# Flu & COVID-19 Vaccination Programme (FVCV) 2023-24

Child Rights and Wellbeing Impact Assessment



#### Disclaimer

This document is an assessment of the impact of Coronavirus (COVID-19) and Seasonal Influenza (flu) Vaccinations 2023-2024 and Scottish Government will continue to review and update this document where required during the strategic decision making process. Any future iterations will reflect an increased understanding of these impacts as the amount of data and research available continues to grow.

This impact assessment should be read in conjunction with the Equality Impact Assessment.

#### **CRWIA Stage 1 – Screening**

#### 1. Brief Summary (Guidance Section 2.1)

Since December 2020, Scotland's Flu and COVID-19 Vaccination Programme (FVCV) has been guided by expert advice from the Medicines and Healthcare products Regulatory Agency (MHRA), the Joint Committee on Vaccination and Immunisation (JCVI), and the UK Chief Medical Officers (CMOs).

2023 has seen the JCVI, and therefore Scottish Government, move away from a pandemic emergency towards pandemic recovery. The main aim of the programme is to stop severe illness, hospitalisations and deaths. During this phase, whilst the virus continues to circulate and cause illness, our focus is to offer vaccination to those at most risk of serious disease and who are most likely to benefit from getting a vaccine.

Between 2 December 2020 and 15 September 2023, lots of COVID-19 vaccines were authorised by the MHRA for use in children and young people from the age of 6 months and over.

Following these authorisations, the JCVI gave advice on how these vaccines should be given to children and young people. This has continued in 2023:

• **07 March 2023:** The JCVI advised a spring booster for those aged 5 to 17 who have a weakened immune system.

**06 April 2023:** The JCVI advised 2 vaccines for those aged 6 months to 4 years who have particular illnesses or conditions that make them more at risk of getting ill with COVID-19. Some people who have a severely weakened immune system could also get a third vaccine.

- **30 June 2023:** Up until 2023, people could come forward to any clinic in Scotland, at any time, and get the COVID-19 vaccines they were eligible for. In 2023 this stopped, so that all healthy people 5 to 64, who don't have any health problems that make COVID-19 serious for them, can't get a COVID-19 vaccine any more.
- 08 August 2023 (statement dated 26 May 2023): The JCVI advise a winter dose for anyone aged 6 months and over who have particular illnesses or conditions that make them more at risk of getting ill with COVID-19, frontline health and social care workers, people aged 12 and over who live people with weakened immune system, people aged 16 and over who are carers and staff working in care homes for older people.

Vaccine	MHRA Age	JCVI Age	Programme
Moderna Spikevax BA.4-5 Bivalent	6 months+	18+	Spring - Winter
Pfizer BA.4-5 Bivalent	12+	12+	Spring - Winter

For 2023, the MHRA and JCVI have also authorised the use of new vaccines:

Pfizer Comirnaty 10mcg	5-11	5-11	Spring - Summer
Pfizer Comirnaty 3mcg	6 months – 4 years	6 months – 4 years	Spring - Summer
Pfizer 30 XBB.1.5	12+	12+	Winter
Pfizer 10 XBB.1.5	5-11	5-11	Winter
Pfizer 3 XBB.1.5	6 months – 4 years	6 months – 4 years	Winter
Moderna Spikevax XBB.1.5	6 months+	18+	Winter

Those aged 12-17 who could not receive a Pfizer or Moderna mRNA vaccine, due to having allergies or a bad reaction, were able to get another vaccine called Novavax Nuvaxovid up until 31 May 2023. Between 1 June 2023 and the end of September 2023, there was no non-mRNA COVID-19 vaccine available in Scotland for the very small number of people who needed it. From late September 2023 another vaccine (non MRnA) called Sanofi Vidprevtyn became available. This is approved for use for those aged 18 and over. For use in those under the age of 18, a clinical assessment has to be made and if the clinician thinks it is appropriate to give the vaccine, it is given under a 'Patient Specific Direction' (PSD).

In winter 2022 we updated our online booking portal, so that people over the age of 12 could book or reschedule an appointment online. This continues for 2023. Those under the age of 12 can't use the online system due to information governance concerns, so have to call the National Vaccination Helpline to book their appointments.

