

Coronavirus pandemic in the EU – Fundamental Rights implications

National vaccine deployment

Slovenia

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Contractor: Peace Institute

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1 National vaccine deployment – planning and overview of priority groups

Specific groups identified in the national vaccine deployment plan	Date of plan	Date of new/revised plans
	<p data-bbox="555 488 675 521">3/12/2020</p> <p data-bbox="467 555 762 723">National strategy on vaccination against COVID-19 (<i>Nacionalna strategija cepljenja proti COVID-19, 3.12.2020</i>)</p> <p data-bbox="459 757 770 891">www.gov.si/assets/ministrstva/MZ/DOKUMENTI/Koronavirus/04122020-Strategija-cepljenja.pdf</p>	<p data-bbox="1034 488 1169 521">a) 1/3/2021</p> <p data-bbox="818 555 1385 689">National strategy on vaccination against COVID-19, Version II, 1.3.2021 (<i>Nacionalna strategija cepljenja proti COVID-19, Verzija II, 1. 3. 2021</i>)</p> <p data-bbox="818 723 1385 857">www.gov.si/assets/ministrstva/MZ/DOKUMENTI/Koronavirus/Cepljenje/Nacionalna-strategija-cepljenja-proti-COVID-19_1.3.2021.pdf</p> <p data-bbox="1034 891 1169 925">b) 11/3/2021</p> <p data-bbox="818 958 1385 1093">National strategy on vaccination against COVID-19, Version III, 11.3.2021 (<i>Nacionalna strategija cepljenja proti COVID-19, Verzija III, 11. 3. 2021</i>)</p> <p data-bbox="818 1126 1385 1227">www.gov.si/assets/ministrstva/MZ/DOKUMENTI/Koronavirus/Cepljenje/Nac-Strategija-cepljenja-proti-covid-19-verzija-III.pdf</p> <p data-bbox="1034 1261 1169 1294">c) 24/3/2021</p> <p data-bbox="818 1328 1385 1462">National strategy on vaccination against COVID-19, Version IV, 24.3.2021 (<i>Nacionalna strategija cepljenja proti COVID-19, Verzija IV, 24. 3. 2021</i>)</p> <p data-bbox="818 1496 1385 1597">www.gov.si/assets/ministrstva/MZ/DOKUMENTI/Koronavirus/Cepljenje/Nacionalna-strategija-cepljenja-IV.-25.3.2021.pdf</p> <p data-bbox="1034 1630 1169 1664">d) 15/4/2021</p> <p data-bbox="818 1697 1385 1832">National strategy on vaccination against COVID-19, Version V, 15.4.2021 (<i>Nacionalna strategija cepljenja proti COVID-19, Verzija V, 15. 4. 2021</i>)</p> <p data-bbox="818 1865 1385 1989">www.gov.si/assets/ministrstva/MZ/DOKUMENTI/Koronavirus/Cepljenje/Nacionalna-strategija-cepljenja-proti-covid-19-verzija-V-150421.pdf</p>

		<p style="text-align: center;">e) 23/4/2021</p> <p style="text-align: center;">National strategy on vaccination against COVID-19, Version VI, 23.4.2021 (<i>Nacionalna strategija cepljenja proti COVID-19, Verzija VI, 23. 4. 2021</i>)</p> <p style="text-align: center;">www.gov.si/assets/ministrstva/MZ/DOKUMENTI/Koronavirus/Cepljenje/Nacionalna-strategija-cepljenja-proti-covid-19-verzija-VI-230421.pdf</p>
<i>older persons; indicate age groups specified</i>	<p>(1) Nursing homes residents (no age specified);</p> <p>(2) ages 60+</p> <p>- to be vaccinated gradually depending on the availability of the vaccine; first those 80+ (if enough vaccine is available in the first delivery phase, to be vaccinated at the same time as healthcare workers), then those 75+, and then those 60+</p>	<p>a)</p> <p>(1) Nursing homes residents (no age specified);</p> <p>(2) ages 80+;</p> <p>(3) ages 75+;</p> <p>(4) ages 70+;</p> <p>(5) ages 65+;</p> <p>(8) ages 60+</p> <p>b)</p> <p>No changes, compared to a) Version II</p> <p>c)</p> <p>(1) Nursing homes residents (no age specified);</p> <p>(2) ages 70+;</p> <p>(3) ages 60+</p> <p>d)</p> <p>(1) Nursing homes residents (no age specified);</p> <p>(2) ages 70+;</p> <p>(4) ages 60+</p> <p>e)</p> <p>(1) Nursing homes residents (no age specified);</p> <p>(2) ages 70+;</p> <p>(4) ages 60+;</p> <p>(6) ages 50+</p>
<i>persons with underlying health problems</i>	<p>(3) Chronic patients under 60 (patients with cancer, diabetes, obesity, with chronic respiratory, cardiac, kidney and liver diseases, neurological patients (including those with cerebrovascular diseases), patients with immunodeficiency</p>	<p>a)</p> <p>(4) Particularly vulnerable chronic patients, regardless of age</p> <p>(compared to the first version which was relatively general in scope and did not include the notion of health conditions making the patients particularly vulnerable, the second and all subsequent versions of the strategy explicitly list the relevant health conditions; they are classified in eight groups: organ transplant patients, patients with certain types of cancer, patients with severe lung diseases, patients with rare diseases that increase the risk of infection (e.g. severe congenital immunodeficiency disorders), persons on immunosuppressive therapy or with conditions that increase the risk</p>

