

# **Coronavirus pandemic in the EU – Fundamental Rights implications**

## **National vaccine deployment**

**Germany**  
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**Contractor: Deutsches Institut für Menschenrechte**

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# 1 National vaccine deployment – planning and overview of priority groups

In **Germany**, the federal government (Bundesregierung) and the federal states (Bundesländer) agreed on a national vaccination strategy in November 2020. According to this strategy, the federal government assumes the responsibility to procure the vaccines centrally and to distribute the vaccine doses to the federal states according to the population share of the respective state. The federal states, on the other hand, are responsible for organising the necessary infrastructure and carrying out the vaccinations locally.<sup>1</sup>

In December 2020, the Federal Ministry of Health (Bundesministerium für Gesundheit) issued the first legal ordinance on vaccination (Coronavirus-Impfverordnung) specifying rules for prioritisation of individual groups among the population with regard to access to the COVID-19 vaccine.<sup>2</sup> The regulations laid down in the vaccination ordinance are essentially based on the vaccination recommendations made by the Standing Committee on Vaccination at the Robert Koch Institute (Ständige Impfkommission, STIKO).<sup>3</sup>

*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.*

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

<b>Specific groups identified in the national vaccine deployment plan</b>	<b>Date of plan</b> <b>18/12/2020</b> <b>Ordinance on the entitlement to vaccination against the SARS-CoV-2</b>	<b>Date of new/revised plans</b> <b>08/02/2021</b> <b>Ordinance on the entitlement to vaccination against the SARS-CoV-2</b>
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<sup>1</sup> Germany, Health Minister's Conference (Gesundheitsministerkonferenz) (2020), '[Gemeinsames Vorgehen bei Impfungen gegen COVID-19](#)', resolution, 6 November 2020; Germany, Federal Ministry of Health (Bundesministerium für Gesundheit), Robert Koch Institute (Robert Koch-Institut), Paul Ehrlich Institute – Federal Institute for Vaccines and Biomedicine (Paul-Ehrlich-Institut – Bundesinstitut für Impfstoffe und biomedizinische Arzneimittel), Federal Centre for Health Education (Bundeszentrale für gesundheitliche Aufklärung, BZgA) (2020), '[Nationale Impfstrategie COVID-19, Strategie zur Einführung und Evaluierung einer Impfung gegen Sars-CoV-2 in Deutschland](#)', 6 November 2020.

<sup>2</sup> Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2020), '[Verordnung zum Anspruch auf Schutzimpfung gegen das Coronavirus SARS-CoV-2 \(Coronavirus-Impfverordnung – CoronaImpfV\) vom 18.12.2020](#)', 18 December 2020.

<sup>3</sup> Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Erste Verordnung zur Änderung der Coronavirus-Impfverordnung](#)', ministerial draft, 24 February 2021; the [vaccination recommendations](#) made by the Standing Committee on Vaccination at the Robert Koch Institute (Ständige Impfkommission, STIKO) can be found on the institute's web page.

