

Privacy Notice - Coronavirus (COVID-19) vaccination of people working or deployed in care homes – Vaccination Log




Introduction

Under the [Health and Social Care Act 2008 \(Regulated Activities\) \(Amendment\) \(Coronavirus\) Regulations 2021](#), employers of all CQC registered care homes must ensure that all staff working within the care home, or professionals, such as healthcare workers, tradespeople, hairdressers, beauticians and CQC inspectors, visiting the care home, have been fully vaccinated against Covid 19.

Staff or professionals, that have certain allergies to the vaccine ingredients or conditions which are medically recognised as reasons not to administer the vaccine, will need to follow the process outlined in the UK Government’s operational guidance to apply for an exemption certificate.

[Detailed operational guidance](#) has been published by the Department of Health and Social Care (DHSC) on the implementation of the Regulations. Subsequently [Skills for Care have also produced their own guidance](#), including a [set of FAQs](#).

The new rules came into effect on the 22 July 2021. However, there is a 16 week ‘grace period’ in place to allow unvaccinated staff to get both vaccine doses before the mandatory vaccination requirement commences on 11 November 2021. This means that the last date for workers to get their first dose, so they are fully vaccinated by the time the regulations come into force, is the 16 September 2021. After that date, any individual who is not fully vaccinated will not be able to enter a CQC registered care home to work or to carry out duties within their role.



What information do we collect from you?

For Vivo to maintain a record of the vaccination status of all staff and professionals that work in, or visit one of, our CQC registered care homes, we will collect the following information:



- Name
- Employee Number
- Job Title
- Vaccination Status – this will include sources of evidence.
- Clinical Exemption – no detail of the nature of the exemption needs to be recorded, only that the manager has had sight of the evidence of exemption.

Currently, the following groups of Vivo staff are in scope:

- All staff working at Curzon House, Dorin Court, and Dover Drive Short Stay Service.
- Any member of staff who visits or may be required to visit a care home as part of their duties. This is currently defined as but not limited to Social Workers, Social Care Assessors, Occupational Therapists including trainees and assistants and relevant managers.

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Who we share your information with?

When required by law, we will share minimum amount of personal information with the following partners and agencies: -

- CQC – From November 2021, CQC will request to view logs within the registered care home as part of the inspection visits to ensure the care home is adhering to the regulations.

Other agencies such as the below, may ask for statistics and will only have anonymised information.

- health service providers including NHS agencies
- Government agencies (e.g., Department of Health)



The lawful basis for processing

Most of the personal information we collect is provided to us by you, under Article 6 of the UK GDPR we rely on the following: -

- We have a legal obligation (UK GDPR Article 6 (c))

When we collect staff data that is classed as special category data, under Article 9 of the UK GDPR we rely on the following: -

- We need it for employment, or social protection (UK GDPR Article 9 (2) (b))

The basis in law is met by the [Health and Social Care Act 2008 \(Regulated Activities\) \(Amendment\) \(Coronavirus\) Regulations 2021](#).

When we collect visiting or working professional persons data that is classed as special category data, under Article 9 of the UK GDPR we rely on the following: -

- We need it for employment, or social protection (UK GDPR Article 9 (2) (h))

The basis in law is met by the [Health and Social Care Act 2008 \(Regulated Activities\) \(Amendment\) \(Coronavirus\) Regulations 2021](#).



How we store your personal information

Your information will be securely stored on our network

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How long we keep your information for

We keep your personal information will be stored within a log which will be stored for **three years**. We will then dispose your information by deleting the log after the stated retention from the network, any printed logs will be securely disposed using the confidential waste bin.



Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.



How to complain

If you are not happy about the way your personal data is being used, or you require further information about how we process your personal data, you can contact Vivo's Data Protection Team: -

- Online: [Contact the DPO](#)
- By post: Data Protection Officer, Lightfoot Lodge, Lightfoot Street, Chester, CH2 3AD

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

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