

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

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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	7
2.1 Channels, means and measures to inform about the national vaccination plan.....	8
2.2. What are the (pre-) registration channels for vaccination put in place? ..	9
2.3 How are the vaccinations administered?	10
3) Challenges and promising practices.....	12
3.1 Challenges	12
3.2 Promising practices	13

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.

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

Specific groups identified in the national vaccine deployment plan	Date of plan First national vaccination deployment plan 04/12/2020¹	Date of new/revised plans 27/01/2021 Subsequent national vaccination deployment plan/s in March/April – in operation²
older persons; indicate age groups specified	No	Yes 75 and above (2 phase) 74-70 (3 phase) 69-65 (4 phase) 64-55 (5 phase)
persons with underlying health problems	No	Yes highly vulnerable people (2b phase) significantly vulnerable due to a pre-existing health condition (3b phase)

¹ National Ethics Commission (*la Commission nationale d'éthique*) (2021). [Consolidated opinion on ethical aspects relating to the prioritization of people to be vaccinated against Covid-19](#) (*Avis consolidé sur les aspects éthiques relatifs à la priorisation des personnes à vacciner contre la Covid-19*).

² Superior Council of Infectious Diseases (*Conseil supérieur des maladies infectieuses*) (2021). [Opinion of the Superior Council of Infectious Diseases: Vaccination strategy against COVID 19 in Luxembourg - phases 2 and following January 27, 2021](#) (*Avis du Conseil supérieur des maladies infectieuses: Stratégie vaccinale contre la COVID 19 au Luxembourg – phases 2 et suivantes 27 janvier 2021*).

		moderately vulnerable people (4b phase) people who have a major health risk (5b phase)
persons with disabilities	Yes (People with disabilities living in approved accommodation facilities (1 phase))	No (as already vaccinated in 1 phase)
key workers (on the basis of their job not their personal characteristics) – e.g. health workers; persons working in care homes; teachers	Yes (health workers in hospitals, retirement homes, care and support networks (1phase) As well as workers working with people with disabilities living in approved accommodation facilities (1 phase))	No ³
persons belonging to ethnic/national minorities	No	No
persons experiencing homelessness	No	Yes (part of the group referred as people living in precarious situations (6b phase) ⁴ or having a pre-existing health conditions (3b phase) ⁵)

³ Clarified in [Parliamentary question N°3721](#)

⁴ Note: Certain professions were not explicitly mentioned in the strategic plan. However, in [Parliamentary question N°3753](#) further clarifications were made: for instance, doctors working in laboratories as well as fire and rescue personnel were vaccinated in 1, 2, 3 Phase)

⁵ Additionally, Clarifications made in [Parliamentary question N°3753](#)

persons with drug addiction dependencies	No	No
persons with low literacy levels	No	No
persons deprived of their liberty	No	No ⁶
persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)	No	No
<u>OTHER</u> – persons living in retirement and care facilities	Yes (1phase)	
<u>OTHER</u> –people in precarious situation, living in communities, and not previously vaccinated because of their vulnerability	No	Yes (6a phase)

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

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

The national vaccination strategy was first presented on 04 December 2020 and outlined 5 pillars, namely: allocation, procurement, logistics, communication and monitoring of post-market effects of vaccines⁷.

Moreover, the first phase of the vaccination rollout began in the last days of December 2020 and included vaccination of healthcare professionals, staff of hospitals and care facilities and residents of accommodation facilities for the

⁶ note : Not openly pronounced as a priority group over general population but made aware of their vulnerabilities; also confirmed in [Parliamentary question N°3894](#)

⁷ The Government of the Grand Duchy of Luxembourg. [Strategic plan for the deployment of COVID-19 vaccination](#) (*Plan stratégique pour le déploiement de la vaccination COVID-19 au Luxembourg*).

elderly⁸ as well as people with disabilities living in care homes⁹. The definition of the first phase and the criteria were based on the recommendations made by the National Commission of Ethics (*la Commission Nationale d'Éthique*). The document was developed at times when vaccination jabs were scarce and it was not known when and what amounts would arrive in Luxembourg.

In January 2021, Higher Council for Infectious Diseases (*Conseil supérieur des maladies infectieuses*) developed a document regarding the prioritisation of population groups for Covid-19 vaccination. This document¹⁰ laid the premises for the vaccination rollout in 2021 in Luxembourg and specified the population groups for each phase.

