

## Factsheet for the administration of seasonal influenza vaccination to staff

<p><b>Can all providers continue to use a PGD to administer influenza vaccination to staff?</b></p>	<p>No.</p> <p>Administration of influenza vaccine by an organisation to employees, including peer-to-peer<sup>i</sup> vaccination, is provision of an occupational health service (OHS<sup>ii</sup>).</p> <ul style="list-style-type: none"> <li>• Private or independent providers can only use PGDs when they are registered with CQC in order to provide one or more regulated activity, in compliance with section 10 of the <a href="#">Health and Social Care Act 2008</a>.</li> <li>• OHS are not a regulated activity and so are not registered with the CQC. Therefore, in accordance with the current legislation PGDs cannot be used by independent providers of OHS.</li> <li>• Although organisations may have used PGDs for such services in the past the CQC has identified this as an area of non-compliance with legislation.</li> <li>• Organisations now need to move to deliver services in accordance with the <a href="#">Human Medicines Regulations 2012 (HMR 2012)</a></li> </ul>
<p><b>What is a written instruction? How does it differ from a PGD?</b></p>	<p>Medicines can be supplied or administered in the course of an OHS<sup>ii</sup> by a registered nurse acting in accordance with the written and signed instruction of a doctor – this instruction is commonly called a written instruction. The use of a written instruction allows medicines to be provided under an exemption in <a href="#">Schedule 17 of the HMR 2012</a> which is applicable to OHS.</p> <p>Under an exemption in <a href="#">Schedule 17 of the HMR 2012</a> which is applicable to OHS, registered nurses can be instructed to administer a medicine. This exemption cannot under the legislation be used by any other registered healthcare professional.</p> <p>In October 2020, <a href="#">The Human Medicines (Coronavirus and Influenza) (Amendment) Regulations 2020</a><sup>7</sup> provided an additional time limited (to 1 April 2022) amendment to Schedule 17 to allow occupational health vaccinators<sup>iv</sup> (that is registered nurses, registered midwives, registered nursing associates; operating department practitioners, paramedics or physiotherapists registered in Part 13, 8 or 9 of the Health and Care Professions Council register; and pharmacists, who are employed or engaged by a person operating an occupational health scheme) to administer influenza or coronavirus vaccines as part of an NHS Body or Local Authority (LA) occupational health scheme in accordance with the written directions of a doctor as to the circumstances in which such medicines are to be used. <b>This amendment only applies to an NHS Body or local authority operating an occupational health scheme and occupational health vaccinators (as listed in the legislation) employed or engaged by them and is limited to the administration of influenza and coronavirus vaccinations; other providers such as independent providers cannot use this amendment.</b></p>

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	<p>A written instruction is completely different to a PGD and is an arrangement between the named registered professional (known as the vaccinator) administering the vaccine and the authorising doctor and isn't subject to the same legislated framework of a PGD.</p> <p><b>PGDs and written instructions are not interchangeable.</b></p> <p>For more detail on the legislation supporting OHS written instructions and PGDs see <a href="#">PGDs and Occupational Health Services</a></p>
<p><b>What is the national written instruction template for influenza vaccination for Occupational Health Services (OHS) for NHS Body or local authority organisations?</b></p>	<p>A written instruction template for NHS Body or local authority organisations will be produced by NHS Specialist Pharmacy Service (SPS) to support organisations wishing to utilise the Schedule 17 amendment provided by The Human Medicines (Coronavirus and Influenza) (Amendment) Regulations 2020, which allows occupational health vaccinators to administer seasonal influenza vaccination to their staff<sup>iii</sup> in the course of an NHS Body or local authority OHS.</p> <p>For seasonal influenza vaccination a written instruction, signed by a doctor, can allow occupational health vaccinators<sup>iv</sup> (that is registered nurses, registered midwives, registered nursing associates; operating department practitioners, paramedics or physiotherapists registered in Part 13, 8 or 9 of the Health and Care Professions Council register; and pharmacists, who are employed or engaged by a person operating an occupational health scheme) to administer inactivated seasonal influenza vaccination to staff<sup>iii</sup> in the course of an NHS Body or local authority OHS, including as a peer-to-peer<sup>i</sup> vaccinator. Vaccinators must be trained and competent to work in accordance with the written instruction.</p> <p>The written instruction can be used by NHS Body or local authority organisations OHS following the signed authorisation of the written instruction by an appropriate doctor, see '<a href="#">Who needs to sign the national OHS written instruction</a>' below.</p> <p>Once adopted by the organisation the written instruction allows named registered nurses, registered midwives, registered nursing associates; operating department practitioners, paramedics or physiotherapists registered in Part 13, 8 or 9 of the Health and Care Professions Council register; and pharmacists, who are trained and competent to work as Occupational Health vaccinators<sup>iv</sup> in accordance with the written instruction, to administer the seasonal influenza vaccination to staff<sup>iii</sup> under the signed written instruction.</p> <p>This written instruction can also be used where organisations provide a service to another organisation for the influenza vaccination of employees.</p> <p>The written instruction cannot be used to administer seasonal influenza vaccination to the public (i.e. to patients or clients) as this is not an OHS.</p>
<p><b>What is the national written instruction template for influenza vaccination for</b></p>	<p>A written instruction template for independent or other providers will be produced by NHS Specialist Pharmacy Service (SPS) to support organisations in the provision of the seasonal influenza vaccination to their staff<sup>iii</sup>.</p>

