

第五章

CHAPTER 05

防止貪污處

CORRUPTION PREVENTION
DEPARTMENT



法定職責

- 審視政府部門和公共機構的工作常規與程序，以修正存在貪污風險的工作方式和程序。
- 為公營機構及因應私營機構和個別人士的要求，提供防貪諮詢服務。

策略

- 與政府部門和公共機構建立伙伴關係，透過強化管治及改善工作程序預防貪污。
- 優先審查備受公眾關注、涉及民生和公眾安全、耗用大量公帑及大型公共工程的項目。
- 採取源頭預防策略，就政府部門和公共機構的新政策、服務和系統及早向有關機構提供防貪建議，以確保新項目在籌劃以至落實過程中，能及早注入防貪措施。
- 為私營機構提供防貪服務，並採取跨界別策略促進公私營合作，加強各行各業的誠信管治，預防私營界別的貪污。

組織

防止貪污處（防貪處）轄下設有七個審查組和一個管理組。

審查組

各審查組均負責多個政府部門和公共機構的防貪工作，並專責一個或多個職能範疇，例如採購、執法、公務員誠信及公共工程等；而其中的防貪諮詢服務組，專責處理私營機構所要求的防貪服務。

STATUTORY DUTIES

- Examine the practices and procedures of government departments and public bodies with a view to securing revision of work methods or procedures which may be susceptible to corrupt practices.
- Provide corruption prevention advisory services to public organisations and, on request, private organisations and individuals.

STRATEGIES

- Adopt a partnership approach with government departments and public bodies to prevent corruption through good governance and system controls.
- Accord priority to areas important to people's livelihood and public safety, and those involving substantial amounts of public money and major public projects.
- Adopt a prevention at source strategy by providing early, interactive input to the Government and public bodies in respect of their new initiatives, services and systems to ensure corruption prevention safeguards are built in at the formulation and early implementation stages.
- Accord equal priority to preventing corruption in the private sector, and adopt a cross-sector strategy to foster public-private sector collaboration in enhancing business integrity and preventing corruption in different industries.

STRUCTURE

Corruption Prevention Department (CPD) is organised into seven Assignment Groups and a Management Group.

Assignment Groups

Each Assignment Group is responsible for the corruption prevention work for a number of government departments and public bodies and specialises in one or more functional areas such as procurement, law enforcement, civil service integrity, and public works. One of the Assignment Groups also serves as the Corruption Prevention Advisory Service (CPAS), dedicated to handling requests for corruption prevention service from private organisations.

管理組

管理組協助制訂防貪工作策略，並為防貪處提供行政支援。

Management Group

It assists in strategic planning for and provides administrative support to CPD.



為政府部門及公共機構進行防貪審查

Corruption prevention studies for government departments and public bodies

專業團隊

防貪處的人員包括各界別的專業人士如會計師／審計師、工程界的專業人員、資訊科技專業人員，以及來自不同政府部門和公共機構的資深公職人員。

Staffing

CPD staff include professionals of different disciplines such as accountants/auditors, construction professionals, information technology specialists, and experienced public servants from different government departments and public organisations.

工作回顧

年內，防貪處持續致力減低公共行政範疇的貪污風險，重點放在備受公眾關注、涉及民生和公眾安全的事宜，以及耗用大量公帑的項目，包括公共工程、政府採購、公眾健康、政府資助計劃、執法及規管職能。防貪處亦繼續協助維持公平和廉潔的營商環境，促進香港經濟健康及可持續發展。

REVIEW OF WORK

During the year, CPD continued to address and prevent risks of corruption in areas of public administration that are important to people's livelihood or public safety, issues of public interest or concern, and programmes and projects involving substantial amounts of public money, covering such areas as public works, public procurement, public health, government funding schemes, law enforcement and regulatory functions. It also continued to help maintain a level-playing field and corruption free environment for business to facilitate healthy and sustainable economic development.

二零一九年完成的工作項目包括：

- 完成 70 項審查工作報告，主要為政府決策局／部門及公共機構的特定制度和相關工作常規作詳細審查，就當中的貪污風險建議防貪措施。
- 向政府決策局／部門和公共機構提供 607 次防貪建議，主要涉及正在草擬或檢討的法例、政策或程序，以及早加入防貪措施。
- 因應要求，共 737 次向私營機構提供防貪建議，並透過防貪諮詢服務熱線，處理共 804 個公眾查詢。
- 向公私營機構超過 13 700 人員提供防貪培訓。
- 於防貪諮詢服務網站及數碼政府合署網站提供防貪資源（包括防貪指南、最佳工作常規、防貪錦囊、行為守則範本、個案研究、防貪要訣及培訓教材）。

Deliverables achieved in 2019:

