

# **Post Office and the then Food and Health Bureau's implementation of declaration of non-local COVID-19 vaccination records at designated post offices Investigation Report**

On 6 May 2022, a Complainant complained to this Office against the Post Office ("PO"). We later confirmed with the Complainant that PO and the then Food and Health Bureau ("FHB")<sup>1</sup> were both under complaint.

## **The Complaint**

2. Allegedly, the Complainant would like to declare his non-local COVID-19 vaccination records ("the declaration") at designated post offices to obtain vaccination record QR code for use to enter specified premises. The Complainant repeatedly failed to get a same-day ticket at post offices for the declaration due to the high demand of this service. On 5 May, the Complainant finally managed to get a same-day ticket at the General Post Office. Against this background, the Complainant complained against PO for failing to deploy sufficient resources to deal with large amount of applications for the declaration. The Complainant also criticised that the daily quota at designated post offices was unreasonable and questioned the necessity to complete the declaration face-to-face as staff of PO would not be able to verify the validity of non-local COVID-19 vaccination records anyway.

## **Our Investigation Findings**

### ***PO's Response***

3. To facilitate the public to turn their non-local vaccination paper form records into an electronic format for local use, individuals can register their non-local vaccination records with the Government by online declaration or at the Port of Entry and Exit for obtaining a vaccination QR code for local use starting from 15 September 2021. To assist those who are unable to make the online declaration or have not declared at control points ("CPs"), FHB commissioned PO to provide the registration service at 18 designated post offices. This is an agency service whereby PO will act on FHB's guidelines in providing the registration service and on the basis that the provision of the agency service would not affect the normal postal services being provided to the public.

4. In the initial launch of the service, FHB estimated the monthly volume to be around 5,000. Considering the low estimated volume together with the layout and

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<sup>1</sup> Health Bureau ("HHB") has taken over relevant duties from the then FHB pursuant to the reorganisation of the Government Secretariat with effect from 1 July 2022.

staffing of the post offices, PO has obtained FHB's agreement to designate one post office in each district to provide the registration service. The 18 selected post offices are basically the larger post office in the district with some capacity to cater for the increase in workload.

5. The registration service undertaken at post offices has been running smoothly in the initial period and the traffic recorded was low. The upsurge of traffic was first observed in late January 2022 after the Government's announcement on 27 January of the immediate suspension of the online declaration platform by FHB and the implementation of first stage of Vaccine Pass on 24 February. To cope with the sudden increase in daily volume, which was about 2,400 per day around 10 February, PO requested FHB to consider relaunching the online registration platform and to provide any other alternative channels that could tackle the increasing demand. In view of the rising demand, FHB revised their traffic estimate on 10 February to around 30,000 per month (i.e. about 1,150 per day) from mid-March to April 2022 and around 10,000 per month in the remaining months until March 2023. The daily traffic subsequently dropped to below 1,000 per day in mid-February 2022. Another wave of traffic upsurge happened after the Government's announcement on 4 May regarding the arrangements of Provisional Vaccine Pass/non-local recovery record and the implementation of the third stage of Vaccine Pass on 31 May. Traffic then rose to over 2,000 per day in early May, which was much higher than FHB's estimation.

6. As part of PO's anti-epidemic measures in reducing social contact and avoid gathering of the crowds, FHB agreed to PO's setting of daily quota since 14 February. In view of the upsurge in demand in early May, the daily quota was increased to 2,400 in the first week of May and was further raised to 3,100 from 10 May. PO had also increased the number of service counters through internal deployment of over 20 staff to support the service.

7. To better manage the queuing arrangement, PO develop an online booking system which was launched on 18 May. Registrants could book up to 3 persons for each time slot in a single day for the coming 14 days. Such measure enabled the registrants to secure a timeslot without the hassle of queuing for a ticket at the post office and facilitated manpower planning. At the same time, FHB relaunched the online declaration platform on 20 May. The situation turned stable thereafter and only around 40% of the online quota was utilised in early June. PO would continue to monitor the demand and adjust the quota as well as the manpower resources suitably to enable the smooth running of the registration service.

