



防止貪污處

第五章

CHAPTER 05
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，透過強化管治及內部控制措施，預防貪污。
- 優先審查關乎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，以及涉及大量公帑的項目和工程。
- 從源頭防貪，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；並於主要項目（例如大型基建工程）的籌劃及落實等主要階段同步提供防貪服務，確保項目能適時注入防貪措施。
- 與各行各業的監管機構／團體及專業團體建立伙伴關係，透過於行業規例／守則中加入防貪及誠信元素、提供防貪指南及培訓，提升私營機構的防貪能力。
- 與相關政府部門及機構合作，推動工作流程和公共服務數碼化以加強他們的防貪能力。

組織

防止貪污處（防貪處）轄下設有六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；而其中一個審查組轄下的防貪諮詢服務，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 internal control systems.
- 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 early corruption prevention input to government departments and public bodies in respect of their new initiatives, services and systems, and offer concurrent corruption prevention services at key stages including formulation and implementation of major programmes (such as large-scale infrastructure projects) to ensure corruption prevention safeguards are put in place in a timely manner.
- Establish partnership with the regulatory authorities/ regime and professional bodies of different industries to enhance the corruption prevention capabilities of the private sector by incorporating corruption prevention and integrity elements in the trades regulations/codes of practice and providing preventive guidelines and training.
- Collaborate with the relevant government departments and organisations for promoting the digitalisation of work processes and public services to enhance their corruption prevention capabilities.

STRUCTURE

The Corruption Prevention Department (CPD) is organised into six 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

管理組

管理組協助為防貪處制訂工作策略，並提供行政支援。

專業團隊

防貪處的人員包括各界別的专业人士如會計／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、關乎民生和公眾安全的事宜，以及涉及大量公帑的項目，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。

二零二二年完成的工作項目包括：

- 68 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 588 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 1 022 次防貪建議，並透過防貪諮詢服務熱線，處理共 711 個公眾查詢。
- 透過防貪諮詢服務網站提供防貪資訊及服務（網站累積逾 165 000 瀏覽次數，下載或閱覽防貪資源次數則約 91 500 次）。
- 向公私營機構超過 13 400 名人員提供防貪培訓。
- 出版並推廣防貪刊物例如《銀行防貪指南》、《工程監督防貪指南》，說明當中的貪污風險及相關防貪措施以供不同界別參考。這些刊物已上載於防貪諮詢服務網站及數碼政府合署網站以供參閱。

integrity, and public works. The Corruption Prevention Advisory Service (CPAS) set up under one of the Assignment Groups is 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 corruption risks in public administration with emphasis on issues which are of public interest or concern, important to people's livelihood or public safety, and programmes and projects involving substantial amount of public money, covering areas such 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 and corruption-free environment for businesses with a view to achieving a sustainable economic development in Hong Kong.

Deliverables achieved in 2022:

- Completed 68 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 588 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 1 022 occasions upon request, and handled 711 public enquiries through the CPAS hotline service.
- Provided corruption prevention information and services by leveraging the CPAS Web Portal (recorded over 165 000 visits to the web portal and about 91 500 downloads or views of corruption prevention resources).

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，包括增加公私營房屋供應、推動運輸基建發展、改善勞工職業安全、推動創科發展等。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，盡早向政府及相關公共機構提供防貪建議，讓必要的誠信管理和防貪元素及早納入制度內。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。

採用“設計及建造”模式興建公營房屋項目

為應付未來十年龐大的公營房屋建築量（約 330 000 個單位），房屋署於二零二二年在合適的項目試行“設計及建造”的新採購模式，以優化整個建造流程。為了進一步提速、提效、提質，行政長官於《二零二二年施政報告》內建議房委會第二個五年期（即二零二八至二九年至二零三二至三三年）至少一半公屋單位採用“設計及建造”合約模式興建。為確保新的採購模式有足夠的制衡及監控措施，防貪處早於房屋署制訂相關的程序及標書時，已主動並同步向署方提供一系列的防貪建議。防貪處會持續向房屋署提供適時的防貪建議及為房屋署職員、承建商及其顧問舉辦誠信培訓，以確保“設計及建造”項目得以廉潔執行。