- Completed 70 assignment reports, with detailed review of the corruption risks and recommended measures for enhancement of specific systems and related practices primarily in government bureaux/departments (B/Ds) and public bodies.
- Provided tailored advice to government B/Ds and public bodies on 607 occasions, mainly in the formulation/review of legislation, policies or procedures to ensure that corruption prevention safeguards were built in at an early stage.
- Offered advisory service to private sector entities on 737 occasions upon request, and handled 804 public enquiries through CPAS hotline service.
- Conducted corruption prevention training for over 13 700 persons in both public and private sectors.
- Provided corruption prevention resources, including corruption prevention guides, best practice checklists, toolkits, sample codes of conduct, case studies, quick tips and training resources, for reference through the CPAS Web Portal and the Government's Central Cyber Government Office website.



就漁農自然護理署繁育狗隻牌照的執法程序進行防貪審查

A review of the Agriculture and Fisheries Conservation Department's enforcement procedures for the issue of Dog Breeder Licences

與海事處職員討論有關視察承辦商維修政府船隻工作的程序

Discussing with an officer of the Marine Department on the procedures for inspecting contractors' maintenance work on government vessels





有關機電工程署檢查石油氣車輛機制的防貪審查

A review of the Electrical and Mechanical Services Department's inspection system for LPG vehicles



為香港社會服務聯會舉辦的防貪講座

A corruption prevention talk for the Hong Kong Council of Social Service

主動就新政策措施及監管制度及早提供防貪建議

政府近年推出更多涉及公私營合作的惠民措施及為特定目標而設的資助計劃，並積極推動創新與科技發展。為確保新措施從一開始就將必要的誠信管理和防貪措施納入制度內，防貪處採取源頭預防策略，於有關措施及計劃的籌備階段與政府及有關公共機構合作，及早提供防貪建議。防貪處亦會跟進新措施的實際推行情況，並進行詳細檢討，以確保防貪建議有效落實。以下是一些例子。

PROACTIVE AND EARLY CORRUPTION PREVENTION INPUT FOR NEW POLICY INITIATIVES AND REGULATORY REGIMES

The Government has been launching an increasing number of new initiatives that involve public-private partnership, subsidies for citizens for specific purposes, and driving innovation and technology development, etc., in recent years. To ensure the necessary integrity management and corruption prevention measures are built in the systems from the outset, CPD has adopted a prevention at source strategy by providing early, interactive input to the Government and public bodies responsible for these initiatives and projects during the preparation stage. CPD also follows up with the detailed reviews of the actual implementation of the new initiatives to ensure robust and successful implementation. The following are examples of the aforesaid approach.

支持創新的政府採購政策

為支持創新及促進初創和中小型企業參與政府採購，政府自二零一九年四月一日起，實施支持創新的採購政策。由於新政策涉及的主要轉變（包括上調技術評審的比重和將創新元素納入為必須的評標準則），有可能增加採購程序的貪污舞弊風險，防貪處早於財經事務及庫務局制訂新政策及程序的初期，已向局方提供建議，確保新採購程序具備足夠的防貪措施。

地區康健中心

為加強社區醫療服務，政府正開展於全港各區設立地區康健中心的計劃。防貪處於計劃的籌備階段，已向食物及衛生局（食衛局）提供防貪建議，確保計劃包含適當的防貪措施。設於葵青區的首個地區康健中心於二零一九年九月開始運作，防貪處事前已就食衛局的《地區康健中心計劃服務及營運指引》，以及適用於中心員工的反貪法例提供意見，並為有關員工舉辦誠信管理簡介會。防貪處會繼續向政府提供適時的防貪建議，協助其在各區設立地區康健中心。

購置私人物業作社福設施

政府預算撥款 200 億元，由二零二零年開始在本港不同地區購買私人物業，以提供各種社福設施。防貪處於跨部門會議向社會福利署、政府產業署及財經事務及庫務局代表提供規管物業購置計劃的原則性防貪建議。其後亦就參與該計劃各有關人士的誠信要求，以及聘用律師行處理物業交易的程序，分別向勞工及福利局和政府產業署提供防貪意見。

Pro-innovation Government Procurement System

To promote innovation and facilitate the participation of local start-ups and small and medium enterprises in government procurement, the Government launched the pro-innovation procurement policy on 1 April 2019. Under the new system, there are some key changes (including an upward adjustment of technical weighting in tender evaluation and "innovation" being an essential criterion for technical assessment) which might heighten the risk of manipulation in the procurement process. Prior to its implementation, CPD and the Financial Services and the Treasury Bureau (FSTB) had partnered to ensure that adequate corruption prevention safeguards would be built in the new system at the outset.