A vaccine called LAIV, or Live Attenuated Influenza Vaccine, is the recommended vaccine for children and young people to protect against flu. This is given as a nasal spray up the nose, and not as an injection. For those who cannot receive LAIV, there is another option available called QIVc or 'Cell-based Quadrivalent Influenza Vaccine'. This is given as an injection.

Groups	Vaccine recommended by the JCVI
At risk children aged 6 months -	Cell-based Quadrivalent Influenza
2 years	Vaccine (surface antigen, inactivated),
	Seqirus Vaccine (QIVc)
Children aged 2 18 years who cannot	Cell-based Quadrivalent Influenza
Children aged 2 –18 years who cannot receive LAIV	Vaccine (surface antigen, inactivated),
	Seqirus Vaccine (QIVc)
Pre-school children aged 2-5 years	
Primary school children	Live attenuated influenza vaccine (LAIV)
Secondary school pupils	

#### Flu vaccines for 2023/24

The flu child and school vaccination programme has been running since 2014, and secondary school pupils were included in the eligible cohorts from 2021-22. This was because it was agreed it was sensible to protect children during the Covid pandemic. Every year the JCVI <u>publishes</u> information on which flu vaccines should be used for the next winter. The JCVI also recommends who they think should be given the free

flu vaccine. Scotland's Chief Medical Officer (CMO) then publishes a CMO <u>letter</u> that lets the NHS know what the flu programme looks like for the coming winter.

### 2. Which aspects of the relevant proposal currently affects or will affect children and young people up to the age of 18?

This CRWIA is about COVID-19 and flu vaccination policy for 2023-24, for all children and young people (under 18 years of age) in Scotland.

The offer of COVID-19 and flu vaccination for children and young people depends on the advice received from the JCVI. The type of vaccine a young person will be offered and the number of vaccine doses they receive will depend on their age and if they have a health condition. Our vaccination policy affects all children aged 6 months to 17 years.

#### Changes to the vaccination policy in 2023

In 2023, the main aim of the FVCV vaccination programme is still the prevention of severe illness, hospitalisation and death. During the current phase of pandemic recovery, the aim is to focus on offering to those at greatest risk of serious illness, who are therefore most likely to benefit from vaccination.

Although the at risk groups and age of children recommended to be vaccinated has largely stayed the same in 2023, the JCVI have lowered the age of children to be vaccinated to 6 months and over from the previous age of 5 years and over.

This covers a larger age group of those children and young people who are identified as being at clinical risk or who have a weakened immune system.

In addition, as of 30 June 2023, the "rolling offer" of COVID-19 vaccination will end. Up until this point, any child or young person could come forward to a clinic, at any point in the year, and request as many vaccines as they were cumulatively eligible for since the start of the programme. This is no longer the case and those aged 5-17 who do not have any clinical conditions that make them vulnerable to COVID-19, will no longer be able to access any COVID-19 vaccination. As uptake has traditionally been lower for the younger age groups, and lower still in areas of high Scottish Index of Multiple Deprivation (SIMD)and in particular minority ethnic communities, this means that children in communities that are already disadvantaged in terms of public health, will have less vaccine-based immunity to COVID-19. However, this is offset by the fact that studies have shown that children are much less likely to develop severe COVID-19 disease than adults and for the vast majority of children, COVID-19 infection is associated with no, or mild symptoms and many children will also have some sort of infection-based immunity to the virus. The clinical risk is therefore greatly reduced.

### 3. Which groups of children and young people are currently or will be affected by the relevant proposal?

Our vaccination policy this year affects all children aged 6 months to 17 years who are identified within a clinical risk or immunosuppressed group and those that work in a care position or in the care sector.

Clinical risk groups include those with:

- Severe or profound or multiple learning disabilities,
- Downs Syndrome
- Teenage pregnancy
- All refugee children who fall under the eligibility criteria for flu and / or Covid
- Those on the learning disability register

Although Scotland doesn't have a learning disability register, we try to identify all those who would be eligible to be on the English equivalent.

Further information on clinical health conditions that are considered eligible can be found in the Green book chapter 14a found here: <u>COVID-19 Greenbook chapter 14a</u> (<u>publishing.service.gov.uk</u>).

