



Flu vaccination service FAQs

September 2021

Questions around legal basis of administration

1. What are the legal mechanisms by which a pharmacist can administer a flu vaccine?

A pharmacist can administer an influenza vaccine by way of:

- a signed Prescription / a signed Patient Specific Direction (PSD)
- a Patient Group Direction (PGD)
- a national protocol* (applies to influenza and Covid-19 vaccines only)

The pharmacist must be suitably trained and must have met the training requirements for each home nation (links to training requirements for each home nation are given below).

1a. Within Community Pharmacy settings:

The administration of the inactivated influenza vaccine for eligible patients by community pharmacists is made under the authority of the national PGD. The PGD must be signed and authorised by the superintendent or the pharmacy manager or the owner. Each individual pharmacist providing flu vaccinations must read and sign the PGD.

Patients that are not eligible for the NHS funded programme (for example those under 50 years of age) can still be vaccinated by way of a separate distinct private PGD.

A pharmacist may also administer a flu vaccine by way of prescription issued by an independent prescriber (which can also be termed a PSD or patient specific direction).

For the 2021-2022 season, a pharmacist may also administer a flu vaccine under the national protocol.

1b. Within GP surgery settings:

The administration of the inactivated influenza vaccine can be under a PSD or a PGD or the national protocol. However, ALL the criteria for a PGD or PSD and national protocol to be legally valid still apply.

An independent prescribing pharmacist may compile a list of patients eligible for vaccination (a PSD) and who may be vaccinated by a suitably trained member of the surgery staff (for example a registered nurse).

A good summary from the CQC can be found [here](#).

Questions around training

1. What training materials do I need to be familiar with?

All pharmacist vaccinators should have the knowledge and skills detailed in the National Minimum Standards and Core Curriculum for Immunisation Training for Registered Healthcare Practitioners (NMS). This can be accessed [here](#).

Pharmacists should also be fully conversant with the initial 12 general chapters of the Green Book and also Chapter 19 which specifically relates to influenza vaccination. The Green Book can be accessed [here](#).

2. What Training should I complete before undertaking flu vaccinations?

Vaccinators need to refresh their training according to the requirements of their authorised PGD or service specification. The training requirements vary in the 4 home nations.

2a. For Community Pharmacy Vaccinations:

Details about training requirements for England can be found [here](#).

Details about training requirements for Wales can be found [here](#).

Details about training requirements for Scotland can be found [here](#).

Details about the influenza immunisation programme 2021-2022 and information for healthcare professionals (including links to resources) for Northern Ireland can be found [here](#).

2b. For Pharmacists administering vaccinations within general practice:

The NMS stipulates that: *“Specific training in Basic Life Support and anaphylaxis recognition and management should also be undertaken annually or as per employer’s stipulations”*

The NMS also has a competency assessment tool that is useful to confirm competency and training for registered pharmacists and this needs to be signed off by a supervisor.

Questions around insurance

1. What Insurance needs to be in place in order for me to provide flu vaccinations?

It is a [professional requirement](#) that every pharmacist undertakes activities that have some sort of indemnity arrangement to cover that activity. This cover may be individual cover or that which is provided by way of the employer (for example a business policy by the pharmacy owner which covers all staff for all activities that are provided within that pharmacy).

If a pharmacy is providing vaccinations away from the pharmacy it may need to arrange additional cover, so you must check that this is in place before providing vaccinations in any place outside of that registered pharmacy.

1a. Within Community Pharmacy

All community pharmacies must have indemnity cover for all the services that are provided within it and for all individuals that provide the services (including locum pharmacists). However, the PDA strongly recommends that all pharmacists should also have in place their own independent insurance cover. There is no separate charge for undertaking flu vaccinations as this is covered within the general policy issued for those working within a community setting.

1b. Within General Practice

All practices will have indemnity cover in place to cover activities undertaken by staff employed within the premises. However, the PDA strongly recommends that all pharmacists should have in place their own independent insurance cover.

2. Do I need additional insurance cover if also providing Covid-19 vaccinations?

At present we do not have information whether the flu vaccination and Covid-19 vaccination will be undertaken together in one patient appointment.

Pharmacists undertaking Covid-19 vaccinations are not covered by their general PDA policy unless they arrange additional cover for this. You can arrange this additional cover [here](#).

Questions around number of daily vaccinations to be scheduled and their impact

1. Who should be in control of the flu diary?

The RP may have conversations with their line manager regarding the flu appointment diary but ultimately the RP has final control over the volume of flu appointments that can safely be booked each day. The RP is responsible for the overall safe and effective operation of the pharmacy business and therefore must ensure patient safety is prioritised over any targets that the company may have set.