District Health Centres

To strengthen healthcare services in the community, the Government embarked on a programme to set up District Health Centres (DHCs) in all districts of the territory. CPD had been advising the Food and Health Bureau (FHB) on this initiative since its planning stage to ensure that control safeguards are early built into the system. Before the first DHC in the Kwai Tsing District commenced operation in September 2019, CPD provided advice on FHB's DHC Scheme Service and Operation Guideline and the anti-bribery laws applicable to DHC staff, and conducted an integrity management briefing for them. CPD will continue to offer timely corruption prevention assistance for the Government to set up DHCs in other districts.

Purchase of Private Properties for Welfare Facilities

The Government set aside \$20 billion for the purchase of private properties from 2020 onwards for providing various welfare facilities in different districts. CPD, at an interdepartmental meeting with representatives from the Social Welfare Department, the Government Property Agency, and the FSTB, advised on the corruption prevention principles governing the property purchase exercise, and subsequently advised the Labour and Welfare Bureau on the probity requirements for parties involved in the exercise and the Government Property Agency on the procedures for engaging solicitor firms for legal services for the property transactions.

保險業監管局

保險業監管局(保監局)於二零一五年成立,屬《防止賄賂條例》附表所列的公共機構。保監局於二零一九年接手規管保險中介人的職能。就此,防貪處一直向財經事務及庫務局提供防貪建議,並就保監局職員及成員的誠信管理制度及保險中介人的新規管制度,提供防貪建議。

自願醫保計劃

自願醫保計劃(自願醫保)於二零一九年四月正式推行。自政府展開自願醫保的公眾諮詢以來,防貪處一直就計劃的實施安排、擬訂程序指引等方面,向食衛局及自願醫保計劃辦事處提供適時的防貪建議。

資助計劃的管理

政府設立各項資助計劃以達至特定政策目標,例如促進創新科技發展、保護環境和濟助老弱貧困等。多年來,防貪處為多項資助計劃的運作進行防貪審查,就它們的管理和管治提出防貪建議。防貪處亦擔任“促成者”的角色,在新資助計劃的籌劃階段,及早向有關政府決策局/部門提出防貪建議,務求於制訂計劃的初期,便在其程序中建立足夠的監控措施;然後在有關計劃全面推行後,再進行詳細的審查研究,檢視其落實情況。年內,防貪處就香港科技園公司的“住宿支援計劃”及“ELITE 計劃”,在其籌備階段提供了早期防貪建議;亦為香港數碼港管理有限公司的“數碼港培育計劃”及“數碼港加速器支援計劃”,肺塵埃沉着病補償基金委員的“撥款及資助計劃”,創新科技署管理及香港生產力促進局執行的“專利申請資助計劃”以及環境保護署管理的“回收基金”,進行了詳細的審查研究。

Insurance Authority

The Insurance Authority (IA), established in 2015 as a scheduled public body, took over the self-regulatory regime for insurance intermediaries in 2019. CPD has all along been providing corruption prevention input to the FSTB regarding the establishment of IA, advising on the integrity management of IA's staff and members, as well as providing corruption prevention advice to IA on its various public consultation papers on the new regulatory regime.

Voluntary Health Insurance Scheme

The Voluntary Health Insurance Scheme (VHIS) was launched in April 2019. CPD has been closely working with FHB and VHIS Office on the scheme implementation arrangement, draft procedural guidelines, etc., since the public consultation of VHIS.

Administration of Funding Schemes

The Government has established various funding schemes to meet specific objectives such as promoting innovation and technology and environmental protection, providing financial relief to elders and the needy. Over the years, CPD has examined a variety of funding schemes and recommended a host of corruption prevention measures on their administration and governance structure. Adopting a "facilitator" approach, CPD also proactively provides early input to government B/Ds on new funding schemes at their formulation stage, with a view to building adequate procedural safeguards from the outset, followed by detailed implementation review after the schemes have come into full operation. In 2019, CPD provided early input on the Tenant Accommodation Support Scheme and the Elite Incentive Scheme of the Hong Kong Science and Technology Parks Corporation, and conducted detailed reviews on the Cyberport Incubation Programme and the Cyberport Accelerator Support Programme of the Hong Kong Cyberport Management Company Limited, the Funding and Sponsorship Programme of the Pneumoconiosis Compensation Fund Board, the Patent Application Grant administered by the Innovation and Technology Commission with the Hong Kong Productivity Council as the implementation agent, and the Recycling Fund administered by the Environmental Protection Department.