### ***FHB/HHB's Response***

8. In September 2021, the Government implemented arrangement for members of the public to declare their non-local COVID-19 vaccination records, including (i) all inbound travelers who are subject to compulsory quarantine to declare via the online platform "Health & Quarantine Information Declaration". Officers at CPs would check

the proof of declared records when the traveler arrives at Hong Kong through air or land transport; (ii) inbound travelers already present in Hong Kong to declare through the online platform of “COVID-19 Vaccination Information Declaration”; and (iii) those who are unable to make declaration online to declare at the 18 designated post offices.

9. As announced in early January 2022, the Vaccine Pass arrangement would be implemented starting 24 February in three stages in all catering business and scheduled premises. With close monitoring of the service demand for declaration at the PO, FHB implemented the following measures at the designated post offices:

- (a) introducing a ticketing system at designated post offices since 14 February to avoid crowd gathering. The daily service quota was set at about 1,200 cases having regard to prevailing demand, and could be suitably adjusted by the designated post offices according to the actual situation;
- (b) streamlining the workflow at the POs to shorten processing time with effect from 16 February; and
- (c) updating the explanatory note accompanying the QR code issued at CPs to state clearly that holders of the QR code (which has been issued to the majority of inbound travelers at CPs since September 2021) do not need to declare again at the POs.

10. FHB explained that the demand for declaration of non-local vaccination records remained very stable from September 2021 to January 2022. Such demand could be tackled by the CPs or post offices, which conduct in-person checking on the factual accuracy of the information declared. For view of this, the online declaration platform was suspended in the end of January 2022. The monthly figures of declaration services provided by PO and the online platform are as follow:

Month	No of Declaration Service Requests at POs				No of vaccination record QR codes issued via online platform	% increase from previous month
	Inputting and printing	% increase from previous month	Printing only	% increase from previous month		
15 Sep – Oct 2021	209	--	165	--	3,879	--
Nov 2021	154	--	138	--	3,040	--
Dec 2021	377	145%	127	-8%	7,009	131%
Jan 2022	3,974	954%	338	166%	16,090	130%

11. On 4 May 2022, the Government announced the arrangement for inbound travelers to obtain a Provisional Vaccine Pass and for persons who have recovered from COVID-19 infection in places outside Hong Kong to declare their non-local recovery record for obtaining a recovery record QR code. The announcement, with the reminder that the third stage of the Vaccine Pass would commence on 31 May, induced a rapid upsurge in service demand at the designated post offices in early May, which was mainly due to the bunching up of people. FHB observed that a good proportion of the service requests were from individuals who entered Hong Kong quite some time ago but had yet to make their declaration despite the ample time given. PO had taken actions to increase the daily quota and introduced an online booking system, but it was anticipated that such measures would unlikely meet the much higher demand anticipated. Balancing the need for in-persons checking against the unfortunate fact that the POs apparently could not cope with the demand surge, the Government also announced on 5 May to (i) re-introduce the revamped online platform and (ii) reiterate the transitional arrangement under the Vaccine Pass whereby persons who had received COVID-19 vaccines from places outside Hong Kong may directly present their non-local vaccination records and complete the specified form (if applicable). With the new arrangements, the declaration service at designated post offices could hopefully catch up with the demand.

12. As for the Complainant's case, FHB/HHB noted from the Complainant's information that he took two doses of COVID-19 vaccine in the Mainland in 2021 and returned to Hong Kong in June 2021. As explained above, the Government has made announcements on declaration of non-local vaccination records as early as mid-September 2021 and the latest information was published through various publicity channels from time to time. Inbound travelers who have yet to obtain a QR code on their non-local vaccination records should have sufficient time to make the required declaration. The above arrangements (**paragraph 9 above**) coped well with the demand for declaration at designated post offices from February to April/early May 2022. That said, FHB/HHB acknowledge that near the commencement date (i.e. 30 April) of the second stage Vaccine Pass, the quota limit or long waiting times at the post offices during the peak periods might have caused inconvenience to members of the public.

13. The Government had made policy decisions at different points in time having regard to all relevant factors, including the projected and actual demand for declaration, the availability of channels for declaration, and the fact that in-person checking provided by designated post offices was generally preferred (where resources permitted) to give more credence to the declaration made by inbound travelers in complying with the Vaccine Bubble/Vaccine Pass regime. It was unfortunate that there was a sudden surge in overdue service demand in early May due to a couple of factors. Nevertheless, the Government had taken a prompt response in ramping up the capacity of designated post offices, and eventually relaunching the online platform to address the issue.