The main reasoning of prioritizing some population groups over others is based on the fact that “ in an initial phase, the vaccine is not available in sufficient doses for everyone to be vaccinated at the same time. It is therefore necessary and legitimate to prioritise according to the objectives of the immunisation strategy, i.e.:

1. protect the most vulnerable residents (based on their age or health status) from the risk of complications from the disease and from the risk of death, and
2. protect the capacity of the health care system”.¹¹

⁸ Superior Council of Infectious Diseases (*Conseil supérieur des maladies infectieuses*) (2021). [Opinion of the Superior Council of Infectious Diseases: Vaccination strategy against COVID 19 in Luxembourg - phases 2 and following January 27, 2021](#) (*Avis du Conseil supérieur des maladies infectieuses: Stratégie vaccinale contre la COVID 19 au Luxembourg – phases 2 et suivantes 27 janvier 2021*).

⁹ National Ethics Commission (*la Commission nationale d'éthique*) (2021). [Consolidated opinion on ethical aspects relating to the prioritization of people to be vaccinated against Covid-19](#) (*Avis consolidé sur les aspects éthiques relatifs à la priorisation des personnes à vacciner contre la Covid-19*).

¹⁰ Superior Council of Infectious Diseases (*Conseil supérieur des maladies infectieuses*) (2021). [Opinion of the Superior Council of Infectious Diseases: Vaccination strategy against COVID 19 in Luxembourg - phases 2 and following January 27, 2021](#) (*Avis du Conseil supérieur des maladies infectieuses: Stratégie vaccinale contre la COVID 19 au Luxembourg – phases 2 et suivantes 27 janvier 2021*).

¹¹ The Government of the Grand Duchy of Luxembourg, Official [webplatform Covid-19](#).

Thus, the main basis for defining phases was age and health condition as the most important criteria associated with mortality and severe forms of SARS-CoV-2 infection¹²

- *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).*

The overall strategy included multiple criteria. Vulnerability towards Covid-19 infection and its associated risks lie at the basis of assigning population into 6 vaccination groups. That is why the first phase included the most vulnerable population: medical health workers, residents of retirement and care homes as well as people with disabilities. Other phases are organised along the age and (general) health related vulnerability. Subsequently, each phase was divided into two subgroups: a) and b). Subgroup a) (typically associated with certain health risks, or risks related to certain social vulnerabilities) is prioritised in each phase. Then within each phase, vaccination is done in the descending order: beginning with the oldest citizens and finishing with the youngest.

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?

¹² Superior Council of Infectious Diseases (*Conseil supérieur des maladies infectieuses*) (2021). [Opinion of the Superior Council of Infectious Diseases: Vaccination strategy against COVID 19 in Luxembourg - phases 2 and following January 27, 2021](#) (*Avis du Conseil supérieur des maladies infectieuses: Stratégie vaccinale contre la COVID 19 au Luxembourg – phases 2 et suivantes 27 janvier 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 Luxembourg, the vaccination strategy plan was officially launched on 04 December 2020¹³ following the recommendations of the World Health Organisation as well as of the European Commission.¹⁴

Within the vaccination campaign, the Ministry of Health developed a number of material (INFOVAXX¹⁵) that included:

- Information on vaccination, available in 5 languages: Luxembourgish, German, French – national languages, Portuguese – the language of the biggest migrants' group, and English.
- Posters and brochures available in Luxembourgish, German, French, as well as Portuguese.
- Information on vaccination phases in Luxembourgish, German, French, Portuguese, English
- Info graphs on vaccinations strategy in in Luxembourgish, German, French, Portuguese, English
- Newsletters in German and French
- Information on vaccination types available in French, German, English
- Video material available in one) of the official languages(i.e. French or German with subtitles in another official language

13 [Ministerial Regulation of 23 December, 2020 setting the operational provisions relating to COVID-19 vaccination centers](#) (*Règlement ministériel du 23 décembre 2020 fixant les dispositions opérationnelles relatives aux centres de vaccination COVID-19*)

14 National Ethics Commission (*la Commission nationale d'éthique*) (2021). [Consolidated opinion on ethical aspects relating to the prioritization of people to be vaccinated against Covid-19](#) (*Avis consolidé sur les aspects éthiques relatifs à la priorisation des personnes à vacciner contre la Covid-19*).

15 The Government of the Grand Duchy of Luxembourg, Official webplatform Covid-19, Information [material Infovaxx](#)

- Interactive campaign where citizens could upload their photo after being vaccinated ¹⁶

With the aim to raise awareness and inform the residents, this produced material was broadcast on the radios, TV stations, in press, distributed to the citizens by post, used as banners in the cities of the country, on various official websites (ministries, municipalities, etc.).