房屋署採用“設計及建造”模式加快興建公營房屋

The Housing Department adopting the “Design-and-Build” model to expedite public housing construction



- Conducted corruption prevention training for over 13 400 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 *Corruption Prevention Guide for Banks* and *Corruption Prevention Guide on Works Supervision*. The publications were available for access through the CPAS Web Portal or the Government's Central Cyber Government Office website.

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 the public and private housing supply, drive the development of transport infrastructure, improve the occupational safety of employees and promote the development 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 and interactive strategy by providing early input to the Government and public bodies concerned during the formulation and preparation stages of these initiatives and projects. CPD also follows up these initiatives with detailed reviews to ensure their robust and successful implementation. The following are some examples of this strategy.

Adoption of “Design-and-Build” Model in Public Housing Projects

In 2022, the Housing Department piloted a “Design-and-Build” procurement model in appropriate public housing projects to enhance the construction workflow for meeting the increased production target (around 330 000 units) in the coming decade. As suggested in the Chief Executive's 2022 Policy Address, the Housing Authority would adopt the “Design-and-Build” contract model for the construction of at least half of the flats scheduled for completion in the second five-year period (i.e. 2028-29 to 2032-33) to further improve the speed, efficiency and quality in construction. To ensure that adequate safeguards and controls were in place in the new procurement model, CPD proactively provided early and concurrent corruption prevention advice to the Housing Department at the formulation stage of the relevant procedures and tenders. CPD will continue to offer timely advice to the Housing Department and organise training seminars to its staff, contractors

工傷僱員復康先導計劃

勞工處於二零二二年九月推出為期三年的“工傷僱員復康先導計劃”（先導計劃），由勞工處委聘的承辦機構向建造業工傷僱員提供私營門診復康治療服務，服務費用主要由政府資助。為及早完善先導計劃的管理，勞工處於先導計劃的籌備階段已主動諮詢防貪處。防貪處亦已就服務承辦機構及有關復康治療人員的誠信要求、先導計劃的運作和勞工處的監管機制等，向勞工處提供防貪建議。

勞工處推出為期三年的“工傷僱員復康先導計劃”

The Labour Department implementing a three-year “Pilot Rehabilitation Programme for Employees Injured at Work”

and consultants to ensure integrity in the delivery of the “Design-and-Build” projects.

Pilot Rehabilitation Programme for Employees Injured at Work

In September 2022, the Labour Department launched a three-year “Pilot Rehabilitation Programme for Employees Injured at Work” to provide private out-patient rehabilitation treatment services to injured construction workers through the contractor appointed by the Labour Department and the fee for the services are mainly subsidised by the Government. During the planning stage of the Pilot Programme, the Labour Department sought CPD’s early input in developing a robust administration system. CPD had made corruption prevention recommendations regarding the integrity requirements of the service contractor and rehabilitation professionals concerned, the operation of the Pilot Programme and the monitoring mechanism of the Labour Department, etc.



公眾關注的事宜

防貪處經常關注關乎民生、公眾安全、備受公眾關注，以及涉及大量公帑的範疇。有關回應公眾關注事宜的防貪工作包括：

ISSUES OF PUBLIC CONCERN

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

廉潔選舉

防貪處於二零二二年行政長官選舉當日，派員實地視察投票和點票的運作，注意到政府已逐步落實防貪處於二零二一年選舉委員會（選委會）界別分組一般選舉及立法會換屆選舉後給予政府的建議，進一步完善投票及點票程序，減低貪污風險。此外，防貪處向在新選舉制度下負責產生選委會當然及提名委員的團體提供防貪建議，協助他們以公平、問責及透明的程序產生選委會委員。