In addition in 2023, the following young people were considered at higher risk and were offered COVID-19 vaccination:

#### Spring booster

• Those aged 5 to 17 who are immunosuppressed

#### Primary course

- Those aged 6 months to 4 years in a clinical risk group: 2 doses
- Those aged 6 months to 4 years who are severely immunosuppressed: 3 doses

#### Winter booster

- Persons aged 6 months to 17 years in a clinical risk group
- Frontline health and social care workers
- Persons aged 12 to 17 years who are household contacts of people with immunosuppression
- Persons aged 16 to 17 years who are carers or who are staff working in care homes for older adults

The Scottish Government continues to keep the programme under review to ensure that is remains relevant, inclusive and reflects current lifestyle choices where appropriate, including offering vaccines suitable for vegetarians and vegans. Where possible alternative vaccines are provided to accommodate religious beliefs.

The JCVI continue to review their advice in relation to the vaccination of children and young people, taking into account new data and information that becomes available, including the timing of flu season (see the graph demonstrating this at Annex 6).

#### Declaration

#### 4. Is a Stage 2 Children's Rights and Wellbeing Impact Assessment required? (Tick relevant requirement)

CRWIA required	$\boxtimes$	No explanation required, please complete questions 5 and 6
CRWIA not required □		Please explain why below and contact the children's rights unit to discuss this decision <a href="mailto:crwia@gov.scot">crwia@gov.scot</a>

Explanation why CRWIA is not required:

#### 5. Sign & Date

Policy Lead Signature & Date of Sign Off:

### Peggy Winford Seasonal Vaccination, Strategy and Transition Unit Head: 4<sup>th</sup> April 2024

CRWIA author, if different from policy lead, Signature & Date of Sign Off:

#### Lynsey McGilvary, Senior Policy Officer, 3<sup>rd</sup> April 2024

Deputy Director Signature & Date of Sign Off:

### Dr ST Cuthbert-Kerr, Deputy Director for Public Health Capabilities, 4<sup>th</sup> April 2024

#### **CRWIA Stage 2 – Assessment of Impact and Compatibility**

### 1. What evidence have you used to inform your assessment? What does it tell you about the impact on children's rights?

As with other vaccines in Scotland, the evidence we have used to inform our assessment has come from the JCVI, who in turn have based their assessment on all emerging scientific data on COVID-19. More information on the evidence can be found at <u>Joint Committee on Vaccination and Immunisation - GOV.UK (www.gov.uk)</u>.

The JCVI recommended that the childhood element of the Seasonal Influenza Programme is a cost effective element that provides population protection and minimises transmission of Seasonal influenza. Following further consideration in December 2021, the JCVI remained supportive of fully extending the childhood programme on a routine basis which they consider to be highly cost effective as per their original recommendation in 2012.

#### 2. Evidence from stakeholders/Policy Colleagues

Currently we do not hold the full data picture of COVID-19 vaccinations for 2023 uptake in children at risk as childhood programmes have been behind with regards to the rollout of COVID-19 vaccinations. Some Health Boards have only just completed dose 2 for some childhood cohorts in summer 2023.

In regards to flu vaccination, in 2022/23 winter period an estimated 595,191 eligible children and young people in schools have been given their vaccination resulting in a 66.5% uptake. In winter 2023/24, 538,606 vaccinations have been administered thus far; although the winter flu vaccination programme is still ongoing, this shows a drop in uptake for the flu vaccinations this year.

Public Health Scotland has and will continue to engage with parents and carers to ensure they are fully informed when it comes to making the decision on whether their child is vaccinated. Section 2.2 highlights the work that has been undertaken this year to engage with those caring for children and to ensure that any marketing is tailored to young people. The Scottish Government has engaged with disability and unpaid carers policy teams in order to inform policy decision making for COVID-19 and flu vaccination of children and young people.

The Scottish Government remains committed to its vaccination programmes and we strongly recommend that individuals eligible to receive vaccinations do so. It should be noted however that COVID-19 and Seasonal Influenza vaccinations are not mandatory, therefore this policy is based on voluntary uptake of the offer of vaccination by children and young people.

In all instances, the offer of vaccination must be accompanied by appropriate information to enable children and young people, and those with parental responsibility, to be adequately able to appraise the potential harms and benefits of vaccination as part of the informed consent process prior to vaccination.