關乎公眾利益或民生的事項

公眾健康及公共衛生

防貪處在二零一九年就食物環境衛生署的運作程序進行一系列的審查工作，並以食物安全及環境衛生的規管職能為重點。審查項目包括定期從市場購買食物樣本以檢測是否符合現行食物安全標準的“食物監測計劃”、為公眾提供火葬及骨灰暫存服務的政府火葬場的管理工作，以及為工業大廈工作人士提供膳食的工廠食堂的發牌及監管制度。

“樓宇更新大行動 2.0”、 “消防安全改善工程資助計劃”及 “優化升降機資助計劃”

防貪處繼續採取積極及伙伴合作的策略，在這三項樓宇復修資助計劃成立之初，便向市區重建局和相關政府部門提供防貪意見／服務。有關計劃合共提供 160 億元以資助符合資格的業主，為其老化樓宇進行維修、改善消防安全及優化升降機工程。為改善這些計劃的整體運作流程及加強監管，防貪處就相關政策文件、處理申請和個案排序的內部指引、聘用定期合約顧問的招標工作等提供防貪建議。此外，防貪處在年內舉辦約 40 場防貪簡介會，向 2 200 多名業主及從業員講解樓宇維修的貪污風險，以提高他們的防貪意識，並協助他們就維修工程制訂防貪措施。

資助出售房屋項目

香港房屋協會（房協）獲政府委託承辦資助出售房屋項目，以折扣價出售房屋單位，協助中低收入家庭置業。鑑於本港市民對資助房屋需求甚殷，為確保有充足措施防禦貪污及舞弊行為，防貪處就房協處理置業申請及聘用服務承辦商支援房

ADDRESSING ISSUES OF PUBLIC INTEREST OR IMPORTANT TO PEOPLE'S LIVELIHOOD

Public Health and Hygiene

In 2019, CPD conducted a series of studies on the operations of the Food and Environmental Hygiene Department, with a particular focus on its regulatory functions in respect of food safety and environmental hygiene. These included the Food Surveillance Programme under which food samples are regularly purchased in the market for testing of their conformity to established food safety standards, the management of government crematoria which provides cremation services and temporary storage of cremains for the public, as well as the licensing and control of factory canteens that provide meals to persons working in industrial buildings.

Operation Building Bright 2.0, Fire Safety Improvement Works Subsidy Scheme, and Lift Modernisation Subsidy Scheme

CPD continued to adopt a proactive and partnering approach to offer early corruption prevention advice/services to the Urban Renewal Authority and relevant government departments, as early as the inception of the three building rehabilitation subsidy schemes. With a total funding of about \$16 billion, the schemes aim to assist the eligible building owners to carry out building repair works, fire safety improvement works, and lift modernisation works for their aged buildings. To strengthen the system integrity and enhance controls in the administration of these schemes, CPD advised on the related policy paper, internal guidelines for processing applications and prioritisation of cases, tender exercise for the appointment of term consultants, etc. In addition, CPD delivered close to 40 corruption prevention briefings reaching out to some 2 200 building owners and practitioners to heighten their corruption prevention awareness and assist them to build in safeguards in their maintenance projects.

Sale of Subsidised Sale Flats

The Hong Kong Housing Society is entrusted by the Government to undertake Subsidised Sale Flats Project to enable the low-to-middle-income families to attain home ownership at discounted prices. In view of the high demand for subsidised flats in Hong Kong, and to ensure that there are adequate safeguards against corruption and related malpractices, CPD conducted a review of

