

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。

## 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.

## 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。
- 優先審查影響民生或公眾安全的公共行政範疇、涉及公眾利益或備受市民關注的事宜，以及耗用大量公帑的項目和工程。
- 採取源頭預防策略，主動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及初期落實階段，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。

## STRATEGIES

- Adopt a partnership approach with government departments and public bodies to prevent corruption through good governance and system controls.
- Accord priority to areas of public administration impacting on people's livelihood or safety, issues of public interest or concern, and programmes and projects involving substantial amounts of public money.
- Adopt a prevention-at-source strategy by providing proactive and timely corruption prevention 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 providing diversified services to enhance business integrity and preventing corruption in different industries.

## 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。

### 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。

### 專業團隊

防貪處的人員包括各界別的专业人士如會計師／審計師、工程界的专业人員、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。

## 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、公眾健康和安安全、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，促進香港經濟可持續發展。

## 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.

### Management Group

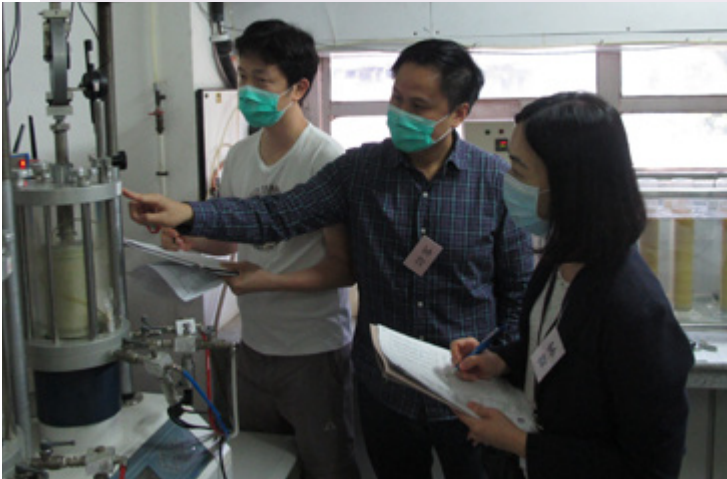
It assists in strategic planning for and provides administrative support to CPD.

### 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.

## 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 and safety, 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 sustainable economic development.



在土木工程拓展署聘用的合約試驗所觀察測試泥土和岩石樣本的程序

Observing the conduct of soil and rock test in a contract laboratory engaged by the Civil Engineering and Development Department

檢視康樂及文化事務署為樹木檢驗及保養的程序

Reviewing the Leisure and Cultural Services Department's procedures for inspection and maintenance of trees



## 二零二零年完成的工作項目包括：

- 完成 65 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 464 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 509 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 744 個公眾查詢。
- 向公私營機構超過 5 100 名人員提供防貪培訓。

## Deliverables achieved in 2020:

- Completed 65 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 464 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 509 occasions upon request, and handled 744 public enquiries through CPAS hotline service.
- Conducted corruption prevention training for over 5 100 persons in both public and private sectors.



二零二零年出版的防貪刊物提供豐富的防貪資源供各界參考

Corruption prevention publications published by CPD in 2020 providing user-friendly corruption prevention resources for various sectors

- 出版不同的防貪刊物例如《非紀律部隊執法機構 – 執法工作防貪指南》、《幼稚園運作防貪指南》、《工程監督防貪指南》、《保險公司防貪指南》及《非政府機構過渡性房屋項目防貪要點》，說明當中貪污風險及相關防貪措施以供不同界別參考。以上刊物已於防貪諮詢服務網站及數碼政府合署網站發布。

- Published a number of corruption prevention guides/toolkits illustrating the corruption risks and providing recommended safeguards for reference by different sectors, such as *Corruption Prevention Guide on Regulatory Enforcement for Non-disciplined Enforcement Agencies*, *Corruption Prevention Toolkit on Kindergartens' Operations*, *Corruption Prevention Guide on Works Supervision*, *Corruption Prevention Guide for Insurance Companies* and the *Corruption Prevention Tips for the Non-governmental Organisations (NGOs) on Implementation of Transitional Housing Projects*. The publications were published through the CPAS Web Portal or the Government's Central Cyber Government Office website.

