

A close-up, artistic photograph of a woman's hands playing a piano. She is wearing a red, sequined dress. Red petals are falling around her, creating a soft, romantic atmosphere. The lighting is warm and focused on her hands and the piano keys. A purple diagonal graphic element is in the top right corner.

堅決反貪 從未改變
Stand Firm against Corruption.
Our Mission Continues.

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，確保新項目在籌劃及初期落實階段時，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；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 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.

STRUCTURE

The 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。

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。

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 corruption risks in public administration with special emphasis on issues which are of public interest or concern, important to people's livelihood or public safety, 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 in Hong Kong.

向地政總署主任了解為評核契約修訂申請而進行實地視察的程序

Discussion with a Lands Department officer on the site visits for assessing lease modification applications



二零二一年完成的工作項目包括：

- 完成 69 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 526 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。
- 因應要求向私營機構提供共 1 375 次防貪建議，並透過防貪諮詢服務熱線，處理共 787 個公眾查詢。
- 防貪諮詢服務網站累積逾 271 700 瀏覽次數，下載或閱覽防貪資源次數則約 80 700 次。
- 向公私營機構超過 11 400 名人員提供防貪培訓。
- 出版並推廣防貪刊物例如《公共機構行為守則範本》、《非紀律部隊執法機構－執法工作防貪指南》、《保險公司防貪指南》、《防貪錦囊－招聘建築工人》及聯同物業管理業監管局出版的《物業管理防貪警示》，說明當中貪污風險及相關防貪措施以供不同界別參考。以上刊物已上載於防貪諮詢服務網站及數碼政府合署網站供參閱。

維護公共選舉廉潔公正

防貪處一直致力維護選舉廉潔，透過向政府提供建議，協助政府在選舉制度和程序中加入防貪措施。新選舉制度於二零二一年五月實施後，防貪處分別檢視了二零二一年九月選舉委員會界別分組一般選舉及十二月立法會換屆選舉的投票和點票程序，並向政府提出多項建議，以減少過程中的舞弊風險和優化管控措施。防貪處亦向所有參與選舉的團體發放指引，並向首次參與者提供諮詢服務，以協

Deliverables achieved in 2021:

- Completed 69 assignment reports, mainly covering detailed review of corruption risks in specific systems and related practices in government bureaux/departments (B/Ds) and public bodies and recommended preventive measures against corruption.
- Provided tailored advice to government B/Ds and public bodies on 526 occasions, mainly involving the formulation/review of legislation, policies or procedures to ensure corruption prevention safeguards were built in at an early stage.
- Offered advisory service to private sector entities on 1 375 occasions upon request, and handled 787 public enquiries through the CPAS hotline service.
- Recorded over 271 700 visits to the CPAS Web Portal and about 80 700 downloads or views of corruption prevention resources.
- Conducted corruption prevention training for over 11 400 persons from both public and private sectors.
- Published and promulgated corruption prevention guides illustrating the corruption risks and recommended safeguards for reference by different sectors, such as *Sample Codes of Conduct for Public Bodies*, *Corruption Prevention Guide on Regulatory Enforcement for Non-disciplined Enforcement Agencies*, *Corruption Prevention Guide for Insurance Companies*, and the *Corruption Prevention Checklist on Recruitment of Construction Workers* and *Property Management Corruption Prevention Red Flags* jointly published with the Property Management Services Authority. The publications were available for access through the CPAS Web Portal or the Government's Central Cyber Government Office website.

KEEPING PUBLIC ELECTIONS CLEAN

CPD always strives to keep public elections clean by providing advice to the Government to build in corruption prevention safeguards in the electoral systems and processes. Following the implementation of the improved electoral system in May 2021, CPD conducted a review on the polling and vote counting processes of the Election Committee Subsector Ordinary Elections and Legislative Council General Elections respectively held in September and December 2021, with a number of recommendations made to the Government to reduce the risk of manipulation and improve the procedural controls. CPD also issued guidelines to all participating organisations of these elections and offered advisory service to those first-time participant to help prevent corruption risk in

助他們預防在選民登記及產生選舉委員會委員的內部機制中的貪污舞弊風險。防貪處會繼續與政府合作和向參與公共選舉的團體提供防貪服務，確保選舉廉潔公正。

主動就新政策措施及早提供防貪建議

政府近年推出多項新政策措施，包括增加房屋及商業樓面供應、推動發展智慧城市、促進創新科技的採用等。防貪處採取源頭預防和互動策略，於有關措施和計劃的籌備階段向政府及相關公共機構及早提供防貪建議，讓必要的誠信管理和防貪元素從起初便納入制度內。防貪處亦會跟進和詳細檢討這些新措施的推行情況，確保建議得以有效落實。以下是這項策略的一些例子。