	<p>coronavirus (<u><a href="#">Verordnung zum Anspruch auf Schutzimpfung gegen das Coronavirus SARS-CoV-2 (Coronavirus-Impfverordnung – CoronaImpfV)</a></u>)</p>	<p>coronavirus (<u><a href="#">Verordnung zum Anspruch auf Schutzimpfung gegen das Coronavirus SARS-CoV-2 (Coronavirus-Impfverordnung – CoronaImpfV)</a></u>)</p> <p>24/02/2021</p> <p>First ordinance amending the coronavirus vaccination ordinance (<u><a href="#">Erste Verordnung zur Änderung der Coronavirus-Impfverordnung</a></u>)</p> <p>10/03/2021</p> <p>Ordinance on the entitlement to vaccination against the SARS-CoV-2 coronavirus (<u><a href="#">Verordnung zum Anspruch auf Schutzimpfung gegen das Coronavirus SARS-CoV-2 (Coronavirus-Impfverordnung – CoronaImpfV)</a></u>)</p> <p>31/03/2021</p> <p>Ordinance on the entitlement to vaccination against the SARS-CoV-2 coronavirus (<u><a href="#">Verordnung zum Anspruch auf Schutzimpfung gegen das Coronavirus SARS-CoV-2 (Coronavirus-Impfverordnung – CoronaImpfV)</a></u>) – in operation</p> <p>29/04/2021</p> <p>First ordinance amending the coronavirus vaccination ordinance (<u><a href="#">Erste Verordnung zur Änderung der Coronavirus-</a></u></p>
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		<b><u>Impfverordnung</u> – in operation</b>
<b><i>older persons; indicate age groups specified</i></b>	<p>YES</p> <p>In order of priority by oldest age group</p> <p>Ages 80+ (1)<sup>4</sup></p> <p>Ages 70-79 (2)</p> <p>Ages 60-69 (3)</p>	No change
<b><i>persons with underlying health problems</i></b>	<p>YES</p> <p>Reference given to specific health conditions associated with either a very high or high risk of a severe or fatal COVID-19 disease progression (2) or an increased risk (3)</p>	<p>YES</p> <p>Other specific health conditions were added to the list of those associated with a very high or high risk (2) as well as the possibility of an individual medical assessment, irrespective of any listed conditions</p>
<b><i>persons with disabilities</i></b>	<p>YES</p> <p>Reference given to trisomy 21 and specific mental disabilities (2)</p>	<p>YES</p> <p>Other specific mental disabilities were added (2)</p>
<b><i>key workers (on the basis of their job, not their personal characteristics) – e.g. health workers; persons working in care homes; teachers</i></b>	<p>YES</p> <p>Reference given to specific job profiles including</p> <ul style="list-style-type: none"> <li>– care home workers or providers of mobile care services who care for the elderly, those in need of long-term nursing care (1) or mentally disabled persons (2);</li> <li>– health workers with a very high risk (1), a high or an increased risk (2) or a low risk (3) of exposure to the coronavirus or those who treat persons with a very high risk of a</li> </ul>	<p>YES</p> <ul style="list-style-type: none"> <li>– soldiers exposed to a high risk of infection whilst on foreign deployment introduced as a new group for prioritisation (2);</li> <li>– group of persons in relevant positions in state institutions extended to all members of constitutional bodies (3);</li> <li>– persons working in childcare facilities, primary schools or special schools were given higher priority (2);</li> </ul>

<sup>4</sup> The vaccination ordinance distinguishes between the following priority groups: (1) highest priority vaccinations under section 2, (2) high priority vaccinations under section 3, (3) increased priority vaccinations under section 4.

	<p>severe or fatal COVID-19 disease progression (1);</p> <ul style="list-style-type: none"> <li>– public health service workers or persons with a relevant position for the maintenance of the hospital infrastructure (2);</li> <li>– persons in relevant positions in state institutions, in particular the government, administration, police, fire service, judiciary (3);</li> <li>– persons in relevant positions in facilities forming part of the critical infrastructure, such as pharmacies, the food industry, water and energy supply or in transport and telecommunications (3);</li> <li>– police officers with a high risk of infection (2);</li> <li>– persons working in homeless shelters or accommodations for asylum seekers and refugees (2);</li> <li>– food retail workers (3);</li> <li>– childcare workers and teachers (3);</li> <li>– persons in precarious working conditions (3)</li> </ul>	<ul style="list-style-type: none"> <li>– group of care home workers extended to those working in outpatient assisted living groups (1);</li> <li>– persons who regularly carry out protective vaccinations against the coronavirus specifically mentioned (1);</li> <li>– persons working in German missions or for the German Archaeological Institute and German political organisations in different fields, including crisis prevention, development cooperation or foreign cultural and educational policy, or as German nationals in international organisations, each in places with insufficient health care, introduced as new groups for prioritisation (2);</li> <li>– group of persons working in joint accommodations for the homeless, etc. extended to persons working in other facilities for the homeless (2) and in women's shelters (2);</li> <li>– voluntary workers in accredited programmes for the elderly introduced as a new group (2);</li> <li>– election workers introduced as a new group for prioritization (3)</li> </ul>
<p><i>persons belonging to ethnic/national minorities</i></p>	<p style="text-align: center;">YES</p> <p>Reference given to persons accommodated in the facilities referred to in section 36 (1) No. 4 of the Infection Protection Act (<i>Infektionsschutzgesetz</i>),</p>	<p style="text-align: center;">No change</p>

