

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

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National vaccine deployment – planning and overview of priority groups

The National vaccination strategy (*Národná stratégia očkovania*)¹ was approved on 16 December 2020 by the Government of the Slovak Republic. It states that vaccination is the most effective way to prevent pandemic diseases, including COVID-19. It argues that especially in the first months, vaccine supplies will be limited depending on production capacity. Thus, strategy prioritizes specific groups of population and occupational groups to be vaccinated first.

The National vaccination strategy therefore proposed 4 phases of vaccination, according to which different groups of the population were to be vaccinated gradually. The highest priority was given to persons who come in contact with high-risk persons. The national strategy identified 4 phases of vaccination as follows:

- 1) Phase 1 the health care workers, employees of social care homes, critical infrastructure (in the first phase only people who come into contact with the risk population), police and army forces.
- 2) Phase 2 clients of social care homes, patients above 65 years, chronically ill patients.
- 3) Phase 3 Specific population with the high risk of spread of the disease teachers, marginalised Roma communities, homeless people, refugees.
- 4) Phase 4 rest of the population older than 18 years.

The details of the vaccination of specific groups of population have been specified by decrees of the Ministry of Health that issued five such decrees as of January 2021. The vaccination scheme as defined by the National vaccination strategy was revised quite significantly **four times** between January and April 2020, the **fifth revision** takes effect as of 1 May 2021. The changes in the vaccination strategy were very complicated and confusing and the state authorities (mainly the Ministry of Health) did not sufficiently communicate the reasons behind those changes in the prioritization of specific groups of population.

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¹ Slovakia, Ministry of Health (*Ministerstvo zdravotníctva SR*) (2020), The National vaccinaton strategy against the COVID 19 disease within the conditions of Slovak Republic (*Národná stratégia očkovania proti ochoreniu COVID 19 v podmienkach Slovenskej republiky*), 16 December 2020, available at: https://www.uvzsr.sk/docs/info/covid19/3 Vlastny material zapr prip.pdf

The first revision, adopted on 19 January 2021², brought significant changes to the vaccination strategy, as it redefined the vaccination phases from the original 4 to a total of 13 vaccination phases. Priority groups are combined within the phases. The vaccination phase starts with the opening of the central online registration system for the relevant population groups. In addition to the groups defined in the original national strategy, vaccination of "organized groups" (usually people in social care homes or chronic patients as the most vulnerable to infection and spread of the virus) was added to the first phase. At the same time, it was possible to vaccinate people over the age of 65 in residential facilities (the same reason).

The other phases combine age and health conditions (chronic disease). Teachers (according to their age) were also added as specific group from phase 7.

Other vulnerable groups, such as marginalized Roma communities, asylum seekers and the homeless people, have not been listed as priority groups by this decree, nor have they been prioritized by the other three amendments adopted till the end of April (although they were defined as priority groups by the National vaccination strategy). Thus, people belonging to these groups could be vaccinated only when meeting the overall criteria. The Ministry of Health did not explain this change in prioritization.

The second revision, adopted on 12 February 2021³, extended the priority groups in the first phase to field social workers, social service providers, employees working in marginalized communities, people involved in testing of the population, etc. (as the most vulnerable to the infection). Teachers were moved from phase 7 to phase 4 (but only from the age of 56).

Another decree adopted at the end of February 2021⁴ allowed teachers (after the discussion on opening the schools after lockdown) under the age of 56

² Slovakia, Ministry of Health (Ministerstvo zdravotníctva SR) (2021), Decree No. 10/2021 establishing the criteria for ordering people in vaccination against COVID 19 (Vyhláška 10/2021, Z.z., ktorou sa ustanovujú kritéria určovania poradia očkovania osôb proti ochoreniu COVID 19), 19 January 2021, available at: https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/10/20210120.html

³ Slovakia, Ministry of Health (Ministerstvo zdravotníctva Slovenskej republiky) (2021), Decree No. 58/2021 establishing the criteria for ordering people in vaccination against COVID 19 (Vyhláška 58/2021, Z.z., ktorou sa ustanovujú kritéria určovania poradia očkovania osôb proti ochoreniu COVID 19), 11 February 2021, available at: https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/58/20210212

⁴ Slovakia, Ministry of Health (*Ministerstvo zdravotníctva Slovenskej republiky*) (2021), Decree No. 93/2021 establishing the criteria for ordering people in vaccination against COVID 19 (*Vyhláška 93/2021, Z.z., ktorou sa ustanovujú kritéria určovania poradia očkovania osôb proti ochoreniu*

and non-teaching staff to register for vaccination. Accordingly, this decree also expanded the range of professions that can be vaccinated including public transport drivers, taxi drivers, retail workers, etc. The decree did not specify in detail which professional groups were able to register for vaccination which gained a great deal of criticism from the experts, other members of government and the prime minister as well.⁵ At that time, the vaccination of the elderly was progressing slowly with a very low share of older persons already vaccinated (see challenges in this report).

Therefore, the **fourth decree**⁶ was adopted by the Ministry of Health in March, which completely changed the vaccination strategy. Only prioritized professional groups could be vaccinated in the first phase, and other groups were prioritized (from phase 2) solely on the basis of age. The number of phases decreased from 13 to 11. At the same time, **people with chronic diseases could only apply for vaccination as substitutes; they were not allowed to register through the central online registration system.** Some vaccination centres and hospitals opened their own registration for people who were able to come instead of people who did not come on the set date. The substitutes were able to register via telephone or registration form. Some of the regional governments created special registration systems for vaccination in their vaccination centres. The lists of persons who registered as substitutes were not centralized. However, the Ministry of Health provided the list⁷ of hospitals and vaccination centres allowing people to register as substitutes.