支持創新科技發展

為推動香港的創新科技發展，多個公共機構就培育人才、基礎建設、開拓商機等方面推出多項與創新科技相關的措施。防貪處繼續向這些機構提供協助，確保其制度和日常工作能抵禦貪污舞弊風險。年內，防貪處檢視了香港科技園公司處理創科人才申請入住其“創新斗室”的程序；亦就落馬洲河套區“港深創新及科技園”判授建造工程和顧問合約及採購一般物料和服務的程序，及早提供防貪建議。防貪處亦就其他公共機構的多項創科計劃與項目給予防貪意見，確保它們管理及運作妥善。

中環新海濱三號用地

位於中環區的中環新海濱三號用地被納入政府二零二零年度賣地計劃的具規模（4.8公頃）優質商業用地，由發展局以“雙信封制”的新方式（即設計與價格的評分比重各佔一

their internal systems pertaining to voter registration and return of Election Committee members. CPD will continue to collaborate with the Government and offer corruption prevention services to participating organisations to keep public elections clean.

PROACTIVE AND EARLY INPUT TO GOVERNMENT'S NEW INITIATIVES

In recent years, the Government has launched a number of new initiatives, including those to increase land supply for housing and commercial use, drive the development of Smart City, facilitate the adoption of innovation and technology, etc. To ensure necessary integrity management and corruption prevention measures are built in the implementation 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 their formulation and preparation stages. CPD also follows up these initiatives with detailed reviews to ensure their robust and successful implementation. The following are some examples of this strategy.

Support for Innovation and Technology Development

Various public bodies have launched initiatives for advancing innovation and technology (I&T) development in Hong Kong, covering the nurturing of talents, construction of infrastructure and development of business opportunities in I&T. CPD continued to assist them in ensuring their systems and practices were resilient against corruption. In the year, CPD reviewed the procedures for admission of I&T talents to the InnoCell operated by the Hong Kong Science and Technology Parks Corporation, and provided early corruption prevention input to the Hong Kong-Shenzhen Innovation and Technology Park at the Lok Ma Chau Loop on the letting of construction works consultancies and contracts and procurement of general goods and services. CPD also advised other public bodies on a number of I&T related schemes and programmes to ensure propriety in their administration and operation.

Site 3 of the New Central Harbourfront

Site 3 of the New Central Harbourfront is a sizable (4.8 hectares) premier commercial site in Central included in the Government's 2020 land sale programme. The

半) 招標出售。由於以評審設計方案的方式賣地並非慣常做法，防貪處於是主動接觸發展局，提供防貪意見，以確保該土地須根據中標方案而發展。

新一代停車收費錶系統

為配合政府推動“智慧出行”措施，運輸署於二零二一年推出新一代停車收費錶系統，以取代全港現有的 12 000 台停車收費錶，並將該系統的開發和營運外判予承辦商。於新收費錶系統的管理、營運及維修合約生效之際，防貪處即向運輸署就管理合約及監管承辦商的程序，以及如何運用新系統加強監察收費錶的運作情況及承辦商的工作表現提供建議。防貪處亦會在新收費錶系統全面實施後，再詳細檢視其推行情況。

就強制性公積金受託人加入“積金易”平台提供防貪建議

為了將強制性公積金(強積金)計劃的行政程序標準化、精簡化和自動化，政府委託強積金管理局(積金局)負責設計、構建和營運“積金易”平台，以提供一站式的電子平台服務。積金局成立了一間全資附屬公司(即“積金易”平台有限公司)推行“積金易”平台項目。另外，政府將撥款向成為先行者率先加入平台的強積金受託人提供財政支援。鑑於開發／推出“積金易”平台涉及大量公帑，對大眾利益影響深遠，積金局主動就開展“積金易”平台的安排向防貪處徵詢意見。防貪處除了及早就強積金受託人加入“積金易”平台的程序提供防貪建議外，亦會繼續適時就推行其他“積金易”平台的落實安排向積金局提供防貪建議，包括於“積金易”平台有限公司的企業管治及內部監控系統中建立防貪措施，以及提升新平台公司職員的誠信水平。

Development Bureau (DEVB) adopted a novel “two-envelope” approach (50:50 design-to-price weighting) for selling the site by tender. In view of the unconventional approach of assessing design proposals in land sale, CPD proactively approached DEVB to provide corruption prevention advice to ensure the land lot is developed in accordance with the winning proposal.

New Generation Parking Meter System

As one of the Smart Mobility initiatives, the Transport Department (TD) launched a new generation Parking Meter System (PMS) in 2021 which would replace all 12 000 existing parking meters across the territory. To take forward the initiative, TD engaged a contractor to develop and operate the system. Upon commencement of the new PMS's Management, Operation and Maintenance contract, CPD provided advice on TD's procedures for contract administration, managing contractors and on how to make the best use of the new system to enhance the monitoring of proper operation of the meters and the performance of contractors. CPD will conduct a detailed review on the implementation of the new PMS after it has been in full operation.

