

Coronavirus pandemic in the EU – Fundamental Rights implications

National vaccine deployment

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

<p>Specific groups identified in the national vaccine deployment plan</p>	<p>Date of plan</p> <p>22 December 2020</p> <p><u>First guidelines for handling the vaccination against COVID-19 divided the population into the following 12 groups:</u>¹²</p> <ol style="list-style-type: none"> 1. Persons living in nursing home. 2. Persons age ≥ 65, who receive certain types of home care. 3. Persons age ≥ 85. 	<p>Date of new/revised plans</p> <p>17 March 2021</p> <p><u>Revision of the plan regarding how part of the population is divided into groups</u>³</p> <p>Groups 10-12 were compiled into a single enlarged group 10 divided into the following subgroups in order of priority by persons with a specific age interval:</p> <ol style="list-style-type: none"> 10 a. Persons age 60-64. 10 b. Persons age 55-59. 10 c. Persons age 50-54.
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¹ **Denmark**, the Danish Health Authority (*Sundhedsstyrelsen*), Guidelines for handling the vaccination against COVID-19 (*Retningslinje for håndtering af vaccination mod COVID-19*), version 1, 22 December 2020. Note that version 1 of the guidelines are no longer available on the webpage of the Danish Health Authority (*Sundhedsstyrelsen*). However, version 3 of the guidelines, 5 February 2021, is available in Danish at: <https://www.sst.dk/da/Udgivelser/2021/Retningslinjer-for-haandtering-af-vaccination-mod-COVID-19>. See also the Danish Health Authority (*Sundhedsstyrelsen*), When will it be your turn to be offered vaccination against COVID-19?, 8 January 2021, which more briefly and in English describe the vaccination programme against COVID-19 and the 12 priority groups, available at: <https://www.sst.dk/en/English/publications/2021/Target-groups---pamphlet>.

² We are uncertain whether the guidelines can be characterized as the first vaccine deployment plan in Denmark or whether it is the plan for the initial roll-out of vaccines from 26 November 2020, that can be characterized as the first vaccine deployment plan. Given that it was not until the guidelines from December that the entire population was divided into different priority groups we have characterized the guidelines from December 2020 as the first vaccine deployment plan. The Roll-out of vaccinations against COVID-19 (*Udrulning af vaccination mod COVID-19*), from the Danish Health Authority (*Sundhedsstyrelsen*), 26 November 2020, is available in Danish at: <https://www.sst.dk/-/media/Udgivelser/2020/Corona/Vaccination/Udrulning-af-vaccination-mod-COVID-19.ashx?la=da&hash=6E61F582E69776E061F83D962290D0523FF71EFA>.

³ **Denmark**, the Danish Health Authority (*Sundhedsstyrelsen*), Vaccination calendar, version 10 (*vaccinationskalender, version 10*), 17 March 2021, available in Danish at: <https://www.sst.dk/da/Udgivelser/2021/Vaccinationskalender>. Version 10 can be found by going to the bottom of the page and choosing "Se older versions of the vaccination calendar and detailed vaccinationskalender (zip-file)" ("Se ældre versioner af vaccinationskalenderen og specificeret vaccinationskalender (zip-fil)").