#### 3. Evidence from children and young people

All of the decisions related to the vaccination of children and young people have been taken in the best interests of children and young people, as well as to promote health, wellbeing and safety.

For this CRWIA we have consulted with parents and carers, but had minimal consultation with children and young people on our vaccination policy. We will attempt to rectify this for future iterations.

While children and young people have not been directly consulted on the use of COVID-19 vaccine, we have engaged with parents and carers and the following organisations representing the interests of children and young people.

- Children's Health Scotland
- National Carer Organisations (NCOs)
- Connect
- Down's Syndrome Scotland
- Parenting across Scotland
- Voluntary Health Scotland

Prior to the COVID-19 vaccination roll out for 5-11 year olds, Public Health Scotland (PHS) undertook some focus work groups and issued a short survey in March 2023 for parents and carers to provide their input, as they developed child-centred COVID-19 vaccination materials for children aged 5 to 11 years. As part of this parents and carers reported on what their children wanted to know about COVID-19 vaccination. The survey was advertised via PHS social media and shared directly with the following organisations: Coalition of Carers in Scotland, Carers Trust (Scotland), Children in Scotland, Children's Health Scotland, CHAS, Connect, Down Syndrome Scotland, Family Fund, National Parent Forum of Scotland, One Parent Families Scotland, Parent Club, Parenting across Scotland and Voluntary Health Scotland.

Alongside the work by PHS, we have funded MECOPP to undertake qualitative research exploring what Gypsy Travellers think of vaccine information resources and how they can be improved to reflect cultural realities, which has included a focus on young people's information resources. The report can be found <u>here</u>.

#### Analysis of the evidence

### 4. How have the findings outlined in questions 1-3 influenced the development of the relevant proposal?

When formulating advice in relation to vaccination of children and young people, the JCVI have consistently held the view that the main focus of their considerations is the potential benefits and harms of vaccination to children and young people themselves.

Different cohorts of children and young people have become eligible for vaccination at different stages of the programme, as per JCVI advice, based on clinical and other risk factors, with those at higher risk of severe COVID-19 outcomes being prioritised.

Full details regarding the JCVI advice which outlines what groups became eligible and when and for how many doses the should be give can be found at JCVI <u>COVID-19 vaccination of children - GOV.UK (www.gov.uk).</u>

### 5. Assessing for compatibility against the UNCRC requirements UNCRC Articles

# What impact does/will your relevant proposal have on children's rights (Please tick positive, negative or neutral)

	Positive   Ne	egative	Neutral
Article 1 Definition of the child	$\boxtimes$		
Article 2 Non-discrimination	$\boxtimes$		
Article 3 Best interests of the child	$\boxtimes$		
Article 4 Implementation of the Convention	$\boxtimes$		
Article 5 Parental guidance and a child's evolving capacity	ities 🖂		
Article 6 Life, survival and development	$\boxtimes$		
Article 7 Birth registration, name, nationality, care			$\boxtimes$
Article 8 Protection and preservation of identity			$\boxtimes$
Article 9 Separation from parents			$\boxtimes$
Article 10 Family reunification			$\boxtimes$
Article 11 Abduction and non-return of children			$\boxtimes$
Article 12 Respect for the views of the child	$\boxtimes$		
Article 13 Freedom of expression	$\boxtimes$		
Article 14 Freedom of thought, belief and religion	$\boxtimes$		
Article 15 Freedom of association	$\boxtimes$		
Article 16 Right to privacy			$\boxtimes$
Article 17 Access to information from the media	$\boxtimes$		
Article 18 Parental responsibilities and state assistance	$\boxtimes$		
Article 19 Protection from violence, abuse and neglect			$\boxtimes$
Article 20 Children unable to live with their family			$\boxtimes$
Article 21 Adoption			$\boxtimes$