The daily professional activities and professional priorities together with how the professional areas of the pharmacy operates should not be micromanaged by a non-pharmacist store manager, an area manager or a Head Office.

2. What should I do if my store manager overrides my decision as RP regarding the flu diary?

We would hope that pharmacists were not put in this position because as noted above the RP has final control over the appointment diary, and this has already been acknowledged by one company (Boots). If the store manager tries to override this decision the pharmacist should then escalate this to the pharmacy support manager.

The PDA Union reps can support members in raising this issue and we urge members to get in touch with their local PDA Union rep for assistance and advice.

3. What should I do if I turn up in a store as RP and there are more flu vaccines booked in than I think is safe for me to carry out whilst maintaining my other duties?

Initially it would be recommended to have a discussion with your line manager, to see if additional cover can be given to you that day to enable you to safely deliver the flu service. If this is not possible, and as RP you do not believe it is possible to safely deliver these vaccines, it would be advisable to contact patients to reschedule appointments to a more suitable time when there will be adequate cover to deliver the service.

4. Should I prioritise flu vaccines over my other daily duties as RP?

Pharmacy Contractors must carry out essential services as part of the NHS Community Pharmacy Contractual framework therefore this should be the priority for the pharmacist. Essential services include the dispensing of medicines and appliances and repeat dispensing. Flu vaccination service is an advanced service and should not take priority over essential services. Recent guidance issued by the

NHS in Wales explicitly states that the flu service should be provided but not to the detriment of core contracted services.

5. What should I do if additional pharmacist cover is withdrawn, and I have a flu clinic booked in?

Any staffing amendment should always be discussed with the RP so that the RP can organise the services (including core or essential services such as dispensing) within the pharmacy to be provided safely. Initially it would be recommended to have a discussion with your line manager to understand why the original cover has been withdrawn and to seek replacement cover to enable you to safely deliver the flu service on that day. If this is not possible, and it is not possible to safely deliver these vaccines it would be advisable to contact patients to reschedule appointments to a time when there will be adequate cover to deliver the service.

6. I am a relief /locum pharmacist so have no idea of how many flu appointments I will walk into each day?

As a relief / locum pharmacist it is advisable to have a conversation with the different stores you may work with at this stage now regarding how many flu appointments you will be comfortable delivering in a day, this may vary depending on which stores you work in. It would be advisable to follow this up with an email confirming what has been discussed. A couple of days before working in that store, call ahead and check the number of appointments booked, if this is different to the agreed volume then ask the store manager to reschedule some of these appointments. If this request is refused, you may wish to escalate this with Pharmacy Services Manager or the Superintendent's office. Your local PDA Union rep can also provide advice on this in context of the specific circumstances.

Questions around the use of consulting rooms

1. What should I do if I only have one consultation room and I also offer services such as CPCS and EHC?

Services such as CPCS and EHC need to be carried out in a consultation room and the need for these services can occur at any time throughout the day. Considering the volume of these services that you would normally provide we would advise you to leave regular appointment spaces available throughout the day to allow you to continue these services. The flu service must not be prioritised to the detriment of other essential pharmaceutical services.

2. Can I refuse to vaccinate someone if they will not wear a mask in the consultation room.

Customers should already be wearing a face mask in the pharmacy as this is a healthcare setting, and this is especially important when in more confined spaces such as the consultation room. If the customer is not wearing a face mask, please offer them one before entering consultation room. If they refuse and you are concerned about your own health and safety, you do not have to vaccinate but can signpost them to an alternative flu vaccination clinic. More suitable alternatives may be vaccination clinics in outside settings or with larger consultation rooms.

3. What can I do if I am uncomfortable sitting in a consultation room with a patient who is exempt from wearing a mask?

Whilst these patients are exempt from wearing a mask, if you are concerned for your own health and safety, you do not have to vaccinate these patients. Firstly, discuss with the customer if they would be happy to wear a mask just for the very short time you will be in the consultation room together. If this is not possible you may wish to signpost them to a more appropriate vaccination setting. Ideally, booking forms should inform patients that face masks should be worn when receiving the vaccination service.

Questions around anaphylactic reactions to the flu vaccination

1. In the case of anaphylaxis if I am struggling drawing up adrenaline from ampoules as I have never done this in an emergency setting before can I use an auto injector instead?

As part of the PGD, individuals must be trained in the immediate management of anaphylaxis and immediate access to adrenaline 1 in 1000, it does not state how this is delivered. Some larger companies have an annual refresher training to draw up adrenaline from ampoules. This may be the option specified in the refresher training.

However, in an emergency setting if pharmacists have received adequate training in using an Emerade 500mcg auto injector and feel competent to do so, the adrenaline dose could also be delivered in this way. Please remember that you should always have 2 doses of adrenaline immediately available in case of anaphylaxis.