屋銷售（如市場推廣及宣傳服務）的程序進行審查研究，建議包括加強程序管控及對服務承辦商的誠信要求。

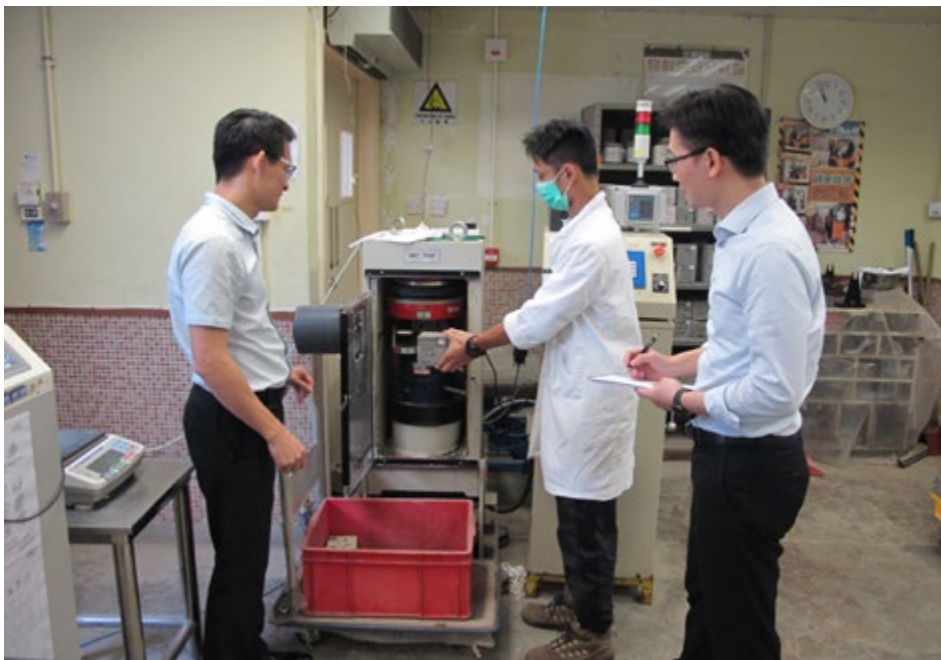
公共工程主要建築材料的檢查及測試

政府公共工程中的建築材料品質監控，存在貪污風險。為回應市民的關注，防貪處進行了為期兩年的工作，審查發展局及各工務部門的建築材料品質監控制度，已於年內完成。二零一九年，防貪處就檢查、測試及驗收建築材料、監管認可鋼筋預製工場、管理和運作工務試驗所等方面提供防貪意見。防貪處亦審查了房屋署於公共房屋項目中測試及檢查物料的監控制度，並就香港品質保證局的混凝土生產和供應質量規範，以及香港認可處的實驗所認可計劃，提供防貪建議。

procedures of the Hong Kong Housing Society for processing flat-purchase applications and engaging service providers to support flat-sale exercises (e.g. marketing and advertising services). Recommendations were made to strengthen procedural control and enhance the probity requirements for service providers.

Inspection and Testing of Major Construction Materials in Government Works Projects

To address public concern on the corruption risks in the quality control of construction materials for government works projects, CPD has completed a two-year programme on the review of materials quality control system of the Development Bureau (DEVB) and works departments. In 2019, CPD offered advice on the inspection, testing and acceptance of materials on-site, monitoring of approved steel reinforcing bar prefabrication yards, and management and operation of public works laboratories. CPD has also reviewed the Housing Department's control system on testing and inspection of materials for public housing projects, and recommended corruption prevention measures on the Hong Kong Quality Assurance Agency's quality scheme for production and supply of concrete and the Hong Kong Accreditation Service's laboratory accreditation scheme.



在工務試驗所檢視混凝土壓力測試程序

Reviewing the conduct of compression test on concrete cubes in a public works laboratory

在認可工場了解鋼筋預製過程

Studying rebar prefabrication process in an approved yard



審批及檢查機場和鐵路設施的消防裝置

消防處在擴建香港國際機場及鐵路網絡的項目中，負責審批消防裝置圖則及檢查已安裝的消防裝置。為減低批核及檢查有關消防裝置時的貪污風險，防貪處就批核圖則的透明度、檢查消防裝置的問責性及驗收測試的完整性等方面，向消防處提供防貪意見。

Approval and Inspection of Fire Services Installations in Airport and Railway Facilities

The Fire Services Department approves building plans of proposed fire services installations (FSIs) and inspects completed FSIs in the expansion projects of Hong Kong International Airport and the railway network. CPD offered advice to the Fire Services Department to minimise corruption risks in the approval and inspection of FSIs of these projects, covering transparency in approval of FSIs, accountability in conducting inspections of completed FSIs, and integrity of acceptance tests.



有關消防處審批和檢查鐵路及機場工程消防安全圖則的防貪審查

A corruption prevention study of the Fire Services Department's approval and inspection of fire safety plans for railway and airport works

公共工程承建商的防貪意識與防貪能力

鑑於近期公眾對公共工程承建商的誠信十分關注，防貪處聯同相關政府決策局／部門及公共機構，展開工作以加強公共工程承建商在誠信管理、工地監督管控制度及分判商管理等方面的防貪意識及防貪能力。其中一項已完成的工作包括對發展局《認可公共工程承建商名冊》的管理機制作出審查研究。為提升承建商的誠信水平，防貪處建議發展局規定所有認可承建商須制訂有效的誠信管理系統，作為納入名冊的其中一項要求。防貪處亦在完成檢視分判商的管理機制後，向發展局提供建議以改善制度及加強監管。防貪處會繼續推行這方面的工作，包括與相關政府決策局／部門合作，協助公共工程承建商實施誠信管理系統及加強工地監督。

總區及警區的洗黑錢案件調查程序

洗黑錢活動近年備受全球關注。作為香港打擊洗黑錢活動的主要執法機關，警務處將撲滅有關罪行列為其首要工作之一。為確保此項重要的執法工作具備足夠的防貪措施，防貪處審視了警務處總區及警區調查洗黑錢案件的程序，集中審視總區及警區層面的調查程序。防貪處的研究顯示警務處已有健全的調查機制，並就優化案件處理程序提供了意見。