防貪處人員觀察模擬票站運作

CPD officers observing the operation of a mock polling station

三跑道系統工程

有見公眾對三跑道系統工程的高度關注以及工程耗費高達 1,400 億元，防貪處早於二零一五年起已一直採取“同步預防”的方式向機管局提供防貪服務。當中包括就香港機場管理局（機管局）建造工程的招標及合約管理程序進行防貪審查研究，涵蓋工程監督、分判商管理、批核工程款項等，並協助機管局落實相關防貪措施。此外，防貪處為機管局工程人員、工程顧問和承建商地盤監督人員舉辦防貪培訓講座，提升他們的防貪能力和意識。鑑於最近三跑道系統工程發生貪污案件，防貪處已檢視相關程序並向機管局提供了一系列的防貪建議，堵塞貪污漏洞。



Clean Elections

CPD officers observed the polling and vote-counting processes of the 2022 Chief Executive Election, and noted that the corruption risks in the processes had been reduced after the Government had gradually implemented the recommendations given by CPD after the 2021 Election Committee Subsector Ordinary Elections and the Legislative Council General Election. CPD also recommended corruption prevention practices to the entities responsible for returning Election Committee (EC) ex-officio and nominated members, so as to assist them in returning EC members in a fair, accountable and transparent manner.



Three-Runway System Project

In light of the great public concern about the three-runway system (3RS) project which incurred a substantial construction cost of about \$140 billion, CPD has been adopting a concurrent corruption prevention strategy since 2015 to provide services to the Airport Authority Hong Kong (AAHK). Apart from conducting assignment studies to review the tendering and contract management procedures of AAHK's construction projects, covering the site supervision, management of subcontractors, approval of works payment, etc, and assisting AAHK to implement the recommended corruption prevention measures, CPD also organised integrity trainings for AAHK's staff, consultants and contractors to enhance their corruption prevention capability and awareness. In view of a recent corruption case concerning the 3RS project, CPD has reviewed the relevant procedures and provided AAHK with a number of recommendations to plug the corruption loopholes.

防貪處人員觀察工程監督的程序

A CPD officer observing the site inspection procedures

公共機構行為守則範本

有鑑於公共機構的職能日益重要，防貪處協助公共機構加強工作制度中的防貪措施，以及為機構成員和僱員的誠信指引提供建議。防貪處於二零二一年推出《公共機構成員及僱員行為守則範本》的更新版後，就如何應用該範本，向公共機構提供建議，並編纂了一套使用該範本的常見問題解答。

食物進口商及食物進口簽證管制

為保障食物安全及市民健康，食物環境衛生署（食環署）設立食物進口商登記制度，並就食物貿易商的違規情況採取執法行動。食環署也會就高風險類別食物（如肉類及家禽）實施進口前驗證，以確保進口食物的安全。鑑於食物安全問題及登記制度與執法過程潛在貪污風險，防貪處審視了食環署就食物進口商及食物進口簽證的管制程序，並提供防貪建議。



Sample Codes of Conduct for Public Bodies

Given the growing importance of public bodies' functions, CPD assisted public bodies in strengthening their system controls, and made recommendations on the probity guidelines for their members and staff. Further to the launch of the updated *Sample Codes of Conduct for Members and Employees of Public Bodies* in 2021, CPD provided advice to public bodies on the adoption of the codes and compiled a set of frequently asked questions on the use of the codes.

Control of Food Importers and Food Import Licences

To safeguard food safety and public health, the Food and Environmental Hygiene Department (FEHD) has put in place a registration scheme for food importers, and takes enforcement actions against food traders' irregularities. FEHD also implements a pre-entry assurance system for high-risk food (e.g. meat and poultry) to ensure the safety of the imported food. In view of food safety issues and corruption risks inherent in the registration and enforcement processes, CPD reviewed and made corruption prevention recommendations on FEHD's procedures for the control of food importers and food import licences.