## Our Comments

14. We have examined relevant records and explanations provided by FHB/HHB and PO. In our investigation of the case, we are mindful of the different roles of the two parties in the matter. FHB/HHB oversees anti-epidemic efforts and policies in Hong Kong, which includes vaccination requirements and implementation of the Vaccine Pass. PO, on the other hand, serves as the service agent of FHB/HHB. To put things in perspective, we have also taken into account the changes in the Government's prevailing anti-epidemic policies in light of changes in outbreak situation.

15. PO started providing the service in September 2021. At that time, an online platform launched by FHB was available for inbound travelers to make such declaration while PO's role was to assist those who were unable to make such declaration online (**paragraphs 3 and 8**). The service operated smoothly until the first upsurge in late January 2022, following the Government's announcement in early January the implementation of Vaccine Pass and FHB's suspension of the online declaration platform in late January. As such, save for those who made declaration at CPs, PO had to meet all demand for making declarations. Service demand had a six-fold increase from the 5,000 per month (192 per day) as estimated by FHB in the beginning of the service to monthly traffic estimation of 30,000 (1,154 per day) from mid-March to April 2022. At its peak in early February, the actual daily traffic was around 2,400, which was more than ten times the original estimation. Against such background, it is not difficult to imagine the serious difficulties PO faced. We noted that PO had closely monitored the traffic and attempted measures to cope. PO also asked FHB for help by relaunching the online platform but unfortunately the request was turned down.

16. The second upsurge happened in May, when it was getting close to the implementation of the third stage of the Vaccine Pass. It was also the time when the Complainant attempted to secure a quota at post offices. The second upsurge saw daily traffic of around 2,000 in early May, which was again much higher than FHB's estimation. PO again increased daily quota in attempt to meet the service demand, and subsequently launched a booking service to facilitate queuing. It was not until 20 May that FHB relaunched the online platform, after which the situation in post offices finally improved.

17. We are of the view that PO was on the receiving end of something it could not plan for: it had no information on the potential number of non-local vaccinations to be declared; it had no control of the timing of Government's announcements and implementation of various stages of Vaccine Pass (which prompted people to declare) and the availability of other means for declaration (such as online declaration platform). As a service agent, PO had dutifully monitored the situation closely and liaised with FHB accordingly. When FHB turned down PO's suggestion of relaunching the online platform, all PO could do was to increase quota as far as practicable. We note that the daily quota was increased from 1,200 to 2,400 and eventually to 3,100. However, it was inevitably constrained by its service capacity, and it had to maintain the provision

of postal services, which is its core duty. In view of these, we consider that PO had, within its ambit, appropriately monitored the situation and taken appropriate follow up actions, including increasing quota and asking FHB to relaunch the online platform. While the increased quota might not be sufficient, there was no maladministration on the part of PO.

18. As for FHB/HHB, as the subject bureau for anti-epidemic policies and measures, we believe that it should have more information on potential demand for such declarations and the timing of announcements and implementation of various stages of Vaccine Pass. In respect of the means to be made available for people to make declaration, we expect that, in line with the Government's Smart Government initiative, a digital means would be provided as far as practicable irrespective of whether the demand for such service could be met otherwise. Even from the perspective of epidemic control, we doubt whether requiring people to make such declarations physically at post offices was in line with social distancing measures during the height of the fifth wave of outbreak. It is only logical that an online means be provided for as many services as possible such that people could stay at home and avoid crowding at any place.

19. Against such background, we find it rather perplexing for FHB to suspend the online declaration platform in late January when the Vaccine Pass was rolling out. We would examine the rationales for the suspension below:

- (a) HHB claimed that in-person checking provided by POs would increase the credence of the declaration. However, we do not find such explanation reasonable as the staff at POs did not have any special knowledge to verify non-local vaccination records anyway. Moreover, if FHB took this view, the online platform should not have been launched altogether. We would also like to point out that checking needs not be done in-person. FHB could require people making declaration online to submit copy of documents and conduct checking at the backend.
- (b) HHB claimed that the demand for declaration remained very stable from September 2021 to January 2022. Such claim was not supported by the figures which were increasing exponentially (**paragraph 10 above**).
- (c) We note from records provided by PO that in February 2022 FHB explained to PO that the online platform was suspended and could not be re-opened to prevent possible abuse of the system as it did not have any identity checking and this would create a serious loophole. We have the following comments and observations:
  - (i) This loophole existed from the very beginning when the platform was launched. While the Vaccine Pass was not in place

then, the Government did rely on the platform to implement certain measures under Vaccine Bubble which involved relaxing of social distancing measures based on a person's vaccination status, e.g., whether a restaurant could operate according to Type D mode of operation, whether a person can join a cruise journey. If the loophole needed to be plugged, it should have been done much earlier.

