

The [Autumn and Winter Plan 2021](#), published on 14 September, sets out the government's aims to sustain the progress made and prepare the country for future challenges, while ensuring the National Health Service (NHS) does not come under unsustainable pressure. If the data suggests the NHS is likely to come under unsustainable pressure, the government has prepared a Plan B for England.

The government set out its intention that vaccine certification could form part of a Plan B, however, final decisions on the policy have not been made. Under Plan B, in certain settings:

- mandatory vaccine-only certification could be introduced for all visitors aged 18 or over; and
- members of the workforce aged 18 or over in these settings could then be required to test regularly if they are not fully vaccinated

The government invites responses to the detail on the proposed certification regime which could be introduced as part of Plan B. The government is particularly interested in views from businesses, event organisers and venue operators, including from those that have experience of using certification on a voluntary basis over the summer, and on the proposals for the workforce.

The government invites submissions of evidence, and is also engaging with stakeholder representative groups. This opportunity for engagement will enable the government to take into account relevant comments and views, making any warranted revisions. We are now asking for responses by 11 October, although we encourage stakeholders to submit views as quickly as possible in case there is need to introduce certification, as part of Plan B, at short notice. If Plan B is implemented, it could be at short notice in response to concerning data. The government would seek to give businesses at least one week's notice before mandatory vaccine certification came into force.

The government intends to take a proportionate approach, balancing the impact on public health with the economic and social impacts by focussing on settings where crowds mix and come into close contact. Mandating vaccine-only certification could allow settings that have experienced long periods of closure to remain open and is preferable

to closing venues entirely or reimposing capacity caps or social distancing.

## Settings

Under Plan B, the government expects that mandatory vaccine-only certification for visitors to venues and events, and vaccine-or-test certification for the workforce would be introduced for the following venues and events:

- all nightclubs, and other venues open after 1am with alcohol, music and dancing
- indoor, crowded settings with 500 or more attendees where those attendees are likely to be in close proximity to people from other households, such as music venues or large receptions
- outdoor, crowded settings with 4,000 or more attendees where those attendees are likely to be in close proximity to people from other households, such as outdoor festivals
- any settings with 10,000 or more attendees, such as large sports and music stadia

There are some settings that will be exempt from requirements to use the NHS COVID Pass, such as:

- communal worship
- wedding ceremonies
- funerals
- other commemorative events

### Question

Do you think that the list of settings is too narrow or captures too many settings?

- the list is too narrow
- the list captures too many settings
- I don't know

If you said the list is too narrow, which settings should also be in scope of certification? (maximum 150 words)

If you said the list captures too many settings, which should be excluded from certification? (maximum 150 words)

**IGNORE THIS QUESTION**

## Visitors and staff

### Question

Which of the following best describes your opinion about the COVID-19 vaccination status of people who choose to attend venues and events where certification would be required, if Plan B is implemented?

- I feel strongly that they should be vaccinated
- **I would prefer that they are vaccinated**
- I don't mind either way
- I would prefer that they are not vaccinated
- I feel strongly that they should not be vaccinated
- I don't know

### Question

To what extent do you agree or disagree that visitors to venues and events where certification would apply should be required to be fully vaccinated to enter, unless they are exempt?

- strongly agree
- slightly agree
- neither agree nor disagree
- slightly disagree
- **strongly disagree**
- I don't know

### Question

To what extent do you agree or disagree that people working at the venues and events where certification would apply should be required to be fully vaccinated or test regularly to enter, unless exempt?

- **strongly agree**
- slightly agree
- neither agree nor disagree
- slightly disagree
- strongly disagree
- I don't know

### Question

Do you think unvaccinated people working at venues to which certification would apply should be supervised or unsupervised when taking regular tests?

- supervised
- **unsupervised**
- I don't know

### Question

Do you think that everyone working in venues to which certification would apply, or only those in customer-facing roles, should be required to show they are vaccinated, exempt or being testing regularly?

- **both customer facing and non-customer facing roles**
- customer facing roles only
- I don't know

### Question

Please provide any additional comments you have on requirements on people working at venues where certification would apply.  
(maximum 500 words)

**Venues and operators within the theatre sector already have rigorous testing procedures in place, capturing both vaccinated and non-vaccinated workforce. There remains a significant proportion of both our audience and workforce who will remain unvaccinated because of a strongly held religious, cultural or social belief.**

Whilst theatre venues would not be captured in the mandatory scheme where certification would apply, we anticipate operators continuing to test workforce, both customer-facing and non-customer facing. This is support by staff bodies and the trades unions that cover our sector, who in turn do not support mandatory vaccination amongst our staff.

As our venues face dynamic demand from audiences depending on productions, it is essential that operators can risk assess individual productions or events and develop testing protocols to ensure minimal COVID-19 transmission on a case-by-case basis. A government commitment to continue offering free access to testing as long as COVID-19 protocols remain in place would be welcome support to operators in the sector.