	<p>4. Frontline staff in the healthcare sector with an increased risk of infection, or who carry out critical functions.</p> <p>5. Selected patients with conditions or diseases that carry a significantly increased risk of a severe course of COVID-19.</p> <p>6. Selected close relatives of patients with conditions or diseases that carry a significantly increased risk of a severe course of COVID-19 or close relatives who are indispensable as caregivers.</p> <p>7. Persons age 80-84.</p> <p>8. Persons age 75-79.</p> <p>9. Persons age 65-74.</p> <p>10. Persons under the age of 65 years with conditions or diseases that carry an increased risk of a severe course of COVID-19.</p> <p>11. Staff in other functions critical to society.</p> <p>12. The remaining population, subdivided by age</p>	<p>10 d 1. Persons age 16-19 and persons age 45-49.</p> <p>10 d 2. Persons age 20-24 and persons age 40-44.</p> <p>10 d 3. Persons age 25-29 and persons age 35-39.</p> <p>10 d 4. Persons age 30-34.</p> <p>As of 3 May 2021, groups 1, 2, 3, 5, 6 and 7 have been fully vaccinated. Groups 4, 7, 8, 9 and 10 a have begun vaccination.⁴</p>
<p><i>older persons; indicate age groups specified</i></p>	<p>YES</p> <p>Firstly, in order of priority by persons above a specific age and who receive both personal care and practical assistance. Secondly, in order of priority by persons with a specific age interval</p>	<p>No change</p>

⁴ **Denmark**, the Danish Health Agency (*Sundhedsstyrelsen*), Vaccination calendar, version 14 (*vaccinationskalender, version 14*), 3 May 2021, available in Danish at: <https://www.sst.dk/-/media/Udgivelser/2021/Corona/Vaccination/Kalender/Vaccinationskalender-03052021.ashx?la=da&hash=6AA8391E858E91DA5C20523CCFDB971D269435D8>. See latest version: <https://www.sst.dk/da/udgivelse/2021/vaccinationskalender>

	<p>2. Persons age ≥ 65, who receive certain types of home care.</p> <p>3. Persons age ≥ 85.</p> <p>7. Persons age 80-84.</p> <p>8. Persons age 75-79.</p> <p>9. Persons age 65-74.</p>	
<i>persons with underlying health problems</i>	<p>YES</p> <p>5. Selected patients with conditions or diseases that carry a significantly increased risk of a severe course of COVID-19.</p> <p>10. Persons under the age of 65 years with conditions or diseases that carry an increased risk of a severe course of COVID-19.</p>	<p>No change in group 5.</p> <p>Change in group 10 as there is no longer a focus on persons under age 65 with conditions or diseases that carry an increased risk of a severe course of COVID-19. Such persons are included in the new groups 10 a-10 d on the same basis as persons without underlying health conditions or diseases.</p>
<i>persons with disabilities</i>	<p>YES</p> <p>1. Persons living in nursing home.^{5 6}</p>	<p>No change</p>
<i>key workers (on the basis of their job not their personal characteristics) – e.g. health workers; persons working in care homes; teachers</i>	<p>YES</p> <p>4. Frontline staff in the healthcare sector with an increased risk of infection, or who carry out critical functions.</p> <p>11. Staff in other functions critical to society</p>	<p>No change for group 4.</p> <p>Change in group 11 as there is no longer a focus on staff in other functions critical to society. Such persons are included in the new groups 10 a-10 d on the same basis as persons that are not working in a function critical to society</p>

⁵ This group only covers people in residential care and it doesn't cover people with disabilities who receives home assistance / personal assistance while living in their own home. Such persons might have been included under group 2 or group 5 if they meet the requirements set for those groups. They might also have been included in the previous group 10 that was changed in March 2021 and no longer take into consideration whether a person has a disability or whether a person receives home assistance / personal assistance.

⁶ In this paper [it is described how social vulnerable people are offered vaccination. Vaccination på socialområdet, National Health Authority, 2021. https://www.sst.dk/da/Udgivelser/2021/NOTAT-Vaccination-paa-socialomraadet](https://www.sst.dk/da/Udgivelser/2021/NOTAT-Vaccination-paa-socialomraadet)

<i>persons belonging to ethnic/national minorities</i>	NO	NO
<i>persons experiencing homelessness</i> ⁷	NO	NO
<i>persons with drug addiction dependencies</i> ⁸	NO	NO
<i>persons with low literacy levels</i>	NO	NO
<i>persons deprived of their liberty</i>	NO	NO
<i>persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)</i> ⁹	NO	NO
<i>OTHER</i> – not specified above; e.g. ‘Persons living in crowded accommodation’; etc. Please insert . . . ¹⁰	Yes 6. Selected close relatives of patients with conditions or diseases that carry a significantly increased risk of a severe course of COVID-19 or close relatives who are indispensable as caregivers.	No change