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COVID 19), 26 February 2021, available at: https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/93/20210227

⁵ Denník N (2021) 'Od pondelka sa má očkovať už len podľa veku, na rade sú už aj šesťdesiatnici', 2 March 2021, available at: https://dennikn.sk/2293611/od-pondelka-sa-ma-ockovat-iba-podla-veku-na-rade-su-uz-aj-sestdesiatnici-dostanu-astrazenecu/, Kissová, K (2021) 'Dostane zdravý taxikár vakcínu skôr ako starší cukrovkár? TV noviny, 2 March 2021, available at: https://www.tvnoviny.sk/exkluzivne/2021837_dostane-zdravy-taxikar-vakcinu-skor-ako-starsi-cukrovkar-ministerstvo-si-stoji-za-ockovacim-planom

⁶ Slovakia, Ministry of Health (Ministerstvo zdravotníctva Slovenskej republiky) (2021), Decree No. 96/2021 establishing the criteria for ordering people in vaccination against COVID 19 (Vyhláška 96/2021, Z.z., ktorou sa ustanovujú kritéria určovania poradia očkovania osôb proti ochoreniu COVID 19), 5 March 2021, available at: https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/96/20210501

⁷ Information available at the website of Ministry of Health: https://www.health.gov.sk/Clanok?covid-19-23-02-2021-ockovanie-nahradnici

This strategy has changed again **as of 1 May 2021**⁸. According to the decree adopted at the end of April 2021, people with chronic diseases have been involved again in priority groups (they could be vaccinated only as substitutes until that time). The category of persons allowed to get the vaccination has been extended to people (older than 18 years of age) accompanying a person older than 70 years to the vaccination. The aim of this measure is to increase the interest and possibilities of older people to get the vaccine. The 12th phase was added again to allow people above 16 years to register for the vaccination.

According to the newly appointed Minister of Health⁹, public authorities are planning to focus on vaccination of vulnerable groups – such as marginalized Roma communities and homeless people after the vaccine from Johnson and Johnson (because this vaccine is easier to be stored) is available in Slovakia. However, these groups have not been explicitly listed in the last adopted decree among the priority groups.

Specific groups identified in the national vaccine deployment plan	Date of plan	Date of new/revised plans
	National Vaccination Strategy Národná očkovacia stratégia Date of adoption: 16 December 2020	1st revision – adopted on 19 January 2021 https://www.slov-lex.sk/pravne- predpisy/SK/ZZ/2021/10/20210120.h tml
	Hyperlink: https://www.uvzsr.sk/d ocs/info/covid19/3 Vla stny material zapr pri p.pdf	2nd revision – adopted on 11 February 2021 https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/58/20210212

⁸ Slovakia, Ministry of Health (*Ministerstvo zdravotníctva Slovenskej republiky*) (2021), Decree No. 161/2021 amending the Decree No. 96/2021 establishing the criteria for ordering people in vaccination against COVID 19 (*Vyhláška 96/2021, Z.z., ktorá mení a dopĺňa vyhlášku 96/2021, ktorou sa ustanovujú kritéria určovania poradia očkovania osôb proti ochoreniu COVID 19), 27 April 2021, <i>available at:* https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/161/20210501

⁹ Denník N (2021), 'Z odpadových vôd zistíme, kde nám hrozia ohniská a tie otestujeme PCR testami', 22 April 2021, available at: https://dennikn.sk/2362459/lengvarsky-z-odpadovych-vod-zistime-kde-nam-hrozia-ohniska-a-tie-otestujeme-pcr-testami-plosne-testovania-uz-nebudu-podcast-video/

		3rd revision – adopted on 26 February 2021 https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/93/20210227 4th revision – adopted on 5 March 2021 https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/96/20210501 5th revision – adopted on 27 April 2021, valid from 1 May 2021. https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/161/20210501
older persons; indicate age groups specified	YES – prioritised in 2 nd phase – age 65+	Yes – prioritised with every change in the vaccination strategy (from phase 2), the age groups have been divided into different phases (85+, 75+, 65+, 55+ etc). But each phase combined different priority groups. Based on the decree valid from March 2021 – besides the vaccination of professional groups which fall into the phase 1, the age was the only criterion for the vaccination.
persons with underlying health problems	YES – prioritised in 2 nd phase	Yes – first revision of the vaccination strategy added people with health problems into the first phase, but only as "organised groups" (f.e. as clients of care homes). Other people with chronic diseases were prioritised based on their diagnose within the phases 2 – 7 – out of 13 phases) No – after the change adopted in March – people with chronic diseases could only register for the list of substitutes Yes – after the fifth change adopted at the end of April 2021, people with

persons with disabilities	NO (only people with	chronic diseases are prioritized again. People with chronic diseases will be prioritized after people older than 70 years and then second priority group is people 60+ along with people with another chronic diseases (list of diseases is part of the decree). People with disabilities are not explicitly listed as a priority group.
	chronic diseases)	They could register for vaccination only if they fulfil the other stated criteria (f.e. age).
key workers (on the basis of their job not their personal characteristics) — e.g. health workers; persons working in care homes; teachers		Key workers were prioritized with every revision of the vaccination strategy. First two changes extended the scope of professionals that fall in the phase 1. Change 1 – the possibility to be vaccinated was extended to social workers, priests in the hospitals, people who provide PCR and AG
	YES – prioritised in the 1 st phase – health workers, employees of care homes, critical infrastructure	testing (phase 1) Change 2 – the possibility to be vaccinated was extended to people working in marginalised Roma communities or work with homeless people, (phase 1). The teachers above 56 years were added to the phase 4.
	Teachers – prioritised in the 3 rd phase	Change 3 – at the end of February - the list of key workers in phase 1 remained the same. However, in phases 4-6 – the list of other professionals was extended to all teachers, employees of small businesses that remained open during the lockdown, drivers of public transport and all teachers and non-pedagogical workers working in schools
		Change 4 – In March, Key workers in phase 1 remained the same. However, all workers from phase 4-6 have been deprioritized

		and the only criterion of prioritization from phase 2 was age.
persons belonging to ethnic/national minorities	YES – only people from marginalised Roma communities – prioritized in 3 rd phase	No - Since the first change in the vaccination strategy adopted in January, these groups are no longer explicitly stated among priority groups.
		Minister of Health announced in media that once the vaccine Johnson and Johnson is available in Slovakia, they will focus on vaccination of marginalised Roma communities.
persons experiencing homelessness	YES – prioritised in the 3 rd phase	No - Since the first change in the vaccination strategy adopted in January, these groups are no longer among priority groups.
		Minister of health announced in media that once the vaccine Johnson and Johnson is available in Slovakia, they will focus on vaccination of homeless people.
persons with drug addiction dependencies	NO	NO
persons with low literacy levels	NO	NO
persons deprived of their liberty	NO	NO
persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)	Yes – people with granted asylum – prioritised in 3 rd phase	No - Since the first change in the vaccination strategy adopted in January, these groups are no longer among priority groups.
OTHER – not specified above; e.g. 'Persons living in crowded accommodation'; etc. Please insert	NO	

