



Llywodraeth Cymru  
Welsh Government

ATISN 15466

23 September 2021

Dear

### **ATISN 15466 – VACCINATION FOR 16-17 YEAR OLDS**

Thank you for your request to the Welsh Government for information under the Freedom of Information Act (2000) received on 27 August. You requested the following -

*(a) the reasoned scientific basis/evidence held by the Welsh Government, that shows why 16-17 year olds and younger should be vaccinated. Put another way, if Welsh Government accepts JCVI or similar recommendations, what does Welsh Government, specifically, aim to achieve through such support and, by its very nature, encouragement of teenagers to be vaccinated?*

*(b) the legal advice to Welsh Government, where such release is clearly in the very wider public interest, as to parental consent that may or may not be required for children as young as 12 to be vaccinated.*

### **Response**

On Q1, The Welsh Government has accepted the advice provided by the JCVI on the 4th August regarding the vaccination of 16 and 17 year olds. The evidence considered by the JCVI is published alongside this advice, accessible via this link:

<https://www.gov.uk/government/publications/jcvi-statement-august-2021-covid-19-vaccination-of-children-and-young-people-aged-12-to-17-years/jcvi-statement-on-covid-19-vaccination-of-children-and-young-people-aged-12-to-17-years-4-august-2021>

In September 2021, the JCVI advised that for children and young people aged 12-15 without underlying health conditions, the individual health benefits from vaccination are slightly greater than the potential known harms, but that the margin of benefit, is considered too small to recommend a universal programme of vaccination. The Committee was of the view there were wider issues outside their remit to evaluate, for example, education and

mental health issues, on which they recommended the 4 UK CMOs were best placed to advise.

After careful consideration, further informed by independent senior clinical and public health input from across the UK, the CMOs recommended on public health grounds that all children and young people aged 12-15, not already covered by existing JCVI advice, should be offered a first dose of Pfizer-BioNTech COVID-19 vaccine. A link to their advice and the evidence considered is attached:

[Universal vaccination of children and young people aged 12 to 15 years against COVID-19 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/universal-vaccination-of-children-and-young-people-aged-12-to-15-years-against-covid-19)

It was felt the additional likely benefits of reducing educational disruption and the resulting reduction in public health harm provided enough extra advantage to recommend in favour of vaccinating this group. In addition, there was a small advantage at an individual level as already identified by the JCVI. The Welsh Government has accepted this advice.

On Q2, Under 16s are not automatically presumed to be legally competent to make decisions about their healthcare, including whether they should be given the COVID-19 vaccine.

For those under 16 years of age, consent to vaccination is sought from a person with parental responsibility. Consent is only needed from one person with parental responsibility as long as there is no dispute about vaccination with any other parent responsible for that child or another person "in loco parentis" where a decision by the courts may be needed.

In situations where young people and parents are not agreed about the benefits of the vaccine, we would follow the law and best practice on respecting children's rights and parental responsibility. This might include individual clinical discussions and documentation of Gillick competence, as appropriate, which is standard practice in other vaccine administration.

Advice for health professionals on consent can be found in the Green Book, chapter 2; Consent.

[Consent: the green book, chapter 2 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/green-book-2020/green-book-2020-chapter-2-consent)

## **Next Steps**

The request you sent me contains personal information about you - for example, your name and address. The Welsh Government will be the data processor for this information and, in accordance with the General Data Protection Regulation, it will be processed in order to fulfil our public task and meet our legal obligations under the Act to provide you with a response.

We will only use this personal information to deal with your request and any matters which arise as a result of it. We will keep your personal information and all other information relating to your request for three years from the date on which your request is finally closed. Your personal information will then be disposed of securely.

Under data protection legislation, you have the right:

- to be informed of the personal data we hold about you and to access it

- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection

For further information about the information which the Welsh Government holds and its use, or if you wish to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer  
Welsh Government  
Cathays Park  
CARDIFF  
CF10 3NQ  
Email: [DataProtectionOfficer@gov.wales](mailto:DataProtectionOfficer@gov.wales)

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,  
Welsh Government,  
Cathays Park,  
Cardiff,  
CF10 3NQ  
Email: [Freedom.of.information@gov.wales](mailto:Freedom.of.information@gov.wales)

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire,  
SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process

Yours sincerely,