		<p>of infection (e.g. adults HIV patients: CD4<200 cells/mm³, persons on biologics such as rituximab), adults with Down syndrome, adults on dialysis or with grade 5 chronic kidney disease, persons with several chronic diseases which, in the judgment of the attending physician, are particularly vulnerable; this list is included in the main body of strategies II-V, while the sixth and the latest version includes reference to the recommendations on COVID-19 vaccination produced by the National Institute of Public Health (<i>Nacionalni inštitut za javno zdravje</i>), available on www.nijz.si/sites/www.nijz.si/files/uploaded/priporocila_za_cepljenje_proti_covid_uskl_psc_apr_2021.pdf)</p> <p>(7) chronic patients between 18 and 64 years of age who do not belong to the group of particularly vulnerable chronic patients (no version of the strategy includes a list of the relevant conditions in the main body of the text; the sixth and the latest version includes reference to the 23 April recommendations on COVID-19 vaccination produced by the National Institute of Public Health, available on www.nijz.si/sites/www.nijz.si/files/uploaded/priporocila_za_cepljenje_proti_covid_uskl_psc_apr_2021.pdf); this document details a series of chronic conditions, including chronic lung, cardiovascular, kidney, liver, neurological, rheumatic and autoimmune diseases, psychiatric conditions, obesity; persons treated for cancer, persons with visual impairment, pregnant women and other chronic patients who are at risk of a more severe course of COVID-19, if so established by their personal doctor, are also included; the minutes of the meeting of the Vaccination Advisory Group (<i>Posvetovalna skupina za cepljenje</i>), an expert group set up within the National Institute of Public Health, dating back to 2 March, are the first document including this same list that we have been able to identify, and is available on www.nijz.si/sites/www.nijz.si/files/uploaded/26_zapisnik_psc_02.03.2021_splet.pdf)</p> <p>b) No changes, compared to a) Version II</p> <p>c) (2) Particularly vulnerable chronic patients, regardless of age;</p>
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		<p>(3) chronic patients between 18 and 64 years of age who do not belong to the group of particularly vulnerable chronic patients</p> <p>d) (2) Particularly vulnerable chronic patients, regardless of age, parents or guardians of particularly vulnerable chronically ill children; (4) chronic patients between 18 and 59 years of age who do not belong to the group of particularly vulnerable chronic patients</p> <p>e) (2) Particularly vulnerable chronic patients, regardless of age, parents or guardians of particularly vulnerable chronically ill children; (4) chronic patients between 18 and 59 years of age who do not belong to the group of particularly vulnerable chronic patients</p>
<i>persons with disabilities</i>	NO	<p>a) NO b) NO c) NO d) NO e) NO</p>
<i>key workers (on the basis of their job not their personal characteristics)</i> – <i>e.g. health workers; persons working in care homes; teachers</i>	<p>(1) Healthcare workers and co-workers, nursing homes staff; (4) other essential services: e.g. employees in educational institutions, the police, civil protection, the army, agricultural and food sector, transportation...</p>	<p>a) (1) Healthcare workers and co-workers (includes all employees with healthcare providers and all those who participate in the work process of treatment and care of patients and come into direct contact with patients), nursing homes staff and staff in other social welfare institutions; (6) employees in education who come into direct contact with children, pupils and students, members of the National Assembly and members of the National Council (i.e. upper house) (and part of their professional services), the Government of the Republic of Slovenia and employees of ministries performing tasks necessary for smooth operation of the government, the President of the Republic of Slovenia and the Office of the President, mayors and directors of municipal administrations, the Constitutional Court and employees with the judiciary performing tasks necessary for the functioning of the judicial system, employees with the Administration of the Republic of Slovenia for Civil Protection and Disaster Relief and with the police;</p>

