

Coronavirus pandemic in the EU – Fundamental Rights implications

National vaccine deployment

Poland

5 May 2021

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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.

National Vaccination Programme against COVID-19

(*Narodowy program szczepień przeciw COVID-19*)

Date of publication: 15 December 2020

Hyperlink: <https://www.gov.pl/web/szczepimysie/narodowy-program-szczepien-przeciw-covid-19>

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	National Vaccination Programme against COVID-19 15 December 2020 (https://www.gov.pl/web/szczepimysie/narodowy-program-szczepien-przeciw-covid-19)	National Vaccination Programme against COVID-19 (as amended)
<i>older persons; indicate age groups specified</i>	YES Persons aged 60 years and over (in descending order) (group 1)	20 January 2021 (https://www.gov.pl/web/szczepimysie/zmiana-kolejnosci-szczepien-chorzy-przewlekle-priorytetowi): classified as sub-group 1a
<i>persons with underlying health problems</i>	NO	20 January 2021 (https://www.gov.pl/web/szczepimysie/zmiana-kolejnosci-szczepien-chorzy-przewlekle-priorytetowi): persons in the course of dialysis due to renal failure; persons with cancer in the course of radiotherapy or chemotherapy; persons after transplantations who undergo immunosuppressive therapy, and persons

		requiring permanent ventilatory support – included as sub-group 1b
<i>persons with disabilities</i>	NO	
<i>key workers (on the basis of their job not their personal characteristics) – e.g. health workers; persons working in care homes; teachers</i>	YES Health workers, persons employed in care homes (group 0)	20 January 2021 (https://www.gov.pl/web/szczepimysie/zmiana-kolejnosci-szczepien-chorzy-przewlekle-priorytetowi): extended by uniformed services (sub-group 1c) 4 February 2021 (https://www.gov.pl/web/szczepimysie/ruszaja-szczepienia-nauczycieli): extended by teachers (sub-group 1c)
<i>persons belonging to ethnic/national minorities</i>	NO	NO
<i>persons experiencing homelessness</i>	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>	NO	NO
<i>persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)</i>	NO	NO
<i>OTHER</i> – not specified above; e.g. ‘Persons living in crowded accommodation’; etc.	YES Residents of social care centres and other places of stationary stay	YES: <ul style="list-style-type: none"> statutory representatives of children born before the 37th week of pregnancy academic teachers employed at a medical university or at another university, conducting classes in the fields of preparation for the medical profession and doctoral students and students of these

		<p>universities participating, in accordance with the study program, in classes with the participation of patients or during which there is contact with biological infectious material</p> <ul style="list-style-type: none"> • official veterinarians and persons employed in the Veterinary Inspection, carrying out activities related to the control of SARS-CoV-2 infection in mink and fighting outbreaks of this disease • people employed in shelters for homeless and overnight stays • persons conducting classes at church universities and higher seminaries • persons directly ensuring the functioning of the state's basic activities and persons performing activities directly related to counteracting COVID-19 • members of the national team of Polish sports associations in Olympic sports, competitors preparing for the Olympic Games, Paralympic Games or deaf Games, members of training staffs of Polish national sports associations in Olympic sports, members of training staffs of competitors preparing for the Olympic Games, Paralympic Games or and members of the Olympic Mission and the Paralympic Mission
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Please briefly indicate here (not in the above table):

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

As acknowledged by the government, major changes with regard to priority groups result from postulates of representatives of particular groups – for example, as a result of numerous requests, the order of vaccination of persons with underlying health problems has been changed.¹ Moreover, decisions were made based on the recommendations of the Medical Council. As the government points out, the National Vaccination Programme against COVID-19 is not perfect and should be modified every time it is necessary. Problems with the availability of vaccines were also mentioned as a significant factor of changes.

- *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).*

According to the National Vaccination Programme against COVID-19, the main grounds for identifying groups as priority ones in Poland are: the risk of exposure to infection, the risk of serious illness and death, the socio-economic risk and the risk of virus transmission.²

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?

¹ Poland, [Zmiana kolejności szczepień. Chorzy przewlekle priorytetowi](#), 15 January 2021.

² Poland, [National Vaccination Programme against COVID-19](#), 15 December 2020, p. 22.

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.