食環署人員巡查食物貿易商

An FEHD officer carrying out inspection of a food trader

酒店和賓館作過渡性房屋用途先導計劃

為預防政府在推行酒店和賓館作過渡性房屋用途先導計劃時可能出現的貪污舞弊風險，防貪處向當時的運輸及房屋局就其監管和審核角色及程序提供防貪建議，以強化有關機制。

Pilot Scheme on Using Hotels and Guesthouses as Transitional Housing

To reduce potential corruption risks involved in the implementation of the Government's pilot scheme on using hotels and guesthouses as transitional housing, CPD provided the then Transport and Housing Bureau with corruption prevention advice on its monitoring and auditing roles and procedures to strengthen the mechanism.



政府推出酒店和賓館作過渡性房屋用途先導計劃

The Government implementing a pilot scheme on using hotels and guesthouses as transitional housing

私營領域的防貪工作

防貪處持續地評估特定界別的需要，加強當中的防貪工作。防貪處於二零二二年的重點工作包括：

建造業“誠信管理制度”

為提升建造業界的防貪意識及有系統地協助業界加強防貪能力，防貪處推動建築公司採用“誠信管理制度”，包括：(一)誠信政策；(二)誠信培訓；及(三)誠信風險管理。發展局於二零二一年三月把“誠信管理制度”的首兩項元素（即誠信政策和誠信培訓）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，當中涉及 800 多間建築公司。建造業議會緊隨其後，於二零二二年四月亦把該兩項元素納入為其管理的註冊專門行業承造商制度的誠信管理註冊核心要求之一，涵蓋約 8 000 名註冊承造商和分包商。

為鼓勵建築公司自願採納及實施“誠信管理制度”及協助建築公司採用二零二一年推出的“『誠』建商約章”，防貪處分析過往貪污案件，就四個高風險範疇（包括企業誠信與管治、員工管理、報價方式採購及招標採購）製作了四套誠信風險管理懶人包，涵蓋相關工作程序及項目的 20 個誠信風險及提供了約 100 個控制

CORRUPTION PREVENTION WORK IN PRIVATE SECTOR

To optimise the efficacy in corruption prevention, CPD continuously identifies the needs of specific industries. The major corruption prevention work conducted in 2022 includes the following:

Integrity Management System for Construction Industry

To raise corruption prevention awareness and systematically assist in enhancing corruption prevention capabilities in the construction industry, CPD has encouraged construction companies to adopt Integrity Management System (IMS) which consists of (1) Integrity Policy, (2) Integrity Training and (3) Integrity Risk Management (IRM). In March 2021, the Development Bureau (DEVB) incorporated the first two elements, i.e. Integrity Policy and Integrity Training, into the listing requirements for Government's approved contractors, suppliers of materials and specialist contractors for public works which involved over 800 construction companies. In April 2022, the Construction Industry Council (CIC) also followed suit and added these two elements as one of the registration requirements of integrity management under the Registered Specialist Trade Contractors Scheme which covered some 8 000 registered contractors and subcontractors.

To encourage construction companies to voluntarily implement IMS and assist their adoption of the Integrity Charter launched in 2021, CPD compiled four IRM toolkits on corporate integrity and governance, staff administration, procurement (quotation exercise) and tendering based on the analysis of previous ICAC cases. The toolkits identified 20 integrity risks and correspondingly made about 100 control measures concerning the relevant work procedures and items for reference by construction companies. A short training video on IRM was also launched to illustrate the use of the IRM toolkits.

