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Northumberland Local
Medical Committee

Enhanced Service – Covid Vaccination Programme Summary of FAQs Version 1 (4/12/2020)

NHS England published both the [Covid-19 Enhanced Service \(ES\) Specification](#) and an accompanying letter [Covid-19 vaccination programme 2020/21 – next steps](#) on 01 December 2020.

These documents contain specific information that practices and PCN groupings need to be aware of when assessing whether they can deliver the ES, which formally begins on 08 December 2020.

Throughout this week, many of you will have been considering the content of these documents in readiness for confirming your decision before 23.59 on 07 December 2020.

Recognising that some of you will already feel ready to commit, we know that queries have been raised regarding certain elements of the specification and that the ask to sign up within such a pressing timeframe is a challenge.

We are issuing a summary of FAQs compiled from local queries and also national ones that we hope can provide those practices and PCN groupings who need it with some clarity and reassurance, noting that this is a very fluid situation, and that updates and guidance are being updated on a daily basis.

This document has been produced in collaboration with Northumberland Local Medical Committee. With thanks to Cambs LMC.

How does this relate to our core GP contract?

Contractually, signing up to deliver this enhanced service is no different to signing up to other enhanced services. The CVP ES will be commissioned under section 7a of the 2006 NHS Act, as an enhanced service directed by NHSEI, using full delegated powers from the secretary of state. This provides flexibility for necessary amendments to the specification to be made swiftly, by national agreement between NHSEI and GPCE only. This is crucial in such a fast-moving environment where we will need to add in new information without delay as more vaccines are supplied with different requirements.

If a practice declines to sign up to the ES now but changes their mind later after the deadline, can they sign up later after that date?

Yes, there are no guarantees for such practices, but it may be an option.

If a GP practice does not choose to sign up with the rest of their PCN how are their patients covered?

There is currently a lack of clarity about the mechanism that will be used to deliver the service for these patients, this is yet to be confirmed.

When do we have to make a decision?

You have until 23:59 on 07 December to voluntarily accept or decline participation in the CVP ES from 07 December 2020 – 31 August 2021, with responses via an email to the CCG, with the name of the designated vaccination site included in the email.

Is there any way we can deliver this from our practice?

No. The designated single PCN site needs to have been agreed by the CCG. Additional sites may be possible in the future, but this is not currently permissible under the CVP ES.

Where does the responsibility and liability sit?

PCNs don't exist in any legislature, so any responsibility and liability rests with member practices. Practices will be jointly and severally liable for the vaccine, its safe storage and delivery of this service with other PCN members and may want to seek legal advice over the creation of a Collaboration Agreement, which needs to be in place at least one day prior to the date of the first administration of the vaccines. You will be jointly liable, with your PCN member practices, for the programme, the stock of the vaccine, including any financial liability or costs incurred.

What can we do to mitigate the potential liabilities?

Nothing. Once signed, the CVP ES becomes an extension of your core GMS contract (as per all national enhanced services) if you do not meet the requirements, then any money already paid to you may be clawed back by direct deduction via Open Exeter. You may also be liable for the failure of your fellow practices to meet the requirements.

Will NHSEI have to seek agreement with GPC England if they wish to change the CVP ES?

No. NHSEI may unilaterally impose variations or additions, they do not need to consult with GPC England. If changes or variations are made, you must fulfil those requirements. You may be enlisted to support other practices outside of your PCN grouping.

Can we serve notice if the CVP ES is changed?

Once signed, you cannot exit the contract without serving 42 days' written notice to NHSEI, with supporting reasons unless otherwise agreed with the commissioner (NHSEI). If unilateral variations are imposed to the CVP ES, you will have to abide by them for the full notice period. You will still be bound by the Collaboration Agreement and remain jointly and severally liable for the duration of the CVP ES unless the Collaboration Agreement is amended.

Who will undertake consent?

It is the practice's responsibility to seek informed consent, that needs to be obtained by a registered healthcare professional. There is no mention of a nationally coordinated consent system. However, it has been confirmed there is comprehensive cover from the Clinical Negligence Scheme for General Practice.

What happens in the exceptional circumstances where we can't deliver a follow-up dose?

Exceptional circumstances where a practice may be paid for a single vaccine, include: adverse events following the initial dose; end of life care being commenced; death; a consultation recorded in the record with a clinician when a patient declines; the patient DNAs despite two separate attempts to contact and 60 days elapsing. It is extremely important that practices keep accurate records to facilitate correct payment.

When does this actually start?

Designated sites will be given 10 days notice of the first vaccines becoming available to ensure sites can be stood-up and clinics arranged. Practices and their PCNs must register with the Primary Care Bulletin as outlined in the NHSEI documentation, as this will be the CVP ES communication channel. On 03 December it was announced that 280 GP sites will be asked to commence the week commencing 14 December. Events are moving quickly, and all this is subject to change daily.

Will we have to be open 8am-8pm seven days a week?

The CVP ES states that the PCN site must be able to deliver the vaccine 8am-8pm seven days a week, including bank holidays, where NHSEI inform the PCN that this is required. This is in order to maximise the number of vaccinations and minimise waste. Wastage must not exceed 5%. There is no clarity as to the consequences of a wastage level >5%. There is also no clarity as to how you are to be expected to guarantee the connectivity of your broadband. Remember, the ES also requires you to ensure designated site security at all times.

Who will be eligible?

Patients are to be vaccinated in strict order of cohorts. Please reference 9.2 of the CVP ES. GP practices are required to keep up to date with these criteria which will change from time to time and will be notified by NHS England of amendments through the Primary Care Bulletin. At the time of writing (04 December 2020), call and re call arrangements are still under discussion. As national PGDs has not been released vaccination will need to take place under a PSD.

The LMC will support practices and PCN groupings, irrespective of what decision you make.

We will continue to liaise with CCGs, ICS and BMA GPC colleagues to provide you with much needed advice and guidance during these challenging times.