## 主動就新政策措施及早提供防貪建議

政府近年推出數項新政策措施，包括涉及公私營合作的惠民措施、為特定目標而設的資助計劃，以及推動創新科技發展的計劃。為確保新措施從一開始便將必要的誠信管理和防貪元素納入制度內，防貪處採取源頭預防策略，於有關措施和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。防貪處亦會透過為這些新措施進行詳細檢討，跟進它們的推行情況，以確保防貪建議有效落實。以下是有關該項策略的例子。

## PROACTIVE AND EARLY INPUT TO GOVERNMENT'S NEW INITIATIVES

The Government has launched a number of new initiatives in recent years that involve public-private partnership, funding schemes for specific purposes, and initiatives to drive innovation and technology development. To ensure that 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 and interactive input to the Government and public bodies responsible for these initiatives and projects during the early and preparation stages. CPD also follows up these initiatives with detailed reviews to ensure their robust and successful implementation. The following are examples of the aforesaid approach.



## 有關創新及科技發展項目的防貪工作

政府透過決策局／部門和公共機構推出不同的創新及科技發展項目，以促進香港成為創新及科技發展的樞紐，其中涉及的公帑數以十億元計。為了協助有關機構有效落實防貪措施，防貪處審查了創新科技署轄下的兩個資助計劃及香港科技园公司的一項創新及科技發展計劃的管理程序。審查研究提出了一系列建議，以提升計劃的誠信管理系統及加強計劃的監控措施。此外，防貪處亦就創新科技署和香港生產力促進局的七項創新及科技發展計劃，適時提供逾十次的防貪建議，以提高計劃的透明度，確保計劃具足夠的誠信規定，及加強相關管理程序的監控措施。

## 土地共享先導計劃

發展局於二零二零年五月推出土地共享先導計劃（先導計劃），以釋放私人土地的發展潛力及促進公營房屋發展。在先導計劃下，申請人須負責有關基建工程以支援其建議發展項目，並將最少七成的新增住用總樓面面積交予政府作公營房屋用途。為確保此新計劃具備足夠的防貪措施，防貪處就先導計劃的運作計劃書，顧問小組成員利益申報制度，以及發展局轄下土地共享辦事處的工作指引提供了防貪建議。

## Corruption Prevention Work in relation to Government's Initiatives on Innovation & Technology

The Government has launched a wide-range of initiatives, involving billions of public money, for different government B/Ds and public bodies to promote Hong Kong as an innovation and technology hub. As part of the efforts to assist these organisations in ensuring their implementation of the initiatives are corruption resistant, CPD reviewed the procedures for administering two funding schemes under the Innovation and Technology Commission and another innovation and technology programme under the Hong Kong Science and Technology Parks Corporation. The reviews have come up with a host of recommendations to strengthen the related integrity management system and enhance controls in the administration of these schemes/programme. CPD also provided timely corruption prevention advice on more than 10 occasions to the Innovation and Technology Commission, and the Hong Kong Productivity Council on their seven innovation and technology related schemes/programmes, with a view to enhancing their transparency, ensuring adequate probity requirements are in place, and strengthening the control measures in administration procedures.

## Land Sharing Pilot Scheme

The Development Bureau (DEVB) launched the Land Sharing Pilot Scheme (LSPS) in May 2020 to unleash the development potential of private land and to facilitate public housing development. Under LSPS, applicants are required to build the necessary infrastructure to support their proposed development and hand over to the Government at least 70% of the increased domestic gross floor area for public housing development. To ensure adequate corruption prevention measures are in place in this new scheme, CPD provided advice on the preliminary proposal on LSPS, system for declaration of interests by the panel of advisors, and operational guidelines for DEVB's Land Sharing Office.