Corruption Prevention Advice on the Onboarding Arrangement for the eMPF Platform

The Government tasked the Mandatory Provident Fund Schemes Authority (MPFA) to design, build, and operate a common electronic platform (eMPF Platform) to standardise, streamline and automate the administration processes of the Mandatory Provident Fund (MPF) schemes. MPFA established a wholly owned subsidiary, the eMPF Platform Company Limited, to implement the initiative. The Government would provide financial incentive to those MPF trustees which become early adopters for onboarding. In view of the substantial sum of public funding involved in developing/launching the eMPF Platform and huge impact of the initiative to the general public, MPFA proactively sought CPD's advice on the eMPF Platform initiative. CPD provided early input on the onboarding arrangement of MPF trustees and will continue to offer timely corruption prevention assistance concerning the implementation of the initiative, including building in corruption prevention safeguards in the governance and internal control over the administration of the Platform, and enhancing the probity standard of staff in the new company.

針對行業的防貪工作

防貪處持續地評估特定界別的需要，加強當中的防貪工作。防貪處於二零二一年的重點工作包括：

打擊建造業收取“介紹費”的貪污行為

為防止建築工人在求職過程中受到壓榨，被承建商／分判商中的不良員工／代理人索取非法“介紹費”，防貪處取得相關政府部門、公共機構及建造業議會的全力支持推行防貪措施以杜絕歪風。年內，防貪處編製了《防貪錦囊－招聘建築工人》供建築公司參考，以及建議建造業議會優化其求職配對應用程式“建工易”中的自動配對／提示功能和在應用程式內加入反貪信息。

CORRUPTION PREVENTION WORK FOR INDUSTRIES

CPD continuously identifies the needs of specific industries for strengthening corruption prevention work. The major corruption prevention work conducted in 2021 includes the following –

Curbing “Referral Fee” Malpractice in the Construction Industry

To protect construction workers against the corrupt practice of unscrupulous employees/agents of contractors/subcontractors soliciting and accepting “referral fee” from them for their employment in construction projects, CPD has secured the full support of the relevant government departments, public bodies and the Construction Industry Council (CIC) to implement corruption prevention measures to stamp out the malpractice. In the year, CPD published a *Corruption Prevention Checklist on Recruitment of Construction Workers* for reference by construction companies, and advised CIC to enhance the auto-matching/alert functions of its job-matching mobile app “easyJob” and embed anti-bribery messages in the app.



《防貪錦囊－招聘建築工人》提供防貪措施，以協助承建商／分判商在招聘過程中預防貪污和不當行為

Corruption Prevention Checklist on Recruitment of Construction Workers providing corruption prevention measures to assist contractors/subcontractors to safeguard against corruption and malpractices in the recruitment processes



廉政公署聯同保險業監管局舉辦新聞簡報會，推廣《保險公司防貪指南》

ICAC holding a joint press briefing with the Insurance Authority to promote the *Corruption Prevention Guide for Insurance Companies*

保險公司防貪指南

有見保險業設立新監管制度，以及業界一些營運範疇潛在貪污風險，防貪處與業界於二零二零年合作編製《保險公司防貪指南》，供保險公司參考使用。該防貪指南涵蓋反貪法例、良好企業管治元素及內部監控等內容，以及有關保險公司主要營運範疇（例如保險中介人的管理、銷售程序、核保及核實索償程序等）的貪污風險和相應的防貪措施。今年，防貪處繼續聯同保險業監管局及業界團體向業界積極推廣該防貪指南及防貪措施，例如舉辦培訓課程、刊發專題文章／帖文以推介指南的防貪建議，以及因應個別保險公司的要求提供適切的防貪意見，協助其建立及加強主要營運範疇的防貪能力。

Corruption Prevention Guide for Insurance Companies

In view of the new regulatory regime over the insurance sector and the inherent corruption risks in various business processes in the industry, CPD collaborated with the industry in 2020 to develop the *Corruption Prevention Guide for Insurance Companies* for reference of insurance companies. The Guide covers contents on anti-bribery legislation, elements of good corporate governance and internal controls, as well as the corruption risks and corresponding safeguards in the core operations of an insurance company (e.g. management of insurance intermediaries, sales process, underwriting and claims verification procedures). This year, CPD continued its collaboration with the Insurance Authority and industry bodies in proactively promoting the Guide and corruption prevention practices to the industry, for example, by organising training, publishing articles/posts to promote the recommended practices in the Guide, and providing tailored advisory services to individual insurance companies upon request to assist them in establishing and strengthening the corruption prevention capabilities in their core operations.