特別調查課調查走私活動的程序

香港海關於二零一三年成立特別調查課，專責調查一般商品的走私活動，特別是集團式走私活動。因應調查走私活動所涉的貪污風險，防貪處檢視了特別調查課的調查走私活動程序。防貪處的研究顯示海關已在相關程序中建立了健全的監控機制，並就一些執行細節提供強化監控的意見。

Corruption Prevention Awareness and Capabilities of Public Works Contractors

In view of public concern over integrity in the implementation of public works projects, CPD, in collaboration with government B/Ds and public bodies concerned, embarked on an initiative to enhance the corruption prevention awareness and capabilities of public works contractors, covering integrity management, control systems in site supervision and management of subcontractors. As part of the initiative, CPD completed a review on DEVB's system for managing the *List of Approved Contractors for Public Works*. To enhance their integrity, CPD advised the DEVB to require all approved contractors to put in place an effective integrity management system as part of the listing requirements. CPD also completed a review concerning subcontractor management to offer advice to the DEVB with a view to improving the system and enhancing controls. CPD will continue our efforts in this area, including collaborating with the relevant government B/Ds to assist public works contractors to implement the integrity management system and enhance site supervision.

Procedures for Investigation of Money Laundering Cases at Regional and District Levels

Given that money laundering has been a global concern in recent years, the Hong Kong Police Force, as a major anti-money laundering enforcement agency, has accorded a high operation priority to combat the crime. To ensure adequate controls exist to address inherent corruption risks in such an important enforcement function, CPD had reviewed the Police's procedures for the investigation of money laundering cases, focusing on those at the regional and district levels. Noting a robust investigation mechanism has been in place and operating effectively, CPD provided corruption prevention advice for further refinement of the case processing procedure.

Smuggling Investigation Procedures of the Special Investigation Group

Set up in 2013, the Special Investigation Group of the Customs and Excise Department is tasked to combat the smuggling of general goods, in particular those by syndicates. In view of the corruption risks in the investigation of smuggling activities, CPD had reviewed the smuggling investigation procedures of the Special Investigation Group. Noting that the Customs and Excise Department has established a robust system in the Group's investigation process, CPD provided corruption prevention advice to fine-tune the enforcement procedures for further enhanced monitoring.

保險業及虛擬銀行

多年來，防貪處致力向私營機構提供專業防貪諮詢服務，以協助香港維持公平的營商環境。香港金融管理局（金管局）引入虛擬銀行（主要透過互聯網或其他形式的電子渠道提供零售銀行服務的銀行），並接受虛擬銀行牌照的申請。防貪處亦同步就處理牌照申請的各項程序，如申請人的誠信要求、篩選申請人、審閱申請文件及批核授權等，向金管局提供防貪建議。在保險業方面，防貪處將聯同業界編製防貪指引，協助保險公司就其核心業務建立及加強防貪能力。除了就自願醫保計劃在二零一九年推出之初已向當局提供防貪建議之外，防貪處亦會繼續與自願醫保計劃辦事處緊密合作，確保相關機制全面實施時已設有足夠防貪措施。

協助教育界加強防貪能力

防貪處一直向教育界的持份者，包括教育局、香港考試及評核局（考評局）、各大學、中學、小學及幼稚園提供防貪服務，以提升它們的系統防貪能力。在發生數宗考務人員涉嫌未經許可披露機密資料的事件後，防貪處已審查考評局聘任及管理兼職考務人員的程序及常規，並就改善兼職考務人員的聘任、誠信管理及監察工作表現等機制提出建議。除了就學校行政及誠信管理指引向教育局提供意見外，防貪處亦協助各學校制訂行為守則，並在採購、處理捐款及收生上向多間大學提供防貪建議。此外，防貪處亦為教育界不同背景的從業員舉辦研討會以提升其防貪意識。

Insurance and Virtual Banking Initiative

Over the years, CPD has strived to provide professional corruption prevention advisory service to the private sector and helped to maintain a level playing field for business in Hong Kong. For example, when the Hong Kong Monetary Authority introduced virtual banking for providing retail banking services primarily through the internet or other forms of electronic means, and invited applications for virtual banking licences, CPD provided concurrent corruption prevention input to the Hong Kong Monetary Authority regarding its procedures for processing the licence application in 2019, covering the probity requirements for applicants, integrity in shortlisting of applicants for detailed vetting, vetting of application documents and the approval of the authorisation. Regarding the insurance sector, CPD also, in collaboration with the insurance industry, will develop a corruption prevention guide for use by insurance companies to assist them in establishing and strengthening their corruption prevention capabilities in their core operations. In addition to providing early advice when the VHIS was firstly established in 2019, CPD continues to work closely with the VHIS Office to ensure that adequate safeguards are in place when the system is in full use.