	including facilities for ethnic German repatriates ( <i>Spätaussiedler</i> ) (2)	
<i>persons experiencing homelessness</i>	YES  Reference given to persons accommodated in homeless shelters (2)	YES  Persons accommodated in other facilities for the homeless were mentioned (2)
<i>persons with drug addiction dependencies</i>	NO	NO
<i>persons with low literacy levels</i>	NO	NO
<i>persons deprived of their liberty</i>	YES  Reference given to persons in precarious living conditions who, according to the explanation contained in the draft bill of the Federal Ministry of Health's vaccination ordinance, include detainees (3) <sup>5</sup>	No change
<i>persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)</i>	YES  Reference given to joint accommodations for refugees/asylum seekers/ persons who are subject to deportation (2)	No change
<b><i>OTHER – not specified above; e.g. 'Persons living in crowded accommodation'; etc. Please insert . . .</i></b>	YES  Reference given to care or nursing home residents (1) and to one contact person of members of specifically listed prioritised groups and pregnant persons (2)	YES  – group of care home residents extended to those cared for in day-care facilities and outpatient assisted living groups (1); – two contact persons included for members of specifically listed groups

5 Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), 'Verordnung zum Anspruch auf Schutzimpfung gegen das Coronavirus SARS-CoV-2 (Coronavirus-Impfverordnung – CoronaImpfV)', ministerial draft.

		with different priorities (2) / (3) – persons accommodated in women’s shelters introduced as a group (2)
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Please briefly indicate here:

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

In **Germany**, most notable changes with regard to priority groups were made before the reporting period.

The amendment of 24 February 2021, for instance, included persons working in the field of childcare and primary education in the group of persons to be vaccinated with high priority. This decision was made on the basis that children and their parents are particularly affected by current restrictions. The Federal Chancellor (*Bundeskanzlerin*) and the heads of government of the federal states decided that schools and day-care centres should, therefore, be able to reopen gradually.<sup>6</sup>

Due to existing reservations about AstraZeneca's vaccine among the population and to ensure that all existing vaccine is used, the federal states of Saxony, Mecklenburg-West Pomerania, Bavaria and Berlin lifted the prioritisation for this vaccine entirely, at the end of April.<sup>7</sup>

- *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).*

In **Germany**, section 20 (2a) of the Infection Protection Act (*Infektionsschutzgesetz*) provides that the Federal Ministry of Health’s vaccination

<sup>6</sup> Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Erste Verordnung zur Änderung der Coronavirus-Impfverordnung](#)', ministerial draft, 24 February 2021.

<sup>7</sup> Germany, Bavarian State Ministry of Health and Care (Bayerisches Staatsministerium für Gesundheit und Pflege) (2021), '[Holetschek: Bayern gibt AstraZeneca in Arztpraxen für alle Altersgruppen frei – Bayerns Gesundheits- und Pflegeminister: Der Impfstoff kann auch an unter 60-Jährige verimpft werden](#)', press release, 21 April 2021; Germany, Berlin Senate Department for Health, Long-Term Care and Gender Equality (Senatsverwaltung für Gesundheit, Pflege und Gleichstellung) (2021), '[Berlin hebt Priorisierung bei AstraZeneca-Impfstoff auf](#)', press release, 22 April 2021; Germany, Mecklenburg-West Pomeranian Ministry of Economics, Employment and Health (Ministerium für Wirtschaft, Arbeit und Gesundheit) (2021), '[Gesundheitsminister Glawe: Mecklenburg-Vorpommern gibt AstraZeneca ab sofort für alle Altersgruppen frei](#)', press release, 21 April 2021; Germany, Saxon State Ministry for Social Affairs and Social Cohesion (Sächsisches Staatsministerium für Soziales und Gesellschaftlichen Zusammenhalt) (2021), '[Impfangebot für weitere Menschen in Sachsen – Öffnung der gesamten Priorisierungsstufe 3](#)', press release, 20 April 2021.



ordinances as well as the underlying recommendations made by the STIKO shall be based in particular on the following criteria:

- reduction of severe or fatal courses of disease,
- prevention of transmission of the coronavirus,
- protection of persons at particularly high risk of severe or fatal disease progression,
- protection of persons with a particularly high risk of infection due to disability, professional activity or residence,
- maintenance of central state functions, critical infrastructures, central areas of services of general interest and public life.<sup>8</sup>

Consequently, the definition of priority groups by the Federal Ministry of Health aims to prioritise vaccines to those who, due to their age or state of health, have a significantly increased risk of a severe or fatal course of the disease as well as to those who treat, care for or look after such persons or have a key position in central areas of services of general interest and central state functions.<sup>9</sup> This exact approach is also stipulated in section 20i (3) sentence 2 No. 1 (a) of Book V of the German Social Code (Das Fünfte Buch Sozialgesetzbuch – Gesetzliche Krankenversicherung –, SGB V).<sup>10</sup>

## **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?*

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<sup>8</sup> Germany, [Infection Protection Act](#) (Gesetz zur Verhütung und Bekämpfung von Infektionskrankheiten beim Menschen (Infektionsschutzgesetz - IfSG)), 22 April 2021.

