully vaccinated against Covid-19 unless they are medically exempt. This includes students and trainees undertaking clinical placements. This means that unvaccinated individuals will need to have had their first dose by 3 February 2022, in order to have received their second dose by the 1 April 2022 deadline.

## What are the changes to requirements for Covid vaccination?

Recent amendments to The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (“the 2014 Regulations”) require that all those over 18 years of age and who have direct, face to face contact with patients or service users for the purpose of the provision of a CQC regulation activity, must evidence that they have been vaccinated with a complete course of a Medicines and Healthcare products Regulatory Agency (MHRA) approved COVID-19 vaccine, subject to limited exceptions, by no later than 1 April 2022.

The Vaccination as a Condition of Deployment (VCOD) regulations in health and adult social care settings (domiciliary care and other CQC regulated settings) are intended to:

- Protect all those that use health and social care services, a large number of whom are vulnerable, as well as the wider community.
- Protect workers through increasing vaccination uptake rates.
- Help reduce COVID-19 related sickness absences.

If you have not been vaccinated by 31 March 2022 you will not be able to undertake practice placements that require contact with patients or service users. This will affect your ability to complete your programme and join the professional register.

You can find some useful information by following this link: [Vaccination as a condition of deployment \(VCOD\) for all healthcare workers](#)

## I haven't yet been vaccinated, what do I need to do?

All students and trainees undertaking practice placements, that have face to face contact with patients and service users, in any CQC regulated service will be required to be fully vaccinated by 31 March 2022.

In practical terms this means if you have not yet been vaccinated and are not exempt you will need to ensure you have your first vaccination by 3 February 2022 in order to receive your second dose by 31 March 2022.

If you have not been vaccinated by 31 March, you will not be able to undertake placements that require contact with patients, which will affect your ability to complete your programme and join your regulatory body's register (Nursing and Midwifery Council [NMC] or Health and Care Professions Council [HCPC]).

### Key dates:

- **6 January** – This requirement became law and began the start of a 12-week grace period.
- **3 February** – 8 weeks before regulations are enforced (and the period required between the first and second vaccination dose). You will need to have had your first vaccination in order to have your second dose by 31 March
- **1 April** – Regulations enforced. All individuals in scope must be fully vaccinated or have a confirmed medical exemption.

## I'm not sure about whether to have the vaccine, where can I find out more information? What resources are available to support decision making about vaccination?

If you contract Covid or pass it onto anybody you and others can become seriously ill, die, or have long-term effects. Vaccination has also been proven to be highly effective in reducing the severity of illness and will help protect you, your family and those you care for.

Research has shown that vaccines help:

- reduce your risk of catching or spreading Covid-19
- reduce your risk of getting seriously ill or dying from Covid-19

For more information on the vaccines available please go to [Coronavirus \(COVID-19\) vaccines](#)

There is lots of helpful information available on the NHS website which provides up to date facts about Covid-19 and the vaccination. You can of course talk to your GP, and universities will be having conversations with students and offering support.

There are some links to some useful resources below:

- [COVID-19 vaccination programme](#)
- [What is in the vaccine and how does it work?](#)
- [Coronavirus \(COVID-19\)](#)
- [Coronavirus \(COVID-19\) vaccines](#)

## Will some people be medically exempt from the requirement to have the vaccine?

There will be a small number of people where the clinical advice is that the COVID-19 vaccination is not suitable for them. In such cases they will be able to apply for proof of their medical exemption status to ensure they comply with the regulations. Information about the formal exemption process can be found here: [COVID-19 medical exemptions: proving you are unable to get vaccinated](#)

You may also be able to have a temporary exemption if you have a short-term medical condition or recent covid infection. Pregnant women are strongly advised to have the vaccine as they are at higher risk from COVID-19. Pregnant women can however get a temporary exemption up to 16 weeks post-natal.

Individuals who believe they are exempt from the requirement to be vaccinated should apply for a formal COVID-19 medical exemption to comply with the regulations. This can be done by ringing 119 and requesting an NHS COVID Pass medical exemption application form.

The possible reasons for exemptions are limited. Your application will be clinically reviewed by a doctor, specialist clinician or if you are pregnant, a midwife, and you will automatically get the results of your application by post 2 to 3 weeks after applying. If you wish to apply for a formal medical exemption, please do so as soon as possible and inform your university of the outcome of your application.

## If I haven't been vaccinated by 31 March 2022, what should I do?

We recommend that you talk with your university, they will be able to advise on your individual circumstances and what that means for you in relation to your programme of study.

If you are unable to evidence vaccination or exemption you will not be able to undertake a placement in a health or care setting where patient facing activity takes place on or after 1 April 2022.

## I have just had Covid and now cannot receive the vaccine for a while?

If you have had a confirmed infection of Covid-19 after 6 January 2022 and are not yet vaccinated this will affect your ability to receive two doses by the deadline. Please talk to your university who can advise you on what you need to do while you await vaccination.