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<p><b>Occupational Health Services (OHS) for independent or other providers?</b></p>	<p>The written instruction can be adopted by organisations following the signed authorisation of the written instruction by an appropriate doctor, see 'Who needs to sign the national OHS written instruction' below. For seasonal influenza vaccination a written instruction, signed by a doctor, can allow named registered nurses to administer the seasonal influenza vaccination to staff<sup>iii</sup>, including as a peer-to-peer<sup>i</sup> vaccinator. Registered nurses must be trained and competent to work in accordance with the written instruction.</p> <p>Once adopted by the organisation the written instruction allows named registered nurses, who are trained and competent to work in accordance with the written instruction, to administer the seasonal influenza vaccination to staff<sup>iii</sup> under the signed written instruction.</p> <p>The written instruction can also be used where organisations provide a service to another organisation for the influenza vaccination of employees.</p> <p>The written instruction cannot be used to administer seasonal influenza vaccination to the public (i.e. to patients or clients) as this is not an OHS.</p>
<p><b>Who needs to sign a national OHS written instruction template for influenza vaccine for it to be legally adopted by an organisation?</b></p>	<p>Within the organisation adopting the written instruction template it must be signed by an Occupational Health Physician employed by that organisation – where there is no such doctor employed/contracted by the organisation it should be the doctor assuming responsibility for the delivery of the influenza vaccination programme to staff<sup>iii</sup> within the organisation (for example the organisation's Medical Director or a GP partner).</p> <p>The doctor signing the written instruction on behalf of the organisation they are employed by must be working within their own competency when signing.</p>
<p><b>What are the roles and responsibilities of the doctor signing the written instruction?</b></p>	<p>Signatories are recommended to consider the SPS advice '<a href="#">What are the roles and responsibilities of the various signatories of patient group directions (PGDs)?</a>' to support their role: although the document pertains to PGDs the roles and responsibilities of those authorising a written instruction would be similar.</p>
<p><b>Do health care professionals operating under a national written instruction template need to sign it?</b></p>	<p>Yes.</p> <p>Registered healthcare professionals operating under a written instruction should complete the practitioner authorisation sheet to declare themselves as having completed the required training and deemed competent to work under the written instruction. The named healthcare professionals signing a written instruction should be confirmed by corresponding sign-off from their line manager/clinical supervisor. This is not a legal requirement but identified as a component of a national written instruction template, to facilitate a good governance process for the authorisation of vaccinators working under a written instruction.</p>
<p><b>What are the roles and responsibilities of the healthcare professionals operating under a written instruction?</b></p>	<p>Registered healthcare professionals operating under a national written instruction template to administer inactivated seasonal influenza vaccine should refer to Section 1 of the document for further details of training and competency requirements. All registered healthcare professionals operating under a written instruction must act within their own professional competency at all times.</p>