<sup>9</sup> Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Verordnung zum Anspruch auf Schutzimpfung gegen das Coronavirus SARS-CoV-2 \(Coronavirus-Impfverordnung – CoronaImpfV\)](#)', ministerial draft.

<sup>10</sup> Germany, [Book V of the German Social Code](#) (Das Fünfte Buch Sozialgesetzbuch – Gesetzliche Krankenversicherung –, SGB V), 22 April 2021.

## 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.*

In **Germany**, the federal government, its subordinate agencies as well as the National Association of Statutory Health Insurance Physicians (Kassenärztliche Bundesvereinigung, KBV) provide information about the national vaccination plan on various websites.<sup>11</sup>

The Federal Ministry of Health, the Robert Koch Institute (Robert Koch-Institut, RKI) and the Federal Centre for Health Education (Bundeszentrale für gesundheitliche Aufklärung, BZgA) have launched an education and information campaign ('Deutschland krempelt die #Ärmel hoch'), with a budget of € 25 million,<sup>12</sup> using web-based information, video clips, posters and radio spots<sup>13</sup>.

In addition, the Federal Ministry of Health offers virtual and interactive information events (so-called town hall meetings) specifically tailored to doctors, pharmacists and nursing staff who play a significant role in providing information to citizens about the vaccinations. Furthermore, it has put together a digital package for the long-term care sector including promotional and informational materials specifically aimed at care facilities and caregivers.<sup>14</sup>

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<sup>11</sup> Germany, Federal Government (Bundesregierung) (2021), '[FAQ, Die wichtigsten Fragen und Antworten zur Corona-Impfung](#)'; Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Zahlen, Fragen und Antworten zur COVID-19-Impfung](#)'; '[Corona-Schutzimpfung](#)'; '[Corona-Schutzimpfung](#)'; Germany, Federal Centre for Health Education (Bundeszentrale für gesundheitliche Aufklärung, BZgA) (2021), '[Corona-Schutzimpfung gegen COVID-19](#)'; Germany, Robert Koch Institute (Robert Koch-Institut, RKI) (2021), '[COVID-19 und Impfen: Antworten auf häufig gestellte Fragen \(FAQ\)](#)'; Germany, Paul Ehrlich Institute – Federal Institute for Vaccines and Biomedicine (Paul-Ehrlich-Institut – Bundesinstitut für Impfstoffe und biomedizinische Arzneimittel) (2021), '[Coronavirus und COVID-19](#)'; Germany, National Association of Statutory Health Insurance Physicians (Kassenärztliche Bundesvereinigung, KBV) (2021), '[Corona-Impfung: Was Sie wissen sollten](#)'.

<sup>12</sup> Germany, Federal Government (Bundesregierung) (2021), '[Regierungspressekonferenz vom 1. März 2021](#)', transcript of press conference, 1 March 2021.

<sup>13</sup> Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Die Nationale Impfstrategie](#)'.

<sup>14</sup> Germany, Parliament of the Federal Republic of Germany (Deutscher Bundestag) (2021), '[Antwort der Bundesregierung auf die Kleine Anfrage der Abgeordneten Dr. Wieland Schinnenburg, Michael Theurer, Grigorios Aggelidis, weiterer Abgeordneter und der Fraktion der FDP – Drucksache 19/25926 – COVID-19-Impfstoffbeschaffung von Bund und EU](#)', Drucksache 19/26324, 1 February 2021.

Information and documents in an easy to read format can be found in particular on the websites operated by the Federal Ministry of Health and the Federal Centre for Health Education (Bundeszentrale für gesundheitliche Aufklärung, BZgA) .<sup>15</sup> The Federal Ministry of Health also initiated a YouTube channel with different videos in sign language.<sup>16</sup> A free country-wide hotline ensures information in English, Turkish, Russian and Arabic.<sup>17</sup>

At local level, the 16 federal states also provide information on their state internet portals or on websites specifically set up for this purpose.<sup>18</sup> The possibility of obtaining information in other languages varies greatly from region to region. While, for example, on the website of Berlin information can be easily accessed in English, Turkish and Arabic,<sup>19</sup> or on the website of the city of Magdeburg in English, French, Arabic, Russian or Polish,<sup>20</sup> other regional websites such as the one of the state of Mecklenburg-West Pomerania barely offer any foreign language information at all<sup>21</sup>.

