

Care Home Vaccination as Condition of Deployment (CVOD) Exemptions

9th September 2021

We expect national guidance imminently, so are sharing this information as it gives a starting point to raise understanding about identifying and discussing vaccination exemptions among care home managers in advance of the guidance.

NHS England and NHS Improvement



Current status

- Thursday 16th September is last date for care home workers to get their first vaccine dose so they are fully vaccinated by the time CVOD regulations come into force.
- Care home managers have been reporting that staff are claiming to be exempt from receiving the vaccination and so are planning/expecting to not get their first dose and keep getting deployed.
- Care home managers, who will be required to demonstrate the full vaccination or exemption status of their staff after 11th November, have been seeking guidance on how to demonstrate that whether staff are exempt from getting the vaccine.
- The regional team has been requesting this guidance from the national team and DHSC for several weeks.

What we know

[Coronavirus \(COVID-19\) vaccination of people working or deployed in care homes: operational guidance](#) (Updated 3 September 2021) states:

- **“There are a range of circumstances in which an exemption may be granted which will reflect the [Green Book on Immunisation against infectious disease, chapter 14a](#) and clinical advice from the Joint Committee of Vaccination and Immunisation (JCVI).**
- There will be a clear process for staff to follow if they think they may have a clinical reason to be exempt. This process will be aligned with certification for domestic events, exemptions from self-isolation for confirmed contacts and travel. Guidance for certification is being developed and we will add a link to this guidance here as soon as it’s published.
- We will be producing separate guidance for clinicians, which will align with guidance for vaccine certification in other public settings. This guidance will help clinicians to verify exemptions.”
- **In other words:**
- **Exemptions will reflect the Green Book**
- **Staff will need clinical approval to demonstrate their exemption**
- **The way that clinicians will be able to demonstrate this will be clarified**

The Green Book states:

- "There are very few individuals who cannot receive the Pfizer BioNTech, Moderna or AstraZeneca COVID-19 vaccines. Where there is doubt, rather than withholding vaccination, appropriate advice should be sought from the relevant specialist, or from the local immunisation or health protection team."
- JCVI has advised that women who are pregnant should be offered vaccination at the same time as non-pregnant women, based on their age and clinical risk group.
- JCVI advises that breastfeeding women may be offered any suitable COVID-19 vaccine.
- Individuals who have immunosuppression and HIV infection (regardless of CD4 count) should be given COVID-19 vaccine in accordance with the recommendations and contraindications above.
- Those who have had a previous allergic reaction to a COVID-19 vaccine or to any component of the COVID-19 vaccine ***should seek expert advice, and alternative vaccines are available.***
- Minor illnesses without fever or systemic upset are not valid reasons to avoid immunisation.
- If a COVID-19 patient is seriously debilitated, still under active investigation, or has evidence of recent deterioration, ***deferral of vaccination may be considered.***
- Extremely rare reports of capillary leak syndrome have been reported after AstraZeneca vaccine in individuals with a prior history of this condition. ***These individuals may be offered vaccination with an alternative COVID-19 vaccine.***

[The Green Book \(Immunisation against infectious disease\) Chapter 14a COVID-19 - SARS-CoV-2 - Contraindications and precautions](#)

IN OTHER WORDS:

- There are very few reasons not to have a particular vaccine, and this should always be discussed with an expert, after considering whether alternative vaccinations are appropriate.
- Non-clinical reasons are not to be considered as reasons for exemption.
- **Staff members cannot determine that they are exempt from getting a vaccine without having a clinical conversation.**

What next?

- We expect national guidance imminently, so are sharing this information as it gives a starting point to raise understanding about identifying and discussing vaccination exemptions among care home managers in advance of the guidance.
- Guidance is expected to expand on the process for confirmation of exemptions, rather than reasons for exemptions.
- **Proposal:**
- Disseminate the above information to care home managers to discuss with staff, and confirm with those whose claims of exemption are not genuine.
- Whilst national guidance on demonstrating exemption is still not forthcoming, care home staff who believe that they are exempt should evidence it.