On 17 March 2021, a major change occurred when groups 10-12 in the first plan were changed into one large group 10 consisting of sub groups 10 a-10 d defined by an age interval instead of health conditions or staff in critical functions. Firstly, the Danish Health Authority (*Sundhedsstyrelsen*) based the changed vaccination deployment plan on the fact that age is an independent and crucial risk factor. Secondly, because of expectations of large quantities of vaccines in April, May and June there is according to the Danish Health Authority no longer the same need for a sharp distinction between groups of persons when only a few weeks will separate each group.¹¹

⁷ Ibid

⁸ Ibid

⁹ Ibid

¹⁰ Ibid

¹¹ **Denmark**, the Danish Health Authority (*Sundhedsstyrelsen*), The Danish Health Agency adjusts the vaccine deployment plan (*Sundhedsstyrelsen justerer vaccinationsplanen*), 17 March 2021,

The basis for defining priority groups are the following three main objectives of the vaccination programme:

1. Minimising death and serious illness due to COVID-19.
2. Epidemic control and minimising the spread of COVID-19.
3. Securing functions that are critical to the stability and functioning of society.¹²

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

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

The government and public authorities have made use of press conferences that are simultaneously translated into sign language and online information on a webpage regarding COVID-19¹³, the webpage of the Danish Health Authority (Sundhedsstyrelsen), regional health agencies and municipalities etc. A list of publications can be found on the English part of the webpage of the Danish Health Authority.¹⁴ This includes a pamphlet on vaccination against COVID-19 that is translated into the following languages: Arabic, Bosnian, English, Farsi, Kurdish, Somali, Tigrinya, Turkish and Urdu.¹⁵ A letter has been sent out digitally to the public on 22 December 2020, and the letter is available on the webpage of the

available in Danish at: <https://www.sst.dk/da/nyheder/2021/sundhedsstyrelsen-justerer-vaccinationsplanen>.

¹² **Denmark**, the Danish Health Authority (*Sundhedsstyrelsen*), Guidelines for handling the vaccination against COVID-19 (*Retningslinje for håndtering af vaccination mod COVID-19*), version 3, page 37, 5 February 2021, available in Danish at: <https://www.sst.dk/-/media/Udgivelser/2021/Corona/Retningslinjer/Retningslinje-for-haandtering-af-vaccination-mod-COVID.ashx?la=da&hash=9F4DE3E6CB26472FD8977007D4BCF75D925094BC>. See also the Danish Health Authority (*Sundhedsstyrelsen*), The Danish Vaccination Programme Against COVID-19, 1 February 2021, available at: <https://www.sst.dk/-/media/English/Publications/2021/Corona/Vaccination/The-Danish-Vaccination-Programme-Against-COVID-19.ashx?la=en&hash=C5AC701C8D17412ABA3B1871CF2BF2B90B1353E4>.

¹³ **Denmark**, webpage regarding information on COVID-19, including on vaccination, available in Danish at: <https://coronasmitte.dk/raad-og-regler/vaccination>. There is also an English version of the webpage that doesn't have a specific site regarding vaccinations, available at: <https://en.coronasmitte.dk/>.

¹⁴ **Denmark**, The Danish Health Authority (*Sundhedsstyrelsen*), publications, available in English at: <https://www.sst.dk/en/English/Corona-eng/Vaccination-against-COVID-19/Publications>.

¹⁵ **Denmark**, The Danish Health Authority (*Sundhedsstyrelsen*), Vaccination against COVID-19 (*Vaccination mod COVID-19*), 22 April 2021, available in the listed languages on the Danish part of the webpage: <https://www.sst.dk/da/Udgivelser/2021/Vaccination-mod-COVID-19>.