In December 2022, DEVB, CIC and CPD enhanced and renamed the Integrity Charter to the Construction

措施供建築公司參考，亦推出了《防貪速學短片》，方便建築公司使用該懶人包。

此外，發展局、建造業議會及防貪處於二零二二年十二月把『誠』建商約章擴展為“『誠』建約章 2.0”，以涵蓋顧問公司。防貪處會繼續與發展局、建造業議會及業界持份者緊密合作，鼓勵及協助建築公司落實誠信風險管理，並提供免費、度身訂造的誠信培訓和防貪建議，鞏固建造業的誠信及專業。

Industry Integrity Charter 2.0 and extended it to also cover consulting firms. To encourage and assist construction companies in implementing IRM, CPD would continue to maintain close collaboration with DEVB, CIC and all stakeholders and provide free and tailor-made integrity training and corruption prevention services to enhance integrity and professionalism in the construction industry.



廉政專員（左上）、發展局常任秘書長（工務）（右上）、建造業議會主席（左下）和建造業議會執行總監（右下）透過宣傳短片呼籲建築公司及顧問公司簽署“『誠』建約章 2.0”

The Commissioner, ICAC (top left), the Permanent Secretary for Development (Works) (top right), the Chairman of the Construction Industry Council (bottom left) and the Executive Director of the Construction Industry Council (bottom right) encouraging construction companies and consulting firms to sign the Construction Industry Integrity Charter 2.0 in a promotional video

防貪處助理處長（圖左）與建造業議會註冊專門行業承造商制度專責委員會主席（圖右）介紹誠信風險管理懶人包及“註冊專門行業承造商制度”

Assistant Director/Corruption Prevention (left) and Chairperson of the Committee on Registered Specialist Trade Contractors Scheme of the Construction Industry Council (right) introducing the IRM toolkits and the Registered Specialist Trade Contractors Scheme



上市公司企業管治

防貪處早於二零一三年已建議香港交易及結算有限公司（港交所）要求上市公司建立反貪政策，及後接連取得令人鼓舞的進展。二零一六年，港交所要求上市公司在環境、社會及管治（ESG）報告中，根據“不遵守就解釋”或“建議披露”的準則，匯報反貪信息。防貪處一直與港交所保持合作，包括就上市公司防貪系統制訂指引，供上市公司參考。港交所於二零二零年進一步將 ESG 報告的所有關鍵績效指標（包括反貪污）的披露責任提升為“不遵守就解釋”，並於二零二一年發布的《董事會及董事企業管治指引》中採納了防貪處建議的反貪和舉報政策元素。此外，港交所於二零二二年把反貪污及舉報政策的規定提升為《企業管治守則》的守則條文，又舉辦了題為“聚焦企業管治”的網絡研討會，議程包括防貪處處長就反貪和舉報政策及道德商業文化作出的主題演講。防貪處將繼續與港交所合作，加強上市公司的防貪及管治工作。

防貪處處長在港交所舉辦的“聚焦企業管治”網絡研討會講解反貪和舉報政策

Director of Corruption Prevention explaining anti-corruption and whistleblowing policies at the HKEX's webinar on “Corporate Governance in Focus”