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

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

On its website www.slovenskoproticovidu.sk10 the Ministry of Health provides answers to more than 40 questions about vaccinations, vaccines, their benefits, as well as their possible side effects. The website also presents public figures who have decided to support the information campaign with the central theme "Vaccine is freedom". The website has Slovak, Hungarian and English language version.

The Facebook page of the Ministry of Health of the Slovak Republic fights misinformation on social networks. ¹¹

At the same time, a campaign called "Vaccinate your grandma and grandpa" was launched on their Facebook to increase the number of vaccinated seniors. The campaign encourages people to register their grandparents for vaccination and possibly share a photo from the vaccination on social media aiming to inspire their friends and other people. ¹² A new and huge vaccination campaign is to start on May 3, lasting two months, according to the Minister of Health. The campaign will include TV and radio spots. ¹³

The Office of the Plenipotentiary of the Government of the Slovak Republic for Roma Communities has launched an information campaign entitled "Join us, come and get vaccinated!" with the intention to support the interest of marginalized Roma communities in vaccination (please see promising practices in this report).¹⁴

¹⁰ For more information please see: https://www.slovenskoproticovidu.sk/sk/osobnosti

¹¹ Slovakia, Ministry of Health of the Slovak Republic (*Ministerstvo zdravotníctva SR*), MZ SR spúšťa ďalšiu fázu kampane na podporu očkovania. Ústredným motívom je sloboda. , available at: https://www.health.gov.sk/Clanok?covid-19-29-01-2021-kampan

¹² FB page of Ministry of Health of the Slovak Republic, available at: https://www.facebook.com/MinisterstvoZdravotnictvaSR/posts/809100346625410/

¹³ Denník N (2021), 'Od pondelka sa začne kampaň na očkovanie', 30 April 2021, available at: https://dennikn.sk/minuta/2372853/

¹⁴ Slovakia, Office of Government Plenipotentiary for Roma Communities, Ministry of Interior of the Slovak Republic (*Úrad splnomocnenca vlády SR pre rómske komunity, Ministerstvo vnútra SR*)

The Zdravé regióny (Healthy Regions) organization (a state-subsidized organization of the Ministry of Health, whose mission is the implementation and development of temporary compensatory measures in the area of health in marginalized Roma communities) has prepared a campaign focused on basic information about vaccination which informs why it is worth vaccinating in three language versions (Slovak, Roma and Hungarian). Leaflets are free to download from their website.¹⁵

The #KtoPomozeSlovensku (#WhoWillHelpSlovakia) initiative, which was established by people from business, NGOs and health care as a platform for financial and material assistance during the first wave of the pandemic, brings another information campaign: #IWillBeVaccinated. The online platform aims to provide the public with validated information about vaccination and to share the reasons that motivate ordinary and well-known Slovaks to get vaccinated. The campaign is only in Slovak language.¹⁶

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.?

The Ministry of Health recommends using primarily the official registration form https://www.old.korona.gov.sk/covid-19-vaccination-form.php for registration for vaccination. It can also be filled in by relatives of vaccination applicants. The form is only in Slovak language. ¹⁷ The registration form was gradually updated with new groups that could apply for vaccination (according to age or affiliation to each phase of the vaccination).

^{(2021), &#}x27;Na podporu očkovania vznikla ďalšia kampaň, tentokrát sa zameriava na rómske komunity', press release from 1 April 2021, available at https://www.minv.sk/?spravy_rk&sprava=na-podporu-ockovania-vznikla-dalsia-kampan-tentokrat-sa-zameriava-na-romske-komunity

¹⁵ For more information please see: https://www.zdraveregiony.eu/ockovanie-informacie-letaky-a-brozury/

Slovakia, Representation of the European Commission in Slovakia (Zastúpenie EK na Slovensku)(2021), 'Kto Pomôže Slovensku spúšťa informačnú kampaň na podporu očkovania', 29 January 2021, available at https://ec.europa.eu/slovakia/news/kto pomoze slovensku spusta informacnu kampan na podporu ockovania sk

¹⁷ Slovakia, Ministry of Health (*Ministerstvo Zdravotníctva SR*), 'Seniori nad 85 rokov sa môžu na očkovanie prihlásiť aj telefonicky', 25 January 2021, available at: https://www.health.gov.sk/Clanok?covid-ockovanie-infolinka-registracia

In the beginning, there was a problem with applying due to a lack of dates for the oldest people, as vaccination dates were running out quickly and many people were unsuccessful in registering their relatives (parents, grandparents, etc.). The President of Slovak Republic also described the registration system as undignified. ¹⁸ On 17 March 2021, a new vaccination registration form was launched. Registration for the virtual waiting room was made available, making it possible to wait for the vacancy on a selected vaccination site and date. People could apply for the waiting room according to their age and the relevant vaccination phase. ¹⁹ From 28 April 2021, new changes to the vaccination registration form were introduced again.

