Accountability and Delegation under the National Protocols for COVID-19 vaccines: visual diagram

This document has been developed to support the publication of the National Protocols by Public Health England (PHE). Healthcare Professionals should also refer to the COVID-19 vaccination guidance for healthcare practitioners document published by PHE.

This document provides a visual diagram of the process under the National Protocol where the vaccination task is split into separate components (clinical assessment, preparation, administration and record keeping) and where preparation and administration of the vaccine may be performed by non-registered healthcare support workers who are appropriately trained, competent and supervised.

The name of the immuniser and, where different from the immuniser, the professional assessing the individual, person preparing the vaccine, and person completing the vaccine record must be identified in the vaccination record.

The purpose of this document is to help those who are operating under the National Protocols understand what their role-specific accountabilities and responsibilities are, particularly those who have not previously read or worked under a Patient Group Direction (PGD) and therefore will not be familiar with the language used in the National Protocol. The principles described in this document do not apply when working under a PGD or Patient Specific Direction (PSD).

A suite of Standard Operating Procedures which provide a framework for the safe and secure handling of the vaccine have been developed by the Specialist Pharmacy Service and are available here. These should be read in conjunction with the National Protocols.

Links to the national protocols, further relevant training resources and professional guidance are provided in the appendix.

Please note this document is only in reference to practice under the National Protocols.

The National Protocols

National protocols authorise the safe supply and administration of a vaccine.

Each element of activity under a protocol may be carried out by a different person or the same person, depending on the delivery model, so long as the professional registration and minimum training requirements are met for fulfilling each stage of activity. The name of the immuniser and, where different from the immuniser, the professional assessing the individual, person preparing the vaccine, and person completing the vaccine record must be identified in the vaccination record.

Legislation requires protocols to be authorised by ministers.

Legal authority to supply and administer a Prescription Only Medicine is provided to those working in accordance with the national protocols.

The clinical particulars in the protocols will be required to instruct and inform the safe and appropriate administration of vaccine in accordance with national recommendations. Standard Operating Procedures (SOPs) for the handling of vaccines and preparation of doses are available here.
All staff must play their part in ensuring that the efficacy of all vaccines is protected, by following the correct procedures for the ordering, receipt, storage, supply and administration of vaccines. Responsibilities are described here (specific responsibilities for PCN designated sites are here).

A visual diagram of this process is on page 4.

Vaccination roles under the National Protocols and how they operate

The table below outlines the roles involved in the vaccination process under the National Protocols.

Please note the Clinical Supervisor referenced below and in the visual aid is the Clinical Supervisor described in the national protocols. This is a senior lead role accountable for the clinical supervision and has accountability for the whole vaccination process across a vaccination site. This role must be a Doctor, Nurse or Pharmacist who is trained and competent in all aspects of the national protocol. This role has been assigned to the Band 8a Nursing Manager in the COVID-19 Vaccination Programme workforce models and is different to the Band 6 “COVID-19 Vaccination Programme - RHCP Clinical Supervisor (Vaccinations)” which undertakes a clinical supervisory role overseeing vaccination activity within a single pod. This role does not need to be a Doctor, Nurse or Pharmacist.
<table>
<thead>
<tr>
<th>Role/Task</th>
<th>Task/Responsibilities</th>
<th>Registration Status</th>
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<td><strong>Site</strong></td>
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| Clinical Supervisor (National Protocol) | - Must be present and provide clinical supervision for the overall provision of clinical care provided under the legal authority of the protocol.  
- Ensure the national policies including national protocols and standard operating procedures (SOPs) are followed.  
- In vaccination centres the Clinical Supervisor (National Protocol) is responsible for clinical oversight of multiple vaccination and post-vaccination observation pods. | Specified Registered Healthcare Professional (who is a Doctor, Nurse or Pharmacist competent in all aspects of the Protocol) |
| Nursing Manager (workforce model) (Please see clarification below this table) | | |
| Band 6 RHCP Clinical Supervisor (Vaccinations) (workforce model) (Please see clarification below this table) | - Oversees several non-registered vaccinators, Band 5 HCPs for clinical assessment and drawing-up, and post vaccination observation St John Ambulance (SJA) volunteers.  
- In vaccination centres the Clinical Supervisor (Band 6 RHCP Clinical Supervisor (Vaccinations)) undertakes a clinical supervisory role overseeing activities within a single pod. | Specified Registered Healthcare Professional (who is, or is supervised by, a Doctor, Nurse or Pharmacist competent in all aspects of the Protocol) |
| **POD** |                       |                     |
| Clinical Assessment | - **Responsible for the patient clinical assessment pre-vaccination** | Specified Registered Healthcare Professional (who can operate under a PGD or as an occupational health vaccinator) |
| Vaccine Preparation | - **Responsible for vaccination dilution, draw-up** | An appropriately trained, competent and supervised Registered Healthcare Professional or Non-Registered Healthcare Support Worker (who is, or is supervised by, a Doctor, Nurse or Pharmacist, in line with Regulation 3a) |
| Vaccine Administration | - **Responsible for administration of vaccines** | Registered Healthcare Professional or Non-Registered Healthcare Support Worker |
| Vaccine Admin Support | - Responsible for patient record keeping  
- Responsible for recording vaccination data (e.g. batches, numbers) | Registered Healthcare Professional or Non-Registered Healthcare Support Worker |
National Protocols

Under the National Protocols all responsibilities in the vaccination process are delegated directly to the individuals performing the tasks.

National protocols authorise the safe supply and administration of a vaccine. Each element of activity under a protocol may be carried out by a different person or the same person, depending on the delivery model, so long as the minimum training requirements are met for fulfilling each stage of activity. The name of the immuniser and, where different from the immuniser, the professional assessing the individual, person preparing the vaccine, and person completing the vaccine record must be identified in the vaccination record.

- Legislation requires protocols to be authorised by ministers (SOPs).
- Legal authority to supply and administer a Prescription Only Medicine is provided to those working in accordance with the national protocols.
- The clinical particulars in the protocols will be required to instruct and inform the safe and appropriate administration of vaccine in accordance with national recommendations. Standard Operating Procedures (SOPs) for the handling of vaccines and preparation of doses are available here.
- All staff must play their part in ensuring that the efficacy of all vaccines is protected, by following the correct procedures for the ordering, receipt, storage, supply and administration of vaccines. Responsibilities are described here (specific responsibilities for PCN designated sites are here).

This pictorial representation is available as a power point slide and can be printed as a poster for easy visual representation.
National Protocols


Professional standards


General Pharmaceutical Council (2017). Standards for pharmacy professionals. [link](https://www.pharmacyregulation.org/sites/default/files/standards_for_pharmacy_professionals_may_2017_0.pdf)


Royal College of Nursing (2019). Health Care Support Workers Administering Inactivated Influenza, Shingles and Pneumococcal Vaccines for Adults and Live Attenuated Influenza Vaccine (LAIV) for Children. [link](https://www.rcn.org.uk/professional-development/publications/pub-007441)

Royal College of Nursing (2019). The Role of Nursing Associates in Vaccination and Immunisation. [link](https://www.rcn.org.uk/professional-development/publications/pub-007565)

Training resources and other useful materials


NHSEI / SPS vaccine handling video (tbc) – to be confirmed on publication, please see the specialist pharmacy service website https://www.sps.nhs.uk/