Current NHS guidance is that individuals aged 18 years old or over must wait 28 days before getting any dose of the vaccine. For the purposes of the Regulations, individuals will be considered temporarily exempt from the date of their positive test result on the basis that there are clinical reasons why they should not be vaccinated.

Their temporary exemption will start from the date of their positive test and continues for 42 days from the date of their positive test result. The 42 days comprises a 28-day grace period based on clinical advice, and 14 days in which to receive their first dose of COVID-19 vaccine.

You should still be able to book your first and/or second dose of the vaccine and can therefore provide evidence of your intent to be vaccinated to your university.

## I am pregnant and plan to delay vaccination until after I have had the baby – will this impact on my programme?

If you are pregnant, it is important to get vaccinated to protect you and your baby. You are at higher risk of getting seriously ill from Covid-19 if you are pregnant. If you get Covid-19 late in your pregnancy, your baby could also be at risk.

If you have not had a Covid vaccination yet, it is recommended to arrange to be vaccinated as soon as possible. You do not need to delay vaccination until after you have given birth. If you had your second dose at least three months ago, you can now book a booster dose. The vaccines cannot give you or your baby Covid-19. Useful information can be found by following the links below.

- [Coronavirus \(COVID-19\) Infection in Pregnancy](#)
- [Pregnancy, breastfeeding, fertility and coronavirus \(COVID-19\) vaccination](#)

A short-term medical exemption from the Covid-19 vaccination is an option that pregnant woman may choose to take. The exemption expires 16 weeks after giving birth. This will allow them to become fully vaccinated after birth.

Whilst the short-term exemption means that pregnant women can continue to be in patient facing roles a risk assessment should be undertaken. Pregnant women can use MAT B1 certificates when applying for an exemption.

Temporary pausing of placements may be considered and mutually agreed upon, following the outcome of applicable risk assessments or on the advice of occupational health. If you plan to defer your vaccination, please do talk to your university who will advise you what this means for your programme.

The domestic NHS COVID Pass will look and work in the same way for people with clinical exemptions as it will for people who are fully vaccinated. The pass will not show that a worker has a clinical exemption. Workers will receive a confirmation letter which they should keep for their records and use to prove that their unable to get vaccinated. The letter will explain that the individual is medically unable to get vaccinated, the pass does not.

## I have a medical exemption certificate – can I continue with my placements?

Placements can continue for those for whom vaccination is not clinically appropriate, however, it is important that your university, with the placement provider(s), takes steps to ensure the mitigation of workplace risk and identification of additional support required.

## I was vaccinated abroad what evidence do I need to show to prove I am vaccinated or exempt?

Individuals who are vaccinated abroad will be required to provide evidence of their vaccination status and, where necessary, have a top-up dose with a UK authorised vaccine consistent with the UK Health Security Agency (UKHSA) guidance on vaccines. To avoid doubt, mixed doses (that is, where different vaccines have been administered to complete the dose schedule) will be accepted for the purposes of the vaccination requirements

- [Vaccination of those who received COVID-19 vaccine overseas](#)

## I will qualify very soon and join the professional register. If I'm not vaccinated what does that mean for me in terms of future employment?

Covid vaccination will be a requirement of deployment for all those in patient facing roles in services regulated by the CQC. You will be required to provide evidence to your employer of full vaccination status or exemption to undertake a role with patient facing duties.

Occupational Health Departments will look at this as they do other required vaccinations (e.g. MMR, Tuberculosis, Hepatitis, Varicella) as part of pre-employment screening.

## Who is responsible for ensuring students are vaccinated?

As a future healthcare professional, it is the responsibility of the student to ensure they are vaccinated against Covid-19 or have the appropriate evidence of exemption. Universities should encourage the vaccination as part of their communications with students in line with NHS guidance and ascertain students' vaccination status to enable clinical placement education to occur. If students are not vaccinated (first and second dose) by 1 April 2022 they will not be permitted to undertake clinical placements and this may impact on their ability to complete their programme.

## Am I required to have more than two doses of the Covid-19 vaccination? / Is the Covid-19 booster included in the regulations?

At present, the regulations do not require evidence of booster doses, but it is strongly encouraged that all students take the opportunity to have a booster dose, at the appropriate interval, if you have not already received this.

## Are any other vaccinations included in the regulations?

At this time, no other vaccinations are included in these regulations although the government has stated its intention to keep this under review in respect of the influenza vaccine following this winter and ahead of winter 2022/23.

### Other useful links

- [Vaccination as a condition of deployment \(VCOD\) for healthcare workers](#)
- [COVID-19 and vaccination FAQs](#)
- [Vaccination as a condition of deployment \(VCOD\) for health and care workers \(England\) Frequently Asked Questions](#)
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