創意香港員工巡查須燃放特別效果物料的电影拍攝場景

Conducting inspection of the discharge of special effects materials for a movie scene by Create Hong Kong officer



觀察環境保護署在路邊使用遙測設備，偵測排放過量廢氣的汽油和石油氣車輛

Observing the Environmental Protection Department using mobile remote sensing equipment at roadsides to detect petrol and LPG vehicles with excessive emission of pollutants

### 購置物業以提供社福設施

自二零二零年起，政府會撥出 200 億元用於購買私人物業以在不同地區提供各種社福設施。防貪處自二零一九年在跨部門會議上向社會福利署和政府產業署代表提供初步意見後，在二零二零年於系統設計和指引制定階段，持續向兩部門提供防貪建議達二十多次，範圍涵蓋誠信管理、操作程序和其他事項。

### 非政府機構推行的過渡性房屋項目

政府推出了一項 50 億元的資助計劃以支援非政府機構興建和營運過渡性房屋項目，目標是在未來三年內提供 15 000 個房屋單位。為協助受資助非政府機構減低推行項目時的貪污風險，防貪處在資助計劃推出前主動與運輸及房屋局聯繫以提供相關的防貪服務。此外，防貪處已編製簡便的防貪刊物，闡釋有關判授及管理工程合約和工程顧問的貪污風險和防貪措施，供非政府機構參考。防貪處將繼續提供適時的防貪建議和服務，包括舉辦專題研討會，以協助非政府機構在落實過渡性房屋的工程項目和營運時保持誠信。

### Purchase of Premises for Provision of Welfare Facilities

The Government has set aside \$20 billion for the purchase of private properties from 2020 onwards for providing various welfare facilities in different districts. Subsequent to the initial views given at an interdepartmental meeting with representatives from the Social Welfare Department and the Government Property Agency in 2019, CPD offered further advice on some 20 occasions to both departments during their system design and guidelines development stages in 2020, covering integrity management, operational procedures and other issues.

### Transitional Housing Projects by Non-governmental Organisations

The Government launched a funding scheme of \$5 billion to support NGOs in constructing and operating transitional housing projects, with a target supply of 15000 units within the coming three years. To assist grantee NGOs in mitigating the corruption risks inherent in the implementation of these projects, CPD proactively liaised with the Transport and Housing Bureau prior to the launch of the funding scheme to offer corruption prevention services to the NGOs. CPD had also drawn up handy publications illustrating the corruption risks and safeguards concerning the letting and administration of works contracts and works consultancies for the NGOs' reference. CPD will continue to offer timely advice and services, including organising thematic seminars, to these NGOs to uphold integrity in the implementation of works projects and operation of transitional housing.



《非政府機構過渡性房屋項目防貪要點》旨在闡釋有關判授及管理工程合約和工程顧問的貪污風險和防貪措施，供非政府機構參考

*The Corruption Prevention Tips for Non-governmental Organisations on Implementation of Transitional Housing Projects illustrating the corruption risks and safeguards concerning the letting and administration of works contracts and works consultancies for non-governmental organisations*

## 規管持牌物業管理公司和持牌物業管理人的發牌制度

物業管理業監管局（監管局）於二零一六年成立，並透過於二零二零年八月一日正式實施的發牌制度，規管物業管理公司及物業管理人。自監管局成立以來，防貪處一直協助該局加強其管治及內部監控，例如檢視其董事會成員和員工的行為守則。防貪處亦就發牌制度、牌照申請文件以及相關的程序指引提供防貪建議。除了及早向監管局就持牌物業管理公司和持牌物業管理人的操守守則及作業守則提供防貪建議外，防貪處會繼續適時向監管局就其實施新的發牌制度，包括投訴處理機制和紀律處分等程序提供防貪建議。

## Licensing Regime for Property Management Companies and Property Management Practitioners

The Property Management Services Authority (PMSA), established in 2016, regulates the provision of property management services by companies and practitioners through a licensing regime that came into operation on 1 August 2020. Since its inception, CPD has been assisting PMSA to strengthen its governance and internal controls, such as reviewing its code of conduct for Board members and staff. CPD has also provided early corruption prevention advice on the licensing regime as well as the relevant licence application documents and procedural guidelines. Apart from providing early corruption prevention advice to PMSA on its codes of conduct and practices for licensed companies and practitioners, CPD will continue to offer timely corruption prevention assistance concerning the implementation of the new licensing regime, including building in corruption prevention safeguards in its complaint handling and disciplinary systems.