Additionally, there have been regular press conferences of top officials (i.e. Prime Minister and the Minister of Health) explaining new information and answering questions of journalists. The information was presented in Luxembourgish, with a simultaneous sign language, as well as simultaneous translation in French and English. However, the Consultative Commission on Human rights recommended broadening information and the need including easy language and languages understandable for asylum seekers.¹⁷

Since the beginning of the pandemic, a hotline was set up to provide information and clarifications with regard to Covid-19, large scale testing and vaccination. The information is mainly provided in Luxembourgish, French, German and English. Additionally, hotline workers can answer in 17 other languages, including Portuguese, Serbian, Croatian, Russian, Spanish, Italian, etc¹⁸.

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.?

Registration for vaccination is possible online¹⁹ through a national platform (guichet.lu) using the code provided in the invitation received by post.

¹⁶ Vaccination site [Echloossemechimpfen.lu](https://echloossemechimpfen.lu)

¹⁷ Consultative Commission on Human Rights of the Grand Duchy of Luxembourg (*Commission consultative des Droits de l'Homme du Grand-Duché de Luxembourg*) (2021). [The health crisis and its consequences: What impacts on human rights? CCDH report](#) (*La crise sanitaire et ses conséquences : Quels impacts sur les droits humains ? Rapport de la CCDH*)

¹⁸ [Parliamentary Question N3923 on Hotline Covid-19](#).

¹⁹ Guichet.lu [Booking an appointment for vaccination against COVID-19 using the code provided in the invitation received by post](#)

- 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?

People who are unable to make an appointment online can contact the health hotline²⁰ (Monday to Sunday, from 8.00 to 19.00). The staff at the Hotline can help make an appointment. The appointment for the second vaccine dose is fixed at the vaccination centre as dates vary depending on the vaccination type.²¹

2.3 How are the vaccinations administered?

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

In total, there are 5 vaccination centres in various regions of the country. Each vaccination centre has sufficient space for parking as well as good connection by public transport²². Shuttle busses have been provided for people above 65 to the vaccination centres free of charge, parking is also provided for free at the location. Additionally, mobile units were organised for vaccinations in residential care homes for the elderly and for people with reduced mobility.²³ There, support of the medical doctors and nurses is particularly taken into account for ensuring preparation for the in-time vaccination.²⁴ A mobile team is composed of a medical officer, team leader, and an administrative / logistics assistant²⁵. Vaccination was also administered at hospitals to medical personnel working there. However, it is

²⁰ [Ministerial Regulation of 23 December, 2020 setting the operational provisions relating to COVID-19 vaccination centers](#) (*Règlement ministériel du 23 décembre 2020 fixant les dispositions opérationnelles relatives aux centres de vaccination COVID-19*)

²¹ Guichet.lu [Booking an appointment for vaccination against COVID-19 using the code provided in the invitation received by post](#)

²² [Ministerial Regulation of 23 December, 2020 setting the operational provisions relating to COVID-19 vaccination centers](#) (*Règlement ministériel du 23 décembre 2020 fixant les dispositions opérationnelles relatives aux centres de vaccination COVID-19*)

²³ [Ministerial Regulation of 23 December, 2020 setting the operational provisions relating to COVID-19 vaccination centers](#) (*Règlement ministériel du 23 décembre 2020 fixant les dispositions opérationnelles relatives aux centres de vaccination COVID-19*)

²⁴ [Parliamentary question N°3833](#)

²⁵ [Ministerial Regulation of 23 December, 2020 setting the operational provisions relating to COVID-19 vaccination centers](#) (*Règlement ministériel du 23 décembre 2020 fixant les dispositions opérationnelles relatives aux centres de vaccination COVID-19*)

currently not possible to be vaccinated in private medical offices by family doctors due to particularities of distribution and storing the Covid-19 vaccines. The government is getting ready for enlarging the scope once the vaccines get different storage conditions²⁶.

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

The Ministry of Health provided supporting information material regarding the vaccination roll-out. Any information on vaccination process could also be clarified through the hotline. Information could be provided by the general doctors who know patient's illness history. Due to certain health conditions, general doctors also include patients into the lists of vulnerable groups and recommend specific vaccination jabs. They then assign their patients in the waiting lists²⁷.

A lot of information and clarification is included at different stages of the vaccinating process. When registering for the vaccination appointment, some health questions and possible risks for people with certain diseases is included throughout the registration procedure. Also, prior to vaccination, assisting medical staff provides medical consultation before the vaccination²⁸ at the vaccination centre as well as by mobile units.²⁹

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

No. All vaccines are free of charge within the national vaccination campaign realized by the Luxembourgish government. It is not relevant whether a person has a health insurance or not.³⁰ The Ministry of Health specified that the people eligible to vaccinations are selected based on two criteria: people 1) registered in the national register of physical persons (*le register national des personnes physiques* – RNPP) and 2) according to priorities that are fixed in the nation

²⁶ [Parliamentary question N°3742](#)

²⁷ Information is provided through a conversation with a general doctor.

