

Reference:	FOI.5074.21
Subject:	COVID-19 vaccination roll out plan
Date of Request:	20 January 2021

Requested:

Please provide a detailed plan of your COVID-19 vaccination roll out.

Including where the vaccines will be rolled out, at what rate per demographic, and what type of vaccine will be administered.

Response:

Hywel Dda University Health Board (UHB) has applied an exemption under Section 36(2)(c) of the Freedom of Information Act 2000 (FoIA), which states that information being considered under this exemption, would or would be likely to, in the reasonable opinion of the UHB's qualified person, prejudice the effective conduct of public affairs.

In the case of the UHB, the qualified person is the Chief Executive.

The UHB considers that the disclosure of this information would or would be likely to prejudice the effectiveness of the UHB's decision making. As a public authority responding to a global pandemic, the UHB requires some discretion and flexibility in its ability to deviate from its prepared vaccination plan and implement alternative options, in accordance with the situation presented.

As seen with the COVID-19 pandemic, regulations and guidance have been ever changing and the UHB has to be able to work in accordance with and make changes at a fast pace. Therefore publication of the UHB's vaccination roll out plan could inhibit the UHB's ability to fulfil its vaccination schedule and could be used to prevent the UHB from making necessary changes to the original plan.

The UHB needs to be able to adapt at short notice to any scenario that may arise. Therefore, due to the ongoing changes to vaccine supplies, plans are reviewed on a weekly basis, however there may be occasion for last minute changes to be made to effectively manage the roll out of the vaccine. The UHB requires the ability to change a plan expeditiously, as it is imperative to the running of the UHB and the ongoing vaccine roll out.

An example to demonstrate the above was when the UHB recently had to make a change to the vaccine plan that was in place due to an unexpected change to the quantity of vaccine being delivered, this change saw the UHB having to redirect all appointments for shielding patients to its Mass Vaccination Centres (MVC), rather than at GP practices. A copy of the UHB's press release in relation to the change can be accessed via the link below:

[People who are shielding to receive vaccine at a mass vaccination centre - Hywel Dda University Health Board \(nhs.wales\)](https://www.nhs.uk/news/2021/01/21-hywel-dda-university-health-board-mass-vaccination-centres/)

Furthermore, the UHB's vaccination plan is a large document containing details of scheduled vaccine deliveries, commercial agreements with partners relating to vaccine programme delivery, site security information, contingency planning, staffing and the overarching timelines for anticipated delivery and fulfilment of doses for the various priority groups. Due to the complexity of the

document and the information contained within it, it is deemed extremely sensitive, and as a result the UHB is withholding this information under Section 36(2)(c)(i) of the FoIA.

Section 36 of the FoIA is subject to the public interest test, applied as follows:

In favour of disclosure: There is a legitimate public interest in transparency and accountability of the ways in which public bodies operate and manage emergency planning in response to developing situations. This includes enhancing the public understanding of the steps taken by the UHB, which in turn builds trust in the UHB and its officers.

Against disclosure: Disclosure of this information would be likely to cause substantial harm to the UHB's process, as information would be disclosed pertaining to the finer details of its operational planning and the adaptations required in response to the presenting circumstance. Additionally, the UHB must be able to change the plan at its own discretion to protect and preserve its operational security and patient and staff safety.

Decision: The UHB considers that the public interest in withholding the information is greater than the interest in disclosing it, and believes that there is wider established public interest in the Board's ability to make decisions and plan for all circumstances.

It has therefore been decided that releasing the information under FoIA, to which the UHB is subject, would be likely to impair the UHB's operation.

Whilst operating in accordance with the Chancellor's Code of Practice under Section 45 of the FoIA, the UHB has a duty to provide advice and assistance.

Information relating to the vaccine roll out is already within the public domain; therefore, the UHB has applied an exemption under Section 21 of the FoIA, as the information is accessible by another means. The UHB's Board meeting papers of the 28 January 2021 contain an update on the vaccination programme. A paper on the UHB's COVID-19 Mass Vaccination Programme Delivery Plan was presented at the People, Planning and Performance Assurance Committee (PPPAC) meeting on the 10 February 2021.

For ease of reference, please click on the links below, which will take you directly to the UHB's web pages:

Board meeting paper:

<https://hduhb.nhs.wales/about-us/your-health-board/board-meetings-2021/board-agenda-and-papers-28th-january-2021/28th-january-2021-documents/item-4-2-covid-19-report/>

COVID-19 Mass Vaccination Programme Delivery Plan:

[Vaccination Programme Delivery Plan Draft v0.1 \(nhs.wales\)](#)

The UHB is allocating vaccinations in accordance with the advice as set out by the Joint Committee of Vaccination & Immunisation (JCVI), which can be accessed via the following link:

[Joint Committee on Vaccination and Immunisation: advice on priority groups for COVID-19 vaccination, 30 December 2020 - GOV.UK \(www.gov.uk\)](#)

Additionally, vaccine data is published on a weekly basis and can be located on the UHB's press release webpages via the following link:

[Press releases - Hywel Dda University Health Board \(nhs.wales\)](#)

Updates on when the vaccination programme is being extended to the next awaiting priority group is published on the UHB's website and Social Media pages to ensure members of the public are kept informed of progress.