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<p><b>Can occupational health vaccinators employed or engaged by an NHS body or a local authority operating an OHS, other than registered nurses, operate under an OHS written instruction for the supply or administration of any medication/vaccination?</b></p>	<p>No. The provision inserted into legislation by the <a href="#">The Human Medicines (Coronavirus and Influenza) (Amendment) Regulations 2020</a> allows healthcare professionals other than registered nurses as occupational health vaccinators only when the written instruction is for the supply or administration of a prescription only medicine used for vaccination or immunisation against coronavirus or influenza.</p>
<p><b>Can healthcare professionals other than registered nurses operate under an OHS written instruction if employed or engaged by an organisation that is not an NHS body nor a local authority?</b></p>	<p>No. There is no provision within the legislation for registered healthcare professionals other than nurses to operate under written instructions within independent organisations or other providers. The provision inserted into Schedule 17 of the HMR 2012 by the <a href="#">The Human Medicines (Coronavirus and Influenza) (Amendment) Regulations 2020</a> only applies to an NHS body or a local authority operating an occupational health scheme and occupational health vaccinators employed or engaged by them. The Schedule 17 provision for ‘persons operating an occupational health scheme’, which would apply to all other organisations operating an OHS, only relates to supply and/or administration of a medicine by a registered nurse acting in accordance with the written instructions of a doctor. These written instructions define the circumstance(s) in which such medicines are to be used in the course of an OHS.</p>
<p><b>Can all OHS (including NHS and independent organisations who provide private OHS) use the national written instruction template?</b></p>	<p>Yes.</p> <p>The relevant written instruction template can be adopted by all organisations giving influenza vaccination to staff<sup>iii</sup> as part of an OHS.</p> <p>A written instruction can be used within an organisation and where organisations provide flu vaccination services to other organisations as part of an OHS.</p> <p><b><u>OCTOBER 2020</u> – going forward there will be two templates. One for use by all providers including independent organisations for use by registered nurses only and one for use specifically by NHS Body or local authority organisations only who wish to allow for administration by the additional practitioners defined as occupational health vaccinators.</b></p>
<p><b>Our organisation commissions its OHS from another provider but this doesn’t include provision of seasonal influenza vaccination to our staff. Can our organisation adopt the national written instruction template to offer staff peer-to-peer seasonal influenza vaccination?</b></p>	<p>Yes.</p> <p>The provision of seasonal influenza vaccination to staff<sup>iii</sup> can be offered as a separate operation to the commissioned OHS. Therefore, peer-to-peer<sup>i</sup> influenza vaccination can be undertaken by an organisation under the relevant written instruction once signed by and appropriate doctor in the organisation, see <a href="#">‘Who needs to sign the national OHS written instruction’</a> above.</p> <p><b><u>OCTOBER 2020</u> – going forward there will be two templates. One for use by all providers including independent organisations for use by registered nurses only and one for use specifically by NHS Body or local authority organisations only who wish to allow for administration by the additional practitioners defined as occupational health vaccinators.</b></p>

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<p><b>Can private or independent healthcare providers of OHS services use PGDs to provide peer-to-peer influenza vaccinations to their own staff?</b></p>	<p>No.</p> <p>Private or independent providers can only use PGDs when they are registered with CQC to provide one or more regulated activity, in compliance with section 10 of the <a href="#">Health and Social Care Act 2008</a>. OHS are not a regulated activity and as such are not registered with the CQC; as a result PGDs cannot be used by independent providers of OHS.</p> <p>A written instruction can be used.</p>
<p><b>Can private or independent healthcare providers of OHS services use PGDs to provide peer-to-peer influenza vaccinations to employees of other organisation?</b></p>	<p>No.</p> <p>Private or independent providers can only use PGDs when they are registered with CQC to provide one or more regulated activity, in compliance with section 10 of the <a href="#">Health and Social Care Act 2008</a>. OHS are not a regulated activity and as such are not registered with the CQC; as a result PGDs cannot be used by independent providers of OHS.</p> <p>A written instruction can be used.</p> <p>Where an organisation offers an OHS to another organisation they would be expected to provide services that meet the appropriate standards for such a service.</p>
<p><b>Can NHS in-house OHS services use PGDs to provide influenza vaccinations to their own staff including peer-to-peer?</b></p>	<p>Yes.</p> <p>The legislation still allows NHS organisations to use PGDs and they may legally use them to provide in-house OHS where these are provided strictly to their own staff<sup>iii</sup>.</p> <p>However, NICE guidance (<a href="#">MPG 2 2017</a>) recommends that PGDs should not be used where they are not required and <a href="#">HMR 2012</a> provides alternative exemptions in <a href="#">Schedule 17</a> for the delivery of occupational health services. As such the use of the written instruction rather than a PGD should be considered first as PGD use may not be appropriate unless it offers a benefit to service delivery i.e. provision by healthcare practitioners other than nurses, who may legally operate under a PGD. As the registered vaccinators able to operate under a written instruction for NHS OHS has been extended the need for a PGD for the influenza and coronavirus vaccines has been reduced and is unlikely to be required. Where NHS organisations want to utilise a PGD for an occupational health service it would be the responsibility of the NHS organisation to develop and authorise the PGD in accordance with <a href="#">HMR 2012</a>.</p>
<p><b>Can an NHS organisation who does not operate an in-house OHS use PGDs to administer the seasonal 'flu vaccine to their staff (including peer to peer vaccination)?</b></p>	<p>Yes.</p> <p>For seasonal 'flu vaccination only it is acceptable for an NHS organisation which does not operate an in-house OHS to offer staff<sup>iii</sup> the seasonal 'flu vaccination under a PGD where it has been locally determined that a written instruction cannot adequately meet the needs of the service. NICE guidance (<a href="#">MPG 2 2017</a>) recommends that PGDs should not be used where they are not required and <a href="#">HMR 2012</a> provides alternative</p>