²⁸ [Ministerial Regulation of 23 December, 2020 setting the operational provisions relating to COVID-19 vaccination centers](#) (*Règlement ministériel du 23 décembre 2020 fixant les dispositions opérationnelles relatives aux centres de vaccination COVID-19*)

²⁹ [Parliamentary question N°3833](#)

³⁰ [Parliamentary Question N°3219](#)

strategy of vaccination.³¹ Considering the fact that health and care workers are among most vulnerable groups against Covid-19, cross-border workers, working in hospitals and accommodation facilities for the elderly, are also vaccinated in the first phase of the roll-out.³²

Neither additional fees, nor any other categories are included under the national vaccination plan.

3 Challenges and promising practices

3.1 Challenges

- 1) Unequal coverage of persons in the same priority group (e.g. some institutional settings such as care homes prioritised, others not e.g. prisons, detention centres, or homeless people being left behind;

In defining phases of vaccination rollout, the Superior Council of Infectious Diseases (*Le Conseil Supérieur des Maladies Infectieuses*) emphasizes a particular vulnerable situation of people living in a precarious situation or people living in closed communities, as, for instance, people in detentions³³. However, this group has not been prioritised due to difficulties of administering vaccination at once for all the persons and assuring safety of medical workers.³⁴

- 2) Unequal access based on residence status

Currently, only registered residents in the country are eligible for vaccination – except for cross-border workers in the health sector or in the elderly care sector.

³¹ [Parliamentary question 3891](#)

³² Superior Council of Infectious Diseases (*Conseil supérieur des maladies infectieuses*) (2021). [Opinion of the Superior Council of Infectious Diseases: Vaccination strategy against COVID 19 in Luxembourg - phases 2 and following January 27, 2021](#) (*Avis du Conseil supérieur des maladies infectieuses: Stratégie vaccinale contre la COVID 19 au Luxembourg – phases 2 et suivantes 27 janvier 2021*).

³³ Superior Council of Infectious Diseases (*Conseil supérieur des maladies infectieuses*) (2021). [Opinion of the Superior Council of Infectious Diseases: Vaccination strategy against COVID 19 in Luxembourg - phases 2 and following January 27, 2021](#) (*Avis du Conseil supérieur des maladies infectieuses: Stratégie vaccinale contre la COVID 19 au Luxembourg – phases 2 et suivantes 27 janvier 2021*).

³⁴ [Parliamentary question N°3894](#)

However, due to migration specifics in Luxembourg, where an overwhelming number of workers come from neighbouring countries, some members of the Parliament questioned whether other basis of vaccination could be selected to allow cross border workers too.

- 3) incidents of favouritism in accessing vaccines contrary to established rollout rules.

There was an incident when some members of the board of directors of a hospital became vaccinated even though they were not health workers working in hospitals³⁵. After the incident became public these people had to step down from the board of directors. The incident put into question whether hospitals had too much liberty with the vaccination strategies³⁶.

3.2 Promising practices

- tailored vaccination services for people in vulnerable situations facing difficulties in accessing health and vaccination services;

Vaccination centres are organised in places reachable by public transport. Furthermore, in addition, to people who are 65+ years old, shuttle busses have been provided to the vaccination centres free of charge to ensure easy reach to the centres. These shuttle busses are provided by local municipalities.³⁷ Reservation is possible via the phone, through the Health helpline or by mail.

- tailored outreach targeted at different groups and communities, overcoming language and cultural barriers (e.g. engaging with mediators and community leaders trusted by communities);

The Health hotline (*la Helpline Santé*) provides information and clarifications with regard to Covid-19, large scale testing and vaccination. There, staff answers questions in Luxembourgish, French, German. In addition to this, hotline workers

³⁵ [Parliamentary question N°3798](#)

³⁶ Paperjam.lu [Controversy at robert schuman hospitals. "Morally unacceptable vaccination"](#). (*Polémique aux hôpitaux robert schuman. «Une vaccination moralement inacceptable»*) . Press release 24.02.2021.

³⁷ [Parliamentary question N°3692](#).

can answer in 17 other languages, including Portuguese. Serbian, Croatian, Russian, Spanish, Italian, etc³⁸ to ensure understanding of every calling person.

- tailored outreach targeted at different groups and communities, overcoming language and cultural barriers (e.g. engaging with mediators and community leaders trusted by communities);

To be able to reach homeless people for vaccination, The Ministry of Health works closely with the local authorities. Organisations offering support to homeless people inscribe them for vaccination (within phase 3 if there are health risks, or otherwise phase 6).³⁹

³⁸ [Parliamentary Question N3923 on Hotline Covid-19.](#)

³⁹ [Parliamentary question N°3753](#)