Strengthening Corruption Resistant Capabilities in the Education Sector

CPD offers corruption prevention services to a wide spectrum of stakeholders in the education sector, including the Education Bureau, the Hong Kong Examinations and Assessment Authority, various universities, secondary and primary schools and kindergartens, with a view to strengthening their systems' resistance to corruption. Following incidents alleging unauthorised disclosure of confidential information by examination personnel, CPD reviewed procedures and practices of the Hong Kong Examinations and Assessment Authority on the appointment and administration of part-time examination personnel, and made recommendations to enhance its mechanism for their appointment, integrity management and performance monitoring. CPD also advised the Education Bureau on the school administration and integrity management guidelines for schools, various schools in drawing up codes of conduct, and a number of universities in conducting procurement exercises, handling donations, and admitting students. Capacity building sessions were also organised for practitioners of various backgrounds in the education sector to enhance their corruption prevention awareness.

維護公共選舉廉潔公正

防貪處致力維護公共選舉廉潔公正，就此一直向政制及內地事務局及選舉事務處提供防貪意見，令選舉制度及程序更為完善。在二零一九年展開的新一輪公共選舉中，防貪處協助當局檢視了選舉法例的修訂草案及二零一九年區議會選舉的最新選舉活動指引。此外，為減低來屆立法會功能界別選舉中潛在的“種票”風險，防貪處聯同選舉事務處進行新一輪探訪計劃，探訪設有會員註冊制度、其會員有資格在選舉中投票的訂明團體。計劃內容包括發布更新版的《會籍管理防貪指引》，加入針對以虛假資料及文件申請會籍的管控措施，供訂明團體參考。

Keeping Public Elections Clean

As a continuous effort to keep public elections clean, CPD has been providing corruption prevention advice to the Constitutional and Mainland Affairs Bureau and the Registration and Electoral Office to further enhance the election systems and procedures. In preparation for the new public election cycle commencing in 2019, CPD helped review the draft amendments to the electoral law, as well as the updated guidelines for the 2019 District Council Election. In addition, to mitigate the "vote planting" risk in the coming Legislative Council Functional Constituency Elections, CPD has partnered with the Registration and Electoral Office to conduct a new round of visit programme to the Specified Bodies with a membership administration system, the members of which are eligible to vote at the elections. The programme entailed issuing an updated *Best Practice Checklist on Membership Administration* (with new measures to strengthen the control against membership applications with falsified information and documents) for reference by the Specified Bodies.



有關香港考試及評核局委任考務人員程序的防貪審查，包括觀察進行口試評核的情況

A review of the appointment procedures for examination personnel of Hong Kong Examinations and Assessment Authority, covering observation of the conduct of speaking examinations

強化機構管治及防貪能力

就支持創新的政府採購政策 為決策局／部門舉辦研討會及 提供最佳工作常規

為協助政府決策局／部門有效落實新推出的支持創新採購政策，防貪處於二零一九年三月應邀在三場研討會中，向共約 730 名高、中級政府人員闡釋新制度的貪污風險及相應的監控措施，以加強他們的防貪意識。由二零一九年四月開始，防貪處為政府決策局／部門新修訂的採購指引、招標文件等提供防貪建議，至今共六次；並修訂了《政府採購一般物料和服務防貪指南》，提供相應的最佳工作常規，以供有關人員參考。

透過防貪諮詢服務網站提供 防貪資源

防貪處自二零一七年一月起推出防貪諮詢服務網站，向私營界別提供防貪資訊（例如防貪刊物、培訓短片、個案研究、防貪警示和要訣等）。除不斷更新資訊讓網站內容更豐富外，防貪處亦繼續透過政府決策局／部門、專業組織、監管機構、業界團體等網絡，向不同業務界別推廣該網站。網站自推出至二零一九年十二月底，累積瀏覽次數約 244 000 次，下載或閱覽防貪資源次數約 92 600 次。另外約有 9 700 名用戶登記訂閱，可定期獲取防貪資訊、工具和資源。

ENHANCING GOVERNANCE AND CORRUPTION PREVENTION CAPACITY BUILDING

Service-wide Seminars and Best Practices on Pro-innovation Government Procurement for Government Bureaux/Departments

To assist government B/Ds to effectively implement the new pro-innovation procurement policy, CPD delivered a briefing session on "Corruption Prevention in Government Procurement" in three service-wide seminars in March 2019 to enhance the corruption prevention awareness of government procuring staff. A total of about 730 senior and middle-ranked government officers were briefed on the corruption risks in the new system as well as the corresponding control measures. CPD had also, since April 2019, provided tailor-made advice to government B/Ds on a total of six occasions on their procurement matters, including revised procurement guidelines and tender documents. Moreover, CPD revised the *Corruption Prevention Guide on Government Procurement of General Goods and Services* accordingly to provide updated reference for government B/Ds.