Currently, the registration for the virtual waiting room is also available for people aged 16 and older. Dates will be assigned according to age. In addition to age, the waiting room also prioritizes people with severe and moderate risk condition. Rather than specific vaccination site, a district (or even several districts) is selected in the registration process. The more districts people choose when registering, the faster they can get a vaccination date. The applicants are automatically assigned a specific date with regard to age and priority, including the type of vaccine. ²⁰

It is also possible to apply for vaccination as a substitute. However, only persons with medical indications and persons with severe disabilities can be substitutes. The lists of substitutes are not centralized and they are kept separately by individual hospitals and vaccination centres. The website of the Ministry of Health lists specific places where those interested in vaccination as a substitute could apply. ²¹ Some municipalities have also set up a list for substitutes. It is possible to register with, but also without a diagnosis. Substitutes for vaccination are called in case all registered candidates do not arrive on the vaccination date. ²² However, it is always necessary to register first through the official registration form available at https://www.old.korona.gov.sk/covid-19-vaccination-form.php.

¹⁸ Spravy.rtvs.sk (2021), ´Je to veľmi nedôstojné, myslí si prezidentka o systéme registrácie na očkovanie´, 8 March 2021, available at: https://spravy.rtvs.sk/2021/03/je-to-velmi-nedostojne-mysli-si-prezidentka-o-systeme-registracie-na-ockovanie/

¹⁹ For more information please see: https://korona.gov.sk/nova-registracia-ockovanie-cakaren/

²⁰ For more information please see: https://korona.gov.sk/nova-registracia-ockovanie-cakaren/

²¹ Slovakia, Ministry of Health (*Ministerstvo Zdravotníctva SR*), Ako sa prihlásiť ako náhradník na očkovanie proti COVIDU-19', 26 March 2021, available at: https://www.health.gov.sk/Clanok?covid-19-23-02-2021-ockovanie-nahradnici

²² Bratislavskykraj.sk (2021), ´Ak máte chronické ochorenie, registrujte sa k nám ako náhradníci na očkovanie´, 23 April 2021, available at https://bratislavskykraj.sk/zupa-otvara-moznost-ockovania-pre-zdravotne-tazko-postihnutych/

The Ministry has prepared an update of the Vaccination Decree which aims to speed up the vaccination of people most at risk of COVID-19. The decree (effective as of 1 May) aims to prioritize patients with severe and moderate chronic diseases.

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 also possible to register for vaccination against COVID-19 by phone. This option is offered by the call centre of the Ministry of Health. ²⁴

Many municipalities have set up helplines for their citizens with no access to the Internet.²⁵ Some municipalities are also proactive in calling seniors with an offer to help them register for vaccination. The project of assistance with registration for vaccination was launched under the Slovak Catholic Charity with the support of the Conference of Bishops of Slovakia. A free helpline has been set up which can be reached by anyone seeking help with registration. ²⁶

The ombudsman Mária Patakyová drew attention to the problem of unavailability of registration for some population groups and asked the Minister of Health to ensure that vaccination was available to all people in Slovakia. She pointed to a large group of people without internet access or without sufficient skills to use online reservation system. Pointing to the mere formality of the telephone registration, she argues that this option does not take sufficient account of the situation of all population groups; it is necessary to provide specific conditions for

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²³ Slovakia, Ministry of Health (*Ministerstvo Zdravotníctva SR*), Očkovanie chronicky chorých pacientov, skupinové očkovanie a sprievod pre seniorov', 26 April 2021, available at: https://www.health.gov.sk/Clanok?covid-19-26-04-2021-ockovanie-strategia-aktualizacia

²⁴Slovakia, Ministry of Health (*Ministerstvo Zdravotníctva SR*), 'Seniori nad 85 rokov sa môžu na očkovanie prihlásiť aj telefonicky', 25 January 2021, available at: https://www.health.gov.sk/Clanok?covid-ockovanie-infolinka-registracia

²⁵ Trnava.sk (2021), 'Mesto chce občanom pomôcť s registráciou na očkovanie, zriaďuje linky pre tých, ktorí nemajú prístup na internet', 12 March 2021, available at https://www.trnava.sk/sk/aktualita/mesto-chce-obcanom-pomoct-s-registraciou-na-ockovanie-zriaduje-linky-pre-tych-ktori-nemaju-pristup-na-internet

²⁶ Noviny.sk (2021), 'Pomocná ruka pre našich seniorov: S registráciou na očkovanie im budú pomáhať kňazi', 26 March 2021, available at https://www.noviny.sk/slovensko/596544-pomocna-ruka-pre-nasich-seniorov-s-registraciou-na-ockovanie-im-budu-pomahat-knazi

certain groups of people with disadvantages in order for them to be able to apply their rights on an equal basis with others. ²⁷

2.3 How are the vaccinations administered?

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

National vaccination strategy foresaw establishment of 79 vaccination centres in medical facilities throughout Slovakia and the government started with their establishment accordingly in the beginning of 2021.²⁸ Vaccination centres in hospitals and medical facilities use mainly Pfizer/BioNTech and Moderna vaccines. All aspects of the vaccination process are coordinated by the Vaccination Coordination Centre of the Ministry of Health.²⁹ Logistics of the distribution is coordinated by the Operation Centre for Vaccination of the Ministry of Health who coordinates distribution companies supplying vaccines to vaccination centres.³⁰ On 13 January 2021, the Government passed amendment to the Act No. 576/2004 Coll. on health care allowing for establishment of vaccination centres also in non-medical premises to speed up vaccination.³¹ Following that, self-governing regions offered their capacities and assistance with vaccination process.³² In February 2021, self-governing regions began creating their own large capacity vaccination

²⁷ Denník N (2021), 'Ombudsmanka žiada Mareka Krajčího, aby zabezpečil dostupnosť očkovania všetkým obyvateľom Slovenska. ', 11 March 2021, available at: https://dennikn.sk/minuta/2307311/?ref=in

²⁸ Slovakia, Ministry of Health of the Slovak Republic (*Ministerstvo zdravotníctva* SR) (2020), ´Národná stratégia očkovania proti ochoreniu COVID-19 v podmienkach Slovenskej republiky´, available at https://rokovania.gov.sk/RVL/Material/25588/1

²⁹ Onuferová, M. (2021), ´Šéfka operačného strediska pre očkovanie: Naplno sa to rozbehne v apríli ´, Denník N, 4 March 2021, available at https://bit.ly/3epeqHu

³⁰ See for instance Slovakia, Ministry of Health of the Slovak Republic (*Ministerstvo zdravotníctva SR*) (2021), 'Metodický postup pre očkovanie proti ochoreniu COVID-19 vakcínou Moderna', 24 January 2021, available at https://www.health.gov.sk/Clanok?Hlavna-sprava-COVID-19 and similarly for all remaining EMA approved vaccines.

