



msc Medical
Schools
Council



Introduction of Covid-19 vaccination as a condition of deployment for NHS workers in England – implications for healthcare students

The Department of Health and Social Care in England has recently announced that all NHS staff will need to be vaccinated against COVID-19 if they wish to be deployed in roles that involve face to face contact with service users. These rules will come into effect, subject to Parliamentary approval on 1 April 2022. At present (November 2021), this requirement only applies to England and not to Northern Ireland, Scotland and Wales.

The announcement from DHSC states that this requirement applies to all staff providing clinical care as well as to ancillary staff such as porters or receptionists who may have social contact with patients but are not directly involved in their care. The DHSC has subsequently informed MSC and DSC that:

‘A CQC registered person can only employ or otherwise engage a worker to undertake a regulated activity if the worker has received a full course of COVID-19 vaccination, unless the worker is exempt (exemptions include 1) medical exemption 2) clinical trial exemption 3) under 18 years of age).

Students who are over the age of 18 (and not clinically exempt) are therefore in scope of this requirement if they are deployed to undertake a CQC regulated activity.’

Further guidance will be provided to employers and HEIs in the near future.

Implications for HEIs training healthcare students

Many HEIs will already mandate immunisation against common serious communicable diseases for students entering education and training (such as Hepatitis B vaccination). This process is generally handled by occupational health services when the student joins the course.

Therefore, there is a clear precedence for mandating vaccination against Covid-19 for healthcare students. There is also a practical consideration; given that placement providers will require that all those undertaking training in their organisations are vaccinated against Covid-19 it will not be possible for a student to meet the required outcomes to graduate without undertaking placements in a CQC regulated setting.

Throughout the pandemic healthcare students have been treated as key workers. They have been able to access vaccination ahead of their near age peers on non-healthcare related courses and have undertaken placements within the NHS when access to healthcare premises has been reduced for the general public. Therefore, consistent with this principle, healthcare students should be treated the same as NHS employees with respect to mandatory vaccination.

Supporting students

Whilst the overwhelming majority of healthcare students have been vaccinated against COVID-19 there will be a small number who either cannot receive the vaccination for health reasons or who have not yet chosen to be vaccinated for a number of reasons. HEIs have a duty to support these students.

In the case of students who have been unable to take the vaccine for health reasons HEIs should ensure that students are encouraged to let them know that they believe this to be the case. The new requirements set by DHSC specifically state that individuals who are clinically exempt from vaccination can still be deployed in roles involving face-to-face contact with patients and this will also apply to students. HEIs should refer students in this position to their occupational health team which can confirm that the student is exempted from vaccination and work with the student to put in place a plan to manage any risk of contracting COVID-19 and transmission to patients whilst the student is on placement.¹

Where a student has not been vaccinated and would otherwise be eligible for the vaccine, HEIs should explore with that student their reasons for not wishing to be vaccinated in a one to one, confidential meeting. Students should be given access to [resources and expert advice](#) to support their decision making around vaccination.

Where a student decides that they still do not wish to be vaccinated against Covid-19 they may need to leave their healthcare course. It should be made clear to that student that this decision has been made because it is not possible for them to achieve the mandatory learning outcomes of their course without undertaking clinical placements and access to these placements is reliant on students being vaccinated. Non-vaccinated students pose a risk to patients, as well as to themselves.

HEIs should map the learning outcomes of their courses to demonstrate that the achievement of the outcomes is not reasonably possible outside of CQC regulated premises where vaccination is mandatory for face-to-face contact with service users.

There are issues about the few unvaccinated students, with no medical exemption, from Northern Ireland, Wales and Scotland continuing on their studies unvaccinated – theoretically they would not be allowed to practise as front-line patient-facing healthcare professionals in England under the current Covid rules.

¹ For more information on reasons why individuals may be clinically exempt from taking the COVID-19 vaccine please see page 29 of the [Covid-19 Greenbook](#)