
	Hong Kong Institute of Clinical Psychologists Limited 香港臨床心理學家公會有限公司	Document No.	HKICP-ADM-PO-005-R0
	Information Management and Information Security Policy of Hong Kong Institute of Clinical Psychologists Limited	Issue Date	24/04/2023
		Review Date	24/04/2026
		Approved by	Board of Directors
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Information Management and Information Security Policy of Hong Kong Institute of Clinical Psychologists Limited

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(Distribution list: This Policy should be read by all staff and members of HKICP, Professional Council and its committees, and the general public.)


1. Objective

This policy document describes the direction of information management and support for information security in accordance with the legal requirements of Hong Kong. Its aim is to define the security requirements for the proper and secure use of Information and to protect personal data against security threats, to the maximum possible extent.

2. Policy Statement

HKICP is committed to preserving the security of data processed in our information systems, with respect to its collection, use, storage (all media), access, extraction, transmission and disposal, and ensuring that personal information:

- 2.1 be properly safeguarded to maintain confidentiality, integrity and availability;
- 2.2 be protected according to the Personal Data (Privacy) Ordinance which has laid down the following data protection principles:
 - 2.2.1 Personal data should be obtained and processed lawfully and fairly.
 - 2.2.2 Personal data should be accurate, up-to-date and kept no longer than necessary.
 - 2.2.3 Personal data should be used for the purposes for which they were collected.
 - 2.2.4 Appropriate security measures should be applied to personal data.
 - 2.2.5 Information regarding personal data should be generally available.
 - 2.2.6 Provide channels for data subjects to have rights of access to and correction of their personal data.
- 2.3 be accessed in a need-to-know basis only.


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3. Scope

- 3.1 This policy applies to all Directors, members of Professional Council and its committees, and staff who are involved in handling and processing personal data of HKICP.
- 3.2 This policy covers all information systems, networks, applications and locations of HKICP.
- 3.3 This policy covers information in the form of documents, email, voice messages, memo, minutes, audio-visual materials and business system data.
- 3.4 This policy also covers all business applications used to create, manage and store information including the official information management systems, email, websites, social media applications, databases and operational information systems.

4. Information Management and Relevant Legislation


- 4.1 HKICP is obliged to abide by all relevant Hong Kong legislation regarding handling of personal data and information.
- 4.2 The requirement to comply with legislation shall be devolved to all employees and agents of HKICP, who may be held personally accountable for any breaches of information security for which they may be held responsible.
- 4.3 To provide a clear guidance to staff and members concerned, HKICP has drafted a Guideline on Information Management and information Security (HKICP document HKICP-ADM-GL-006-) in accordance with the relevant captions of legislation below:
 - 4.3.1 Personal Data (Privacy) Ordinance (Cap.486) - e.g. timely destruction of personal data in accordance with Privacy Commissioner Office's Code of Practice on Human Resource Management;
 - 4.3.2 Electronic Transactions Ordinance (Cap.553) - e.g. admissibility of electronic records in a court of law;
 - 4.3.3 Code on Access to Information - e.g. proper organization of records to facilitate their efficient retrieval to timely respond to public access requests;
 - 4.3.4 Computer Crimes Ordinance [Telecommunications Ordinance (Cap. 106), Crimes Ordinance (Cap. 200) and Theft Ordinance (Cap. 210)];

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- 4.3.5 Unsolicited Electronic Messages Ordinance (Cap. 593);
- 4.3.6 Limitation Ordinance (Cap.347) - e.g. retention of relevant records for the specified limitation periods to serve as evidence in possible legal proceedings;
- 4.3.7 Evidence Ordinance (Cap. 8) - e.g. proper keeping of records to ensure its legal admissibility;
- 4.3.8 Copyright Ordinances [Trade Marks Ordinance (Cap. 559), Patents Ordinance (Cap. 514), Registered Designs Ordinance (Cap. 522), Copyright Ordinance as amended by Intellectual Property (Miscellaneous Amendments) Ordinance 2000 (Cap. 528), Copyright (Suspension of Amendments) Ordinance 2001 (Cap. 568), Prevention of Copyright Piracy Ordinance (Cap. 544), Lay-out Design (Topography) of Integrated Circuits Ordinance (Cap. 445)].

5. Reference Documents

- 5.1 Personal Data (Privacy) Ordinance (Cap.486) - e.g. timely destruction of personal data in accordance with Privacy Commissioner Office's Code of Practice on Human Resource Management; https://www.pcpd.org.hk/english/data_privacy_law/ordinance_at_a_Glan ce/ordinance.html. Accessed on 24 April, 2023.
- 5.2 Electronic Transactions Ordinance (Cap.553) - e.g. admissibility of electronic records in a court of law; <https://www.elegislation.gov.hk/hk/cap553!en>. Accessed on 24 April, 2023.
- 5.3 Code on Access to Information - e.g. proper organization of records to facilitate their efficient retrieval to timely respond to public access requests. <http://www.access.gov.hk/en/home/index.html>. Accessed on 24 April, 2023.
- 5.4 Limitation Ordinance (Cap.347) - e.g. retention of relevant records for the specified limitation periods to serve as evidence in possible legal proceedings; <https://www.elegislation.gov.hk/hk/cap347>. Accessed on 24 April, 2023.
- 5.5 Evidence Ordinance (Cap. 8) – e.g. proper keeping of records to ensure its legal <https://www.elegislation.gov.hk/hk/cap8!en>. Accessed on 24 April, 2023.

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- 5.6 InfoSec Website Government of HKSAR
<https://www.infosec.gov.hk/en/>. Accessed on 24 April, 2023.
- 5.7 HA's Policy on Information Security and Privacy (ITCir1-2009)
- 5.8 Government Records Services
<https://www.grs.gov.hk/en/>. Accessed on 24 April, 2023.
- 5.9 Copyright ordinance
<https://www.elegislation.gov.hk/hk/cap528>. Accessed on 24 April, 2023.