Resources through Corruption Prevention Advisory Service Web Portal

CPD launched a dedicated web portal in January 2017 to facilitate dissemination of corruption prevention information (e.g. corruption prevention publications and training videos, case studies, red flags, corruption prevention tips) to the private sector. Since then, CPD has strived to continuously enriching the web portal content, and promoting the web portal to users in different business sectors via the networks of government B/Ds and professional/regulatory/trade bodies. Since its launch and up to the end of December 2019, the web portal has attracted about 244 000 visits and with corruption prevention resources downloaded or viewed for about 92 600 times. There are also an accumulated total of about 9 700 subscribers who regularly receive the corruption prevention news, tools and resources.

上市公司 – 防貪管理系統和披露反貪資訊

年內，防貪處致力協助上市公司建立及檢視防貪管理系統和加強披露反貪資訊，以符合香港交易及結算有限公司於二零一六年起實施的披露規定。防貪處亦與有關監管機構及專業團體合作，為香港會計師公會、香港特許秘書公會和香港董事學會等專業團體逾 700 名會員舉辦培訓講座，並在其會員通訊發表專題文章，闡述有關披露反貪資訊的實務建議及介紹防貪處的諮詢服務。

Listed Companies – Anti-bribery Management Systems and Disclosure of Anti-corruption Information

Throughout the year, CPD assisted listed companies in establishing and reviewing their anti-bribery management systems and enhancing the disclosure of anti-corruption information, so as to better comply with the Hong Kong Exchanges and Clearing Limited's disclosure requirement implemented since 2016. Through collaboration with the regulator and professional bodies concerned, CPD organised training for over 700 members of professional bodies including the Hong Kong Institute of Certified Public Accountants, the Hong Kong Institute of Chartered Secretaries, and the Hong Kong Institute of Directors. CPD also published feature articles in their newsletters to promulgate the recommended practices in anti-corruption disclosure and introduce CPD's advisory service.

為香港會計師公會會員舉辦有關披露反貪資訊的研討會

Seminar on disclosure of anti-corruption information for members of the Hong Kong Institute of Certified Public Accountants



海外營商防貪要訣 – 恪守誠信 無分疆界

為確保商界在海外營商時恪守誠信和防貪準則，防貪處提供有關海外營商的防貪要訣，以協助在外地尋找商機或拓展業務的公司防範貪污陷阱和建立良好商譽。防貪處建議這些公司採取的防貪措施包括：制訂公司對貪污零容忍的政策，包括嚴格遵守《防止賄賂條例》及公司在海外營商所屬司法管轄區的反貪法例；要求所有員工和代理人（包括派駐或受僱於海外的人員）遵從公司的防貪政策；嚴禁員工或代理人向任何人士（包括外國公職人員等）行賄，藉以獲得生意或協助，或試圖影響有關人士的決定，或違反《防止賄賂條例》或在有關司法管轄區適用的反貪法例；在有需要時，就海外反貪法例及行規向有關的司法部門、反貪機構、法律顧問、商會或行業組織等徵詢意見；以及聘用熟悉相關海外法例（尤其是反貪法例）的法律專業人士，審閱公司的行為守則、標書、合約、合資協議等文件。

Tips on Doing Business Overseas – Anti-corruption Commitment across Territories

To enhance business entities' integrity and anti-corruption commitment when doing business overseas, CPD drew up tips which business entities may make reference to when seeking for business opportunities or expanding their business outside Hong Kong. The tips help businesses to stay out of corruption and establish good reputation. They are advised to formulate a policy on zero tolerance against corruption and strict compliance with the Prevention of Bribery Ordinance and anti-corruption laws of the jurisdictions where the business is carried out, and require all staff and agents (including those stationed or employed overseas) to comply with the policy. They should also prohibit staff and agents from bribing any persons, including foreign public officials, for securing business or their assistance, influencing their decisions, or in any way contrary to the Prevention of Bribery Ordinance or anti-corruption laws of the jurisdictions concerned. Where necessary, advice on overseas anti-corruption laws and proper trade practices should be sought from the relevant ministries of justice, anti-corruption agencies, legal consultants, chambers of commerce, trade associations, etc. Businesses should also engage legal professionals conversant with the overseas legislations, particularly those on anti-bribery, to vet their codes of conduct, tender and contract documents, joint venture agreements, etc.



於防貪諮詢服務網站提供海外營商防貪要訣
 Tips on doing business overseas at CPAS Web Portal