

Guidance for Care Home Managers Action Plan

From 11 November 2021 registered managers must ensure that they do not allow anyone to enter the inside of a care home, unless they have had a complete course of doses of an authorised vaccine or fall into one of the [exempted groups](#). Registered managers are responsible for ensuring compliance with the requirements.

Click [here](#) for full guidance

Vaccination Policy

Registered managers may wish to consider developing a Vaccination Policy to support compliance with the new regulations. Care home staff would need to be aware of and understand the contents of this policy.

Checking vaccination or exemption status

The registered manager will have to check that all persons wishing to enter the care home have received a full course of vaccination, unless they are exempt.

Action - prepare procedure for checking vaccination status

Example:

Step	Action	Done
1.	Ensure visiting professional remains outside until vaccination status is verified	Y
2.	Check for previous registration	Y
3.	If not previously registered, request proof of identification including photographic evidence	Y
4.	Check COVID vaccination status from one of the following: <ul style="list-style-type: none">NHS AppNHS websiteNHS Covid Pass Letter	Y
5.	Record information on Vaccination Register	Y

Recording vaccination or exemption status

The registered person should keep a record of:

- the vaccination or exemption status of staff members and the date that the status was last checked
- the vaccination or exemption status of those entering the care home unless exempt and the date that the status was last checked

Individuals entering a care home only need to demonstrate vaccination status on the first occasion they enter or register, and the registered manager should record their status on the care home's

local system. Records should be checked regularly to ensure they are up to date.

Action - prepare vaccination register

Example:

Staff Record

Name	Staff number	Role	Proof of vaccination	Proof of exemption	Date checked	Authorised by	Re-check due
Sarah Jones	01065	Registered Manager	NHS App	n/a	26/07/21	Michael Shaw Deputy manager	25/07/22
Michael Shaw	01002	Deputy Manager	NHS App	n/a	28/07/21	Sarah Jones Registered Manager	27/07/22
Juliet Gardener	01043	Senior Nurse	n/a	Self-assessment form	17/09/21	Sarah Jones Registered Manager	16/12/21

Visiting Professional Record

Name	Staff number	Role	Proof of vaccination	Proof of exemption	Date checked	Authorised by
John Smith	RGN Care Home Support Team	NHS App	n/a	11/11/21	08:30	Sarah Jones Registered Manager
Barbara Miles	Hairdresser	n/a	NHS Covid Pass Letter	13/11/21	14:00	Sarah Jones Registered Manager
Kathy Forge	CQC Inspector	NHS website	n/a	18/11/21	09:20	Michael Shaw Deputy Manager

General Data Protection Regulation (GDPR) compliance

Care homes must keep records to demonstrate compliance with the regulations.

Care homes need to ensure that they process information about vaccination or medical exemption in accordance with data protection legislation.

Action - review and update all existing data protection and privacy documentation and assessments to ensure compliance with the regulations

Special considerations for visiting professionals

For visiting professionals contracted to the care home, registered managers may decide that the

best way to ensure that a person has been vaccinated or is exempt prior to entering a care home, is to include the requirement in any contract for the provision of services provided by that person or organisation.

Where a service provider is unable to provide services via a person who is vaccinated or medically exempt, and the services cannot be provided outside the care home, it may be necessary to make alternative arrangements for provision of the service.

Action - identify all services undertaken inside the care home and provide a copy of the new regulations to enable the provider to secure compliance before 11 November. Seek independent legal advice before entering into or amending any contract

The role of the Care Quality Commission

The requirement forms part of the [fundamental standards](#) and will be monitored and enforced in appropriate cases, by the Care Quality Commission (CQC). CQC has [published a statement](#) on their website outlining their approach to:

- registration
- ongoing monitoring
- Enforcement

Action - check CQC website for the published statement

Support for registered managers

A range of resources is available to support registered persons and staff to have conversations about vaccine safety and efficacy, as well as financial support to access to vaccination. More information and links to these resources can be found [here](#).

Skills for Care has developed a dedicated one stop webpage that is bringing together a range of support, information and resources together to support social care employers to continue to recruit and retain their staff in a challenging environment.

Guidance on good employment practice can be found [here](#).