In respond to the "Report on Leakage of Personal Data" prepared by the Independent Police Complaints Council (IPCC), Internet Professional Association would like to provide the following submission to the Panel to help the discussion of Honorable Councilors:

1. Data security is always a top priority in the I.T. industry. Nearly all I.T. systems have different level of security control by design. It's the user decision whether to turn on the security control. Commonly used security tool includes: password control, access control by location (I.P address), data encryption, virtual network for safe transfer (Virtual Private Network), etc.

2. Major IT contractor have internal process on information security. Commonly used international standard include COBIT and ISO17799. These information security standards provide a very useful guideline for both I.T. contractor and organizations to develop an internal control process which fit their need of security level.

3. For different level of information security requirement, I.T. contractors can use different kind of technology and process to implement. These are some of the real example for I.T. project for reference.

- A local bank decides to outsource cheque clearing operation to an I.T. contractor in China. All cheques are scanned in a dedicated machine in the bank's Hong Kong office and send to the the I.T. contractor's China office through a Virtual Private Network (VPN). All files received in China office will process within 24 hours and the files will be deleted from the systems automatically by a time checking software. All machines in China offices can only connected to the VPN, but not the public Internet.

- A local information companies decides to build a searchable archive for both current and historical data. Old data need to be scanned and input to the system. More recent data need to do format conversion. The information companies employed an I.T. contractor by in-sourcing a technical team to develop the

software within their office. And the I.T. contractor also needs to install the scanners in the information company's office on rental basis.

4. As can be illustrated from the above examples, I.T. contractor can implement the system in different security level. It's the customers' choice to decide on what level of security they required. I.T. contractor can provide professional advice while the ultimate decision still relied on the customers.

We agree very much with the suggestion made by IPCC that "The awareness of staff members of the IPCC Secretariat in data protection when using IT to process personal data should be enhanced." (p.17). iProA is now working with the Office of the Privacy Commissioner for Personal Data (PCO) and other I.T. associations including Hong Kong Institution of Engineers and ISACA Hong Kong Chapter to promote and educate the awareness of information security to both the general public and corporations. We believe that if the information security awareness can be improved, most of the data leakage incident can be avoided.

In conclusion, the latest advancement of I.T. system has created a new loophole for data leakage, which usually will have a much server impact that traditional paper-based leakage. The I.T. industry has already built in enough security measure in most systems to protect the data and information. A higher level of effort should be made to educate the government, quasi-government and business sectors (both SME and large corporations) to make better use of the information security technology.

Ringo Lam
Policy Committee Chairman
Internet Professional Association
3 May 2006