

Coronavirus pandemic in the EU – Fundamental Rights implications

National vaccine deployment

Ireland

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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.....	7
2.2	What are the (pre-) registration channels for vaccination put in place? ..	9
2.3	How are the vaccinations administered?	9
3	Challenges and promising practices.....	10
3.1	Challenges.....	10
3.2	Promising practices	11

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 11/12/2020 National COVID-19 Vaccination Strategy and first COVID-19 Vaccine Implementation Plan (see p9 of the Implementation Plan)	Date of new/revised plans Last updated 31/03/21 Provisional Vaccine Allocation Groups (see notes below table)
<i>older persons; indicate age groups specified</i>	YES - Priority group 1, Adults aged ≥65 years who are residents of long-term care facilities - Priority group 3, Aged 70 and older in the following order: 85 and older; 80- 84; 75-79; 70-74 - Priority group 5, Aged 65-69 - Priority group 12. Aged 55-64 years.	YES Most nursing home residents and over 70s are now vaccinated. Priority was changed to put those with severe health problems above the general population aged 65-69 (see below) but the 65-69 cohort are now being vaccinated.
<i>persons with underlying health problems</i>	YES - Aged 65-69. Prioritise those with medical conditions which put them at high risk of severe disease (priority group 5) - Aged 18-64 years with medical conditions which put them at high risk of severe disease. (priority group 7)	YES In updated plans, all people aged 16-69 with a medical condition which puts them as very high risk of severe disease or death became priority group 4, before the 65-69 cohort.
<i>persons with disabilities</i>	NOT SPECIFIED While 65+ residents of long term care homes were priority group 1, and residents of long-term care facilities aged 18-64 were priority group 8,	YES In the new priority group 4 mentioned in box above, intellectual disability is mentioned as a qualifying medical condition for the over 65, while only Down

	there is no specific mention of disability, nor were specific disabilities listed as qualifying medical conditions in the original plan.	Syndrome is mentioned as a qualifying condition for 18-64.
<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> <ul style="list-style-type: none"> - Priority group 1, adults 65+ in long term care, came with proviso: ‘Consider offering vaccination to all residents and staff on site’ - Priority group 2, Frontline healthcare workers (HCWs)* in direct patient contact roles (including vaccinators) or who risk exposure to bodily fluids or aerosols. - Priority group 6, Key workers (to be further refined). - Priority group 10 - Key workers in essential jobs who cannot avoid a high risk of exposure to COVID-19. They include workers in the food supply system, public and commercial transport and other vital services. <p>Priority group 11- Those who are essential to education and who face disease exposure - primary and second level school staff, special needs assistants, childcare workers, maintenance workers, school bus drivers etc</p> <p>Priority group 13- Those in occupations important to the functioning of society, e.g., third level institutions, entertainment and goods producing industries who work in settings where protective measures can be followed without much difficulty</p>	<p>YES, BUT...</p> <p>In the original plan, various groups were to be prioritised ahead of the general cohort of 18-54 year olds. In the current plan, frontline health workers remain priority 2 but are now fully vaccinated. Staff working with 65+ adults in long term care are also vaccinated, in priority group 1. Priority group 6, however, is now the general cohort of 65-69 AND key workers essential to the vaccine programme. No other key workers (teachers, police, food supply systems) now featured in the new plan. See below.</p>
<i>persons belonging to ethnic/national minorities</i>	<p>NO</p> <p>Irish Travellers and other ethnic minorities are not</p>	NO

	mentioned specifically in the plan (see more below).	
<i>persons experiencing homelessness</i>	NO, not mentioned in the plan, but see 3.2 below.	NO
<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 - although not specified, prisoners were expected to be vaccinated as part of priority group 9 'Aged 18-64 living/working in crowded accommodation where self-isolation and social distancing is difficult to maintain'.	YES, but downgraded. - those living or working in crowded settings are now to be vaccinated 'in parallel' with the general population aged 64 and younger, which is the final priority group (still group 9, since there are many fewer groups).
<i>persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)</i>	NO - although asylum seekers, who live in direct provision, would also be part of priority group 9 above.	NO
<i>OTHER – not specified above; e.g. 'Persons living in crowded accommodation'; etc. Please insert . . .</i>	YES - Priority group 9 'Aged 18-64 living/working in crowded accommodation where self-isolation and social distancing is difficult to maintain'.	YES, but downgraded. - those living or working in crowded settings are now to be vaccinated 'in parallel' with the general population aged 64 and younger, which is the final priority group (still group 9, since there are many fewer groups).

