

Nuffield Council on Bioethics

The Rt Hon Matt Hancock, MP
Secretary of State for Health and Social Care
Department of Health and Social Care
39 Victoria Street
London
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29 August 2019

Dear Secretary of State

I am writing to you following the announcement made by the Prime Minister last week regarding plans to increase vaccination uptake.

The Nuffield Council on Bioethics looked at the ethical issues relating to vaccination policies in our [Public health: ethical issues](#) report. Whilst the report was published in 2007, it remains highly relevant today, and I thought it would be useful to highlight some of our recommendations.

In our report, we proposed a stewardship model to inform public health policies. The central premise is that the state has responsibility to look after the health of all its citizens – both collectively and individually – and public health policies should aim for the least intrusive means possible to achieve the required health benefit. We provide an ‘intervention ladder’ as a useful way of thinking about the different ways that public health policies, including on vaccinations, can affect people’s choices. Interventions that are higher up the ladder are more intrusive and therefore require a stronger justification:

Eliminate choice
Restrict choice
Guide choice by disincentives
Guide choice by incentives
Guide choice by changing the default policy
Enable choice
Provide information
Do nothing

Our report examines the tension between the individual choice to vaccinate or not, and the corresponding benefits and harms that may result at population level. We discussed the ethics of voluntary, quasi-mandatory and mandatory vaccination policies.

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At the time, we did not find enough justification to recommend that the UK moves away from a voluntary approach to childhood vaccination and in our view, this has not changed, though other approaches to encourage and support vaccination are clearly still warranted. We identified two circumstances in which quasi-mandatory vaccination measures are more likely to be justified. First, for highly contagious and serious diseases and second, for disease eradication if the disease is serious and eradication is in reach. In either case, there would need to be very clear evidence that less intrusive measures had been properly implemented and had failed to achieve their aim.

Clearly, the rising incidence of measles cases in the UK is a cause for concern, but we would urge any policy decisions in this area to be based on the best possible scientific evidence. The intervention ladder illustrates how there are several less intrusive steps to be considered before compulsory vaccination. We welcome the Government's plans to introduce measures which will improve access to childhood vaccinations, and we would strongly support the sort of practical actions that aim to remove existing barriers – for example, improving appointment booking processes and more consistent provision of reminders, in appropriate formats for parents and carers. It is hard to see how compulsory approaches could be justified until much more has been done in this area.

Regarding measles, it is clear that one contributor factor in the rise in measles cases is concern about the safety, in general, of vaccines. The proliferation of misinformation through social media has had a huge effect here. In our report we said that anyone reporting on health research has a duty to communicate findings in a responsible manner, and this must apply for social media companies too. Under our stewardship model, all companies have obligations towards society, and the media - including social media - have a responsibility to present evidence and information accurately, clearly and fairly. We therefore welcome the call for social media companies to discuss how they can play their part in promoting accurate information about vaccination.

We note that your team are currently developing a vaccination strategy, working with Public Health England and NHS England. We would be very happy to meet with you and/or your policy team to discuss our report and how it may be able to offer some guidance on this complex issue.

Should this be of interest, please contact our Public Affairs Manager, Richella Logan on rlogan@nuffieldbioethics.org / 020 7681 9619.

Yours sincerely,

A handwritten signature in black ink that reads "Hugh Whittall". The signature is written in a cursive, slightly slanted style.

Hugh Whittall
Director, Nuffield Council on Bioethics