	Version 4 February 2023		
Article 22 Refugee children	$\boxtimes$		
Article 23 Children with a disability	$\boxtimes$		
Article 24 Health and health services	$\boxtimes$		
Article 25 Review of treatment in care			$\boxtimes$
Article 26 Social security			$\boxtimes$
Article 27 Adequate standard of living			$\boxtimes$
Article 28 Right to education	$\boxtimes$		
Article 29 Goals of education			$\boxtimes$
Article 30 Children from minority or indigenous groups	$\boxtimes$		
Article 31 Leisure, play and culture			$\boxtimes$
Article 32 Child labour			$\boxtimes$
Article 33 Drug abuse			$\boxtimes$
Article 34 Sexual exploitation			$\boxtimes$
Article 35 Abduction, sale and trafficking			$\boxtimes$
Article 36 Other forms of exploitation			$\boxtimes$
Article 37 Inhumane treatment and detention			$\boxtimes$
Article 38 War and armed conflicts			$\boxtimes$
Article 39 Recovery from trauma and reintegration			$\boxtimes$
Article 40 Juvenile justice			$\boxtimes$
Article 41 Respect for higher national standards			$\boxtimes$
Article 42 Knowledge of rights	$\boxtimes$		

#### 6. Impact on children and young people

This impact assessment considers the impacts to children's rights and wellbeing in relation to the COVID-19 and Seasonal Influenza vaccination policy and programme implemented throughout Scotland.

The assessment considers all children and young people, while specifically highlighting implications for children and young people who may be at greater clinical risk from a COVID-19 and Seasonal Influenza infections. This includes those with

underlying health conditions, and examines what steps have been taken to mitigate the impacts for these groups.

Assessment of the vaccination policy conveys an overall positive impact on the United Nations' Convention on the Rights of the Child (UNCRC) for all children and young people.

#### 7. Negative Impact/Incompatibility

No negative impact of the policy has been identified. However, just as with any medical product COVID-19 vaccination may, on rare occasions, result in adverse events.

The Medicines and Healthcare products Regulatory Agency (MHRA) is the organisation that is responsible for the authorisation and safety monitoring of vaccines. The MHRA keep the safety of all vaccines under close and continual review and Ministers will immediately take appropriate action if new evidence emerges which called into question the safety of any vaccines currently in use in Scotland. In addition to making the approval for safety and publishing known side effects of COVID-19 vaccines, the MHRA provides continual monitoring of any new or suspected new adverse reactions. This is done through the <u>Yellow Card Scheme</u> which can be used to report side effects.

As with all other vaccinations in Scotland, COVID-19 and flu vaccines are not mandatory and as mentioned earlier in the document, we have worked with PHS to ensure that both parents and children are aware of the informed consent process when it comes to vaccinations.

No negative impact of the policy has been identified in relation to the Seasonal Influenza offer as there is an alternative for those who cannot receive the nasal spray, or do not want it for religious or philosophical beliefs.

### 8. Options for modification or mitigation of negative impact or incompatibility

What options have been considered to modify the existing legislation or decision or relevant proposal in order to mitigate negative impact or potential incompatibility issues?

Please summarise mitigation actions taken in the below table:

#### Mitigation table

Issue or risk Identified per article/ Optional Protocol	Action Taken/ To Be Taken	Date action to be taken or was taken
Article 6 Life, survival and development Article 24 Health and health services COVID-19 vaccination safety and side effects	The MHRA keep the safety of all vaccines under close and continual review and Ministers will immediately take appropriate action if new evidence emerges which called into question the safety of any vaccines currently in use in Scotland	Ongoing
Article 12 Respect for the views of the child Article 24 Health and health services Article 42 Knowledge of rights Lack of informed choice / consent	PHS develops a range of informed consent materials to support parents, carers and children to understand the benefits and risks of vaccination and make a decision about receiving it. Vaccination staff are also trained to answer questions and explain about vaccines and will engage with every patient's individual needs. Patient's of all ages will have their decisions regarding vaccination respected.	Ongoing
Article 14 Freedom of thought, belief and religion Article 24 Health and health services Choice of alternative vaccine, where available, due to religious or philosophical beliefs	An alternative vaccine is available for those who cannot receive the nasal spray, or do not want it for religious or philosophical beliefs.	Ongoing

Article 24 Health and health services Children who are not eligible for COVID-19 or flu vaccination	We follow the independent advice of the JCVI regarding eligible cohorts in Scotland. This advice is based on clinical and cost effectiveness rationale. Some children are not eligible for COVID-19 vaccination however patients aged 12 and above may now be able to purchase a private COVID-19 vaccines from some pharmacies.	Ongoing

# 9. Positive impact: Giving better or further effect to children's rights in Scotland

The Scottish Government has made it clear that children and young people and their parents, will be supported in their decisions and will not be stigmatised, whatever decision they reach on the vaccination offer. Individual choice will be respected.