## 回應公眾關注的問題

### 維護公共選舉廉潔公正

在二零一九年區議會選舉中出現的各種懷疑違規行為，引起公眾關注投票和點票程序是否廉潔公正。有見及此，防貪處迅速檢視了有關程序，並向政制及內地事務局提出數項建議，以改善來屆立法會選舉及二零二一至二二年內各項公共選舉的安排。此外，為減低立法會功能界別選舉中的種票風險，防貪處已完成一項探訪計劃，對其會員有資格登記為相關功能界別選民的訂明團體進行探訪，以協助它們加強會籍管理制度。防貪處會繼續與當局合作，進一步改善選舉程序和監管措施，以維持公共選舉（包括二零二一年立法會選舉）的廉潔公正。

## ADDRESSING ISSUES OF PUBLIC CONCERN

### Keeping Public Elections Clean

In view of the various alleged malpractices in the 2019 District Council Election which aroused public concerns over the integrity of its polling and vote counting processes, CPD quickly conducted a review on the relevant procedures and recommended to the Constitutional and Mainland Affairs Bureau a number of improvement measures for the Legislative Council (LegCo) Election and other public elections in 2021-22. In addition, to mitigate vote-rigging risks in LegCo Functional Constituencies Elections, CPD has completed a visit programme to Specified Bodies, the members of which are eligible to register as voters of the relevant functional constituencies, to assist them in enhancing their membership administration systems. CPD will continue to collaborate with the Administration to further enhance the electoral processes and controls to keep public elections clean, including the LegCo Election in 2021.



進行實地巡查，以監察持牌小販履行食物環境衛生署牌照條件的情況

Conducting site inspections to monitor licensed hawkers' compliance with licence conditions of the Food and Environmental Hygiene Department

### 小販事務隊的管理

食物環境衛生署（食環署）約有 2 250 名各級別的小販管理主任職系人員，以管制小販活動、打擊店鋪阻街及與環境衛生有關的各種違法行為（例如亂拋垃圾）。由於監察這些分散在戶外不同地點執行職務的員工存在難度，並且不時有媒體報導和投訴他們在工作時擅離崗位、疏忽職守和其他不當行為。因此，防貪處審查了食環署管理這些員工的程序。防貪處的研究顯示食環署已在程序中建立了合理的監管措施，並就員工的監察及管理提供建議，以進一步完善制度。

### Management of Hawker Control Teams

The Food and Environmental Hygiene Department (FEHD) has around 2 250 Hawker Control Officer grade staff at various ranks to control hawking activities and combat illegal shop front extensions and various environmental hygiene-related offences (e.g. littering). Since these staff perform outside duties at scattered locations which are difficult to monitor and from time to time there are media reports and complaints alleging them of loafing, dereliction of duties and other malpractices, CPD reviewed FEHD's procedures for managing these staff. Noting that FEHD has put in place reasonable controls in its procedures, CPD provided corruption prevention advice for further refinement of the staff monitoring and management systems.