³¹ Slovakia, Government Office of the Slovak republic (*Úrad vlady* SR) (2021), ´Návrh zákona, ktorým s amenia a dopĺňajú niektoré zákony v súvislosti s druhou vlnou pandémie ochorenia COVID-19´, UV-533/2021, available at https://rokovania.gov.sk/RVL/Material/25642/1

³² See for instance: Slovakia, Banská Bystrica Self-Governing Region (*Banskobystrický samosprávny kraj*) (2021), 'BBSK ponúka štátu pomoc pri očkovaní – musíme konať ihneď', press release, 15 January 2021, available at https://bit.ly/3aVizAD

centres.³³ Currently, there are 26 large capacity vaccination centres run by self-governing regions.

Due to demanding storage conditions of Pfizer/BioNTech and Moderna vaccines large capacity vaccination centres run by self-governing regions used only AstraZeneca vaccine at first which meant limited target group (AstraZeneca vaccine is only designated for people of 18-59 years of age)³⁴ and limited supplies depending on national supplies of AstraZeneca vaccine. Some self-governing regions argued that they had built the vaccination centres to increase vaccination capacities and these were going to waste because the Government was unable to secure sufficient supplies of vaccines.³⁵ Public response of the Government to this critique could not be identified. However, around this time the Minister of Health met with the chairman of the SK8 (Association of Self-Governing Regions) and discussed various aspects of regional vaccination processes, including cooperation of the state and self-governing regions and ways to increase regional vaccination capacities.³⁶ Soon after large capacity vaccination centres started administering also Pfizer/BionNTech in April 2021.³⁷

³³ See for instance: Slovakia, Žilina Self-Governing Region (*Žilinský samosprávny kraj*) (2021), 'Otvorili sme veľkokapacitné očkovacie centrum v Žiline', press release, 13 February 2021, available at https://bit.ly/2QDsvIn; Slovakia, Trnava Self-Governing Region (*Trnavský samosprávny kraj*) (2021), 'Župa začala s očkovaním učiteľov vo svojom prvom veľkokapacitnom očkovacom centre', press release, 22 February 2021, available at https://bit.ly/3e9RBri; Slovakia, Banská Bystrica Self-Governing Region (*Banskobystrický samosprávny kraj*) (2021), 'V Banskej Bystrici začalo očkovanie učiteľov, očkovacie centrum pripravil BBSK v spolupráci s Novamedom', press release, 22 February 2021, available at https://bit.ly/3e8HL95; Slovakia, Bratislava Self-Governing Region (*Bratislavský samosprávny kraj*) (2021), 'Skvelá správa pre kraj: Otvárame veľkokapacitné očkovacie centrum', press release, 10 March 2021, available at https://bit.ly/3aUacFL; Slovakia, Trenčín Self-Governing Region (*Trenčiansky samosprávny* kraj) (2021), 'Veľkokapacitné krajské očkovacie centrum je otvorené!', press release, 22 March 2021, available at https://bit.ly/3aUamNn

³⁴ For more information please see https://korona.gov.sk/informacie-k-novemu-prihlasovaniu-sa-na-ockovanie/

³⁵ Šnídl, V. (2021), ´Kraje by chceli očkovať ďalšími vakcínamim, nielen AstraZenecou. S Pfizerom má štát vlastné plány´, *Denník N*, 14 April 2021, available at https://bit.ly/3tavR20

³⁶ See for instance post on the official Facebbok page of the Ministry of Health care of 13 April 2021, available at https://www.facebook.com/MinisterstvoZdravotnictvaSR/posts/824696581732453

³⁷ See for instance Slovakia, Trenčín Self-Governing Region (Trenčiansky samosprávny kraj) (2021), ′Počas víkendu bude župa očkovať vakcínami AstraZeneca aj Pfizer´, press release, 30 April 2021, available at https://bit.ly/3aX5ruO; Slovakia, Prešov Self-Governing region (Prešovský samosprávny kraj) (2021), ´V očkovacích centrách PSK sa už podáva aj vakcína Pfizer´, press release, 30 April 2021, available at https://bit.ly/33ccATH

National vaccination strategy also foresaw establishment of mobile vaccination units for the purposes of vaccinating clients and staff in residential care facilities.³⁸ Mobile vaccination units are one of three methods of vaccination when a team of medical staff comes to residential care homes – the other two include individual vaccination in vaccination centres or group vaccination of groups of at least 10 in vaccinations centres.³⁹ Mobile vaccination units must be requested via the Ministry of Labour, Social Affairs and Family. The Ministry of Health then dispatches a mobile vaccination unit as requested. At least 20 individuals must be registered to be vaccinated in a residential care home for the mobile unit to come. In case of small-capacity facilities they are advised to submit joint requests.⁴⁰

In January 2021, the Ministry of Labour, Social Affairs and Family launched a pilot vaccination in two residential care homes in Bratislava using mobile vaccination units. In its press release the Labour Ministry stated that in total there were 43 100 staff and 68 000 clients in residential care homes in Slovakia.⁴¹ As of 27 April 2021, the Labour Ministry registered 832 requests for a mobile vaccination unit (i.e. 832 facilities requested vaccination of their staff and clients) and at that time 723 of them were actually serviced thus administering first jabs to 35 939 clients and staff combined (roughly 32% of all).⁴²

Mobile vaccination units are currently being established also by self-governing regions and used to vaccinate people with reduced mobility, clients in residential