Ongoing testing will continue to be crucial to operators' responses to the pandemic to protect and provide confidence to our audiences and workforce.

## Exemptions

There will be a small number of exemptions.

The following have an exemption from vaccination, which they will demonstrate through the COVID Pass or international equivalents:

- UK COVID-19 vaccine clinical trial participants or vaccine trials participants who have taken part in a clinical trial in any country whose proof of participation is recognised that is recognised for UK border purposes
- anyone with a clinically approved medical reason why they cannot vaccinate

The following have an exemption from certification:

- anyone aged under 18 years of age

- police officers, local authority officers and emergency services responders acting in their official duties
- a diplomat or someone working for an international organisation

### Question

Do you think other groups should be exempt from requirements?

- yes
- no
- I don't know

If yes, please give reasons for your answer. (maximum 150 words)

While those with a valid medical reason for not receiving the vaccination will be able to gain certification through individually assessed endorsement from GPs, a significant proportion of our audience and workforce will remain unvaccinated because of a strongly held religious, cultural or social belief.

SOLT & UK Theatre members do not endorse a vaccine only programme. We have been consistently clear that we have a strong desire to provide access on an equal basis to all audiences, including those who have made the decision not to receive the vaccination.

### Question

Are there any groups, particularly those with protected characteristics, that you think would benefit from vaccine certification becoming mandatory in the settings listed? (maximum 150 words)

For many, the idea of a rigorously implemented certification system represents the only circumstance under which they would consider attending an event at all. In the Theatre Access 2021 Survey, 75% of respondents favour a vaccine passport (50% strongly agree, 25% agree.) 82% of survey respondents identify as deaf, disabled or neurodivergent.

### Question

Are there any groups, particularly those with protected characteristics, that you think would be placed at a disadvantage from vaccine certification becoming mandatory in the settings listed? (maximum 150 words)

In the Theatre Access 2021 Survey, 11% of respondents would not favour a vaccine passport (9% strongly disagree, 2% disagree.) 82% of survey respondents identify as deaf, disabled or neurodivergent.

Anyone with any medical condition that means they have been advised against getting the vaccine, or who is completely unable to be vaccinated is clearly disadvantaged; even where evidence of exemption can be obtained, it is another barrier to people for whom the experience of going to the theatre is full of barriers anyway.

Although there are other ways of obtaining and showing evidence than on the NHS app, this represents a clear digital divide, especially given the issues some will have with accessing and using the app even if they have a mobile phone.

### **Question**

Thank you for taking the time to share your thoughts. We welcome any further comments you may have relating to this consultation. (maximum 500 words)

The Society of London Theatre & UK Theatre represent approximately 470 performing arts venues and producers. UK Theatre also operates as a professional association, supporting over 1,400 individuals. In 2018, 34 million tickets were sold to 63,000 performances in member venues; 290,000 people were employed in the performing arts.

Other than those hosting a limited number of immersive or promenade productions, SOLT & UK Theatre venues will not be captured in the mandatory certification scheme as proposed.

Nonetheless, the application of the proposed scheme would have operational and cultural implications:

**Vaccine Only Certification:** While those with a valid medical reason for not receiving the vaccination will be able to gain certification through individually assessed endorsement from GPs, a significant proportion

of our audience and workforce will remain unvaccinated because of a strongly held religious, cultural or social belief.

SOLT & UK Theatre members do not endorse a vaccine only programme. We have been consistently clear that we have a strong desire to provide access on an equal basis to all audiences, including those who have made the decision not to receive the vaccination.

Within our own venues, SOLT & UK Theatre members have developed rigorous testing procedures for our workforces. This is supported by staff bodies and the trades unions that cover our sector, who in turn do not support mandatory vaccination amongst our staff.

Change of Use of the NHS App to Vaccine Only: At present, the NHS COVID Pass displays an individual's COVID status on the basis of vaccine, test or natural immunity status. SOLT & UK Theatre member venues consider this construction to be fit for purpose in protecting the public health of both our audiences and workforce. However, if mandatory certification were introduced, the NHS COVID Pass would switch so that it certified individuals based on vaccine status only. SOLT & UK Theatre Organisations, which are out of scope, would continue to be able to accept testing as a voluntary measure but would need to accept alternative methods (such as emails or text messages) as confirmation of a negative test result. This would have a significant negative impact on SOLT and UK Theatre member venues' operational ability to deliver voluntary schemes, as our operators want to continue to allow testing as a method of entry and therefore will have to assess a number of different proofs on the door. If the app were to switch to vaccine only, we will see the number of voluntary schemes running in the theatre sector reduce considerably. Some operators will abandon voluntary schemes altogether; others will move from complete checks to spot checks of a small percentage of audiences.

Recognition of International Vaccines: Currently, a limited number of vaccine providers overseas are recognised by the UK Government. If mandatory certification is introduced, this could present operational barriers to welcoming international audiences