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 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 the original vaccine implementation plan, a number of factors were taken into consideration when planning the vaccine rollout, including age; profession; vulnerability to infection due to illness; vulnerability to infection due to inability to social distance (living or working in crowded conditions). However, in a revised plan approved on 30 March 2021, the professional categories, with the exception of frontline health workers and those essential for the vaccine rollout, were removed in favour of a system based largely on age and medical conditions.

Unions representing teachers, gardaí (police) have objected to these changes,¹ but the Government have defended them, saying that an age-based system is fairer and more scientifically sound (because age is the primary determinant of how likely COVID-19 is to cause death or severe illness), and also easier to implement.² Some adjustments may be made to this plan in light of the age restrictions on certain vaccines. However, as of 5 May 2021, suggestions that people in their 40s might be vaccinated in parallel with those in their 50s have not been taken up, with the age-based system remaining in place.³

The National Immunisation Advisory Committee recommendation on which the current plan is based identifies members of the Roma and Traveller communities and the homeless as the only specific groups identified as being at significantly increased risk and therefore should be prioritised for vaccination. While these are not mentioned specifically in the official Government plan, provisions are being made for these groups 'in parallel' with the general population under 64 in the final priority group. In practice, this means that while the general population are being targeted in order of descending age, these groups may be vaccinated sooner than their age cohort. For example, a specific programme to vaccinate homeless people in Dublin was put in place at the end of April⁴ (see 3.2 below). It is not clear, however, that any specific programme has been put in place for members of the Roma and Traveller communities.

¹ Association of Secondary Teachers Ireland (2021), 'ASTI, INTO and TUI demand urgent meeting with government on teacher vaccination', 9 April 2021, available at: <https://www.asti.ie/news-campaigns/latest-news/asti-into-and-tui-demand-urgent-meeting-with-government-on/> ; The Irish Examiner (2021), Teachers and gardaí 'shocked and dismayed' at changes to vaccine rollout plan, 31 March 2021, available at: <https://www.irishexaminer.com/news/arid-40255007.html> .

² The Irish Times (2021), 'Age-based vaccine policy 'simple' and country can open quicker – Varadkar', 1 April 2021, available at: <https://www.irishtimes.com/news/health/age-based-vaccine-policy-simple-and-country-can-open-quicker-varadkar-1.4526143> .

³ The Irish Times (2021), 'Vaccine Q&A: With targets in the balance, what is going on with the rollout?', 4 May 2021, available at: <https://www.irishtimes.com/news/ireland/irish-news/vaccine-q-a-with-targets-in-the-balance-what-is-going-on-with-the-rollout-1.4555413> .

⁴ The Journal.ie (2021), 'Homeless people in Dublin to start getting Covid-19 vaccines next week', 23 April 2021, available at: <https://www.thejournal.ie/mass-vaccination-of-homeless-people-in-dublin-to-begin-next-week-5416273-Apr2021/> .

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.

Information on the vaccine rollout, including which group is currently being targeted, has been incorporated into the frequent Government announcements on radio and television.

While several public information leaflets were issued by post to all households earlier in the pandemic, there have been no similar leaflets issued for the vaccine rollout. This may be because the vaccine rollout has been subject to changes and multiple delays due to changes in vaccine supply and authorisation for certain age groups, and also because the first priority groups were targeted in their workplace or home (older people in long term care facilities, front line workers), and over 70s were contacted by their GP directly.

Information is available online on the Government website⁵, the Health Service Executive website⁶ and the Citizens Information website⁷. There is also a COVID-

⁵ Government of Ireland (2021), 'Provisional Vaccine Allocation Groups' webpage, Last updated 30 April 2021, available at: <https://www.gov.ie/en/publication/39038-provisional-vaccine-allocation-groups/> .

⁶ Health Service Executive Ireland (2021), 'Rollout of COVID-19 vaccines' webpage, available at: <https://www2.hse.ie/screening-and-vaccinations/covid-19-vaccine/rollout/> .

⁷ Citizens Information Ireland (2021), 'Vaccines for COVID-19' webpage, Last updated 4 May 2021, https://www.citizensinformation.ie/en/health/health_services/vaccinations/vaccines_for_covid19.html# .