³⁸ Slovakia, Ministry of Health of the Slovak Republic (*Ministerstvo zdravotníctva* SR) (2020), ´Národná stratégia očkovania proti ochoreniu COVID-19 v podmienkach Slovenskej republiky´, available at https://rokovania.gov.sk/RVL/Material/25588/1

³⁹ Slovakia, Ministry of Labour, Social Affairs and Family of the Slovak Republic and Ministry of Health of the Slovak Republic (*Ministerstvo práce, sociálnych vecí a rodiny SR a Ministerstvo zdravotníctva* SR) (2021), 'Usmernenie pre očkovanie proti ochoreniu COVID-19 – poskytovalie sociálnych služieb, subjekty sociálno-právnej ochrany detí a sociálnej kurately a ďalšie subjekty, ktorých výkon súvisí s poskytovaním sociálnych služieb a výkonom opatrení sociálno-právnej ochrany detí a sociálnej kurately', 21 January 2021, available at https://bit.ly/3eJGXq4

⁴⁰ Slovakia, Ministry of Labour, Social Affairs and Family of the Slovak Republic and Ministry of Health of the Slovak Republic (*Ministerstvo práce, sociálnych vecí a rodiny SR a Ministerstvo zdravotníctva* SR) (2021), ´Usmernenie pre očkovanie proti ochoreniu COVID-19 – poskytovalie sociálnych služieb, subjekty sociálno-právnej ochrany detí a sociálnej kurately a ďalšie subjekty, ktorých výkon súvisí s poskytovaním sociálnych služieb a výkonom opatrení sociálno-právnej ochrany detí a sociálnej kurately´, 21 January 2021, available at https://bit.ly/3eJGXq4

⁴¹ Slovakia, Ministry of Labour, Social Affairs and Family of the Slovak Republic (*Ministerstvo práce, sociálnych vecí a rodiny* SR) (2021), ´V ZSS budú pripravené očkovať aj špeciálne mobilné tímy´, press release, 18 January 2021, available at https://bit.ly/2RdHl8b

⁴² Slovakia, Ministry of Health of the Slovak Republic (*Ministerstvo zdravotníctva* SR) (2021), ´Ako prebieha očkovanie v zariadeniach sociálnej starostlivosti´, press release, 27 April 2021, available at https://bit.ly/3t7IXO3

care homes and senior citizens living in remote localities who have difficulties travelling to vaccination centres.⁴³

As suggested by the new Health Minister the Ministry of Health currently discusses the option of borrowing 10 mobile vaccination teams from the Army. 44 These should administer Johnson & Johnson vaccine primarily to marginalized communities, people experiencing homelessness and other socially excluded groups. The Minister stated that by the end of April each self-governing region should have such team at their disposal. However, this is not the case as of yet. According to the Minister, the Ministry of Health is also preparing a pilot project of vaccination with Johnson & Johnson and AstraZeneca vaccines at general practitioners offices given their less demanding storage conditions. That, however, depends on supplies of these vaccines. 45

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 launched an informational website www.slovenskoproticovidu.sk providing information on vaccination, EMA approved vaccines and their potential side effects. The website has a Slovak and Hungarian version. There is no version for people with visual impairment. Link to this website is provided in a confirmation email received by those who were assigned a vaccination appointment.

The Health Minister said the Ministry was about to launch a massive information campaign targeting mainly senior citizens that should be supported by a wide media coverage. The Ministry also started cooperation with the Slovak Postal Service and started distributing information leaflets to senior citizens along with

https://bit.ly/3eJ0eIh

⁴³ See for instance Slovakia, Trnava Self-Governing Region (*Trnavský samosprávny kraj*) (2021), ′Župa spustí mobilnú očkovaciu jednotku′, press release, 15 April 2021, available at https://bit.ly/3e9Ug4g; Slovakia, Trenčín Self-Governing Region (*Trenčiansky samosprávny kraj*) (2021), ′Očkovanie imobilných ľudí zabezpečuje výjazdová očkovacia služba′, press release, 30 April 2021, available at https://bit.ly/3u9nlCp; Tomaškovičová, J. (2021), ′S vakcináciou seniorov pomôžu mobilné očkovacie jednotky′, *Košiceonline.sk*, 15 April 2021, available at

⁴⁴ Folentová, V. (2021), ´Lengvarský: Z odpadových vôd zistíme, kde nám hrozia ohniská, a tie otestujeme PCR testami. Plošné testovania už nebudú´, Denník N, 22 April 2021, available at https://bit.ly/33851NU

⁴⁵ Folentová, V. (2021), ´Lengvarský: Z odpadových vôd zistíme, kde nám hrozia ohniská, a tie otestujeme PCR testami. Plošné testovania už nebudú´, *Denník* N, 22 April 2021, available at https://bit.ly/33851NU

their pension checks. Leaflets contain information on vaccination and registration channels (online or telephone).⁴⁶

References to information on each vaccine approved by EMA are also published on the official state website korona.gov.sk. After clicking on each reference, one is redirected to the website of the State Institute for Drug Control (Štátny ústav na kontrolu liečiv) that contains detailed information on each vaccine (only in Slovak).⁴⁷

Some self-governing regions provide detailed information on vaccination process on their websites. The information, however, only pertains to the vaccination process in their large capacity vaccination centres. For instance, Bratislava self-governing region prepared a detailed instructional video describing the vaccination process in the vaccination centre step-by-step. Bratislava self-governing region also published information on all EMA approved vaccines, their efficacy and potential side effects on their website where they also inform about accessibility of their vaccination centres. Information is only in Slovak. Trnava self-governing regions runs three large capacity vaccination centres and informs about the vaccination process on their website in Slovak and in Hungarian. Other self-governing regions do not extensively inform about the vaccination process. Usually, they only publish information about documents that one needs to bring to vaccination and about routes and directions. Information is usually only in Slovak.

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

No such circumstances have been recorded.