## 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.?

The main registration channels are websites and hotlines/call centres. Only six of the 16 federal states are now partially or fully working with a standardised online module, which is operated by the National Association of Statutory Health Insurance Physicians (Kassenärztliche Bundesvereinigung, KBV). The vast majority of the registration websites of the federal states can only be accessed in German.<sup>22</sup> Only on the websites of the states of Bremen and Saarland can booking

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<sup>15</sup> Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Wie läuft die Corona-Schutzimpfung ab?](#)'; Germany, Federal Centre for Health Education (Bundeszentrale für gesundheitliche Aufklärung, BZgA) (2021), '[Was muss ich zur Corona-Impfung wissen?](#)'.

<sup>16</sup> For the respective videos, see the [Youtube channel](#) of the Federal Ministry of Health.

<sup>17</sup> Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Information regarding COVID-19 in Germany](#)'.

<sup>18</sup> Hyperlinks to the corresponding [websites of the federal states](#) are embedded on the Federal Ministry of Health's website on the coronavirus.

<sup>19</sup> Germany, The Governing Mayor of Berlin – Senate Chancellery (Der Regierende Bürgermeister von Berlin – Senatskanzlei) (2021), '[Schutzimpfung gegen das Coronavirus SARS-CoV-2: Voraussetzungen, Termine und Ablauf](#)'.

<sup>20</sup> Germany, Lord mayor of Magdeburg (Oberbürgermeister) (2021), '[Ablauf, Terminvergabe, Fragen und Antworten](#)'.

<sup>21</sup> Germany, Mecklenburg-West Pomeranian Office of Health and Social Affairs (Landesamt für Gesundheit und Soziales) (2021), '[Impfen gegen Corona](#)'.

<sup>22</sup> Hyperlinks to the [registration websites of the federal states](#) are embedded on the website of the National Association of Statutory Health Insurance Physicians.

masks for registration also be set in English.<sup>23</sup> No easy-to-read formats are used on the registration web pages.<sup>24</sup>

In some federal states, appointment arrangements in vaccination centres require a prior invitation letter with an individual access code for registration sent out by the senate department for health or on its behalf by the statutory health insurance providers or the respective association of statutory health insurance physicians on the basis of the resident's registration office's data and medical billing data.<sup>25</sup> No information could be found on whether the invitation letters were also made available in other languages than German.

Persons who live or work in a facility, such as nursing homes, usually do not need an individual appointment, as the vaccinations are organised by the management/employer for the entire facility.<sup>26</sup>

Across Germany, family doctors, who have also been included in the vaccination process since the beginning of April, can arrange appointments individually. There are no central registration channels in place for them. The family doctors can address their patients themselves with regard to the given prioritisation.<sup>27</sup>

- 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?

Apart from the previously mentioned possibility of making appointments by telephone, the involvement of special facilities served by mobile vaccination teams or the involvement of family doctors, no information on other alternatives to online

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<sup>23</sup> The registration websites of the states of [Bremen](#) and [Saarland](#) have an English language setting.

<sup>24</sup> Hyperlinks to the [registration websites of the federal states](#) are embedded on the website of the National Association of Statutory Health Insurance Physicians.

<sup>25</sup> Germany, The Governing Mayor of Berlin – Senate Chancellery (Der Regierende Bürgermeister von Berlin – Senatskanzlei) (2021), '[Fragen und Antworten zum Impfen](#)', 6 May 2021; Germany, Berlin Senate Department for Health, Long-Term Care and Gender Equality (Senatsverwaltung für Gesundheit, Pflege und Gleichstellung) (2021), '[Gesundheitsverwaltung verschickt Einladungen zur Corona-Impfung an über 80-jährige Berlinerinnen und Berliner](#)', press release, 5 January 2021; Germany, Association of Statutory Health Insurance Physicians Berlin (Kassenärztliche Vereinigung Berlin) (2021), '[Coronavirus-Schutzimpfung](#)'; Germany, Bremen Senator for Health, Women and Consumer Protection (Die Senatorin für Gesundheit, Frauen und Verbraucherschutz) (2021), '[Fragen & Antworten zur Terminvergabe](#)', 4 May 2021; Germany, Association of Substitute Funds (Verband der Ersatzkassen e.V., vdek) (2021), '[Fragen und Antworten, Informationen zur Covid-19-Schutzimpfung im Land Bremen](#)', 6 May 2021.