2. I am unable to obtain Emerade autoinjector, but I do have an EpiPen and Jext, can I use this instead?

The dose of adrenaline for anaphylaxis is 500mcg for adults over the age of 18 years and two doses of this should always be immediately available when carrying out flu vaccination. EpiPen and Jext have a dose of 300mcg. Whilst this is not the recommended dose for anaphylaxis if a pharmacist was struggling to draw up 500mcg of adrenaline in a lifesaving emergency situation it would be a professional decision but would be better to administer 300mcg adrenaline immediately than to wait.

Questions around pharmacy technicians or other staff undertaking flu vaccinations

1. Can a suitably trained registered technician administer flu vaccinations under the national PGD?

The national influenza PGD does not list pharmacy technicians as one of the professions that can administer the influenza vaccine.

2. How can a suitably trained registered technician or other suitably trained support staff undertake vaccinations?

Registered technicians and other suitably trained staff may be able to administer flu vaccinations under a national protocol (but not the PGD) and would need to satisfy all the requisite training criteria. You can read the national protocol which details exactly which activity each member of staff can carry out (including the actual vaccination) in a pharmacy providing the flu vaccination service [here](#).

3. Can a suitably trained registered technician continue to vaccinate whilst a pharmacist is on a break?

A suitably trained registered technician may vaccinate under a Patient Specific Direction (PSD) issued by a prescriber, the national protocol but not under the national PGD.

When requesting vaccination under a PSD, the prescriber must be satisfied that the person to whom practice is delegated has the qualifications, experience, knowledge and skills to provide the care or treatment involved.

A suitably trained registered technician or other suitably trained staff may vaccinate under the national protocol but only when there is a pharmacist trained in vaccinations present on the premises.

4. Is the RP accountable for technicians and other staff that may be vaccinating? Who is responsible for delivering emergency first aid to a patient when a technician is vaccinating?

If a pharmacy technician is administering a flu vaccination under a PSD it is the responsibility of the prescriber to ensure that the pharmacy technician has the requisite training, knowledge, and skills to undertake that vaccination. This would include being able to administer emergency first aid.

Any person who administers a flu vaccine under a PGD must comply with all the requirements specified under the PGD including training requirements which would include providing emergency first aid. Technicians or support staff CANNOT vaccinate under the National PGD.

When providing the flu service under the National Protocol, technicians or support staff that undertake the vaccination MUST have been trained in the recognition and management of anaphylaxis. However, there must also be a pharmacist who is trained in all aspects of the flu service to be present on the premises and who must assume overall responsibility for the service.

In cases of emergency, you must always consider how you can assist irrespective of who should be able to provide that emergency assistance. If for instance a technician or support staff are unable (for any reason) to administer assistance, but you as the pharmacist can, then it would be incumbent on you to do so.

It is the responsibility of the Responsible Pharmacist to secure the safe running of all activities that occur in a registered pharmacy.

4a. I am a locum pharmacist and have been advised that a suitably trained registered technician and suitably trained support staff will be undertaking all the flu vaccinations under the National Protocol so there is no need for my involvement in this.

Every activity and service undertaken in a registered pharmacy must be safely provided. This is the responsibility of the Responsible Pharmacist.

The National Protocol specifically states that the pharmacist, who must be fully trained in the providing of the flu service has to be present and assume overall responsibility for the vaccination. A pharmacy technician is NOT listed as a person that can assume overall responsibility for the vaccination under the national protocol.

Only named staff can undertake activities for providing the flu service under the national protocol and they must sign their declaration of competence to undertake that activity.

A locum RP is still responsible for ensuring and securing the safe and effective delivery of all activities that occur in that pharmacy so would need to be satisfied that all the provisions of providing the flu vaccination (under a National Protocol, a PGD or a PSD) are being met in full.

Questions around mass vaccination centres (MVC)

1. Who is the RP for a mass vaccination centre (MVC)?

If the mass vaccination centre is within the pharmacy premises the pharmacist signed in as RP will also be the responsible pharmacist for the MVC even if they are not involved with the vaccination process.

2. I am a sole pharmacist vaccinating in an MVC and there are back-to-back appointments booked. How should I manage if I get behind due to an incident such as anaphylaxis, fainting, needle phobia etc as the appointment time does take these situations into account?

It would be sensible to ensure adequate time is allocated for appointments but occasionally there may be unpredictable events that may cause these appointments to overrun. It would be advisable to have some allocated time available between blocks of appointments to allow pharmacists time to catch up at the end of a session.

It is vitally important that pharmacists take adequate rest breaks so they should not be expected to catch up with workload during this time. If the pharmacist has fallen behind schedule due to these unpredictable events, they may feel that the safest option is to reschedule some appointments to another day.