		<p>(9) employees in the sectors of energy, transport, food, drinking water supply, finance, environmental protection and information and communication networks and systems, and other employees performing tasks necessary for the smooth functioning of the state</p> <p>b) No changes, compared to a) Version II</p> <p>c) (1) Healthcare workers and co-workers (includes all employees with healthcare providers and all those who participate in the work process of treatment and care of patients and come into direct contact with patients), nursing homes staff and staff in other social welfare institutions;</p> <p>(4) the President of the Republic of Slovenia and the Office of the President, members of the National Assembly and members of the National Council (and part of their professional services), Government of the Republic of Slovenia and Office of the Prime Minister, the Constitutional Court, mayors and directors of municipal administrations, for the smooth functioning of the Government of the , employees with the state administration and the judicial system performing tasks necessary for the smooth functioning of the government and the judicial system, the Administration of the Republic of Slovenia for Civil Protection and Disaster Relief, the police and the Slovenian Army;</p> <p>(5) employees in the sectors of energy, transport, food, drinking water supply, finance, environmental protection and information and communication networks and systems, and other employees performing tasks necessary for the smooth functioning of the state</p> <p>d) (1) Healthcare workers and co-workers (includes all employees with healthcare providers and all those who participate in the work process of treatment and care of patients and come into direct contact with patients), nursing homes staff and staff in other social welfare institutions;</p> <p>(5) the President of the Republic of Slovenia and the Office of the President, members of the National Assembly and members of the</p>
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		<p>National Council (and part of their professional services), Government of the Republic of Slovenia and Office of the Prime Minister, the Constitutional Court, mayors and directors of municipal administrations, for the smooth functioning of the Government of the , employees with the state administration and the judicial system performing tasks necessary for the smooth functioning of the government and the judicial system, the Administration of the Republic of Slovenia for Civil Protection and Disaster Relief, the police and the Slovenian Army;</p> <p>(6) employees in the sectors of energy, transport, food, drinking water supply, finance, environmental protection and information and communication networks and systems, and other employees performing tasks necessary for the smooth functioning of the state</p> <p>e)</p> <p>(1) Healthcare workers and co-workers (includes all employees with healthcare providers and all those who participate in the work process of treatment and care of patients and come into direct contact with patients), nursing homes staff and staff in other social welfare institutions;</p> <p>(5) the President of the Republic of Slovenia and the Office of the President, members of the National Assembly and members of the National Council (and part of their professional services), Government of the Republic of Slovenia and Office of the Prime Minister, the Constitutional Court, mayors and directors of municipal administrations, for the smooth functioning of the Government of the , employees with the state administration and the judicial system performing tasks necessary for the smooth functioning of the government and the judicial system, the Administration of the Republic of Slovenia for Civil Protection and Disaster Relief, the police and the Slovenian Army who have not been vaccinated</p> <p>(6) employees in education who have not been vaccinated, employees with the critical infrastructure operators pursuant to the legislation governing this field (unlike previous versions of the strategy, this last iteration only refers to the umbrella term “critical infrastructure” without explicitly listing the relevant sector; this includes the following sectors explicitly listed in earlier versions:</p>
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		energy, transport, food, drinking water supply, finance, environmental protection and information and communication networks and systems) (7) other employees performing tasks necessary for the smooth functioning of the state (not specified)
<i>persons belonging to ethnic/national minorities</i>	NO	a) NO b) NO c) NO d) NO e) NO
<i>persons experiencing homelessness</i>	NO	a) NO b) NO c) NO d) NO e) NO
<i>persons with drug addiction dependencies</i>	NO	a) NO b) NO c) NO d) NO e) NO
<i>persons with low literacy levels</i>	NO	a) NO b) NO c) NO d) NO e) NO
<i>persons deprived of their liberty</i>	NO	a) NO b) NO c) NO d) NO e) NO
<i>persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)</i>	NO	a) NO b) NO c) NO d) NO e) NO
<u>OTHER</u> – not specified above; e.g. ‘Persons living in crowded accommodation’; etc. Please insert . . .	(5) All other persons	a) (1) Residents in other social welfare institutions; (4) diplomats and other employees of the Ministry of Foreign Affairs and other ministries traveling due to the EU presidency, foreign diplomatic representatives in the Republic of