19, which can also register people for their vaccinations if they cannot do so online.⁸

Information about COVID-19 in Ireland is available in 36 languages, from Albanian to Zulu.⁹ This includes Government advice on issues such as self-isolation, and a series of leaflets on each of the major vaccines available (Pfizer, Moderna and Astra-Zeneca). This leaflet includes information how vaccines work, and the way in which the rollout works (although it does not specify the various groups).¹⁰

Information about each of the major vaccines is available in large print, easy read and audio format.¹¹ A series of videos with Irish Sign Language explaining vaccine safety, side effects etc. are also available.¹² The same difficulty – that you must first select the vaccine you think you will be offered- applies. An email address is provided to request Braille and digital Braille versions of the leaflets about each of the major vaccines.

⁸ Health Service Executive Ireland (2021), 'Contact the HSE' webpage, available at: <https://www2.hse.ie/services/contact-the-hse/#:~:text=If%20you%20are%20still%20having,helpline%20on%201850%2024%201850.>

⁹ Health Service Executive Ireland (2021), 'Translated COVID-19 information' webpage, available at: <https://www.hse.ie/eng/services/covid-19-resources-and-translations/translated-covid19-information/> .

¹⁰ Health Service Executive Ireland (2021), 'Translated COVID-19 information' webpage, available at: <https://www.hse.ie/eng/services/covid-19-resources-and-translations/translated-covid19-information/> .

¹¹ Health Service Executive Ireland (2021), 'COVID-19 vaccine easy read and accessible information' webpage, <https://www.hse.ie/eng/services/covid-19-resources-and-translations/covid-19-vaccine-materials/covid19-vaccine-easy-read-and-accessible-information/> .

¹² Health Service Executive Ireland (2021), 'COVID-19 Irish sign language resources' webpage, available at: <https://www.hse.ie/eng/services/covid-19-resources-and-translations/covid-19-irish-sign-language-resources/covid19-vaccine-irish-sign-language-resources.html> .

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.?*
- 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?*

The method of registration depends on the priority group. Those over 70, and those at very high risk, are contacted by their family doctor. Those who do not have a family doctor are asked to call the COVID-19 Helpline.¹³

The general population aged 58-69 are currently being invited to register for their vaccinations online. Those who cannot register online can use the COVID-19 helpline to register for their vaccination. People with hearing impairments also have the option to text to register for their vaccine, or to use the Irish Remote Interpreting Service. There does not appear to be any other language versions of the registration system available. The online registration system is being progressively extended to the general population in order of age – e.g. from Tuesday 4 May, 59 year olds can register for their vaccine, from Wednesday 5 May, 58 years olds and so on.¹⁴

2.3 How are the vaccinations administered?

- a) *Where are the vaccinations administered e.g. vaccination centres, via mobile units, via family doctors, etc.?*
- b) *For those being vaccinated - how is information about the actual vaccination process, the vaccine and any potential side effects provided?*
- c) *Are there any circumstances where fees are applicable for receiving the vaccine – e.g. for third country nationals?*

The place of vaccination varies according to the priority group. Those over 65 living in long term care facilities were vaccinated there; frontline healthcare workers were vaccinated at their workplace; over 70s were vaccinated by their

¹³ Health Service Executive Ireland (2021) , 'Rollout of COVID-19 vaccines' webpage, available at: <https://www2.hse.ie/screening-and-vaccinations/covid-19-vaccine/rollout/>

¹⁴ Health Service Executive Ireland (2021), 'Getting your COVID-19 vaccine' webpage, available at: <https://www2.hse.ie/screening-and-vaccinations/covid-19-vaccine/get-the-vaccine/getting-your-vaccine/> .

family doctor. A home vaccination can be arranged for people over 70 who cannot leave home for medical reasons.

Those in the cohort currently being vaccinated, 60-69, will receive their vaccination at vaccination centres.

As above, there is information about each of the three major vaccines available in English and 36 other languages. Information on the Janssen (Johnson & Johnson) vaccine is as of now only available in English.

There are no fees for any recipient of the vaccine. Following a consultative process with the Department of Health, the Health Service Executive and the Irish Medical Organisation, family doctors are paid by the Health Service Executive at a rate of €25 per vaccine administered, plus a €10 administration fee per patient.¹⁵ The online system requires you to have your Personal Public Service (social security number). However, the Health Service Executive advise that if you do not have a PPS number, you can still register using the hotline¹⁶. It is not clear whether this means that e.g. undocumented workers can receive the COVID-19 vaccine.