All this information is available on the government website (<https://www.gov.pl/web/szczepimysie>), as well as on governmental hotline, TV commercials, public posters, leaflets, and videos prepared by the government. (This information is available on the government website in Polish, English, Russian and Ukrainian).

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.?

Currently available registration methods for vaccination include a dedicated hotline, a governmental website, the patient's online account, SMS and direct contact with vaccination points.

- 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?

It is possible to register directly at the appropriate vaccination center. One can do it in person or contact the center via phone (e.g. persons with limited mobility).

(This information is available on the government website in Polish, English, Russian and Ukrainian).

2.3 How are the vaccinations administered?

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

The vaccinations are administered via drive-thru points, mobile vaccination points, specialist outpatient care facilities, primary health care facilities, temporary hospitals and another stationary medical facilities. For patients who, due to their

health condition, are not able to reach the vaccination point on their own, there are dedicated home vaccination visits.³

In drive-thru points persons are vaccinated without the necessity to leave their car: they wait for their turn in a queue of other cars with a filled in qualification form, approach the place where vaccinations are administered (when summoned), get vaccinated and then wait for the next 20 minutes after the procedure is completed to ensure if no side effects occur.

Temporary hospitals are in general public utility buildings able to accommodate large numbers of persons (usually assembly halls or sports stadiums) adapted to the needs of treating patients diagnosed with COVID-19, in particular those who require mechanical ventilation.

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

This information is available on the governmental website (<https://www.gov.pl/web/szczepimysie>), as well as on governmental hotline, TV commercials, public posters and videos prepared by the government. Moreover, every vaccinated person is handed a leaflet informing about the particular type of vaccine he or she received.

(This information is available on the governmental website in Polish, English, Russian and Ukrainian).

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

In Poland, vaccination against COVID-19 is free of charge.

3 Challenges and promising practices

3.1 Challenges

Although now the vaccination programme in Poland is in the phase when all adults are entitled to register for the vaccination (since 10 May 2021 the registration has

³ Poland, National Health Fund, [Szczepienie pacjentów w domu. NFZ zorganizował ponad 100 dodatkowych punktów](#), 17 February 2021.

been opened for the youngest age group of persons aged 18-29),⁴ several challenges from a human rights perspective that have emerged since its inception can be indicated.

First, it should be pointed out that in Poland persons in the same priority groups have not been covered equally by the immunisation programme in its early phase. This issue can be clearly illustrated by the example of persons with underlying health problems. According to the National Vaccination Programme against COVID-19 (as amended on 20 January 2021), priority has been given only to persons with particular four health problems: persons in the course of dialysis due to renal failure; persons with cancer in the course of radiotherapy or chemotherapy; persons after transplantations who undergo immunosuppressive therapy, and persons requiring permanent ventilatory support.⁵ No other chronic conditions have been included in the Polish immunisation plan. In December 2020, Polish Diabetes Association pointed out to the fact that persons suffering from diabetes should be vaccinated as a matter of priority due to the risk of possible complications and death related to COVID-19.⁶ Similar arguments have been raised by experts with regard to patients with e.g. pulmonary hypertension⁷ and autism.⁸ Despite those appeals, the group of persons with underlying health problems entitled to early vaccination has not been extended.

Another example to illustrate the abovementioned problem is the unequal coverage of persons deprived of liberty. Whereas residents of social care centres and other places of stationary stay have been included, due to the high risk of the disease spread, in the first group of persons to be vaccinated since the very adoption of the national programme, no such priority has been given to other persons. This pertains, in particular, to convicts and persons in pre-trial detention, who are in practice exposed to contracting COVID-19 in equal measure because of being held in closed facilities. Such persons, however, with an exception for those who fulfilled the age criterion, were vaccinated under general rules. This issue has been scrutinised by the Commissioner for Human Rights, who addressed

⁴ Poland, [Od kiedy mogę się zaszczepić?](#) (accessed on 5 May 2021).

⁵ Poland, [Zmiana kolejności szczepień. Chorzy przewlekle priorytetowi](#), 20 January 2021.

⁶ Polish Diabetes Association, [Stanowisko Polskiego Towarzystwa Diabetologicznego oraz Konsultanta krajowego w dziedzinie diabetologii prof. Krzysztofa Strojka w sprawie szczepienia na COVID-19 chorych na cukrzyce](#), 29 December 2020.

