

Submission from Andrew Watkins, PricewaterhouseCoopers, to the Bills Committee on the Registration of Persons (Amendment) Bill 2001

The Government's innovative plan to introduce a new smart identity (ID) card is considered by many to be a 'natural fit' in relation to the adoption and usage of smart card technologies. In addition to its primary use, this technology solution also provides the potential for additional efficiency and lifestyle benefits - to both the Government and the citizens of Hong Kong - as additional applications and uses are considered in the future.

As with the introduction of any new technology, it is important that privacy and security risks and concerns be addressed. To build public confidence and trust that this has been achieved, appropriate measures need to be taken at various levels: Within the underlying technology and system design (particularly through the use of advanced technologies to address privacy risks), throughout the surrounding operational practices and procedures, through effective communication, and by the introduction or adaptation of associated policies and relevant legal frameworks. The ROP (Amendment) Bill 2001 seeks to address the later of these requirements, and the introduction of its key legislative amendments will be an important step towards the achievement of the Government's vision for a multi-application smart identity card.

We understand that the Government has taken proactive steps to consult the Privacy Commissioner for Personal Data and engaged independent privacy experts to conduct Privacy Impact Assessments on the smart ID card scheme. We look forward to the necessary steps being taken to amend the legislation to address the new privacy risks and requirements posed by the introduction of the new scheme and the associated technologies, particularly in relation to safeguarding the privacy and security of personal data.

On a final note, we recognise that anticipating the impact that continued technological change and development (in general) will present from a legislative perspective is a significant challenge. It seems highly likely that further changes will be required over time to cater for new and emerging risks, opportunities, and initiatives. A considered, consultative and flexible approach to addressing these issues should hopefully enable a reasonable and effective balance to be achieved between the extent and frequency of legislative change and the ability to react to and support technological innovation and advancement in the Hong Kong SAR.

We look forward to the successful introduction of the smart ID card scheme.