Danish Health Authority in the same languages as the pamphlet.¹⁶ On the webpage can also be found a poster on side-effects from vaccines against COVID-19 and two movies titles worth knowing about vaccines and can you trust what you read translated and with subtitles into the following four languages: Arabic, Somali, Turkish and Urdu. A list of hotlines and counselling is included on the webpage of the Danish Health Authority with information in English on a national hotline, regional hotlines, a hotline and e-mail for questions related to support on using the webpage for booking vaccinations and a joint corona hotline between The Danish Health Authority and the Danish Refugee Council offering counselling via chat or telephone in the following 12 languages: Arabic, Bosnian/Serbo-Croatian, English, Farsi, French, Kurmanji, Polish, Romanian, Somali, Tigrinya, Turkish and Urdu.¹⁷

The Danish Health Authority (*Sundhedsstyrelsen*) has communication efforts directed at the public which among others aims at providing knowledge and giving instructions on how to act regarding vaccination against COVID-19. The Danish Health Authority makes use of different communication channels such as posts on Facebook, ads on social media etc.¹⁸

In the media, the Danish Medicines Agency (*Lægemiddelstyrelsen*) is cited for launching a large-scale awareness raising campaign regarding the new vaccines against COVID-19 whereby the Agency engages on social media in a non-judgemental way with people that are sceptical of vaccines against COVID-19.¹⁹

¹⁶ **Denmark**, The Danish Health Authority (*Sundhedsstyrelsen*), Information from the Danish Health Authority on vaccination offer against COVID-19, available in English at: <https://www.sst.dk/en/English/publications/2020/Information-from-the-Danish-Health-Authority-on-vaccination-offer-against-COVID-19>.

¹⁷ **Denmark**, The Danish Health Authority (*Sundhedsstyrelsen*), Hotlines and guidance, available in English at: <https://www.sst.dk/en/English/Corona-eng/Further-information/Hotlines>.

¹⁸ **Denmark**, The Danish Health Authority (*Sundhedsstyrelsen*), Communication efforts regarding COVID-19 (*Kommunikationsindsats om COVID-19*), available in Danish at: <https://www.sst.dk/da/opgaver/forebyggelse/indsatser/kampagner/aktuelle-kampagner/covid-19>.

¹⁹ **Denmark**, the Danish daily newspaper Berlingske, Authority launch a new campaign that they name both "wild" and "historical". It targets people like Maria – but she cannot be persuaded (*Myndighed kommer med ny kampagne, som de kalder både "vild" og "historisk". Den skal ramme folk som Maria – men hun kan ikke overbevises*), 28 April 2021, available in Danish (under a paywall) at:

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.?

A website called www.vacciner.dk is in place for booking a vaccination against COVID-19. The website is available for persons that have received a letter (either digitally or by post) offering vaccination. The website is in Danish and English. Call centres are available for persons that are exempt from communicating through digital means.

It is noted on the webpage that the webpage is partly in compliance with the harmonized standard EN 301 549 on web accessibility.²⁰

- a) 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?

Call centres are available for persons that are exempt from communicating through digital means or lack the necessary skills. The municipalities also provide support to elderly people in order to help them book a vaccination time slot, transportation needs etc.

See also above in section 2.1.

2.3 How are the vaccinations administered?

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

Most citizens will be vaccinated in regional vaccination centres. Residents in e.g. nursing homes will be vaccinated locally. There are also mobile units particularly for citizens where a vaccination on a regional vaccination centre will entail great difficulties. These mobile, decentralized units are also used for vaccination at home, vaccination at pop-up centres, vaccination in nursing homes or other institutions. Such access needs to be agreed with the local municipality. Patients that are being treated at a hospital and on the basis of an individual assessment have a particularly high risk if infected with COVID-19 is offered a vaccination will be given the vaccination at the hospital.²¹

²⁰ **Denmark**, Agency for Digitalisation, declaration on accessibility (*Tilgængelighedserklæring*), available in Danish at: <https://www.was.digst.dk/coronaprover-dk>.