⁴⁶ Folentová, V. (2021), ´Lengvarský: Z odpadových vôd zistíme, kde nám hrozia ohniská, a tie otestujeme PCR testami. Plošné testovania už nebudú´, *Denník* N, 22 April 2021, available at https://bit.ly/33851NU

⁴⁷ For more information please see: https://www.sukl.sk/hlavna-stranka/slovenska-verzia/bezpenos-liekov/vakciny/vakciny-proti-covid-19?page_id=5497

⁴⁸ To watch the video please see https://www.facebook.com/watch/?v=1049948275501223

⁴⁹ For more information please see https://bratislavskykraj.sk/ockovacie-centrum-otazky-a-odpovede/

⁵⁰ For more information please see https://zdravazupa.sk/korona/

⁵¹ See for instance https://www.unsk.sk/zobraz/obsah/12024

3 Challenges and promising practices

3.1 Challenges

Low vaccination coverage of elderly

In Slovakia, vaccination of older age groups is not progressing as fast as in other EU countries⁵². At the end of March, the share of vaccinated population within the age groups was following⁵³:

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- age category 90+ - 36%
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- age category 80 89 years 39%
- age category 70 79 years 38%
- age category 60 69 years 29%
- age category 50 59 years 18%

The share of vaccinated persons of the age category 70+ (who received at least the first dose of vaccine) has been 56% by 20 April 2021⁵⁴. Slovakia has one of the lowest rates of vaccinated persons over 80 years of age⁵⁵.

Low vaccination of the elderly can be caused by several factors. First, there is a lack of reliable information accessible to seniors like for instance paper leaflets, TV or radio broadcasting (the Ministry of Health prepares leaflets that should be distributed via post offices in the near time as well as a campaign in TV and radio broadcasting). The persons of higher age are not actively contacted by their practitioners or health insurance agencies to inform them on vaccination, the possible ways of registration and reliability of the available vaccines. Second, the information on the possible side effects of vaccination is quite widespread, many older people may be simply afraid of the vaccination. Third, the process of registration has not been adjusted for persons who have not internet access or who lack the necessary skills to handle online registration (the registration via

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⁵² Slovak Spectator (2021), 'Warnings sounded over low vaccination uptake among elderly', 16 April 2021, available at: https://spectator.sme.sk/c/22639411/warnings-sounded-over-low-vaccination-uptake-among-elderly.html

⁵³ Dáta bez pátosu (2021), 'Postup očkovania – staršie vekové skupiny', 3 April 2021, available at: https://databezpatosu.sk/2021/04/03/slovensko-neockovaci-plan-na-april/

⁵⁴ Slovakia, Office of the Government of the Slovak Republic (*Úrad vlády SR*) (2021), Information on epidemiological situation, 20 April 2021, available at: https://korona.gov.sk/wp-content/uploads/2021/04/epidemiologicka situacia 210420.pdf

⁵⁵ Denník N (2021), 'V očkovaní najstarších seniorov patríme k najhorším v Únii. Čo treba robiť, aby sa to zmenilo?', 22 April 2021, available at: https://dennikn.sk/2361093/v-ockovani-najstarsich-seniorov-patrime-k-najhorsim-v-unii-co-treba-robit-aby-sa-to-zmenilo-anketa/

phone is not working in practice as it was pointed out by the Ombudsperson⁵⁶). And finally, persons with physical disabilities or persons with serious health problems are not able to travel for vaccination they need to be vaccinated at their homes or nearby facilities, however, the operation of the first mobile vaccination teams started only in the second half of April⁵⁷.

The share of social care homes whose clients (most of them are seniors) have already been vaccinated with the first dose of vaccine reached 87%. In 65% of the social care homes clients already received also the second dose of vaccine. This information applied to 28 April 2021⁵⁸.

The vaccination of foreigners living in Slovakia

The vaccination against COVID-19 is not equally accessible to different categories of foreigners living in Slovakia⁵⁹. Foreigners who are registered in the public health insurance system may be vaccinated without a need to fulfil any specific requirements. EU citizens living in Slovakia who are insured in another EU member state can be vaccinated in Slovakia if they request an S1 form from the health insurance company in their home country and then register it at any Slovak public health insurance company. After that, they receive a specific card issued by the insurance company which allows them to registrate for vaccination via the registration online form. Foreigners who have only commercial insurance cannot register for vaccination. Vaccination as a self-payer is also not possible in Slovakia. In April, an amendment of the legislation came into force that specified the rules for vaccination of foreigners living in Slovakia⁶⁰, however, specific categories of foreigners like third-country nationals without public health insurance have been

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⁵⁶ Slovakia, The Public Defender of Rights (*Verejná ochrankyňa práv*)(2021), 'Očkovanie musí byť dostupné pre všetkých ľudí', 11 March 2021, available at: https://www.facebook.com/verejnaochrankynaprav/posts/3978309325595657

⁵⁷ Denník N (2021), 'V očkovaní najstarších seniorov patríme k najhorším v Únii. Čo treba robiť, aby sa to zmenilo?', 22 April 2021, available at: https://dennikn.sk/2361093/v-ockovani-najstarsich-seniorov-patrime-k-najhorsim-v-unii-co-treba-robit-aby-sa-to-zmenilo-anketa/

⁵⁸ Slovakia, Ministry of Health of the Slovak Republic (*Ministerstvo zdravotníctva SR*)(2021), 'Ako prebieha očkovanie v zariadeniach sociálnych služieb', 27 April 2021, available at: https://www.health.gov.sk/Clanok?covid-19-27-04-2021-ockovanie-zss

⁵⁹ RTVS (2021), 'New rules on vaccination of foreigners in force (update)', 20 April 2021, available at: https://enrsi.rtvs.sk/articles/coronavirus/253646/new-rules-on-vaccination-of-foreigners-in-force-update?fbclid=IwAR3DtXpz4MgbVLI5GEgCDlBtz-enyKC2mD1vlm2NJuJJz_fKzR2tlg12Lh0

⁶⁰ Slovakia, Ministry of Health of the Slovak Republic (*Ministerstvo zdravotníctva SR*) (2021), 'Očkovať proti COVID-19 sa môžu aj niektorí cudzinci a dlžníci na poistnom', 14 April 2021, available at: https://www.health.gov.sk/Clanok?covid-19-14-04-2021-ockovanie-cudzinc

left out of the vaccination⁶¹. The problem lies in the fact that not all third-country nationals living in Slovakia are entitled to have public health insurance. This specific group of foreigners involves for instance third-country nationals who reside in Slovakia for the purpose of family reunification⁶².