		<p>Slovenia, members of the Slovenian Armed Forces who go on peacekeeping missions abroad;</p> <p>(9) participants in the Olympics, employees and volunteers in organisations and associations providing direct assistance to chronic patients with drug addiction dependencies and to other vulnerable groups;</p> <p>(10) other population in the order of registration</p> <p>b) No changes, compared to a) Version II, apart from</p> <p>(9) employees with the pharmaceutical industry and pharmaceutical wholesaler (these groups added to groups already listed above in a) under priority 9)</p> <p>c) (1) Residents in other social welfare institutions;</p> <p>(2) diplomats and other employees of the Ministry of Foreign Affairs and other ministries traveling due to the EU presidency, foreign diplomatic representatives in the Republic of Slovenia, members of the Slovenian Armed Forces who go on peacekeeping missions abroad, members of the police who go on civil peacekeeping missions abroad, participants in Olympics and Paralympics;</p> <p>(5) employees with the pharmaceutical industry and pharmaceutical wholesaler, employees and volunteers in organisations and associations providing direct assistance to chronic patients with drug addiction dependencies and to other vulnerable groups;</p> <p>(6) other population in the order of registration</p> <p>d) (1) Residents in other social welfare institutions;</p> <p>(3) diplomats and other employees of the Ministry of Foreign Affairs and other ministries traveling due to the EU presidency, foreign diplomatic representatives in the Republic of Slovenia, members of the Slovenian Armed Forces who go on peacekeeping missions abroad, members of the police who go on civil peacekeeping missions abroad, participants in Olympics and Paralympics;</p> <p>(4) persons completing secondary school education (<i>maturantje</i>, i.e. graduates) and employees who are directly involved in the</p>
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		<p>implementation of the final exam (<i>matura</i>) and have not yet been vaccinated;</p> <p>(6) employees with the pharmaceutical industry and pharmaceutical wholesaler, employees and volunteers in organisations and associations providing direct assistance to chronic patients with drug addiction dependencies and to other vulnerable groups;</p> <p>(7) other population in the order of registration</p> <p>e)</p> <p>(1) Residents in other social welfare institutions;</p> <p>(3) diplomats and other employees of the Ministry of Foreign Affairs and other ministries traveling due to the EU presidency, foreign diplomatic representatives in the Republic of Slovenia, members of the Slovenian Armed Forces who go on peacekeeping missions abroad, members of the police who go on civil peacekeeping missions abroad, participants in Olympics and Paralympics;</p> <p>(4) persons completing secondary school education (<i>maturantje</i>, i.e. graduates) and employees who are directly involved in the implementation of the final exam (<i>matura</i>) and have not yet been vaccinated;</p> <p>(7) employees with the pharmaceutical industry and pharmaceutical wholesaler, employees and volunteers in organisations and associations providing direct assistance to chronic patients with drug addiction dependencies and to other vulnerable groups, other population in the order of registration</p>
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In **Slovenia**, the main objective of the first version of the national vaccination strategy, adopted in December 2020, as well as its five iterations, adopted in March and April 2021, and indeed the vaccination process is to reduce mortality from COVID-19, improve the health of the population by preventing the severe course of coronavirus disease, relieve the health system, restart the economy, and restore education, transport, cultural and social life and other activities limited due to the crisis. These documents note that age is the most important risk factor for severe course of infection and death due to COVID-19, and that the risk is also higher in individuals with certain chronic diseases.¹ To this end, priority groups of population are defined in terms of their vulnerability to infection (e.g. nursing

¹ For more information, see the government web page with all versions of the national strategy on www.gov.si/teme/koronavirus-sars-cov-2/cepljenje-proti-covid-19/.

homes residents, older people and chronic patients), and groups caring for them (healthcare workers and nursing homes staff, parents or guardians of particularly vulnerable chronically ill children) are also prioritised. Secondly, priority groups are defined by their importance for the functioning of the society or the state (e.g. employees in education, employees with critical infrastructure operators, the police, the army, the government, diplomats and other employees of the Ministry of Foreign Affairs and other ministries traveling due to the EU presidency, members of lower and upper houses), as deemed by the government. The government also included some other groups among the priority groups, such as foreign diplomatic representatives residing in the Republic of Slovenia and national candidates for Olympics and Paralympics.

In **Slovenia**, in spite of relatively frequent revisions of the vaccination strategy, the general approach towards definition of priority groups has not changed much since the adoption of the strategy in December 2020. Changes, generally, involved inclusion of certain occupational groups, deemed important by the government, or reshuffling priority groups, but these revisions were rarely elaborated in greater detail on government channels and press conferences.² Social vulnerability as a criterion for defining priority groups is virtually completely neglected in the national vaccination strategy. The only exception, in the broadest sense, seems to be the inclusion of the final year students in secondary schools as a prioritised group in mid-April version of the strategy.³ On this occasion, met with controversy (please see Section 3.1), the government argued that vaccination would spare the students from further stress of possible infection in an already stressful situation which was taking exit exams (*maturitetni izpiti*), so that they could prepare for final exams as relaxed as possible, while the exams were held in the safest possible environment. In this instance, the government representative also referred to media reports on the mental health situation of youth.⁴

² For more information, see the government web page on www.gov.si teme/koronavirus-sars-cov-2/. See also: Slovenia, Ministry of Health (*Ministrstvo za zdravje*) (2021), '[Minister Poklukar predstavil posodobljeno nacionalno strategijo cepljenja](#)', public release, 2 March 2021; Slovenia, Government of the Republic of Slovenia (*Vlada Republike Slovenije*) (2021), '[Najpozneje v nedeljo odločitev o ukrepih v času velikonočnih praznikov](#)', public release, 25 March 2021.