建造業議會主席及該會執行總監、發展局常任秘書長（工務）及廉政專員聯合主持“『誠』建商約章”啟動禮

Chairman and Executive Director of the Construction Industry Council, Permanent Secretary for Development (Works) and ICAC Commissioner jointly officiating the launching ceremony of the “Integrity Charter”

誠信管理系統於建造業的採用

為加強建造業界的防貪意識和能力，防貪處制定了一套“誠信管理系統”供建築公司採用。該套系統由三項元素組成：(1) 誠信政策、(2) 誠信培訓及 (3) 誠信風險管理，旨在有系統地協助建築公司加強其防貪能力。在發展局的支持下，自二零二一年三月一日起，“誠信管理系統”中的誠信政策和誠信培訓被納入為政府認可公共工程承建商、物料供應商及專門承造商的註冊要求。此外，建造業議會及發展局與防貪處攜手為業界推出一項“『誠』建商約章”（“約章”）的推廣計劃，向所有建築公司推廣“誠信管理系統”。“約章”於二零二一年九月二十四日正式推出，啟動儀式由建造業議會主席及該會執行總監、發展局常任秘書長（工務），以及廉政專員主持，其他出席嘉賓包括來自各政府工務部門、建造業相關商會、公共機構及主要承建商的代表。所有參與“約章”的公司須執行一套誠信政策，並每年安排最少一名高級管理人員接受誠信培訓。“約章”亦提供誠信風險管理的附加選項，旨在協助建築公司識別、評估及管理其業務

Adoption of Integrity Management System in the Construction Industry

To enhance corruption prevention awareness and capabilities of the construction industry, CPD developed the Integrity Management System (IMS) for use by construction companies. IMS consists of three components, namely (1) Integrity Policy, (2) Integrity Training and (3) Integrity Risk Management, and aims to adopt a systematic approach to assist construction companies to enhance their corruption prevention capabilities. With the support from DEVB, the Integrity Policy and Integrity Training of IMS have become the listing requirements for the Government’s approved contractors, suppliers of materials, and specialist contractors for public works since 1 March 2021. Besides, CIC, DEVB and CPD jointly organised an industry-wide campaign entitled as “Integrity Charter” to promote IMS to all construction companies. The Charter was officially launched on 24 September 2021 with a launching ceremony officiated by the CIC Chairman and CIC Executive Director, the Permanent Secretary for Development (Works) and the ICAC Commissioner. Representatives from various government works departments, construction industry-related trade associations, public bodies and major

上的誠信風險。防貪處會擔任“約章”秘書處的職務，負責為參與公司免費提供誠信培訓、防貪建議與資源等服務。“約章”自啟動以來獲建築公司積極參與，充分顯示本港建造業對業界的誠信操守十分重視。

物業管理業的防貪工作

為提升物業管理人(物管人)的誠信水平及鞏固業界的誠信文化，防貪處聯同物業管理業監管局(監管局)向持牌物業管理公司及物管人推廣防貪措施及提供防貪服務。防貪處在監管局制訂持牌人的操守守則及良好作業指南期間向其提供建議。這些文件分別就監管局持牌人的不同業務範疇，訂立各項誠信規定及提供實用的誠信指引。監管局亦將防貪處建議的“誠信管理系統”納入其《防止貪污事宜操守守則》及相關良好作業指南。該“誠信管理系統”涵蓋誠信政策、誠信培訓及誠信風險管理三大元素。為提高物管人對貪污的警覺，防貪處聯同監管局推出《物業管理防貪警示》，臚列有關物業管理的防貪警示、誠信風險及相應的管控措施。防貪處會繼續與監管局合作，協助持牌人遵守《防止貪污事宜操守守則》，包括在持牌人制訂誠信政策的階段向其提供防貪建議、誠信培訓，以及擬定誠信風險管理計劃，協助其轄下公司管理誠信風險。

contractors also attended the ceremony. A participating company has to implement an Integrity Policy and arrange at least one senior management staff member to attend Integrity Training every year. Integrity Risk Management is an optional add-on feature of the Charter which aims to facilitate construction companies to identify, evaluate, and manage the integrity risks in their business operation. CPD, being the secretariat of the Charter, will provide free services like integrity training, corruption prevention advice and resources to participating companies. The active participation of construction companies in the Charter since its launch showcased the strong emphasis on integrity by the construction industry in Hong Kong.

