

GDC consultation response

DHSC consultation:

**Making vaccination a condition of deployment in
the health and wider social care sector**

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Making vaccination a condition of deployment in the health and wider social care sector

The General Dental Council (GDC) regulates all dental professionals in the United Kingdom. We appreciate the opportunity to [respond to the consultation](#) from the perspective of a professional regulator, although we recognise that most of the specific questions are not appropriate for us to answer.

We fully recognise both the general importance of vaccination against COVID-19 in healthcare settings and the particular infection risks which result from the generation of aerosols in dental treatment. We continue to encourage dental professionals to be vaccinated and have included [specific advice on this](#) in our guidance to dental professionals on COVID-19. We set [Standards for the Dental Team](#) with which all dental professionals are expected to comply. They include requirements to provide a safe environment for patients (1.5) and to manage risks to their own health (9.2) as well as a specific requirement to have had had ‘all necessary vaccinations’ (1.5.2).

While we support vaccination as an essential component of wider strategies to address the pandemic, we do not feel it appropriate to express a view on whether it should be made a condition of deployment. There are though some implications of any decision to do so which we would encourage the government to take into account.

Impact on professional regulation

Although the requirement is framed as a condition of deployment rather than directly as an obligation on individual healthcare professionals, there may be unavoidable implications for professional healthcare regulation. Any unvaccinated dental professional who chose to work in a Care Quality Commission (CQC) registered setting and who was not exempt would be in breach of their professional standards.

The GDC, like many other healthcare regulators, has a referral protocol in place, setting out how we work with the CQC and others to manage regulatory interventions. Further work to determine how this protocol would need to change or adapt to a mandatory vaccination scheme would be needed. In addition, it would be open to any concerned person to raise as a fitness to practise concern with us if they had reason to believe that a dental professional was not complying with the requirement.

We would therefore recommend further work be undertaken to understand the impact on regulation, and particularly potential overlap/duplication of remit between regulatory bodies prior to reaching a decision on implementation.

Exemptions

The GDC already receives requests from dental professionals for guidance on determining and evidencing exemptions. The UK Health Security Agency’s guidance on vaccinations set out in the green book is not presented in a way which provides sufficiently clear, accessible, or audience appropriate information for all healthcare professionals. Clarity on exemptions will also be critical to the GDC’s role in determining matters of professional conduct. We

suggest the DHSC further expand on information and guidance regarding exemptions and allows sufficient time for this in order to enable a smooth implementation.

Consistency of approach

As a UK-wide regulator, we recognise the distinct identities of healthcare systems and policies in the four nations. We do though expect consistency of professional standards and behaviour and encourage the health departments of the four nations to act consistently on questions such as this wherever possible. Doing so would make it possible to give very clear messages about the requirements which apply, and thus support compliance and overall vaccination levels.

Within England, members of some dental professional groups may work in environment not regulated by the CQC. That may be because they work in laboratory settings with little or no direct patient contact, or because they work exclusively in non-surgical cosmetic practice. It is for the government to decide where to draw the boundaries of any mandatory vaccination requirement, but it will be very important to give careful consideration to edge cases and to be clear to those affected which side of the boundary they fall.

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