The impact assessment found that overall the vaccination policy will have a positive impact, as it will help mitigate both the health and wider social harms that children and young people have experienced throughout the pandemic and will help support Scotland's intent of managing and living safely with COVID-19.

There is a strong recognition that play and social interactions, with friends and wider family, plays a key role in optimising children's development and wider wellbeing.

Children and people have been severely impacted by the COVID-19 pandemic with normal educational, cultural, sporting and social activities.

Therefore, the vaccination of children and young people supports the Scottish Government's efforts to return to a more normal way of living and should help prevent more restrictive measures, such as lockdowns, being put into place in the future.

# 10. Impact on Wellbeing: does or will the relevant proposal contribute to the wellbeing of children and young people in Scotland?

Wellbeing Indicator	Will there be an improvement in wellbeing in relation to this indicator: yes/no
<b>Safe</b> - Growing up in an environment where a child or young person feels secure, nurtured, listened to and enabled to develop to their full potential. This includes freedom from abuse or neglect.	Yes
<b>Healthy</b> - Having the highest attainable standards of physical and mental health, access to suitable healthcare, and support in learning to make healthy and safe choices.	Yes
<b>Achieving</b> - Being supported and guided in learning and in the development of skills, confidence and self-esteem, at home, in school and in the community.	Yes
<b>Nurtured</b> - Growing, developing and being cared for in an environment which provides the physical and emotional security, compassion and warmth necessary for healthy growth and to develop resilience and a positive identity.	Yes
Active - Having opportunities to take part in activities such as play, recreation and sport, which contribute to healthy growth and development, at home, in school and in the community.	Yes
<b>Respected</b> - Being involved in and having their voices heard in decisions that affect their life, with support where appropriate.	Yes
<b>Responsible</b> - Having opportunities and encouragement to play active and responsible roles at home, in school and in the community, and where necessary, having appropriate guidance and supervision.	Yes
<b>Included</b> - Having help to overcome inequalities and being accepted as part of their family, school and community.	Yes

#### Post Assessment Review and sign-off

#### 11. Communicating impact to children and young people

How will you communicate to children and young people the impact that the relevant proposal is having or will have on their rights?

We will reach out to the organisations that we engaged with during this process, to communicate the impact of the policy on children. We will work with Public Health Scotland (PHS) to continue our engagement with parents and young children and another CRWIA will be produced for 2024/25.

Are you publishing a child-friendly or accessible CRWIA?

Children will be able to access this CRWIA under the supervision of their parents and carers should they wish as it will be published on the Scottish Government website.

#### 12. Planning for the review of impact on child rights

The JCVI will continue to review data on the potential benefits and risks of vaccination of children and young people.

As ever, we will continue to deliver vaccines in line with the advice received from the JCVI and should the JCVI make further recommendations for vaccination for this group, we stand ready to implement any advice as soon as possible.

As this assessment is dependent on the advice of the JCVI, which is subject to change, we will review this document next year when we receive advice from JCVI on the winter COVID-19 and flu programme and any changes will be communicated through a separate CRWIA for 2024-2025.

#### Compatibility sign off statement

This relevant proposal has been assessed against the UNCRC requirements and has been found to be compatible.

Policy Lead Signature & Date of Sign Off: Peggy Winford; 04 April 2024

Deputy Director Signature & Date of Sign Off: Dr ST Cuthbert-Kerr, Deputy Director for Public Health Capabilities, 4 April 2024

SGLD Sign Off: Yes 🛛 No 🗌



© Crown copyright 2024

### OGL

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit **nationalarchives.gov.uk/doc/open-government-licence/version/3** or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: **psi@nationalarchives.gsi.gov.uk**.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.scot

Any enquiries regarding this publication should be sent to us at

The Scottish Government St Andrew's House Edinburgh EH1 3DG

ISBN: 978-1-83601-197-2 (web only)

Published by The Scottish Government, May 2024

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA PPDAS1449778 (05/24)

www.gov.scot