3 Challenges and promising practices

3.1 Challenges

- As indicated above, the decision to provide information about vaccines in three, eventually four, separate leaflets for each of the major vaccines seems an unnecessary barrier to understanding, particularly since those presenting for vaccination do not get a choice in the vaccine they will get.¹⁷ While the general population can at least refer to the website for an overview of the more general

¹⁵ Health Service Executive Ireland (2021), 'Arrangement with General Practitioners in Context of Roll Out of COVID-19 Vaccination Programme', 20 January 2021, Circular Number NCO-02-2021, available at: <https://www.hse.ie/eng/staff/pdrs/circulars/gp/national-covid-19-vaccination-programme-gp-s-circular-nco-02-2021.pdf> .

¹⁶ Health Service Executive Ireland (2021), 'Register to get a COVID-19 vaccine' webpage, available at: <https://vaccine.hse.ie/> .

¹⁷ Health Service Executive Ireland (2021), 'Getting your COVID-19 vaccine' webpage, available at: <https://www2.hse.ie/screening-and-vaccinations/covid-19-vaccine/get-the-vaccine/getting-your-vaccine/> .

information¹⁸, those who need Easy Read or another language version have to choose which vaccine leaflet to read.

- There have been a number of incidents where leftover vaccines in hospital settings went to family members of senior staff¹⁹ or, in one instance, to staff of a private school where the children of the CEO of a private hospital were being educated.²⁰ There have also been claims that the same private hospital offered vaccines to senior staff of health insurance companies with whom they had a commercial relationship.²¹ A number of internal investigations in the hospitals and health insurance companies concerned are underway.

- Some concerns have been expressed about the number of steps involved in the online registration system, and whether the phone line will be answered promptly, but to date there has not been concrete evidence of substantial issues with accessibility.²²

3.2 Promising practices

- A number of resources on the vaccine rollout have been developed specifically for Irish Travellers. This includes an information video and poster, and video interviews of Traveller Primary Healthcare Workers (who are Travellers

¹⁸ Health Service Executive Ireland (2021), 'Getting your COVID-19 vaccine' webpage, available at: <https://www2.hse.ie/screening-and-vaccinations/covid-19-vaccine/get-the-vaccine/getting-your-vaccine/>

¹⁹ The Irish Times (2021), 'Coombe begins investigation into vaccination of family members of staff', <https://www.irishtimes.com/news/health/coombe-begins-investigation-into-vaccination-of-family-members-of-staff-1.4463568> .

²⁰ The Irish Examiner (2021), 'Covid outbreak in Wicklow school at centre of Beacon Hospital vaccination controversy', 28 April 2021, available at: <https://www.irishexaminer.com/news/arid-40276661.html> .

²¹ The Irish Times (2021), 'VHI chief steps aside as inquiry into his Beacon Hospital vaccination ordered', 31 March 2021, available at: <https://www.irishtimes.com/news/health/vhi-chief-steps-aside-as-inquiry-into-his-beacon-hospital-vaccination-ordered-1.4524431> .

²² The Irish Independent (2021), 'Nine thousand people register on Covid-19 vaccine portal within one hour of opening', 15 April 2021, available at: <https://www.independent.ie/world-news/coronavirus/nine-thousand-people-register-on-covid-19-vaccine-portal-within-one-hour-of-opening-40316146.html> .

themselves) talking about their experience of taking the vaccine.²³ A Roma COVID-19 helpline is also available in English or Romanes/Romanian.²⁴

- A specific vaccination programme for high risk people who are homeless or living in hostels has been put in place at the end of April. The Dublin Regional Homeless Executive has consulted with NGOs and the Health Service Executive and will use the help of the Dublin Fire Brigade to transport people to a facility in Dublin city centre for vaccination.²⁵

²³ Health Service Executive Ireland (2021), 'Irish Travellers' webpage, available at: <https://www.hse.ie/eng/about/who/primarycare/socialinclusion/travellers-and-roma/irish-travellers/covid-19-vaccination-programme.html> .

²⁴ Health Service Executive Ireland (2021), 'Roma helpline' webpage, available at: <https://www.hse.ie/eng/about/who/primarycare/socialinclusion/travellers-and-roma/roma/roma-helpline.html> .

²⁵ The Journal.ie (2021), 'Homeless people in Dublin to start getting Covid-19 vaccines next week', 23 April 2021, available at: <https://www.thejournal.ie/mass-vaccination-of-homeless-people-in-dublin-to-begin-next-week-5416273-Apr2021/> .