- (ii) This reason was not mentioned at all in HHB's replies to us. We would like to stress that this Office expects bureaus and departments to provide comprehensive information and response during inquiries and investigations.

20. HHB in its replies to us stressed repeatedly that sufficient lead time has been provided to allow for declaration before implementation of the Vaccine Pass. However, we think that there was no incentive and no urgency for people to make declaration about non-local vaccination until Government announced Vaccine Pass arrangements. The bunching effect was foreseeable and people should not be blamed for not making declaration earlier. On the other hand, the same cannot be said for the Government for preparing and providing sufficient and appropriate means for people to make such declarations: the Government introduced Vaccine Bubble back in April 2021 and launched the online platform in September 2021. And yet the Government failed to maintain the platform when the demand was highest.

21. Further, when PO requested FHB to consider relaunching the online platform in February, FHB refused the request. The online platform was finally relaunched in May. During the period, FHB solely rely on PO to process the declarations for those who had entered Hong Kong earlier. As it was foreseeable that there would be upsurge in demand for declaration in the run up towards the full implementation of Vaccine Pass, if FHB had critically assessed the situation and capacity of PO, it should not have relied solely on PO to handle all those demand. Running an online platform in parallel would be much more flexible, scalable and less physically constrained. We are of the view that FHB could have done better and should have at least relaunched the platform earlier.

22. Besides, comparison of FHB's estimations and actual situation showed huge discrepancy. While we appreciate that estimates are merely estimates, FHB's estimation seemed too wide off the mark and had resulted in an inadequate preparation and response.

23. On the whole, we are of the view that while the quota at post offices was inadequate to meet the upsurge in demand, we found no maladministration on the part of PO. As for FHB, we do not find its explanation for the need for face-to-face declaration at post offices reasonable. We find Complainant's situation attributable to the prolonged suspension of online declaration platform. We consider that FHB should have revamped the online platform sooner and reopened it earlier, so that it did not have

to rely solely on physical declaration at post offices. We urge HHB to learn from such experience and strive to make better use of information technology when new measures are planned and react more promptly when problems arise after implementation.

24. Overall, the Ombudsman considers the complaint against PO unsubstantiated while the complaint against the then FHB substantiated.

### **PO and HHB's Responses to Our Draft Investigation Report**

25. While PO indicated no comment on our draft investigation report, HHB reiterated the following:

- (a) The Government had made policy decisions at different points of time having due regard to all relevant factors, including the projected and actual demand for declaration, the availability of channels for declaration, and the fact that in-person checking provided by the post offices was generally preferred (where resources permitted) not only to give more credence to the declaration made by inbound travelers, but also to ensure the information is declared accurately and correctly in the declaration system, for complying with the Vaccine Bubble/Vaccine Pass regime.
- (b) Since the introduction of the voluntary declaration of non-local COVID-19 vaccination records through designated post offices in September 2021, the arrangement has served a pivotal role in assisting members of the public to declare their non-local vaccination records, as well as ensuring the integrity of the Vaccine Bubble/Vaccine Pass regime. So far, the arrangement remains essential to the Vaccine Pass framework, supporting a significant portion of non-local vaccination record declarations.
- (c) While it was unfortunate that there was a sudden surge in overdue service demand in early May 2022 due to a couple of factors, the Government has strived to project the demand for declaration as accurately as possible, considering the multitude of factors involved in affecting such demand. In response to the surge, the Government had taken a prompt response in ramping up the capacity of post offices in a matter of days, and enhancing the IT systems and relaunching the online platform to address the issue in just about 2 weeks' time.



## Our Concluding Remark

26. After considering HHB's response (**paragraph 25 above**), we maintain our stance in **paragraph 24** above, i.e., overall, the Ombudsman considers the complaint against PO unsubstantiated while the complaint against the then FHB substantiated.

**Office of The Ombudsman**  
**November 2022**

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