³ Vlada Republike Slovenije (2021), '[Nacionalna strategija cepljenja proti COVID-19, Verzija V, 15.4.2021](#)', Ljubljana, Vlada Republike Slovenije

⁴ Slovenia, Ministry of Health (*Ministrstvo za zdravje*) (2021), '[Maturanti naj se k cepljenju prijavijo najkasneje do 19. aprila do 12. ure](#)', public release, 16 April 2021.

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

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

In **Slovenia**, the website www.cepimose.si has been set up as a central information platform, intended for both the general and professional public. It is administered by the National Institute of Public Health and represents one of the key communication tools aiming to build confidence in vaccine safety and its effectiveness, and to encourage various target groups to vaccinate and consequently to increase vaccination coverage. Among other things, the website presents current information, including on the national vaccination strategy, its implementation, on vaccination centres and supply of vaccines to Slovenia. There is a FAQ section providing information on e.g. the importance of vaccination and its effectiveness, on the safety of vaccines in view of their speedy development, as well as practical information on e.g. whether persons who recovered from COVID-19 should get a vaccine, whether it is possible to get a second jab in Slovenia if the first was received abroad, where persons without selected personal doctors can register for vaccination, on side effects of vaccines used in Slovenia, on vaccination of groups to whom certain precaution is advised, such as persons with a weakened immune system, chronic patients, persons with allergies. The website also includes a section with information material developed for the use on social media. It also includes a section with posters and leaflets produced for the purpose of the vaccination campaign. These are directed at different professional target groups, including healthcare workers, nursing homes staff and teachers. Separate materials targeting e.g. older persons, chronic patients have been also produced. There are also information posters and leaflets targeting general public, including in languages of national minorities, that is - Hungarian and Italian languages.⁵ As these materials might be subject to revisions, and new information might be added, due to developments with respect to vaccination, these materials are distributed to stakeholders in electronic format, and they can print them out in required quantities. As of yet, these materials have not been produced in easy read, braille or Slovenian Sign Language.⁶

⁵ For more information, see this website administered by the National Institute of Public Health (*Nacionalni inštitut za javno zdravje*) on www.cepimose.si/.

⁶ Information was provided by the National Institute of Public Health (*Nacionalni inštitut za javno zdravje*) upon request (email, 4 May 2021).

In **Slovenia**, the Government Communication Office (*Urad za komuniciranje*), in cooperation with stakeholders including the Ministry of Health and the National Institute of Public Health, set up a call centre during the pandemic to assist the general public when looking for reliable information about the new coronavirus. Senior students of the Medical Faculty of the University of Ljubljana (*Univerza v Ljubljani, Medicinska fakulteta*), under the mentorship of relevant experts, provide information including on vaccination-related issues. A toll-free call can be placed every workday from 8:00 to 16:00. The government also set up a dedicated webpage with basic information on vaccination and links to the most relevant information providers.⁷

The **Slovenian** government also organises regular press conferences on pandemic where information on vaccination-related issues is also provided. These press conferences regularly feature Slovenian Sign Language interpreters.⁸ The Union of Associations of Deaf and Hard of Hearing of Slovenia (*Zveza društev gluhih in naglušnih Slovenije*) runs Web TV (*Spletna TV*), a project aimed at providing objective and reliable information accessible to persons with hearing impairments. For this platform, the organisation produced a video item with information on the vaccination process and its benefits in sign language and with subtitles. It featured members of this group of population from Slovenia, Croatia and Serbia sharing their experiences with vaccination and reporting very mild side effects, among other things.⁹ The national public broadcaster publishes items in easy-to-read format, including some information on vaccination.¹⁰

2.2 What are the (pre-) registration channels for vaccination put in place?

In **Slovenia**, no central system for registration has been in place. Individuals willing to get a vaccine are, generally, required to register with their personal doctors.¹¹ This can be done via email or telephone, and the doctor then informs the relevant vaccination centres about this. These doctors are mostly employed

⁷ For more information, see the dedicated government web page on www.gov.si teme/koronavirus-sars-cov-2/cepljenje-proti-covid-19/.

