



The Vegan Society response to DHSC, England consultation: Making vaccination a condition of deployment in the health and wider social care sector

1 Background

“The aim of this consultation is to seek views on whether or not the government should extend the existing statutory requirement for those working or volunteering in a care home to be vaccinated against coronavirus (COVID-19) to other health and care settings, as a condition of deployment, and in addition, whether to introduce a statutory requirement to be vaccinated against the flu as a condition of deployment, as a means to protect vulnerable people.”

Consultation document: <https://www.gov.uk/government/consultations/making-vaccination-a-condition-of-deployment-in-the-health-and-wider-social-care-sector/making-vaccination-a-condition-of-deployment-in-the-health-and-wider-social-care-sector>



2 Survey

2.1 About you

2.1.1-2.1.6 – Administrative purposes

2.1.7 Are you completing this consultation as: *

Other (please specify)

“The Vegan Society includes an International Rights Network (originally founded in 2012) of individuals working to improve legal recognition of veganism, and the rights of vegans under international, European and national rights and equality legislation. A leading authority on the subject of veganism and law, the network members are from many different countries, each bringing specialist legal knowledge. Under international law vegans are entitled to a social order that respects their right to live according to the ethical conviction that it is morally wrong to appropriate, abuse and exploit nonhuman animals.” (Words ~ 91)



2.2 Views on policy intention

If you are not a current service user or patient, we still welcome your view as you may need health or social care services in the future.

2.2.1 Which of the following best describes your preference about the COVID-19 and flu vaccination status of the people who would be providing your care?

I don't know

2.3 Which persons should be required to be vaccinated?

2.3.1 Which of the following best describes your opinion of the requirement: "Those deployed to undertake direct treatment or personal care as part of a CQC regulated activity in a healthcare or social care setting (including in someone's home) must have a COVID-19 and flu vaccination"

I don't know.

Please provide details to support your answer (maximum 500 words)

"Your initial Public Sector Equality Duty (PSED) analysis has correctly indicated that making COVID-19 and flu vaccinations a condition of work in health and social care could impact certain groups. Yet, you also concede that you 'have no data on the numbers in the social care workforce who follow religions or hold beliefs that may make them reluctant to take the COVID-19 vaccination.' (Annex C - Equality Impacts: Religion and Belief)

"Moreover, you must also take into account well-founded vaccine hesitancy, which for example is significant in Black People of Colour, and people with relevant protected beliefs. Kadambari & Vanderslott (The Lancet 21:9:1204, 2021 - [https://www.thelancet.com/journals/laninf/article/PIIS1473-3099\(21\)00404-7/fulltext](https://www.thelancet.com/journals/laninf/article/PIIS1473-3099(21)00404-7/fulltext)) have found, 'Distrust of government and public health bodies has arisen due to ongoing discrimination (cited earlier this year by the independent National Health Service Race Observatory Board), previous unethical research (eg, in US Tuskegee syphilis study), and fears that groups are being misled about vaccines.'



“Vegans hold the protected philosophical belief of veganism under the Equality Act 2010. Therefore, if it is deemed appropriate to implement a system of COVID19 and influenza vaccination exemptions for health and social care workers based upon belief, vegans must be given equivalent exemptions to those with other relevant philosophical and/or religious beliefs. Any such exemptions system must be transparent, consistently applied, and clearly in line with the law.”

Same for all:

2.3.2 Must have a COVID-19 vaccination in social care

2.3.3 Must have a Flu vaccination in healthcare

2.3.4 Must have a Flu vaccination in social care

2.3.5 Do you think there are people deployed in or visiting a healthcare or social care setting (including someone’s home) who do not undertake direct treatment or personal care as part of a CQC regulated activity but should also be included within the scope of a requirement to have a COVID-19 and flu vaccine?

2.3.6 Which people do you think should be covered by the scope of the requirement to have a COVID-19 vaccination and flu vaccination?

For COVID-19 and flu vaccination are there people deployed to undertake direct treatment or personal care as part of a CQC regulated activity that should not be in scope of the policy?

2.3.7 COVID-19 vaccination

2.3.8 Flu vaccination

2.3.9 Are there any other health and social care settings where an approach similar to adult care homes should be taken? (that is, all those working or volunteering in the care home must have a COVID-19 vaccination or have an exemption) No opinion

As above

Which of the following best describes your opinion of the requirement: Those under the age of 18, undertaking direct treatment or personal care as part of a CQC regulated activity (in a healthcare or social care setting, including in someone’s home), must have a COVID-19 and flu vaccination?

2.3.10 COVID-19 vaccination in healthcare

2.3.11 COVID-19 vaccination in social care

2.3.12 Flu vaccination in healthcare

2.3.13 Flu vaccination in social care



2.4 Exemptions As above

Do you agree or disagree that exemption from COVID-19 vaccination and flu vaccination should only be based on medical grounds?

2.4.1 COVID-19 vaccination

2.4.2 Flu vaccination

2.4.3 On what other basis, if any, should a person be exempt from COVID-19 vaccination requirements? (maximum 500 words)

2.4.4 On what other basis, if any, should a person be exempt from Flu vaccination requirements?

2.5 Considerations of potential impacts

2.5.1 Are there particular groups of people, such as those with protected characteristics, who would particularly benefit from COVID-19 vaccination and flu vaccination being a condition of deployment in healthcare and social care? *

Not sure

2.5.2 Which particular groups might be positively impacted and why?

No comment

2.5.3 Are there particular groups of people, such as those with protected characteristics, who would be particularly negatively affected by COVID-19 and flu vaccination being a condition of deployment in healthcare and social care?

Yes

2.5.4 Which particular groups might be negatively impacted and why?

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“Moreover, you must also take into account well-founded vaccine hesitancy, which for example is significant in Black People of Colour, and people with relevant protected beliefs. Kadambari & Vanderslott (The Lancet 21:9:1204, 2021 - [https://www.thelancet.com/journals/laninf/article/PIIS1473-3099\(21\)00404-7/fulltext](https://www.thelancet.com/journals/laninf/article/PIIS1473-3099(21)00404-7/fulltext)) have found, ‘Distrust of government and public health bodies has arisen due to ongoing discrimination (cited



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2.5.5 What could the government do to encourage those working in unregulated roles to have the COVID-19 and flu vaccine? (maximum 500 words)

As above

2.5.6 We would welcome any comments you may have relating to Annex B - proposed addition to the code of practice – criterion 10. (maximum 500 words)

As above