

11 March 2022

s 9(2)(a)

By email: s 9(2)(a)  
Ref: H202200791

Tēnā koe s 9(2)(a)

### Response to your request for official information

Thank you for your request under the Official Information Act 1982 (the Act) to the Ministry of Health (the Ministry) on 1 February 2022 for information regarding the use of My Vaccine Pass within New Zealand:

*Can you please outline the current strategy at 26 Jan 2022 (and related operational processes in place) to identify the potential risk of multiple people using the COVID Vaccine Pass of one citizen fraudulently?*

*A few specific questions also, thanks:*

- Does the NZ Pass Verifier app report location check-in data back to the government for monitoring purposes and to identify outliers? (e.g. x restaurant had x number of people check-in on this night of the week)*
- What action is taken to investigate further if it is identified that an establishment that is mandated to require a Vaccine Pass has an abnormally low number of NZ Pass Verification check-ins*
- Is there currently any monitoring or analytics in place to report incidences of the same COVID ID being used to check in to different geo locations within very short time periods - e.g. is time and location data reported to identify if the same COVID Vaccine Pass was used to check-in at two locations within a time frame that is physically impossible to achieve (e.g. Tauranga and Auckland within a 10 minute time frame)*
- What is the current penalty for fraudulently using another person's COVID Vaccine Pass.*

We are aware that people can share copies of their My Vaccine Pass. As is the case for similar official documents, we operate in a high trust model – this serves us well in many areas, including the electoral system. People checking My Vaccine Passes can ask for photo identification when verifying a pass to match the person's name and date of birth.

When a pass is scanned, an anonymous analytics event is reported, noting that a pass has been scanned. This report does not contain information about the pass itself, the person the pass was issued to, the business or organisation scanning the pass, or where the scan occurred. These analytics events are aggregated and used to provide general reporting on the daily usage of the verifier app, similar to the reporting that is done for NZ COVID Tracer app. This is a deliberate design decision to protect the privacy of people using the passes to enter venues under the COVID Protection Framework.

Individuals or businesses who suspect fraudulent use of a Vaccine Pass, or non-compliance with Vaccine Pass requirements, may wish to report this. This can be done by going to: <https://covid19.govt.nz/news-and-data/report-a-breach/>

This information is then passed on to the relevant enforcement agency: the New Zealand Police, WorkSafe New Zealand, the Ministry of Health or the Ministry of Business, Innovation and Employment.

There is an offence for the misuse of COVID-19 Vaccination Certificates set out in the COVID-19 Public Health Response (COVID-19 Vaccination Certificate) Order 2021. You can find this under section 11 at: [www.legislation.govt.nz/regulation/public/2021/0382/latest/whole.html](http://www.legislation.govt.nz/regulation/public/2021/0382/latest/whole.html)

You can find information on the penalties for this offence under section 26 of the COVID-19 Public Health Response Act 2020, at: [www.legislation.govt.nz/act/public/2020/0012/latest/LMS344200.html](http://www.legislation.govt.nz/act/public/2020/0012/latest/LMS344200.html)

Under section 28(3) of the Act, you have the right to ask the Ombudsman to review any decisions made under this request. The Ombudsman may be contacted by email at: [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz) or by calling 0800 802 602.

Please note that this response, with your personal details removed, may be published on the Ministry website at: [www.health.govt.nz/about-ministry/information-releases/responses-official-information-act-requests](http://www.health.govt.nz/about-ministry/information-releases/responses-official-information-act-requests).

Nāku noa, nā



Astrid Koornneef  
**Director**  
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