⁸ For more information, see the government webpage on www.gov.si teme/koronavirus-sars-cov-2/.

⁹ For more information, see the web page of the Union of Associations of Deaf and Hard of Hearing of Slovenia (*Zveza društev gluhih in naglušnih Slovenije*) on www.spletnatv.si/novice/cepljenje-proti-covidu-19/.

¹⁰ For more information, see the web page of the national public broadcaster on www.rtslo.si/enostavno/iskalnik?&q=cepljenje.

¹¹ For more information, see the dedicated government web page on www.gov.si teme/koronavirus-sars-cov-2/cepljenje-proti-covid-19/.

with the community health centres (*zdravstveni domovi*) which operates vaccination centres where vaccines are administered. To this end, these organisations often put in place additional registration channels, mostly emails and dedicated telephone lines,¹² while some also offer registration via web apps.¹³

The National Institute of Public Health reported in April that it was working, in collaboration with the Ministry of Health, on a national app allowing for registration for vaccination, planned to be released in May.¹⁴

2.3 How are the vaccinations administered?

In **Slovenia**, the first vaccination strategy adopted in December 2020 envisaged three vaccination phases. Pursuant to this strategy, in the first phase, it is appropriate for vaccination to be managed centrally through vaccination centres (evenly distributed across regions) and mobile vaccination units. As soon as a sufficient amount of vaccine is available, the aim is to expand the implementation of vaccinations in several vaccination centres located in larger community health centres and then to all health care providers at the primary level. The second and all subsequent versions of the strategy largely followed this pattern. They stipulate that vaccination centres are organised by statistical regions. They collect data on vaccination needs in the areas they cover, report these to the National Institute of Public Health and organise vaccinations in their respective areas. Mobile vaccination units shall be organised to carry out vaccination in the field, while vaccination of persons with reduced mobility is performed by patronage health services or by doctors on home visits.¹⁵

In **Slovenia**, there are currently 61 vaccination centres across all 12 statistical regions. They are operated by community health centres.¹⁶ In smaller

¹² For a sample, see web pages with information regarding vaccination on www.zd-mb.si/Storitve/Obvestila/Obvestilo?id=27199, www.zd-ms.si/novi-prispevki/835-ambulanta-za-cepljenje-proti-covid-19, www.zd-radovljica.si/?subpageid=106&contid=155.

¹³ For more information, see web pages with information regarding vaccination on <https://cepljenje.ozg.si/>, <https://prizdravniku.si/#/vrsta/07883/475>.

¹⁴ For more information, see the web page of the National Institute of Public Health on www.nijz.si/sl/obvestilo-v-povezavi-s-cepljenjem-proti-covid-19/.

¹⁵ For more information, see the dedicated government web page with the relevant strategies on www.gov.si teme/koronavirus-sars-cov-2/cepljenje-proti-covid-19/.

¹⁶ For more information, see the dedicated government web page with the relevant strategies on www.gov.si teme/koronavirus-sars-cov-2/cepljenje-proti-covid-19/. See also web page administered by the National Institute of Public Health (*Nacionalni inštitut za javno zdravje*) on www.cepimose.si/aktualno/cepilni-centri/.

communities, community health centres provide vaccinations in their own facilities,¹⁷ while in larger cities they organise vaccination in larger facilities, such as sports halls or convention/fair centres.¹⁸ Apart from the latter, mobile units are deployed for vaccination in nursing homes.¹⁹ There are further 13 vaccination centres in hospitals which provides for vaccination of health care workers and certain groups of patients, and one additional centre is reserved for the members of the Slovenian Army. The National Institute of Public Health is also designated as a vaccination centre but its principal role is the distribution of vaccines.²⁰

Apart from information channels presented in section 2.1. above, the relevant legislation, namely the Patients' Rights Act (*Zakon o pacientovih pravicah*) provides for the obligation on the part of healthcare providers to inform individuals on, among other things, the aim, type, and expected benefits of the proposed medical procedure, as well as on possible risks, side effects and negative consequences related to the proposed procedure. A medical procedure can only be carried out upon free and informed consent given by the individual concerned, based on such explanations.²¹ To this end, the standard procedure involves informing the vaccinated person about the benefits and risks of vaccination, side effects, negative consequences and other inconveniences related to vaccination. The procedure is mandatory before the start of vaccination, regardless of the type of vaccine. The information provided must be objective and tailored to the individual's ability to understand it. The healthcare provider is also obliged to warn individuals involved of safe behavior after vaccination.²² Vaccinated persons also

¹⁷ For more information, see web pages of selected community health centres on www.zd-ms.si/novi-prispevki/835-ambulanta-za-cepljenje-proti-covid-19, www.zd-po.si/cepljenje-proti-virusu-sars-cov-2-2/, www.zd-slovenskekonjice.si/index.php/cepljenje.

