

Submission Concerning the Smart ID Card and the Registration of Persons

Amendment Bill

Submitted by Hong Kong Computer Society

1. Introduction

The introduction of a new smart identity (ID) card with multi-application capacity is a positive forward step for Hong Kong.

The information technology industry and professionals in Hong Kong welcome the integration of digital certificate, driving licence, library card and change of address function into a single card. We believe that this approach can provide a number of benefits and advantages.

2. Benefits to Hong Kong

a) Provide convenience for citizens

Hong Kong citizens will only need to carry one card and able to access multiple services.

b) Enable and promote eCommerce adoption

The ability to perform electronic transactions securely is of paramount importance in e-business. The smart ID card will make it much more easy and convenient for members of public to obtain a digital certificate (e-Cert), which serves as an “electronic-ID” of the user, for authentication of the identity of the parties involved and for ensuring integrity, confidentiality, and non-repudiation of the data transmitted in an electronic transaction.

With wider promulgation of e-Certs, the members of the public can enjoy most if not all public services, banking services, financial services, equity trading, and other electronic transactions.

The Government should not miss this golden opportunity to expand e-Certs to the public in a very effective manner. This will enable the creation of the necessary infrastructure to enable and promote e-business, secure authentication, transmissions and transactions over the Internet.

We believe that this will facilitate active business trading and enhance economical development, at the same time contribute to making Hong Kong a digital hub in the region.

At this point of time, we do not see the need to make the e-ID card an electronic purse, as there are already alternatives widely available.

c) Improve efficiency and productivity

As the public can conduct most of the transactions using self service functions via Internet, productivity and efficiency in public service provision can be greatly improved with significant cost savings in operations.

3. Amendments to ROP Ordinance

As the physical form factor, data retained and printed, and associated processes of the smart ID card differ from that of the existing ID card, appropriate amendments are needed for the ROP Ordinance in order to provide the framework for various characteristics of the card.

The information technology sector supports in principle the amendments, but would like to put forward the following comments:

- a) Clause 7 may need to make provision for digitally/electronically transfer of data.
- b) Clause 12(1A) may need to include unlawful or unauthorised retrieval of data stored in a chip.
- c) Schedule 2, item 2 regulation 12 (1A) may need to include alteration or manipulation of data stored.

4. Concerns

As there are still concerns on the matter of privacy, proper segregation of systems, data, and applications, definition of ownership, introduction of appropriate access control, audit trail, checking by backend systems, partitioning of chip, should be implemented. Rigorous assessments should also be conducted in order to address the concerns.

On the matter of voluntary use of smart ID card for non-immigration users, it is appropriate to provide this as an option.