Corruption Prevention in the Property Management Industry

To enhance practitioners' integrity and entrench a probity culture in the property management sector, CPD partnered with the Property Management Services Authority (PMSA) to promote corruption prevention practices and provide corruption prevention services to licensed property management companies and practitioners. CPD offered input to PMSA's codes of conduct and best practice guides for licensees, which respectively sets out the requirements and provides practical guidance on various business operations of licensees. On CPD's recommendation, PMSA incorporated the IMS developed by CPD into its *Prevention of Corruption* and relevant best practice guides. IMS comprises Integrity Policy, Integrity Training, and Integrity Risk Management. To raise the practitioners' awareness, CPD jointly published the *Property Management Corruption Prevention Red Flags* with PMSA, listing the red flags, integrity risks and corresponding preventive measures pertaining to property management. CPD will continue to collaborate with PMSA to assist licensees in complying with the *Prevention of Corruption*, which include offering advice to licensees when they draw up integrity policies, providing integrity training to licensees, and developing integrity risk management plans to assist licensees in managing the integrity risks faced by their companies.



《物業管理防貪警示》臚列物業管理常見的防貪警示，以協助居民、物業管理公司和人員及時識別貪污問題和採取防貪措施

Property Management Corruption Prevention Red Flags listing the common red flags in property management in order to facilitate residents, property management companies and practitioners to identify the corruption problems and implement preventive measures in a timely manner

回應公眾關注的問題

防貪處經常關注涉及民生、公眾安全和備受公眾關注的事宜，以及耗用大量公帑的項目和工程，有關回應公眾關注問題的防貪工作包括：

樓宇及消防安全的防貪工作

屋宇署及消防處巡查樓宇和向大廈業主發出消防安全改善工程指示，以及審批建築圖則以確保樓宇符合消防安全標準。鑑於樓宇安全問題及樓宇管制程序存在貪污風險，防貪處已分別就屋宇署及消防處執行消防安全條例及審批建築圖則的程序進行審視，並就相關程序提供防貪建議。



檢視公共房屋消防裝置的巡查和維修程序

Examining the procedures for inspection and maintenance of fire service installations in a public housing estate

處理小型屋宇申請

地政總署審批小型屋宇申請的要求及程序繁複，審批一宗小型屋宇申請一般需時數年，而且並不容易獲批，現時亦有過萬宗申請正在處理中，令人關注到處理小型屋宇申請的過程可能存在貪污風險。防貪處已審視地政總

ADDRESSING ISSUES OF PUBLIC CONCERN

CPD always pays special attention to areas concerning people's livelihood and public safety and issues of public concern, as well as those involving substantial public money. The corruption prevention work addressing issues of public concern includes –

Corruption Prevention Work on Building and Fire Safety

The Buildings Department and Fire Services Department inspect buildings and issue directions to building owners for carrying out fire safety improvement works and process building plans to ensure compliance with the fire safety standards. In view of building safety concern and corruption risks inherent in building control, CPD reviewed the procedures for enforcing the fire safety ordinances and processing building plans respectively for the Buildings Department and Fire Services Department and made recommendations on corruption prevention safeguards.

檢視消防處審批一般建築圖則的程序

Reviewing the Fire Services Department's procedures for processing general building plans



Processing of Small House Applications

The requirements and procedures in the Lands Department's processing of small house applications are complicated. It generally takes a few years to approve a small house application and approval has not been easy to obtain. Currently, over 10 000 applications are under processing. There are concerns over the risks of corruption

署在這方面的工作常規和程序，並提供防貪建議，協助該署加強監管措施以阻止和偵查濫用小型屋宇政策的行為，以及監督處理小型屋宇申請的進度。

in the processing of small house applications. CPD reviewed Lands Department's practices and procedures in the area, and provided corruption prevention advice for strengthening controls to deter and detect abuse of the small house policy and monitoring progress of small house applications.

與環境保護署主任面談和實地觀察，以了解環境保護署管理廢電器電子產品處理及回收設施承包商的情況

Visiting the WEEE-PARK to understand Environmental Protection Department's management of the WEEE-PARK contractor



廢電器電子產品生產者責任計劃的管理

在廢電器電子產品生產者責任計劃下，廢電器電子產品的銷售商必須備有獲環境保護署（環保署）批註的除舊服務方案，而方案須指明提供免費收集和回收服務的收集商和回收商。為配合該計劃，環保署委託了一間廢電器電子產品處理及回收設施（WEEE-PARK）營運商為市民提供廢電器電子產品收集和回收服務，亦可供銷售商於其回收／再造公司以外選擇使用。鑑於相關規管程序、執法行動和合約管理工作存在貪污風險，防貪處對環保署實施該計劃所牽涉的管理程序進行審查研究。環保署已採納防貪處過往提供的防貪建議，訂立管理該計劃的程序指引和核對清單；防貪處進一步建議該署加強對廢電器電子產品收集商和回收商及 WEEE-PARK 營運商的監管。