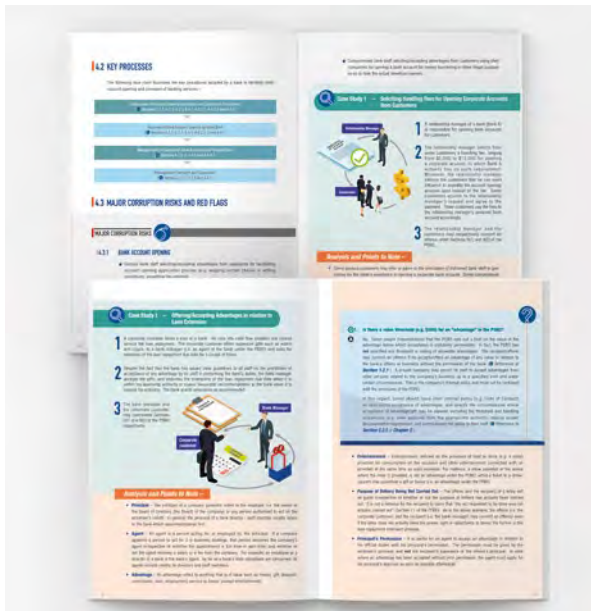


Corporate Governance for Listed Companies

Subsequent to CPD's advice made as early as 2013 to the Hong Kong Exchanges and Clearing Limited (HKEX) requiring the formulation of anti-corruption policies by listed companies, good progress has been made with encouraging results. In 2016, the HKEX required listed companies to disclose anti-corruption information in the Environmental, Social and Governance (ESG) Report on a “comply or explain” or “recommended disclosures” basis. Through sustained collaboration with the HKEX, CPD has developed, among others, a guide on anti-corruption programme for listed companies for the latter's reference. After HKEX's upgrading of the disclosure obligations to report all ESG key performance indicators (including anti-corruption) to “comply or explain” in 2020, elements in respect of anti-corruption and whistleblowing policies recommended by CPD were also incorporated in the HKEX's *Corporate Governance Guide for Boards and Directors* published in 2021. In 2022, the HKEX further upgraded the requirement of establishing anti-corruption and whistleblowing policies to a code provision under the *Corporate Governance Code*. In the “Corporate Governance in Focus” webinar hosted by the HKEX, the Director of Corruption Prevention delivered a keynote speech on anti-corruption and whistleblowing policies, and ethical business culture. CPD will continue to partner with the HKEX to strengthen the corruption prevention capabilities and governance of listed companies.

《銀行防貪指南》

鑑於近年銀行業的貪污風險、新監管要求以及行業發展，防貪處與香港金融管理局及行業公會合作，編製新的《銀行防貪指南》，涵蓋反貪法例、良好企業管治及內部監控等內容，以鞏固銀行的廉潔營商文化。指南透過各類型的個案分析和防貪警示，提高銀行及其從業員對相關貪污風險的警覺及知識；並建議有關防貪政策及管控措施，協助銀行建立及加強其主要營運範疇（包括開戶、處理融資／貸款申請、銷售流程、財富管理、採購、人事管理等）的防貪能力。防貪處已在二零二二年底推出該指南，並將於二零二三年向業界推廣，及因應個別銀行的要求提供防貪建議。



Corruption Prevention Guide for Banks

In view of the corruption risks as well as the new regulatory requirements and developments in the banking industry in recent years, CPD collaborated with the Hong Kong Monetary Authority and industry associations to develop a new *Corruption Prevention Guide for Banks* to entrench the integrity culture of the banking sector. The Guide covers topics including anti-bribery legislation, good corporate governance and internal controls, featuring case studies and red flags to enhance the ethical awareness and knowledge of corruption risks for banking practitioners. Recommendations on the anti-corruption policies and control measures are also included to assist banks in establishing and strengthening anti-corruption capabilities in their core operations, such as opening of accounts, processing of banking facility/loan applications, sales process, wealth management, procurement, staff management, etc. Following the publication of the Guide in late 2022, CPD will promote it to the banking sector in 2023 and offer corruption prevention advice to individual banks upon request.

《銀行防貪指南》

Corruption Prevention Guide for Banks

The Chinese Manufacturers' Association of Hong Kong

As one of the most representative industrial associations with over 3 000 member companies in Hong Kong, the Chinese Manufacturers' Association of Hong Kong (CMA) plays an important role in promoting Hong Kong's industrial and economic development. Besides organising various promotional activities (e.g. Hong Kong Brands and Products Expo, Hong Kong Food Carnival), the CMA also provides an array of services (e.g. testing and certification services, company secretarial services) and training to its members. CPD has maintained close collaboration with the CMA and offered preventive advice on its core operations, including the procurement process and the operation of the CMA Testing and Certification Laboratories (CMA Testing) to enhance internal control and corruption prevention capabilities. The CPAS under CPD has also forged partnership with the CMA to actively promote anti-corruption information to its member companies through various means including online training, so as to heighten their awareness against corruption and help them reduce the risks of corruption and malpractices in their business.

