

Feedback on SOA-QPS Review

To: soaqps_review@ogcio.gov.hk

From: Norman PAN (Managing Consultant, Doctor A Security Systems (HK) Ltd.)

Dear Mr. YEUNG,

Please find our feedback on SOA-QPS Review with reference to the relevant clauses of the SOA-QPS review.

23. We welcome views from the industry on the categorization of services and contractors, and the grouping of contractors within service categories. Suggestions with supporting reasons will be most appreciated.

For Service Category 4 – Information security services, we propose:

- a) to merge Minor Works Group and Major Work Group

RATIONALE:

- 1) We did not perceive any relevance to the skill sets required to conduct the services for Service Category 4 - IT Security Services with reference to the criteria for the “High Risk” and/or “Mission Critical” criteria in the current SOAQPS arrangement. The type of services required for Major and Minor group was almost the same, the only difference was the requirement of independent quality review for Major Works Group. However, this requirement was also available in many of the work assignment briefs for the Minor Works Group. There was no difference with reference to the service requirement!
- 2) With reference to the average amount of the awarded work assignment briefs in the Service Category 4, including both Major Works Group and Minor Works Group, the risk to the Government should be low.
- 3) As a contractor in the Service Category 4 of the SOAQPS, we have been providing IT Security Audit and Security Monitoring services to customers in Non-Government sector with satisfaction. Most of these contracts exceeded HKD260,000, and if according to the SOAQPS criteria, most of these projects should be classified as “High Risk” and/or “Mission Critical”. Fortunately, our customers in Non-Government sector did not have

this kind of criteria. The criteria of “High Risk” and/or “Mission Critical”, “Major Works Group” and “Minor Works Group” in SOAQPS deprived contractors in the Service Category 4 Minor Works Group (most of them were local Hong Kong SME IT service providers) a chance to bid in those work assignments for the HKSAR Government B/Ds, even with modest amount of contract value.

- 4) If the arrangement for the “Major Works Group” and “Minor Works Group” is to be retained, the maximum amount of the contract value for the Work Assignment for the “Minor Works Group” should be the same as the “Major Works Group”.

b) to break into two service types:

- (i) Type 1 – IT Security Audit, Security Management Design and Implementation, Incident Response; and
- (ii) Type 2 – IT Security Monitoring Services

RATIONALE:

The Contractors required to providing the above Type 1 and Type 2 services should possess very different skill-sets and capabilities.

Type 1 are one time services to be provided by consultants or auditors; and

Type 2 are services to be provided by Security Operation Center(s) (SOC) with highly trained staffs and heavy investment in equipment, running at 7x24.

In the existing SOAQPS arrangement, many of these contractors providing highly professional IT Security Audit services could not participate in bidding the SOAQPS, due to they did not have the SOC required for the Type 2 services.

The segregation of the Type 1 and Type 2 services should attract the best contractors specialized in providing service of Type 1 and/or Type 2 services.

- c) Contractors in other Service Category should not be allowed to bid in the IT Security Audit service type

RATIONALE:

The contractors in other Service Category should not be allowed to bid in the IT Security Audit services in the Service Category 4, due to the avoidance of conflict of interest, including:

- (a) The independence of these contractors providing other services (previously and/or in future) would be difficult to maintain; and
- (b) Competitors of these contractors in other Service Categories would have serious concern if pricing, proprietary design and methodology were reviewed by their competitors, during the IT Security Audit.