《非紀律部隊執法機構 – 執法工作防貪指南》旨在提高非紀律部隊執法機構人員對常見貪污漏洞的警覺，以及提供相關的預防措施應對貪污風險

The *Corruption Prevention Guide on Regulatory Enforcement for Non-disciplined Enforcement Agencies* enhancing officers' awareness of the common corruption pitfalls and providing them with related safeguards to address the risks

## 為非紀律部隊執法部門及機構提供防貪服務

執法或規管工作通常涉及較高貪污舞弊風險。不少非紀律部隊政府部門和公共機構兼備執法或規管職能。為協助他們增強防貪能力，防貪處研究相關的貪污風險並製定《非紀律部隊執法機構 – 執法工作防貪指南》，彙列詳細的建議措施以應對相關風險。該指南已上載到數碼政府合署網站，並已分發給相關政府部門和公共機構以供參考。

## Corruption Prevention Services on Regulatory Enforcement for Non-disciplined Service Departments and Public Bodies

Regulatory enforcement is by nature prone to corruption and abuse. In order to assist non-disciplined service departments and public bodies to enhance their corruption prevention capability in carrying out regulatory enforcement work under their purview, CPD conducted research into the relevant corruption risks and developed a *Corruption Prevention Guide on Regulatory Enforcement for Non-disciplined Enforcement Agencies* providing a comprehensive system of recommended control measures to address the corruption risks identified. The Guide was uploaded to the Central Cyber Government Office and promulgated to relevant government departments and public bodies for their reference.

## 改善買位計劃申請的處理

社會福利署（社署）透過改善買位計劃，從私營安老院舍購買宿位，以加快提升資助宿位的數目。加入此計劃的安老院舍為社署提供雙方協定的宿位數量，從而收取月費資助；此資助計劃涉及每年的經常性開支約為 14 億元。鑑於涉及大量公帑及政府資助計劃處理申請程序的潛在風險，防貪處遂審查了相關程序，並就審批申請及實地巡查安老院舍的程序向社署提供建議。

## Processing of Enhanced Bought Place Scheme Applications

The Social Welfare Department has been purchasing residential places from private residential care homes for the elderly (RCHEs) through the Enhanced Bought Place Scheme to speed up the provision of subsidised RCHE places. RCHEs joining the Scheme receive a monthly fee to provide an agreed number of places for allocation by the Social Welfare Department, amounting to an annual recurrent expenditure of around \$1.4 billion. In view of the substantial amount of public money involved and the inherent risks in the application processing of government funding schemes, CPD conducted a review on the related procedures, with recommendations on the application vetting process and site inspections of applicant RCHEs.



《幼稚園運作防貪指南》就幼稚園的主要運作範疇，提供實用的防貪提示及處境分析，供幼稚園從業員參考

The *Corruption Prevention Toolkit on Kindergartens' Operations* providing practical corruption preventive tips and scenario analysis on kindergartens' major operations for reference by kindergarten practitioners

## 《幼稚園運作防貪指南》

幼稚園在幼兒教育中擔當重要的角色。由於政府向幼稚園提供了大量財政資助，公眾對幼稚園的管治水平期望日高。為了達到良好管治，幼稚園必須建立有效的誠信管理和內部監控系統，以防止濫用和貪污行為。有見及此，防貪處與教育局協作，編製了內容全面的《幼稚園運作防貪指南》，就幼稚園的主要運作範疇提供簡便實用的防貪指引及文件範

## Corruption Prevention Toolkit on Kindergartens' Operations

Kindergartens play a vital role in early childhood education. With the substantial financial support provided to kindergartens and thus increased public expectation on the kindergartens' governance, it is imperative for kindergartens to put in place effective integrity management system and sound internal control system, both are essentials to good governance, to avert abuse and corrupt practices. CPD has therefore, in collaboration with the Education Bureau,

本。防貪處於二零二零年底，向近 1 000 所幼稚園推廣使用該指南，並於二零二一年將繼續與教育局合作，在適當的平台上推廣該指南，及按個別幼稚園的要求提供度身訂造的建議。

developed a user-friendly and comprehensive *Corruption Prevention Toolkit on Kindergartens' Operations* (the Toolkit), to provide practical corruption preventive tips on kindergartens' major operations and a library of sample documents. The Toolkit was promulgated in late 2020, reaching about 1 000 kindergartens. In 2021, CPD will continue to explore with the Education Bureau on appropriate platforms for promulgating the Toolkit, and to provide tailor-made advice to individual kindergartens upon request.