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	<p>exemptions in <a href="#">Schedule 17</a> for the delivery of occupational health services. As such the use of the written instruction rather than a PGD should be considered first as PGD use may not be appropriate unless it offers a benefit to service delivery i.e. provision by healthcare practitioners other than nurses, who may legally operate under a PGD. As the registered vaccinators able to operate under a written instruction for NHS OHS has been extended the need for a PGD for the influenza and coronavirus vaccines has been reduced and is unlikely to be required. Where NHS organisations want to utilise a PGD for an occupational health service it would be the responsibility of the NHS organisation to develop and authorise the PGD in accordance with <a href="#">HMR 2012</a>.</p> <p>All other OHS provided medicines/vaccines must be provided via the organisation's OHS provider.</p> <p>This advice includes all NHS organisations including, but not exclusively, NHS Foundations Trusts, NHS Trusts, NHS England and CCGs.</p>
<p><b>Can NHS OHS services use PGDs to provide influenza vaccinations including peer-to-peer to employees of other organisations?</b></p>	<p>No.</p> <p>When an NHS or other publicly funded body provides OHS to another organisation, be it private or publicly funded, this is deemed to be a private service. Private providers can only use PGDs when they are registered with CQC to provide one or more regulated activity, in compliance with section 10 of the <a href="#">Health and Social Care Act 2008</a>. OHS are not a regulated activity and as such are not registered with the CQC; as a result PGDs cannot be used by an NHS or other publicly funded body providing OHS to another organisation.</p> <p>A written instruction can be used.</p> <p>Where an organisation offers an OHS to another organisation, they would be expected to provide services that meet the appropriate standards for such a service.</p>
<p><b>Will the PHE national influenza PGD still include OHS use?</b></p>	<p>No. The PHE influenza vaccine PGD will only cover NHS commissioned services. The PHE PGD will not cover the provision of occupational health schemes or peer to peer influenza vaccination.</p> <p>The PHE PGD for seasonal influenza vaccination should continue to be used, where appropriate, for vaccination of patients.</p>
<p><b>Can the national protocol (NP) for 'flu vaccination be used to provide OHS or peer to peer 'flu vaccinations?</b></p>	<p>No. The national protocol for 'flu vaccination <b>does not</b> include the vaccination of healthcare staff and cannot be used to provide peer to peer or OHS 'flu vaccinations.</p>
<p><b>Can an organisation adapt the written instruction template to provide other vaccinations, immunisations or treatments to staff?</b></p>	<p>No.</p> <p>It is intended that only seasonal influenza (and potentially coronavirus) vaccination is delivered under a written instruction in this way due to its exceptional scope.</p>

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	Any use of a written instruction to provide any other vaccination, immunisation or treatment to staff <sup>iii</sup> as part of an OHS should only be undertaken by the occupational health department providing these services to an organisation whether that is in-house provision or as a commissioned service. Other OHS related vaccinations/immunisations or any other treatments should be managed under the direction of an occupational health physician and any decision to use a written instruction made by them.
<b>What should happen if a member of staff is excluded from receiving the seasonal flu vaccine under the Written Instruction?</b>	<p>Where appropriate, such individuals should be referred to the Occupational Health Consultant or their GP as appropriate.</p> <p>In case of postponement due to acute illness advise when the individual can be vaccinated and how future vaccination may be accessed.</p> <p>Document the reason for exclusion and any action taken in the individual's Occupational Health records.</p>

### For further information see:

- Q&A -PGDs, Written Instructions and Occupational Health Service <https://www.sps.nhs.uk/articles/pgds-and-occupational-health-schemes/>
- Written instruction Templates <https://www.sps.nhs.uk/articles/written-instruction-for-the-administration-of-seasonal-flu-vaccination/>

<sup>i</sup> Under the current legislation, for the purpose of the written instruction, **peer to peer vaccination** refers to the administration of the seasonal influenza or coronavirus vaccine by an appropriately trained and registered nurse (or for an NHS Body or local authority an occupational health vaccinator as listed within this document) to another employee of the same organisation.

<sup>ii</sup> An Occupational Health Service (OHS) is a multidisciplinary service that aims to protect and promote workers' physical, mental and social health and well-being through actions related both to the work environment and to the workers themselves. For the purposes of this factsheet the terms Occupational Health Scheme and Occupational Health Service are deemed interchangeable.

<sup>iii</sup> This includes staff offering commissioned services, sub-contracted staff, agency staff, individuals undertaking work placements with the organisation and volunteers

<sup>iv</sup> **Occupational health vaccinators** are defined in Regulations 8 of the HMR 2012, as amended by The Human Medicines (Coronavirus and Influenza) (Amendment) Regulations 2020. In accordance with Regulation 8 and Schedule 17 of HMR 2012, occupational health vaccinators employed or engaged by a person operating an occupational health scheme who may operate under a written instruction are: Registered nurses, midwives and nursing associates currently registered with the Nursing and Midwifery Council (NMC); operating department practitioners, paramedics and physiotherapists registered in Part 13, 8 or 9 of the Health and Care Professions Council register; Pharmacists registered with the General Pharmaceutical Council.