¹⁸ For more information, see web pages of selected community health centres on www.zd-lj.si/zdlj/index.php?option=com_content&view=article&id=688&Itemid=2775&lang=sl, www.zd-celje.si/si/novice/3083-cepljenje-proti-covid-19,

¹⁹ Slovenia, Ministry of Health (Ministrstvo za zdravje) (2020), '[Prvo cepivo prispelo v Slovenijo](#)', public release, 26 December 2020.

²⁰ For more information, see the dedicated government web page with the relevant strategies on www.gov.si teme/koronavirus-sars-cov-2/cepljenje-proti-covid-19/. See also web page administered by the National Institute of Public Health (*Nacionalni inštitut za javno zdravje*) on www.cepimose.si/aktualno/cepilni-centri/.

²¹ Slovenia, [The Patients' rights act](#) (*Zakon o pacientovih pravicah*), 29 January 2008, and subsequent modifications.

²² For more information, see web page of the National Institute of Public Health (*Nacionalni inštitut za javno zdravje*) on www.nijz.si/sl/pojasnilna-dolznost-pred-cepljenjem.

receive a leaflet with information on possible side effects and advice to seek medical assistance in case of severe health problems after being vaccinated.²³

In **Slovenia**, while group coverage has changed over time, the vaccine is delivered free of charge. The first version of the national strategy envisaged free vaccination of anyone with permanent or temporary residence in the country.²⁴ The next version provided for free vaccination of Slovenian nationals with permanent or temporary residence in the country, accredited diplomatic representatives of other countries residing in Slovenia and individuals employed with an employer headquartered in Slovenia.²⁵ The third and all subsequent iterations of the strategy stipulate the following: vaccination against COVID-19 shall be provided to all those who have permanent or temporary residence in the territory of the Republic of Slovenia, to persons who do not have a residence in the Republic of Slovenia but are employed by an employer based in the country, and to accredited diplomatic representatives of other countries residing in Slovenia.²⁶

3 Challenges and promising practices

3.1 Challenges

In **Slovenia**, since commencement of the COVID-19 vaccine rollout concerns have been raised over incidents of queue jumping contrary to the sections of the national strategy defining priority groups for vaccination. For example, within 21 controls of the implementation of the strategy at 14 vaccination sites, carried out between 27 December 2020 and 16 January 2021, the Health Inspectorate (*Zdravstveni inšpektorat*) found that 297 doses (2 %) were delivered contrary to the strategy determining the priority groups for vaccination.²⁷ The media reported that Health Inspectorate carried out 143 controls by late March, and established

²³ For more information, see the leaflet on www.zd-ptuj.si/images/Obvestila/2021/03/300321/OBVESTILO%20CEPLJENIM.pdf.

²⁴ Vlada Republike Slovenije (2020), [Nacionalna strategija cepljenja proti COVID-19, 3.12.2020](#), Ljubljana, Vlada Republike Slovenije.

²⁵ Vlada Republike Slovenije (2021), [Nacionalna strategija cepljenja proti COVID-19, Version II, 1.3.2021](#), Ljubljana Vlada Republike Slovenije.

²⁶ Vlada Republike Slovenije (2021), [Nacionalna strategija cepljenja proti COVID-19, Version III, 11.3.2021](#), Ljubljana, Vlada Republike Slovenije. For more information, see the government web page with all versions of the national strategy on www.gov.si teme/koronavirus-sars-cov-2/cepljenje-proti-covid-19/.

²⁷ Slovenia, Government of the Republic of Slovenia (*Vlada Republike Slovenije*) (2021), '[Cigler Kralj: Vlada potrdila osnutek PKP8 za obravnavo na Ekonomsko socialnem svetu](#)' public release, 21 January 2021.

that 21 providers vaccinated individuals not belonging to prioritised groups.²⁸ A media outlet recently performed an analysis of 21 inspection decisions issued to these organisations, obtained on the basis of an access to public information request. It showed that these irregularities mostly involved vaccination of relatives and acquaintances of the employees.²⁹ The Silver Thread – Association for decent ageing (*Srebrna nit – Združenje za dostojno starost*), an NGO advocating for the rights of older people, protested already in January 2021 over such incidents.³⁰ In total, since 1 January until 30 April 2021, the Health Inspectorate recorded 42 cases of irregularities during vaccination at 37 vaccination centres. The most common irregularities involved keeping list of persons to be vaccinated without mandatory data, vaccination not being carried out in accordance with the national strategy, vaccination list being inconsistent with the number of vaccine doses ordered from the National Institute of Public Health and keeping reserve list of persons to be vaccinated without mandatory data.³¹