觀察勞工處職員查核承建商遵守職業安全法例的實地巡查工作

Observing a Labour Department officer in conducting field inspections to check contractors' compliance with the occupational safety legislations

## 在建築地盤執行職業安全法例的工作

近年，與建造業相關的意外事故數字持續高於其他行業，使人關注到勞工處在建築工地執行職業安全法例所引致的貪污風險。防貪處審視了勞工處相關的工作常規及程序，並提供防貪建議，以加強該處進行巡查和意外調查的監控機制。防貪處亦建議勞工處對其執法策略進行全面檢討，以促進有效執法。

## Enforcement of Occupational Safety Legislations on Construction Sites

The construction industry has recorded the highest number of accidents among all industries in recent years, which gives rise to concerns over risks of corruption in the enforcement of occupational safety legislations on construction sites by the Labour Department (LD). CPD reviewed LD's related practices and procedures, and provided corruption prevention advice on strengthening the control mechanism for conducting and monitoring inspections and accident investigation. LD was also recommended to conduct a holistic review of its enforcement strategy to facilitate effective enforcement.



### 消除商業樓宇火警危險的程序

消防處就消除樓宇火警危險採取執法行動，以保障消防安全。為確保執法程序具備足夠的防貪措施，防貪處就消除商業樓宇火警危險的程序，向消防處提供防貪建議，涵蓋處理投訴、進行檢查、發出消除火警危險通知書及提出檢控的程序。

### Abatement of Fire Hazards in Commercial Buildings

The Fire Services Department takes enforcement actions to abate fire hazards in buildings to safeguard fire safety. To ensure adequate corruption prevention measures are in place, CPD has offered corruption prevention advice to the Fire Services Department on its procedures for abating fire hazards in commercial buildings, covering the handling of complaints, conduct of inspections, issue of fire hazard abatement notices, and taking of prosecution actions.



檢視消防處驗收消防車的程序

Reviewing the conduct of acceptance inspection of a fire fighting vehicle by the Fire Services Department



檢視公共房屋建築項目的屋宇裝備工程檢驗程序

Studying the procedures for inspection of building services works in a public housing project

## 公共房屋申請及編配

房屋署（房署）為難以負擔私營房屋的市民提供公共房屋（公屋）。截至二零二零年六月，一般公屋申請超過 155 800 宗。而首次編配公屋的輪候時間約為 5.5 年，遠超於房署所訂立的三年編配服務目標。鑑於本港市民對公屋需求甚殷，公屋申請人可能以不當方法務求加快審批其申請。因應當中涉及的貪污風險和公眾利益，防貪處就房署處理公屋單位申請及分配程序進行了審查並提供防貪建議，以確保相關程序有足夠的防貪措施。

## Application and Allocation of Public Rental Housing Flats

The Housing Department (HD) provides public rental housing (PRH) to people who have difficulties in affording private accommodation. As at June 2020, there were over 155800 general applications registered for PRH. The current waiting time for the first flat offer for these applications is around 5.5 years, which is substantially longer than HD's performance target of three years. Given that the demand for PRH significantly outstrips the supply, anxious applicants might have the incentive to expedite the application process through devious means. In light of the corruption risks and the public interest involved, CPD conducted a review of HD's procedures for processing the application and allocation of PRH units, and made a number of recommendations to ensure that sufficient safeguards are in place.