Administration of the Producer Responsibility Scheme for Waste Electrical and Electronic Equipment

Under the Producer Responsibility Scheme for Waste Electrical and Electronic Equipment (WEEE), sellers of WEEE must have a removal service plan that has been endorsed by the Environmental Protection Department (EPD). The plan has to specify the collectors and recyclers respectively for free collection and disposal of WEEE. In connection with the Scheme, EPD has engaged the WEEE-PARK operator as its contractor for providing default WEEE collection and recycling services to the public, and which sellers may use apart from their own collectors and recyclers. In view of the corruption risks inherent in the regulatory processes, enforcement actions and contract administration, CPD reviewed EPD's procedures for the administration of the Scheme. While EPD has adopted CPD's previous corruption prevention recommendations in developing the procedural guidelines and checklists to administer the Scheme, CPD has provided further corruption prevention advice to strengthen the control of WEEE collectors and recyclers and the WEEE-PARK contractor.



於驗貨大堂檢視海關人員使用 X 光貨檢系統查驗空運貨物的程序

Examining the procedures for checking cargoes through the x-ray inspection system at the Cargo Examination Hall by officers of the Customs and Excise Department

查驗空運貨物

香港海關(海關)負責查驗進出口的空運貨物，以偵查走私及其他非法活動，例如走私毒品、瀕危物種、槍械等。空運貨物的處貨量每年高於四百萬噸，海關會按風險管理原則選定查驗目標。由於空運貨流頻繁，清關程序亦存在貪污風險，防貪處就海關的貨檢程序進行審查研究。為進一步加強已有的穩健監管制度，防貪處就抽查貨物作詳細檢查的程序提供了進一步的改善防貪建議。

監督防治蟲鼠服務

食物環境衛生署(食環署)將大部分的防治蟲鼠工作外判予服務承辦商。傳媒不時報道指防治蟲鼠工作成效不彰，以及防治蟲鼠工人疏忽職守，令公眾質疑食環署是否監管不力，縱容承辦商欠佳的工作表現。防貪處審視食環署管理防治蟲鼠服務合約的工作常規及程序後，提供了多項防貪建議，以強化食環署對防治蟲鼠工人日常工作及承辦商整體表現的監管機制。

Inspection of Air Cargoes

The Customs and Excise Department (C&ED) inspects inbound and outbound air cargoes in order to detect smuggling and other illicit activities (e.g. smuggling of narcotics, endangered species, firearms, etc.). With an annual air cargo throughput of over 4 million tonnes, C&ED selects inspection targets on a risk management basis. Given the heavy traffic of air cargoes and inherent corruption risks in cargo clearance, CPD conducted a review on C&ED's related inspection procedures. To further strengthen the sound control system in place, CPD made suggestions to enhance preventive measures in the selection of cargoes for detailed checking and examination.

Supervision of Pest Control Services

The Food and Environmental Hygiene Department (FEHD) has outsourced most of its pest control work to service contractors. From time to time, there are media reports alleging ineffective pest control work and loafing of pest control workers, raising public concern over FEHD's lax supervision and connivance at the contractors' poor performance. Upon reviewing FEHD's practices and procedures for administering pest control service contracts, CPD made a number of recommendations to enhance the mechanism for monitoring the daily services of pest control workers and overall performance of contractors.

觀察食物環境衛生署檢視服務承辦商的防治蟲鼠工作

Observing the Food and Environmental Hygiene Department's inspection of pest control work performed by service contractors



教育局籌辦內地考察團

於二零二一至二二學年起實施的香港中學文憑考試核心科目“公民與社會發展科”要求學生須參與內地考察。就此，教育局計劃委託承辦商承辦考察團，及對選擇自行籌辦考察團的學校提供津貼，並主動就有關的程序諮詢防貪處。防貪處已就委託考察團承辦商、處理學校津貼申請及監管承辦商／學校籌辦考察團情況等程序，向教育局提供防貪建議。

強化機構管治及防貪能力建設

良好管治是有效管理機構的關鍵。防貪處致力提升公私營機構的管治和防貪能力，以及協助其職員秉持誠信操守。

公共機構行為守則範本

為協助公共機構確保其成員及僱員的誠信符合市民日益提高的要求，防貪處修訂了公共機構成員及僱員行為守則範本。新守則範本加強了處理已申報利益衝突的緩解措施，並涵蓋適用於公共機構的防貪和誠信重點及補充條文。防貪處於二零二一年十月向公共機構的高級管理層推廣新的守則範本，及於個別公共機構更新行為守則時，向他們提供適切建議。