Relatively frequent government revisions of **Slovenian** vaccination strategy in March and April and prioritisation of certain groups for vaccination invited criticism. The first version of the strategy adopted in December 2020 prioritised vaccination of vulnerable to infection, that is – vaccination by age groups and underlying health conditions, and vaccination of key workers working with vulnerable population, namely healthcare workers and nursing homes staff.³² The second and third version, adopted in March, prioritised, for example, vaccination of diplomats and other employees of the Ministry of Foreign Affairs and other ministries traveling due to the EU presidency over persons between age 65 and 69 years. Members of the lower and upper house (and part of their professional services), the Government of the Republic of Slovenia and employees of ministries performing tasks necessary for smooth operation of the government, the President of the Republic of Slovenia and the Office of the President, mayors and directors of municipal administrations, the Constitutional Court and employees with the judiciary performing tasks necessary for the functioning of the judicial system were further prioritised over chronic patients aged 18 to 64 years, and individuals

²⁸ STA (2021), '[21 izvajalcev, tudi NIJZ, cepilo brez upoštevanja strategije](#)', *24ur.com*, 30 March 2021.

²⁹ Klipšteter, T. (2021), '[Cepljenje mimo vrste: dobro je imeti sorodnike v zdravstvenih zavodih](#)', *Dnevnik.si*, 2 May 2021.

³⁰ Srebrna nit – Združenje za dostojno starost) (2021), '[Protest Srebrne niti glede neupoštevanja vrste za cepljenje prebivalcev RS proti Covid-19](#)', public release, 20 January 2021.

³¹ Information was provided by the Health Inspectorate (*Zdravstveni inšpektorat*) upon request (email, 4 May 2021).

³² Vlada Republike Slovenije (2020), '[Nacionalna strategija cepljenja proti COVID-19, 3.12.2020](#)', Ljubljana, Vlada Republike Slovenije.

between age 60 and 64.³³ Parts of media sector criticised this as favoritism of the political class.³⁴ Perhaps the most unorthodox government move was the inclusion of the final year students in secondary schools as a prioritised group in mid-April version of the strategy. They were included in the same priority group as persons between age 60 and 69 and chronic patients aged 18 to 59 years.³⁵ The decision was made on the grounds that this would spare the students from further stress of possible infection in an already stressful situation which was taking exit exams (*maturitetni izpiti*), so that they could prepare for final exams as relaxed as possible, while the exams were held in the safest possible environment.³⁶ It was criticised as a political decision prevailing over expert reasoning. The Vaccination Advisory Group (*Posvetovalna skupina za cepljenje*) at the National Institute of Public Health, for example, adopted conclusion disagreeing with the inclusion of students in the priority vaccination group, as it was not a group at increased risk of severe COVID-19 disease, and there were other vaccination priorities in the country.³⁷

3.2 Promising practices

No promising practice could be identified.

³³ Vlada Republike Slovenije (2021), [Nacionalna strategija cepljenja proti COVID-19, Verzija II, 1.3.2021](#), Ljubljana, Vlada Republike Slovenije; Vlada Republike Slovenije (2021), [Nacionalna strategija cepljenja proti COVID-19, Verzija III, 11.3.2021](#), Ljubljana, Vlada Republike Slovenije.

³⁴ Repovž, G. (2021), 'Prvorazredni', *Mladina*, 26 March 2021, pp. 18-22; Cirman, P., Vuković, V. (2021), '[Jelko Kacin je v strategijo cepljenja vrnil sebe in svoje](#)', *Necenzurirano.si*, 8 April 2021; Žerdin, A. (2021), 'Novi sevi strategije cepljenja', *Delo, Sobotna priloga*, 30 April 2021, p. 1.

³⁵ Vlada Republike Slovenije (2021), [Nacionalna strategija cepljenja proti COVID-19, Verzija V, 15.4.2021](#), Ljubljana, Vlada Republike Slovenije

³⁶ Slovenia, Ministry of Health (*Ministrstvo za zdravje*) (2021), '[Maturanti naj se k cepljenju prijavijo najkasneje do 19. aprila do 12. ure](#)', public release, 16 April 2021.

³⁷ For more information, see the minutes of the Vaccination Advisory Group's meeting on www.nijz.si/sites/www.nijz.si/files/uploaded/33_zapisnik_psc_15.04.2021_splet_0.pdf.