香港中華廠商聯合會

香港中華廠商聯合會（廠商會）擁有超過 3 000 家企業會員，是香港最具代表性的工商團體之一，對促進香港的工商業及經濟發展擔當重要角色。廠商會除了舉辦推廣活動（例如工展會、美食嘉年華），亦提供各種服務（例如檢測和認證、公司秘書服務）以及為會員提供培訓等。為加強其內部管控及防貪能力，防貪處及廠商會一直保持合作，對其主要營運範疇包括採購程序，以及廠商會檢定中心的運作等提供防貪建議。此外，防貪處的防貪諮詢服務亦與廠商會合作，向其企業會員積極推廣防貪資訊，例如提供網上培訓，以提升業界的防貪意識及協助減低有關企業的貪污舞弊風險。



防貪處人員檢視廠商會檢定中心的運作
A CPD officer examining the operation of CMA Testing

物業管理業

防貪處繼續與物業管理業監管局（監管局）緊密合作，協助持牌物業管理公司建立“誠信管理制度”。防貪處在監管局制訂持牌物業管理公司的操守守則及相關作業指南時提供建議，就持牌者的業務，包括採購、分判服務、員工聘用及管理範疇，訂立誠信規定及實用的誠信指引。防貪處與監管局於二零二二年十月聯合舉辦以“卓越物管服務之道 - 專業及誠信”為主題的持續專業發展講座，與超過 150 名業界人士交流誠信管理心得。防貪處亦因應個別物管公司的要求，提供防貪意見及培訓。防貪處會繼續與監管局合作，鞏固業界誠信水平及防貪能力。

Property Management Industry

CPD continued to work closely with the Property Management Services Authority (PMSA) to assist licensed property management companies (PMC) to establish an IMS. CPD offered input to PMSA’s codes of conduct and related guidelines for licensees, setting out the integrity requirements and guidance in procurement, outsourcing of services, and staff recruitment and management by PMC. In October 2022, CPD and PMSA jointly organised a Continuing Professional Development Seminar on “Ways to Property Management Service Excellence – Professionalism and Integrity” to exchange views on integrity management with over 150 practitioners. CPD also provided corruption prevention advice and training to individual property management companies upon request. CPD will continue to collaborate with PMSA to strengthen the integrity standard and corruption prevention capabilities of the industry.

防貪處與物業管理業監管局合辦持續專業發展講座
CPD and PMSA co-organising a Continuing Professional Development Seminar



防貪處處長（圖左）與時任物業管理業監管局主席（圖右）介紹在物管業推動廉潔誠信的工作
Director of Corruption Prevention (left) and the then Chairperson of PMSA (right) introducing initiatives to promote integrity in the property management industry