The vaccination of persons with chronic diseases

In March, the Ombudsperson informed that she received several complaints that the system of registration for vaccination does not involve younger people with chronic diseases as well as the system does not allow to choose the vaccine in the case the practitioner does not recommend a person to be vaccinated by the vaccine available for his/her age category⁶³. The situation has improved since the begging of May when persons with chronic diseases have been prioritized by the Vaccination Decree of the Ministry of Health⁶⁴. The dates of vaccination are first assigned to persons older than 70 years, then to persons with chronic diseases regardless of age and then to persons older than 60 years. All of them are entitled to get the vaccine from Pfizer/BioNTech or Moderna⁶⁵.

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⁶¹ Slovak Spectator (2021), 'Health Ministry makes vaccination against Covid-19 accessible to some groups of foreingers', 14 April 2021, available at: https://spectator.sme.sk/c/22638049/health-ministry-makes-vaccination-against-covid-19-accessible-to-some-groups-of-foreigners.html

⁶² SME Daily (2021), 'Niektorí cudzinci nemajú nárok na očkovanie proti COVIDu', 7 March 2021, available at: https://domov.sme.sk/c/22611356/niektori-cudzinci-nemaju-narok-na-ockovanie-proti-covidu.html

⁶³ Slovakia, The Public Defender of Rights (*Verejná ochrankyňa práv*)(2021), 'Ako je to s očkovaním mladších ľudí so závažnými ochoreniami?', 26 March 2021, available at: https://www.facebook.com/verejnaochrankynaprav/posts/4022868617806394

⁶⁴ Slovakia, Ministry of Health of the Slovak Republic (*Ministerstvo zdravotníctva SR*), Decree No. 161/2021 amending the Decree No. 96/2021 establishing the criteria for ordering people in vaccination against COVID 19 (*Vyhláška č. 161/2021 Z.z. ktorou sa mení a dopĺňa vyhláška Ministerstva zdravotníctva SR č. 96/2021 Z.z. ktorou sa ustanovujú kritériá určovania poradia očkovania osôb proti ochoreniu COVID-19*), 27 April 2021, available at: https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/161/20210501

⁶⁵ Slovenskoproticovidu.sk, 'Chronicky chorí pacienti budú očkovaní prioritne', 30 April 2021, available at: https://www.slovenskoproticovidu.sk/aktuality/chronicky-chori-pacienti-budu-ockovani-prioritne

3.2 Promising practices

Mobile vaccination units

First self-governing region to introduce mobile vaccination units was Banská Bystrica. The motivation is to increase vaccination rate among people above the age of 70. They use a vaccination bus and drive to remote localities within the region, mainly to villages in districts with no large capacity vaccination centres. Along with the units they launched an informational campaign in cooperation with mayors of towns and villages, churches, and local broadcast services. They also distribute leaflets containing information on vaccination. Besides vaccination buses the self-governing region also plans to dispatch additional mobile vaccination teams to administer vaccines in people's homes if someone is unable to come to the vaccination bus.⁶⁶

The plan is to have at least 6 mobile vaccination units by May 2021 and 10 by June 2021. The goal is to vaccinate at least 70% of all residents of the region above the age of 60 by July 2021.⁶⁷

Informational campaign in Roma communities

The Office of Government Plenipotentiary for Roma Communities launched an informational campaign called "Join us, get your vaccine!" which is a part of a National Project NP COVID MRK. As part of the campaign, they made a series of videos in both Slovak and Roma language aiming to increase interest in vaccination in marginalized Roma communities. Representatives of various professions (a teacher, a mayor, a community worker, a regional coordinator, a nurse) talk about their experience with vaccination and benefits thereof. Content of the videos is based on a survey of perception of vaccination in marginalized Roma communities that the Office of Government Plenipotentiary for Roma

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⁶⁶ Slovakia, Banská Bystrica Self-Governing Region (*Banskobystrický samosprávny kraj*) (2021), Očkujme tam, kde to najviac pomôže. Kraj prišiel s projektom mobilných očkovacích jednotiek′, press release, 7 April 2021, available at https://bit.ly/3xy99oB; TASR (2021), ´Prvá jazda očkovacieho autobusu má smerovať do B. Štiavnice a Revúcej′, press release, 15 April 2021, available at https://www.tasr.sk/tasr-clanok/TASR:20210415TBB00342

⁶⁷ Nový čas (2021), ´Pilotné testovanie projektu v Banskobystrickom kraji: Mobilné očkovacie jednotky vyrazia do dvoch okresov´, *Nový čas*, 15 April 2021, available at https://bit.ly/3eJICfi

⁶⁸ Slovakia, Office of the Government Plenipotentiary for Roma Communities (*Úrad splnomocnenca vlády pre rómske komunity*) (2021), ´Na podporu očkovania vznikla ďalšia kampaň, tentokrát sa zameria na rómske komunity´, press release, 1 April 2021, available at https://bit.ly/3e5m5um

⁶⁹ All videos are available on the official Youtube channel of the Office of Government Plenipotentiary for Roma Communities https://www.youtube.com/channel/UCO0n-BomWQ3Cm6yqAPrydbg

Communities carried out for their internal use. The videos are in Slovak with Romani subtitles. The campaign aims to increase trust in vaccination and convey information and instruction pertaining to vaccination process, possible side effects etc. Information on vaccination is also communicated personally by community workers in marginalized Roma communities. They also assist with online registration.⁷⁰

Novakia, Office of the Government Plenipotentiary for Roma Communities (Úrad splnomocnenca vlády pre rómske komunity) (2021), Na podporu očkovania vznikla ďalšia kampaň, tentokrát sa zameria na rómske komunity, press release, 1 April 2021, available at https://bit.ly/3e5m5um