<sup>26</sup> Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Informationen zu Impfgruppen und Terminvergabe in den Bundesländern](#)'.

<sup>27</sup> Germany, Federal Government (Bundesregierung) (2021), '[FAQ, Die wichtigsten Fragen und Antworten zur Corona-Impfung](#)'; Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Corona-Schutzimpfung in Arztpraxen](#)'.

registrations could be identified on a national level. However, some municipalities and districts offer support services for the elderly.<sup>28</sup>

## 2.3 How are the vaccinations administered?

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

Vaccinations are administered in vaccination centres or carried out by mobile vaccination teams, which are predominantly used in care home facilities.<sup>29</sup> Following the joint decision of the federal government and the federal states, family doctors started to carry out vaccinations on 6 April 2021.<sup>30</sup>

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

The RKI and the German Green Cross (*Deutsches Grünes Kreuz e.V.*, DGK) have designed medical information sheets on the individual vaccines for national use, which are available on the RKI website in an easy to read format as well as in 21 different foreign languages.<sup>31</sup>

According to section 1 (4) sentence 1 of the Federal Ministry of Health's vaccination ordinance, those entitled to vaccination are also entitled to receive on-site information and advice about the vaccination as well as a symptom-specific examination to rule out acute illness or allergies prior to the administering of the vaccine.

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

The vaccination is free of charge for those entitled to it - regardless of insurance status.<sup>32</sup>

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<sup>28</sup> Germany, Lord mayor of Magdeburg (Oberbürgermeister) (2021), '[Benötigen Sie Hilfe bei der Vereinbarung Ihres Impftermins?](#)'; Germany, Saarland Ministry of Health, Social Affairs, Women and the Family (Ministerium für Soziales, Gesundheit, Frauen und Familie) (2021), '[Übersicht der Hilfsangebote für impfberechtigte Personen](#)', 25 January 2021.

<sup>29</sup> Germany, Federal Government (Bundesregierung) (2021), '[FAQ, Die wichtigsten Fragen und Antworten zur Corona-Impfung](#)'.

<sup>30</sup> Germany, Federal Chancellor (Bundeskanzlerin) and the heads of government of the federal states (2021), '[Telefonschaltkonferenz der Bundeskanzlerin mit den Regierungschefinnen und Regierungschefs der Länder am 19. März 2021, Beschluss](#)', 19 March 2021; Norddeutscher Rundfunk (2021), '[Kampf gegen Pandemie, Hausärzte starten mit Impfungen](#)', 6 April 2021.

<sup>31</sup> Germany, Robert Koch Institute (Robert Koch-Institut, RKI) (2021), '[Aufklärungsmerkblatt zur COVID-19-Impfung mit mRNA-Impfstoff](#)'; '[Aufklärungsmerkblatt zur COVID-19-Impfung mit Vektorimpfstoff](#)'.

<sup>32</sup> Germany, Federal Ministry of Health (Bundesministerium für Gesundheit) (2021), '[Zahlen, Fragen und Antworten zur COVID-19-Impfung](#)'.

## 3 Challenges and promising practices

### 3.1 Challenges

In a statement on the draft bill of the Federal Ministry of Health's vaccination ordinance, the Federal Association of Non-statutory Welfare (*Bundesarbeitsgemeinschaft der Freien Wohlfahrtspflege e. V.*, BAGFW) criticises that undocumented migrants do not have sufficient access to protective vaccinations against COVID-19. The BAGFW urges the government to extend the legal right to vaccinations laid down in section 1 to undocumented migrants. The BAGFW, the Migration Commission of the German Bishops' Conference (*Migrationskommission der Deutschen Bischofskonferenz*) as well as the Chairman of the Catholic Forum Living in Illegality (*Katholisches Forum Leben in der Illegalität*) emphasize the need to suspend all notification obligations to the foreigners authorities – pursuant to section 87 of the Residence Act (*Aufenthaltsgesetz*) –<sup>33</sup> for the period of the pandemic.<sup>34</sup>