為私營機構提供防貪資源／建議

為了更有效和方便地向私營機構提供防貪資訊及服務，防貪處自二零一七年一月起推出革新防貪諮詢服務網站，透過電子平台適時提供防貪要訣、建議及資源（例如防貪刊物、培訓短片、個案研究及防貪警示等）。防貪處不時更新網站內容，並透過各政府決策局／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。網站自推出至二零二一年年底，累積瀏覽次數約 737 000 次，下載或閱覽防貪資源次數則超過 236 200 次；逾 10 600 名登記訂戶會定期收取防貪資訊、工具和資源。疫情期間，該網站更成為向私營機構在家工作的僱員提供無間斷及方便易用的防貪服務的重要工具。另外，防貪處因應私營機構要求提供防貪服務共 1 375 次，反映私營機構對有關服務的需求日益增加，原因主要包括市民的防貪意識不斷提高及可通過不同渠道（包括該網站）獲取防貪資訊，而防貪

Organisation of Mainland Study Tours by the Education Bureau

The new core subject “Citizenship and Social Development” of the Hong Kong Diploma of Secondary Education Examination starting from 2021-22 requires students to take part in Mainland study tours. In planning to engage tour operators for organising the tours and provide subsidies to individual schools which opted to organise the tours on their own, the Education Bureau proactively consulted CPD on the relevant procedures, and CPD has provided corruption prevention advice to the Education Bureau on its procedures for appointing tour operators, processing schools’ applications for subsidies, and monitoring the tour operators/schools in organising the tours.

ENHANCING GOVERNANCE AND CORRUPTION PREVENTION CAPACITY BUILDING

Good governance is pivotal to the effective management of an organisation. CPD has worked strenuously to enhance the governance and corruption prevention capabilities of both public and private organisations and help them uphold a high standard of integrity among staff.

Sample Codes of Conduct for Public Bodies

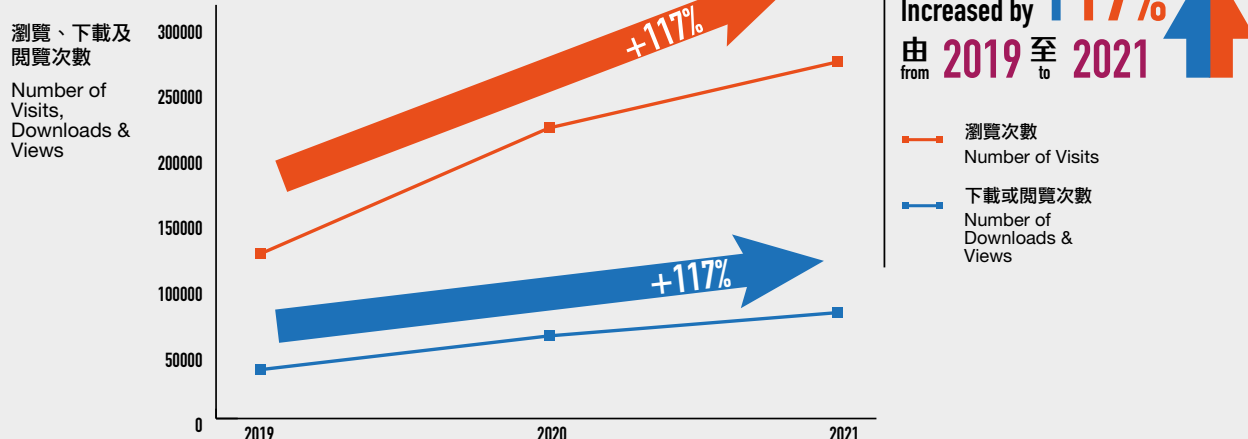
To help public bodies keep up with the heightened integrity standard expected of their members and staff, CPD updated the Sample Codes of Conduct for members and staff of public bodies. The new Sample Codes featured fortified mitigating measures on managing declared conflict of interests, focused content on essential anti-corruption and integrity elements and supplementary provisions for adoption by public bodies. CPD promulgated the new Sample Codes to senior management of public bodies in October 2021, and offered tailored advice to individual public bodies in updating their codes of conduct.

Corruption Prevention Resources/Advice for Private Sector Entities

To enhance the delivery of corruption prevention advice and services to the private sector, CPD revamped and launched a dedicated web portal in January 2017 for timely dissemination of corruption prevention tips, advice and various resources (e.g. corruption prevention publications and training videos, case studies and red flags) through electronic means. CPD has been continuously enriching and updating the portal content, and promoting the

防貪諮詢服務網站

Corruption Prevention Advisory Services Web Portal



過去三年瀏覽、下載及閱覽防貪諮詢服務網站的數據反映私營界別對防貪服務的需求日益增加

An increasing demand for corruption prevention services in the private sector as reflected by past three years' statistics on number of visits, downloads and views of Corruption Prevention Advisory Services Web Portal