《工程監督防貪指南》協助部門／機構和從業人員強化工程監督的管控

The *Corruption Prevention Guide on Works Supervision* helping departments/organisations and practitioners enhance controls in the supervision of projects

## 針對目標界別的防貪工作

### 公共工程工地監督系統的防貪工作

有效和健全的工地監督系統對確保工程質量以及保障公眾利益和安全至為重要。因此，防貪處就發展局和工務部門的公共工程項目工地監督系統完成了防貪審查研究，協助他們加強系統中的防貪措施。防貪處亦就公共工程項目中建立和實施數碼工程監督系統，向發展局提供建議，以加強系統的安全、誠信和可靠性。對於同樣有開展工程項目的非工務部門和公共機構，防貪處編制了《[工程監督防貪指南](#)》供他們使用，並會協助他們落實指南中的防貪措施。此外，防貪處透過防貪諮詢服務網站發布指南，供私營機構（例如建築公司、發展商）和從業人員（例如工程顧問）參考，並將按需要向他們提供度身訂造的建議。

## CORRUPTION PREVENTION WORK FOR TARGET SECTORS

### Corruption Prevention Work on Site Supervision System for Public Works Projects

An effective and robust site supervision system is vital to ensure the quality of works and safeguard the public interest and safety. To this end, CPD completed a review of the site supervision systems for public works projects and assisted the DEVB and works departments with a view to strengthening the corruption prevention safeguards in the systems. CPD also provided advice to the DEVB in the development and implementation of the digital works supervision system in public works projects to ensure the integrity, reliability and robustness of the system. In respect of non-works departments and public bodies which also undertake construction projects, CPD produced a [Corruption Prevention Guide on Works Supervision](#) for their use in their projects and would assist them in adapting and adopting the corruption prevention measures recommended in the Guide. CPD also published the Guide through the CPAS web-portal for reference by private sector companies (e.g. construction companies, developers) and practitioners (e.g. works consultants) and would provide them with tailored advice upon request.



## 公共工程承建商誠信管理系統

公共工程承建商於確保公共工程項目的質量中起重要作用。防貪處在檢視發展局管理認可承建商名冊的制度後，制定了一套“誠信管理系統”，並建議發展局將“誠信管理系統”納入為註冊要求。發展局已就相關建議，與業界持份者進行了兩輪諮詢。防貪處亦一直協助發展局完善“誠信管理系統”，以配合業界的需要。當經修訂的註冊要求推行後，防貪處將繼續與發展局合作，為公共工程承建商提供防貪服務，以建立其誠信管理系統，包括向承建商就其制定誠信政策時提供建議，為他們提供誠信培訓，並就有高貪污風險的建築工作程序制定“誠信風險管理”計劃。

## Integrity Management System for Public Works Contractors

Public works contractors play an important role in upholding the quality of public works projects. Following the Department's review of DEVB's management of approved list of public works contractors, CPD developed an Integrity Management System (IMS) and recommended DEVB to include IMS as a listing requirement for public works contractors. Further to CPD's recommendation, DEVB conducted two rounds of consultations with the industry stakeholders and CPD had been assisting DEVB in refining the IMS requirements to suit the needs of the stakeholders. Upon the implementation of the revised listing requirements, CPD will continue to collaborate with DEVB to offer corruption prevention services to the public works contractors in setting up their IMS, which include offering advice to contractors when they draw up integrity policies, providing integrity training to the contractors, and developing integrity risk management plans of high-risk construction activities.



《保險公司防貪指南》協助保險公司在主要營運範疇中建立及加強防貪能力

The *Corruption Prevention Guide for Insurance Companies* assisting insurance companies to establish and strengthen their corruption prevention capabilities in their core operations

## 《保險公司防貪指南》

保險業監管局於二零一五年成立，並於二零一七及二零一九年分別接管規管保險公司及保險中介人的職能。鑒於這套新的監管制度及保險業營運範疇容易出現貪污問題，防貪處與保險業合作編製《保險公司防貪指南》，供香港的保險公司管理層參考使用，以協助他們在主要營運範疇中建立及加強防貪能力。防

## Corruption Prevention Guide for Insurance Companies

The Insurance Authority, established in 2015, took over the regulation of insurance companies and insurance intermediaries in 2017 and 2019, respectively. In view of the new regulatory regime and that some business operations in the insurance industry are by nature corruption prone, CPD collaborated with the insurance industry to develop the *Corruption Prevention Guide for Insurance Companies*