The Committee for Fundamental Rights and Democracy (*Komitee für Grundrechte und Demokratie e.V.*) and the Prison Archive (*Stravollzugsarchiv e.V.*) jointly call for a higher prioritisation of persons in prisons and prison-like institutions. According to their assessment, prisoners have an increased risk of infection due to the confinement, which often makes it difficult to ensure compliance with distance regulations and the necessary air circulation. Yet, they are given lower priority than other joint accommodations under the vaccination ordinance.<sup>35</sup>

The German Federation of the Blind and Partially Sighted (*Deutscher Blinden- und Sehbehindertenverband e.V.*, DBSV) advocates that deafblind, blind and severely visually impaired persons should be included in the prioritised groups. The DBSV points out that many of them are at particularly high risk of contracting the virus due to the effects of the existing disability. Those affected are often dependent on assistance by other people and thus, in many cases, have frequent physical contact to accompanying persons or strangers.<sup>36</sup>

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<sup>33</sup> Germany, [Residence Act](#) (Gesetz über den Aufenthalt, die Erwerbstätigkeit und die Integration von Ausländern im Bundesgebiet (Aufenthaltsgesetz - AufenthG)), 9 December 2020.

<sup>34</sup> Germany, Federal Association of Non-statutory Welfare (Bundesarbeitsgemeinschaft der Freien Wohlfahrtspflege e. V., BAGFW) (2021), [Stellungnahme der Bundesarbeitsgemeinschaft der Freien Wohlfahrtspflege \(BAGFW\) zum Referentenentwurf einer Verordnung zum Anspruch auf Schutzimpfung gegen das Coronavirus SARS-CoV-2 \(CoronavirusImpfverordnung – CoronaImpfV\) vom 02.03.2021](#), 2 March 2021; Puff, A. (2021), '[Sichtbarkeit, Repräsentation und Teilhabe für Menschen in aufenthaltsrechtlicher Illegalität](#)', keynote speech at the annual conference on illegality on 9/10 March 2021, 10 March 2021.

<sup>35</sup> Germany, Committee for Fundamental Rights and Democracy (Komitee für Grundrechte und Demokratie e.V.) and Prison Archive (Stravollzugsarchiv e.V.) (2021), [Gemeinsame Forderung nach Priorisierung von Gefangenen bei der Corona-Impfung](#), 29 January 2021.

<sup>36</sup> Germany, German Federation of the Blind and Partially Sighted (Deutscher Blinden- und Sehbehindertenverband e.V., DBSV) (2021), [DBSV-Stellungnahme zum Entwurf des BMG vom 01.02.2021 für eine Verordnung zum Anspruch auf Schutzimpfung gegen das Coronavirus SARS-CoV-2 \(Coronavirus-Impfverordnung – CoronaImpfV\)](#), 3 February 2021.

## 3.2 Promising practices

According to media reports, the vaccination of homeless people has started in some German cities, such as Berlin, Frankfurt and Hannover. Vaccinations were administered by mobile teams that visited the respective facilities for the homeless. Consequently, there was no need for individual appointment arrangements at one of the vaccination centres.<sup>37</sup> The Bavarian State Ministry of Health and Care (*Bayerisches Staatsministerium für Gesundheit und Pflege*) announced in a press release that the state of Bavaria also intends to send mobile vaccination teams directly to the homeless, starting in May. In order to facilitate access to vaccination for people who do not have a permanent place of residence and tend to avoid traditional medical assistance structures, the mobile teams will carry out vaccinations in the same places at fixed hours.<sup>38</sup>

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<sup>37</sup> Norddeutscher Rundfunk (2021), '[Diakonie impft Wohnungslose in Hannover gegen Corona](#)', 15 April 2021; Rundfunk Berlin-Brandenburg (2021), '[Obdachlose und Geflüchtete sollen geimpft werden](#)', 26 March 2021; Voigts, H. (2021), '[Corona in Frankfurt: Impfstart für Wohnungslose und Geflüchtete](#)', *Frankfurter Rundschau*, 15 April 2021.

<sup>38</sup> Germany, Bavarian State Ministry of Health and Care (Bayerisches Staatsministerium für Gesundheit und Pflege) (2021), '[Holetschek: Bayern stellt 6.000 Corona-Impfdosen für obdachlose Menschen zur Verfügung – Bayerns Gesundheitsminister: Sonder-Impfkationen durch mobile Impfteams möglich](#)', press release, 22 April 2021.