防貪諮詢服務網站為私營界別提供防貪要訣、建議及資源

Corruption Prevention Advisory Services Web Portal promptly disseminates corruption prevention tips, advice and various resources to the private sector

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 2021, the portal has attracted about 737 000 visits and with corruption prevention resources downloaded or viewed for over 236 200 times. There are over 10 600 subscribers who regularly receive corruption prevention news, tools and resources. The portal has become an important tool for providing uninterrupted and user-friendly corruption prevention services to employees of the private sector who work from home during the pandemic. Besides, CPD has provided corruption prevention services to private sector on request on 1 375 occasions. The figure reflects an increasing demand for our services in the private sector, which is mainly due to increasing public awareness on corruption prevention, availability of various access channels including the web portal, and timely response of CPD to such requests in a strictly confidential way and continuous promotion of the corruption prevention services and proactive launch of major initiatives during the year, etc.

處亦迅速回應防貪服務要求並且對有關服務要求保密，以及持續推廣防貪服務及主動開展年內重要工作等。

提升非紀律部隊執法機構在執法或規管工作的防貪能力

執法或規管工作涉及較高貪污風險。防貪處早前就非紀律部隊執法機構（即兼備執法或

Enhancing Non-disciplined Enforcement Agencies' Corruption Prevention Capacity on Regulatory Enforcement

Regulatory enforcement is by nature corruption-prone. Previous reviews on the regulatory enforcement work of non-disciplined enforcement agencies (NDEAs), i.e. government departments and public bodies which discharge regulatory enforcement functions, have revealed

規管職能的政府部門和公共機構) 進行審查研究, 顯示多項執法或規管程序均出現監管不足的普遍現象, 因而存在貪污風險。為協助他們提升在執法或規管工作方面的防貪能力, 防貪處根據多年來向紀律部隊及非紀律部隊執法機構提供防貪意見所得經驗, 編製《非紀律部隊執法機構—執法工作防貪指南》, 臚列執法工作常見的監管不足之處和貪污風險, 並建議相應措施。防貪處已通過專題簡介會、防貪小組會議等不同渠道將該指南分發給所有非紀律部隊執法機構, 並會繼續協助相關機構因應其具體運作需要, 採用該指南的防貪建議, 以及向員工提供適切的防貪培訓。

“組裝合成”建築項目的防貪工作

“組裝合成”建築法是指預先在廠房(其可能在香港境外)生產建築組件, 然後將組件運送至工地裝嵌成為建築物的一種建築方法。繼政府推行採用“組裝合成”建築法, 以提升生產力和工地安全的政策後, 各工務部門、公共機構及非政府機構均在建築項目中更多採用該種建築法。政府亦透過對私人樓宇項目批出額外樓面面積, 鼓勵發展商使用“組裝合成”建築法。防貪處亦就建築組件品質控制、“組裝合成”建築法預先認可機制等不同程序, 提供防貪建議, 以協助工務部門及公共機構加強實施“組裝合成”建築法時的防貪措施。此外, 防貪處亦編製了《防貪錦囊—「組裝合成」建築項目》, 供公共和私人建築項目的項目委託人和工程顧問參考。

在工地檢視公共房屋工程的樁柱測試程序

Reviewing on site the pile test procedures in a public housing project



common control inadequacies in various regulatory enforcement processes, exposing them to corruption risks. Leveraging on the experience gained from advising both the disciplined forces and NDEAs over the years, CPD developed the *Corruption Prevention Guide on Regulatory Enforcement for Non-disciplined Enforcement Agencies*, setting out common control inadequacies, corruption risks and corresponding recommended measures in enforcement work to assist NDEAs to enhance their corruption prevention capability in carrying out regulatory enforcement work. The Guide was promulgated to all NDEAs through various channels such as thematic briefings and corruption prevention group meetings. CPD will continue to assist NDEAs to adopt and adapt the Guide to suit their specific operational needs and provide tailored training for their staff.

Corruption Prevention Work on Modular Integrated Construction

Modular Integrated Construction (MiC) is a construction process in which building modules are manufactured in factories (which may be outside Hong Kong) and then transported to the construction site for assembly into a building. Following the Government's policy to use MiC to enhance productivity and site safety, works departments, public bodies and non-governmental organisations are adopting more MiC in their building projects. The Government is granting additional floor area as an encouragement to private building projects adopting MiC. To assist works departments and public bodies in strengthening their corruption prevention systems in the implementation of MiC, CPD has offered corruption prevention advice on the related procedures covering quality control of building modules, pre-acceptance mechanism for MiC, etc. In addition, CPD has compiled the *Corruption Prevention Checklist on Building Projects Adopting Modular Integrated Construction* for reference by project clients and works consultants of both public and private projects.

