Coronavirus pandemic in the EU – Fundamental Rights implications
National vaccine deployment

Belgium
5 May 2021

Contractor: Fundamental Rights Research Centre (FRC), Vrije Universiteit Brussel

DISCLAIMER: This document was commissioned under contract as background material for comparative analysis by the European Union Agency for Fundamental Rights (FRA) for the project ‘Coronavirus pandemic in the EU – Fundamental Rights implications’. The information and views contained in the document do not necessarily reflect the views or the official position of the FRA. The document is made publicly available for transparency and information purposes only and does not constitute legal advice or legal opinion.
Table of contents
1 National vaccine deployment – planning and overview of priority groups .............................................. 3
2 Vaccination rollout – communication, targeted outreach, registration, and administration of vaccinations ........................................................................................................................................................................... 5
  2.1 Channels, means and measures to inform about the national vaccination plan ..................................... 5
  2.2 What are the (pre-) registration channels for vaccination put in place? .............................................. 6
  2.3 How are the vaccinations administered? ................................................................................................................. 7
3 Challenges and promising practices ................................................................................................................................. 9
  3.1 Challenges ......................................................................................................................................................... 9
  3.2 Promising practices .................................................................................................................................................. 9
1 National vaccine deployment – planning and overview of priority groups

Please provide the title and hyperlink of the national vaccine deployment plan/s in EN and the national language/s and indicate the date of publication of the plan/s including any updates.

There is no specific title to Belgium’s vaccination plan. The plan was initially published by the vaccination taskforce on 3 December 2020.\(^1\) The dates were released by the taskforce\(^2\) shortly after and the plan is more easily accessible to all at the official channel set by the government to provide information on COVID-19, info-coronavirus.\(^3\) No changes were made to the phases established in the initial plan, however, as vaccines were available earlier than expected, the vaccination plan started (on a small scale) on December 28, 2020, instead of in January 2021, as initially foreseen. The exact dates to start each phase, however, are determined by the regional governments, depending on the availability of vaccines and application capacity.

Please provide information on the planned phases of vaccination with respect to the groups to be prioritised for vaccination.

<table>
<thead>
<tr>
<th>Specific groups identified in the national vaccine deployment plan</th>
<th>Date of plan</th>
<th>Date of new/revised plans</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>older persons; indicate age groups specified</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Old persons in care homes (regardless of age): January 2021</td>
<td></td>
<td>The Belgian vaccination plan was not revised and continues as initially foreseen. The specific day in the month in which vaccination starts, however, is set by the regions.</td>
</tr>
<tr>
<td>B. Persons aged 65 or older: March 2021</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>persons with underlying health problems</strong></td>
<td>April 2021</td>
<td>As above.</td>
</tr>
</tbody>
</table>


\(^2\) Government’s Corona Commissariat (Commissariat Corona du Gouvernement / Regeringscommissariaat Corona), “A plan in phases, according to the vaccination strategy” (Un plan in phases, conforme à la stratégie de vaccination), available at: [https://health-rack.s3-eu-west-1.amazonaws.com/assets/downloads/faseplanmaart2021FR.pdf](https://health-rack.s3-eu-west-1.amazonaws.com/assets/downloads/faseplanmaart2021FR.pdf) [last accessed 12 April 2021]

<table>
<thead>
<tr>
<th><strong>persons with disabilities</strong></th>
<th>Persons with disabilities residing in care facilities: February 2021.</th>
</tr>
</thead>
</table>
| **key workers (on the basis of their job not their personal characteristics) – e.g. health workers; persons working in care homes; teachers** | A. Workers of care homes, as well as health personnel of hospitals: January 2021  
B. First line workers, hospital personnel, and personnel of other care facilities: February 2021  
As above. |
| **persons belonging to ethnic/national minorities** | N/A |
| **persons experiencing homelessness** | N/A |
| **persons with drug addiction dependencies** | N/A |
| **persons with low literacy levels** | N/A |
| **persons deprived of their liberty** | N/A |
| **persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)** | N/A |
| **OTHER – not specified above; e.g. ‘Persons living in crowded accommodation’; etc.** | Essential functions (police forces): April 2021.  
As above. |

Please briefly indicate here (not in the above table):

- the reasons behind major changes with regard to priority groups— as announced by the government.

As seen from the initial vaccination strategy plan published by the taskforce in December 2020, there were no changes to the government’s initial vaccination plan.
the overall approach behind the definition of priority groups: please identify the main ground for identifying groups as priority group (vulnerability to infection; social vulnerability; multiple criteria).

Age, profession, and comorbidity (vulnerability to infection).

2 Vaccination rollout – communication, targeted outreach, registration, and administration of vaccinations

For each of the subsequent questions (2.1, 2.2 and 2.3) please indicate:

Languages: If information in different languages is available. Please list those languages in which information is available (e.g. languages of recognised national or ethnic minorities and immigrant communities; as well as English and other dominant international languages).