²¹ **Denmark**, webpage, www.vacciner.dk, where am I going to be vaccinated? (*Hvor skal jeg vaccineres?*), available in Danish at: <https://www.vacciner.dk/FAQpage/Page/2/hvor-skal-jeg-vaccineres/hvor-skal-jeg-mode-op-nar-jeg-skal-vaccineres>.

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

Information about the vaccination process is for most of the population sent either in a digital letter or by post. If a person is offered a vaccination through their workplace they will receive a message from their employer.²² When a person is eligible for vaccination they receive a letter in Danish either digitally or by post. In the letter there is a link for information in English. In the letter there is also a link to the pamphlet on vaccination against COVID-19 that is mentioned above under question 2.1 and which include examples on common and rare side effects.

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

The vaccine will be free of charge for everyone that is offered a vaccine. Vaccines are offered to persons that have Denmark as their place of residence or right to vaccination services under a stay in Denmark under EU-law or international agreements.²³ Additionally, vaccination is offered to persons with a temporary stay in Denmark of an expected duration longer than 30 days unless the only purpose of stay in Denmark is vaccination against COVID-19.²⁴

3 Challenges and promising practices

3.1 Challenges

In April, media reported that citizens were having problems with the IT-system facilitating booking of timeslots for vaccination against COVID-19 and that the problems previously experienced with the booking system continues.²⁵

Prior to this, in February, the DaneAge Association (*Ældresagen*) expressed concern with the system for booking a timeslot for vaccination in place at the time. They reported receiving many inquiries from elderly citizens and relatives unable

²² **Denmark**, the Danish Health Authority (*Sundhedsstyrelsen*), guide to vaccination against COVID-19 (*Guide til vaccination mod COVID-19*), available in Danish at: <https://www.sst.dk/-/media/COVID-19/Vaccination-mod-COVID-19/Guide-til-vaccination-mod-COVID-19.ashx?la=da&hash=7E401719D47ED9B4375730A96812E3663B69525B>.

²³ **Denmark**, Executive order no. 636 of 13 April 2021, Administrative Act on free vaccination against COVID-19 (*Bekendtgørelse om gratis vaccination mod COVID-19*), § 1, available in Danish at: <https://www.retsinformation.dk/eli/ta/2021/636>.

²⁴ **Denmark**, Executive order no. 636 of 13 April 2021, Administrative Act on free vaccination against COVID-19 (*Bekendtgørelse om gratis vaccination mod COVID-19*), § 2, available in Danish at: <https://www.retsinformation.dk/eli/ta/2021/636>.

²⁵ **Denmark**, the Danish Broadcasting Corporation (*DR*), Booking problems continue: Lotte spent five hours in front of the screen when helping her parents (*Booking-koks fortsætter: Lotte brugte fem timer ved skærmen, da hun skulle hjælpe forældrene*), 17 April 2021, available in Danish at: <https://www.dr.dk/nyheder/regionale/oestjylland/booking-koks-fortsætter-lotte-brugte-fem-timer-ved-skaermen-da-hun>.

to navigate in the booking system and in understanding the information being sent out.²⁶ After the date of the letter from the DaneAge Association (*Ældresagen*), a representative of the Region Nordjylland – which is the public authority responsible for the website vacciner.dk where booking takes place – was quoted in the media for saying that the system for booking a timeslot for vaccination will be adapted.²⁷ The Danish Health Authority (*Sundhedsstyrelsen*) also reported receiving many inquiries regarding a lack of available timeslots for vaccination and challenges with booking a timeslot for vaccination and that the Danish Health Authority was aware of these challenges.²⁸ Therefore, it is not certain whether the system was adapted partly or wholly due to the letter from the DaneAge Association and/or people complaining or whether the public authorities was already aware of the issues.