貪指南內容涵蓋反貪法例、公司管治及內部監控系統的元素，以及保險公司主要營運範疇（包括保險中介人的管理、銷售程序、核保及核實索償程序）中的貪污風險和相應的防貪措施。防貪處會在二零二一年推廣該指南，例如舉辦宣傳活動向公眾及保險公司推廣該指南及將指南派發予保險公司，並因應個別保險公司的要求提供防貪建議等。

### 與監管機構合作加強首次公開招股程序的可靠性

二零一九年一宗香港交易及結算所有限公司（港交所）有關處理首次公開招股申請的貪污案件，引發大眾關注此重要程序的可靠性。防貪處積極聯絡港交所及證券及期貨事務監察委員會（證監會），以檢討其批核招股申請及監管保薦人的程序。防貪處注意到港交所和證監會在有關程序上已建立及優化了管控措施，並就加強港交所和證監會的管控程序及誠信要求，提供了適當的建議。

(the Guide) for reference by the management of insurance companies in Hong Kong to assist them in establishing and strengthening their corruption prevention capabilities in their core operations. The Guide covers contents on anti-bribery legislation, elements of corporate governance and an internal control system, as well as the corruption risks and the corresponding safeguards in the core operations of an insurance company including management of insurance intermediaries, sales process, underwriting and claims verification procedures. CPD will promote the Guide in 2021, such as organising publicity events for promoting the Guide to the public and the insurance companies, distributing the Guide to insurance companies, as appropriate, and offering tailored corruption prevention advice to individual companies on request.

### Collaboration with Regulators to Enhance the Integrity of Initial Public Offering Procedures

A corruption case relating to the Initial Public Offering (IPO) process of the Hong Kong Exchanges and Clearing Limited (HKEX) in 2019 has aroused public concern over the integrity of this important process. CPD proactively approached HKEX and the Securities and Futures Commission (SFC) to review their procedures for processing IPO applications and regulating sponsors. Noting that HKEX and SFC have improved and put in place reasonable controls in their procedures, CPD made recommendations to strengthen HKEX's and SFC's procedural control and relevant probity requirements as appropriate.



聯同英國特許採購及供應學會－香港分會為採購專業人員舉行網上研討會

Joint webinar with Chartered Institute of Procurement and Supply – Hong Kong Branch for procurement professionals

### 透過防貪諮詢服務網站提供防貪資源

為了提高私營機構的防貪意識和更便利地向他們提供防貪服務，防貪處自二零一七年一月起推出[防貪諮詢服務網站](#)，以適時提供各類防貪資源（例如防貪刊物、培訓短片、個案研究、防貪警示和要訣等）。防貪處一直不斷豐富及更新網站的內容，並透過政府決策局／部門、專業組織、監管機構、業界團體等網絡，向不同界別推廣該網站。網站自推出至二零二零年十二月底，累積瀏覽次數約465 300次，下載或閱覽防貪資源次數則多於155 500次。另外約有10 300名用戶登記訂閱，可定期收取防貪資訊、工具和資源。在疫情期間，該網站亦因其無間斷的服務模式，在向私營界別提供防貪服務中發揮了特別重要的作用。

### Resources through Corruption Prevention Advisory Service Web Portal

To raise private sector entities' general awareness and facilitate the delivery of corruption prevention service to them, CPD launched a dedicated [web portal](#) in January 2017 for timely dissemination of corruption prevention resources (e.g. corruption prevention publications and training videos, case studies, red flags, corruption prevention tips). CPD has been continuously enriching and enhancing the web portal content, and promoting the web portal through the networks of government B/Ds and professional/regulatory/trade bodies to users across different business sectors. Since its launch and up to the end of December 2020, the web portal has attracted about 465 300 visits and with corruption prevention resources downloaded or viewed for over 155 500 times. There are also an accumulated total of about 10 300 subscribers who regularly receive the corruption prevention news, tools and resources. During the pandemic, the web portal played a particularly important function in providing uninterrupted corruption prevention services to the private sector.