Accessibility for persons with disabilities: If information is provided in accessible formats to ensure accessibility for people with disabilities (including easy read, in braille, sign language etc); are physical venues made accessible for persons with disabilities?

2.1 Channels, means and measures to inform about the national vaccination plan

Please provide information on channels, means and measures taken by the government or public authorities to inform the public about the national vaccination plan, its rollout strategy and vaccination awareness raising campaigns; e.g. traditional postal letters; online information; telephone calls; public information campaigns etc.

The federal government created a website to provide official information about COVID-19, which includes information on all aspects of the vaccination plan, including which vaccines are used, how safe they are and about potential side effects. The federal website for vaccination in Belgium also has a section dedicated to COVID-19, which includes information on the vaccines and their side-effects. The website is available in Dutch, French, German and English. Similar information is given by the regional governments in their own websites dedicated to providing information on COVID-19. A federal call centre has also been set up to answer questions and provide further information. The federal call centre is available at: https://www.info-coronavirus.be/en/vaccination/ [last accessed 12 April 2021]


to answer questions about the vaccination by phone. At the same time, posters\textsuperscript{7} are being placed in public spaces calling on people to get vaccinated.

Regarding persons with disabilities, NGOs such as Inclusion ASBL organised information sessions on COVID vaccination for persons with disabilities\textsuperscript{8} and their family members.\textsuperscript{9}

2.2 What are the (pre-) registration channels for vaccination put in place?

a) What registration channels for vaccination are in place e.g. websites, apps, hotlines/call centres, letters, via family doctors, etc.?

No pre-registration is needed for vaccination in Belgium. Instead, everyone aged 18 or older residing in Belgium will receive an invitation for vaccination from the regional authorities of their place of residence (Wallonia, Flanders or Brussels) by post as well as by SMS and/or email (according to the information in the national registry) when their age group (or other category, if applicable) is eligible to be vaccinated, according to the vaccination plan. The invitation is sent in the language spoken at the relevant region (French or Flemish). According to the federal call centre, invitations are not sent in foreign languages or Braille and thus, those who do not understand the local languages or have visual impairments are likely to need assistance to read and reply to the invitation. An invited person can reply to the invitation electronically or by phone. For some hard-to-reach groups, (e.g. homeless people), vaccination will be done through their respective NGOs (see challenges in section 3 below). This information and all other information regarding vaccination is available in the info-coronavirus\textsuperscript{10} platform in Dutch, French, German and English.

\textsuperscript{7} Some examples of the posters placed in Wallonia can be found at: Je me vaccine, Resources and downloads (Ressources et téléchargements), available at: https://www.jemevaccine.be/ressources/ [last accessed 4 May 2021]


b) Are any alternatives to digital access to vaccine registration in place e.g. appropriate support for those who need it (such as the elderly; those without access to the internet); physical locations for registration etc?

As mentioned above, there is no pre-registration system in place in Belgium, as every resident will receive an invitation. After receiving the invitation, residents may reply to it electronically or by phone.

**2.3 How are the vaccinations administered?**

a) Where are the vaccinations administered e.g. vaccination centres, via mobile units, via family doctors, etc.?

Vaccination centres are determined by the regional governments. In Wallonia, there are 53 vaccination sites operating;\(^\text{11}\) in Brussels, there are 10;\(^\text{12}\) and in Flanders, there are 95.\(^\text{13}\)

Upon receiving the invitation, the concerned persons will be informed of the place of vaccination. For those who present a valid reason (such as being bedridden, having severe mental health problems or a severe physical disability), mobile units may apply the vaccine in their house.\(^\text{14}\) Free public transport is offered to those who are commuting to and from their vaccination appointment.\(^\text{15}\) For those with reduced mobility, some health insurances may offer other transportation methods such as taxis without cost.\(^\text{16}\)

In Wallonia, vaccinations centres are making efforts to ensure accessibility for those with reduced mobility, and, according to the region, a collaboration with

\(^{11}\) AVIQ, Vaccination, available at: [https://covid.aviq.be/fr/vaccination#ou-se-faire-vacciner](https://covid.aviq.be/fr/vaccination#ou-se-faire-vacciner) [last accessed 12 April 2021]


\(^{13}\) Get vaccinated (laat je vaccineren), Vaccination centers in Flanders: when and where will I get my vaccine? (Vaccinatiecentra in Vlaanderen: wanneer en waar krijg ik mijn vaccin?), available at: [https://www.laatjevaccineren.be/wie-waar-en-wanneer/vaccinatiecentra](https://www.laatjevaccineren.be/wie-waar-en-wanneer/vaccinatiecentra) [last accessed 12 April 2021]