⁷ M. Stelmach, [Pacjenci z nadciśnieniem płucnym apelują o wcześniejsze szczepienia przeciw COVID-19](#), Termedia.pl, 9 February 2021.

⁸ Poland, Commissioner for Human Rights, [Światowy Dzień Świadomości Autyzmu. RPO upomina się o szczepienia chorych i ich opiekunów](#), 9 April 2021.

the Head of Prison Service for information related to the scale of the pandemic in penitentiary units.⁹

Second, several incidents of accessing vaccines contrary to established rollout rules have been exposed in Poland since the beginning of implementation of the immunisation plan. In January 2021, it was reported that a group of 200 celebrities was vaccinated at Warsaw Medical University out of turn whereas the only group entitled to vaccination then were health care workers.¹⁰ As the university officials explained, the vaccination of those persons was administered as part of a campaign aimed at promoting the immunisation plan. However, the investigation conducted by the Ministry of Health has revealed that there was no agreement between the ministry and the school with regard to promotion of immunisation, and that the persons in question were vaccinated as “non-medical workers” of the university. The university was fined with PLN 350.000 and its chancellor was called to resign.

On 1 April 2021 in the morning, the media started to report that registration for vaccination was open for persons aged 30-50 years, whereas such possibility was yet to be introduced in the end of April 2021.¹¹ As a result, several thousand of persons who were not yet eligible for registration pursuant to the national programme could make an appointment before e.g. elder persons, whose turn should be then. The reactions of the government were inconsistent: first, it was stated that this change was intentional, only to be declared in the next few minutes that an error had occurred in the registration system. Consequently, the already made appointments for vaccination (some of them in the early April) were rescheduled to May 2021.¹²

3.2 Promising practices

In Poland, several promising practices related to the national vaccination programme can be indicated.

⁹ Poland, Commissioner for Human Rights, [Służba Więzienna podała statystyki kowidowe osadzonych i funkcjonariuszy](#), 29 April 2021.

¹⁰ M. Sewastianowicz, [WUM zapłaci za szczepienia celebrytów. MZ apeluje do rektora o dymisję](#), 11 January 2021.

¹¹ P. Słowik, [Polska, błąd systemu. Jest oczywiste, że zawinili ludzie \[OPINIA\]](#), Gazetaprawna.pl, 2 April 2021.

¹² J. Ojczyk, [Pełnomocnik rządu przeprosza za błąd w systemie i brak informacji o rejestracji na szczepienia](#), 1 April 2021.

First, it should be praised that the safety of persons placed in social care facilities has been addressed and prioritised by including them in group 0, which was the first to be vaccinated. As could have been seen, this group was particularly exposed to virus transmission and severe course of the disease. The decision to include social care facilities' residents exemplifies a tailored service for persons in vulnerable situation.

Another example with regard to facilitating the access to vaccination is the possibility, however limited by the overall insufficient capacity of the health care, to have the vaccination administered at home.¹³ This applies to persons whose health does not allow them to travel to a stationary vaccination centre, in particular those with limited mobility (recumbent patients). Such persons can register only via phone by contacting their basic health care centre.¹⁴

As means of tailored outreach targeted at supporting the elderly in time of the pandemic, a new voluntary service was created in October 2020 whose main responsibility is to help citizens aged 70 or more with their everyday duties (e.g. shopping or cleaning).¹⁵ This service, coordinated by the Ministry of Family and Social Policy, has also been included in the vaccination programme, in particular in providing the elderly with help concerning online registration for vaccination. Every elderly citizen can access the service via a dedicated hotline.

In any event, a person who does not feel comfortable with using online tools can register for vaccination in person in the vaccination centre, which can be of particular importance for the elderly. It should be also noted that persons who appear at vaccination centres are assisted by soldiers of the Territory Army, who provide them with any guidance needed.¹⁶

¹³ Poland, National Health Fund, [Szczepienie pacjentów w domu. NFZ zorganizował ponad 100 dodatkowych punktów](#), 17 February 2021.

¹⁴ Poland, [Wyjazdowe punkty szczepień dla tzw. pacjentów leżących](#), 2021.

¹⁵ Poland, [Solidarnościowy Korpus Wsparcia Seniorów. Ważna pomoc w czasie pandemii](#), 2 March 2021.

¹⁶ Poland, [Ruszyły szczepienia żołnierzy Wojska Polskiego](#), 25 March 2021.