3.2 Promising practices

In March, an already existing scheme for citizens in priority group (2) and (3) was expanded to include citizens aged 80-84 (priority group 7). Under the scheme citizens where a vaccination on a regional vaccination centre will entail great difficulties is given the opportunity for vaccination in their own home or at a local vaccination facility.²⁹ The Minister for Health has stated that the scheme is expected to continue throughout the vaccination efforts and will be offered to persons in other priority groups where a vaccination on a regional vaccination centre will entail great difficulties is given the opportunity for vaccination in their own home or at a local vaccination facility.³⁰

In April, the Danish Health Agency (*Sundhedsstyrelsen*) decided to pull-out the Vaxzevria-vaccine (from AstraZeneca) from the Danish vaccination programme against COVID-19 based on a link of very rare cases of unusual blood clots, low

²⁶ **Denmark**, the DaneAge Association (*Ældresagen*), Letter to the Minister for Health, Magnus Heunicke, and the Minister for Social Affairs and Senior Citizens, Astrid Krag, 15 February 2021, available in Danish at: <https://www.aeldresagen.dk/presse/viden-om-aeldre/oevrige/2021-tidsbestilling-covid19-vaccine-150221>.

²⁷ **Denmark**, newswebsite Version 2, Region promises improvement of criticised vaccine-booking: Changes ready in a few days (*Region lover forbedring af kritiseret vaccine-booking: Forbedringer klar om få dage*), 19 February 2021, available in Danish at: <https://www.version2.dk/artikel/region-lover-forbedring-kritiseret-vaccine-booking-aendringer-klar-faa-dage-1092137>.

²⁸ **Denmark**, the Danish Health Authority (*Sundhedsstyrelsen*), Statusreport as of 22 February 2021 (*Statusrapport per 22. februar 2021*), page 4, available in Danish at: <https://www.sst.dk/-/media/Udgivelser/2021/Corona/Vaccination/Statusrapport/Statusrapport-vaccinationsindsats-22-februar-2021.ashx?la=da&hash=BCF2ED2D7D73613C7B105CE55A6AD27E45C4AF96>.

²⁹ **Denmark**, the Danish Health Authority (*Sundhedsstyrelsen*), Vaccination efforts against COVID-19: Extended mobile scheme (*Vaccinationsindsats mod COVID-19: Udvidet udkørende ordning*), 4 March 2021, available in Danish at: <https://www.sst.dk/-/media/Udgivelser/2021/Corona/Vaccination/Notater/Notat-udvidet-udekoerende-ordning-vaccination.ashx?la=da&hash=0B7E732AF94D34204DFF9E2C79C9211DB2B612B4>.

³⁰ **Denmark**, response from the Minister of Health to question no. 6 from the Epidemics Committee (*Folketingets Epidemiudvalg*), 30 March 2021, available in Danish at: <https://www.ft.dk/samling/20201/almdel/EPI/spm/6/index.htm>

blood platelet counts, and bleeding coupled with the fact that the COVID-19 epidemic in Denmark is currently under control and that other vaccines are available against COVID-19.^{31 32}

³¹ **Denmark**, the Danish Health Authority (*Sundhedsstyrelsen*), Denmark continues its vaccine rollout without the COVID-19 vaccine from AstraZeneca, 14 April 2021, available at: <https://www.sst.dk/en/English/news/2021/Denmark-continues-its-vaccine-rollout-without-the-COVID-19-vaccine-from-AstraZeneca>.

³² We were uncertain whether the decision to continue the Danish COVID-19 vaccine roll-out without the vaccine from AstraZeneca should be included in the report on national vaccine deployment and if so where in the report it should be mentioned. However, since the decision is based on a weighing up of the risk of side-effects caused by the vaccine with the risk posed by COVID-19 we decided to place it under a promising practice.