

## Information regarding consent to Immunisation and the role of Healthcare Support Workers (HCSWs)

### Purpose

This document provides information on the process of obtaining valid consent for immunisation. It clarifies the role of HCSWs in vaccination, in line with [UKHSA advice](#) and relevant professional standards. Please note there is no change to registered nursing associates; you can find further information regarding legal mechanisms for vaccination from [NHS England](#).

This information should be read in conjunction with all the links, references and further reading.

### Scope

This applies to all healthcare professionals involved in the immunisation programme, including prescribers, registered healthcare professionals, and HCSWs.

### Principles of Consent

- Consent must be freely given, voluntary, and without coercion.
- The individual providing consent must have the mental capacity to do so.
- Consent can be given by:
  - The individual themselves (if competent).
  - A person with parental responsibility (for children lacking capacity).
  - An authorised representative under a Lasting Power of Attorney (LPA) for health and welfare.
  - A court-appointed deputy.
- Consent is a process, not a one-off event. It may be withdrawn at any time.
- Consent for one immunisation does not automatically apply to future doses or other vaccines unless explicitly agreed.

### Responsibilities

#### Prescribers (e.g., under Patient Specific Directions)

- Responsible for seeking informed consent when prescribing vaccines.
- Must ensure the patient understands the risks and benefits of the vaccine.
- Consent may be obtained verbally, via Accurx, or using a written consent form.
- Must document the consent process in patient records.

## Healthcare Support Workers (HCSWs)

### Patient is not receiving the vaccination for the first time

HCSWs may administer subsequent vaccinations previously consented to by a registered HCP, such as seasonal flu vaccines, if the following apply:

- Consent has been previously obtained by a registered HCP eg by a nurse under a PGD, or a prescriber under a PSD and the patient confirms this is still valid.
- There are no changes in the patient's medical history or circumstances.
- The HCSW has undertaken basic checks, for example, checking that the patient is non-febrile and no other contraindications apply since the original assessment to ensure patient safety.
- They must seek support from a registered HCP if:
  - The patient has concerns
  - The patient wishes to discuss risks/benefits further.
  - The patient requires in depth assessment for contraindications e.g. immunosuppressive therapy
  - Any other concerns arise

### Patient is receiving the vaccination for the first time

HCSWs may administer vaccinations to those who have never received the vaccination if the following apply:

- A registered HCP has undertaken a clinical assessment
- The registered HCP ensures the patient understands the vaccine being offered, including risks and benefits and consent is obtained and recorded appropriately. This may be done in one of the following ways:
  - Speaking with the patient directly or through other communication, eg accrux, a letter or an email. This should include NHS information on the vaccine being offered ([Flu vaccine - NHS](#) , [COVID-19 vaccine - NHS](#) , [Shingles - NHS](#), [RSV vaccine - NHS](#)). You can find example Covid consent letter on the [gov.uk website](#).
  - Other staff, eg non clinical may be able to pre-screen in advance; however, the registered HCP must be able to review and confirm responses as needed ([NHS England, 2023](#)).

**What Legal Mechanisms can be used for HCSW to administer if the patient has been assessed and consent has been obtained by a registered HCP or prescriber as outlined above?**

Vaccine	PSD	National Protocol	PGD
Flu	✓	✓	<span style="color: red;">✗</span> No part of the PGD process can be delegated.
Covid	✓	✓	
Shingles	✓	N/A	
Pneumonia	✓	N/A	
RSV	✓	N/A	

## Good Practice Principles

- Always check that the patient is content to proceed before administering subsequent doses.
- Re-seek consent if:
  - The patient withdraws consent or wishes to discuss further
  - New safety information arises.
  - The vaccine formulation or indication changes.
  - The number of doses required changes.
- Provide information in accessible formats, including translations and interpreters where necessary.
- Record that consent has been obtained, even if verbal.

## References and further reading

[UKHSA Green Book, Chapter 5](#)

[NHS Specialist Pharmacy Service guidance on PGDs.](#)

General Medical Council (2021) [Good practice in proposing, prescribing, providing and managing medicines and devices - GMC](#)

NMC (2025) [Useful information for prescribers - The Nursing and Midwifery Council](#)

[Annual flu programme - GOV.UK](#)