\(^{15}\) See e.g. Coronavirus Brussels, “Covid-19 vaccination centres in Brussels & Planning” (Centres de vaccination Covid-19 à Bruxelles & Planning), available at: [https://coronavirus.brussels/centres-de-vaccination-covid-planning/#Quelles_sont_les_solutions_de_transport_pour_les_personnes_a_mobilite_reduite](https://coronavirus.brussels/centres-de-vaccination-covid-planning/#Quelles_sont_les_solutions_de_transport_pour_les_personnes_a_mobilite_reduite); AVIQ, Vaccination, available at: [https://www.wallonie.be/fr/actualites/covid-19-strategie-de-vaccination](https://www.wallonie.be/fr/actualites/covid-19-strategie-de-vaccination) [last accessed 12 April 2021]

Access-i is underway to inform the public about accessibility conditions. In Brussels, all vaccination centres are accessible to people with reduced mobility, with a few wheelchairs available for visitors. In Flanders, those who need are allowed to bring their caregiver, helper and/or interpreter to the vaccination centre and, if further assistance is needed, the concerned person can call the local call centre to request assistance on the day of the vaccination.

b) For those being vaccinated - how is information about the actual vaccination process, the vaccine and any potential side effects provided?

The information sources available are the same ones as the ones mentioned in 2.1. The vaccination invitation letter that is sent also contains information about the vaccination process, such as the importance of being vaccinated, the risks associated with vaccination, counter indications, and practical information regarding how to make the appointment and what to do on the vaccination day. The invitation further advises those who wish to obtain further information to either contact their doctor, refer to the official websites on the matter or call the call centre.

c) Are there any circumstances where fees are applicable for receiving the vaccine – e.g. for third country nationals?

No. Everyone residing in Belgium is eligible to be vaccinated free of charge.


19 Get vaccinated (laat je vaccineren), Frequently asked questions about the organization of a vaccination center (Veelgestelde vragen over de organisatie van een vaccinatiecentrum), available at: https://www.laatjevaccineren.be/veelgestelde-vragen-over-de-organisatie-van-een-vaccinatiecentrum [last accessed 12 April 2021]

20 A model of the letter is available at: https://www.marche.be/wp-content/uploads/2021/03/Convocation-vaccination.pdf [last accessed 4 May 2021]
3 Challenges and promising practices

3.1 Challenges

In Belgium, vaccinating “invisible persons”, such as irregular migrants, homeless persons and others excluded from the healthcare system, has been presented as a challenge by the NGO doctors of the world (Médecins du Monde). In January, the NGO said it was unclear how the vaccination of these populations would take place, noting that, for example, homeless persons often have a more fragile health due to their life conditions. The NGO also noted the challenge of getting those belonging to these populations to present themselves twice for vaccines that require 2 doses and noted that the places where they provide medical services cannot be used to store certain vaccines that require specific storage conditions.

The vaccination of these populations was also presented as a challenge by RTBF info in March. In that occasion, it was mentioned that the strategy to vaccinate these populations would be to provide one dose vaccines to organisations working directly with them such as street nurses (infirmiers de rue) and doctors of the world, but it was still unclear how that would be done in practice.

In late April, the public centre of social action of the municipality of Mons declared it was ready to start vaccinating homeless persons with Johnson & Johnson single dose vaccine, but that it was waiting to obtain practical details from the authorities to start the campaign. It was acknowledged, however, that a sensitisation campaign would be needed to attract this population to get vaccinated.

3.2 Promising practices

Regarding access to vaccination service, as mentioned above, free public transport tickets are offered to those commuting to and from their vaccination appointment. Furthermore, for those who cannot reach the vaccination centre for important

---

21 Doctors of the world (Médecins du Monde), Vaccinate “invisible” people, at which stage are we? (vacciner les personnes « invisibles », où en est-on ?), available at: https://medecinsdumonde.be/actualites-publications/actualites/vacciner-les-personnes-invisibles-ou-en-est-on#undefined [last accessed 4 May 2021]


23 This strategy was also mentioned at BX1, Johnson & Johnson: a single vaccine dose to the most disadvantaged populations? (Johnson & Johnson : une seule dose de vaccin pour les populations les plus défavorisées ?), 12 March 2021, available at: https://bx1.be/categories/news/johnson-johnson-une-seule-dose-de-vaccin-pour-les-populations-les-plus-defavorisees/ [last accessed 4 May 2021].

24 DHnet, The Mons CPAS is ready to vaccinate the homeless (Le CPAS de Mons prêt à vacciner les sans-abri), 26 April 2021, available at: https://www.dhnet.be/regions/mons/le-cpas-de-mons-pret-a-vacciner-les-sans-abri-6086b99cd8ad5816b4d09fab [last accessed 4 May 2021]
health reasons, mobile units are deployed to vaccinate them in their place of residence.

Regarding alternatives to digital access to vaccine registration, invitations in Belgium are sent via post, SMS or email and it is possible to reply to the invitation by phone.