推動科技防貪

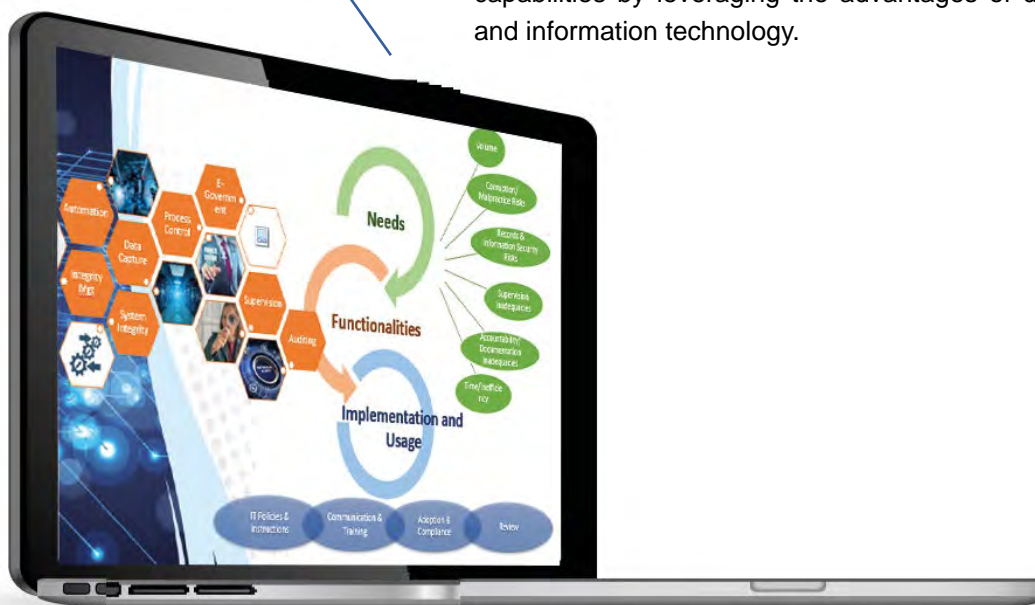
把工作流程電子化和善用科技，不但可大大提升政府、公共機構和私營機構的工作效率及服務質素，亦可藉此加強機構的防貪能力。乘著政府近年大力開展電子政府服務，防貪處定位數碼化為重點防貪策略，以下是有關推動科技防貪的一些例子：

數碼化防貪攻略

防貪處自八十年代起已推動政府部門和公共機構，利用電腦化程序提升防貪能力、改善工作流程。為支持政府近年推動“智慧政府”和“智慧城市”的計劃，以及響應國際反貪組織透過創新科技防治貪污的倡議，防貪處將進一步推廣及建議應用創新科技防止貪污。就此，防貪處完成了一項利用數碼化加強防止貪污的研究，並編製一套“數碼化防貪攻略”。防貪處將應用“數碼化防貪攻略”於防貪審查中，以便更全面、更有系統和更有效地協助政府部門和公共機構利用數碼化和資訊科技的優勢防止貪污。

防貪處編製“數碼化防貪攻略”

The Digital Corruption Prevention Framework developed by CPD



EMBRACING TECHNOLOGY TO ENHANCE CORRUPTION PREVENTION

Digitalisation of work processes and effective adoption of technology can not only improve the efficiency and service quality of the Government, public bodies and private organisations, but also strengthen their anti-corruption capabilities. Riding on the momentum of the e-Government initiatives launched in recent years, CPD has positioned digitalisation as a key strategy in corruption prevention. Efforts made by CPD to embrace technology in enhancing resilience against corruption are summarised below:

Digital Corruption Prevention Framework

Since the 1980s, CPD has been promoting computerisation of work procedures in government departments and public bodies to enhance their corruption prevention capabilities and streamline workflows. To tie in with the e-Government's implementation of the Smart Government and Smart City initiatives in recent years, and to support the international anti-corruption organisations' initiative on the use of innovation and technology to combat corruption, CPD will step up its efforts in promoting and recommending the use of innovation and technology for the anti-corruption cause. Upon completion of a study on the enhancement of corruption prevention through digitalisation, CPD has developed a Digital Corruption Prevention Framework (DCPF). CPD will adopt DCPF in the assignment studies to be conducted for government departments and public bodies, with a view to assisting government departments and public bodies more comprehensively, systematically and effectively in strengthening their corruption prevention capabilities by leveraging the advantages of digitalisation and information technology.

數碼工程監督系統

建築工程中的各項程序和活動往往涉及大量資料及記錄，然而一般的工程監督制度主要依賴人手及紙本記錄，做法不僅效率低而且難以有效監管，不法行為及貪污的風險也因而增加。有見及此，防貪處積極建議業界於工程監管中使用科技以更有效防貪，並就發展局推行的數碼工程監督系統提供防貪建議。防貪處亦製作了《工程監督防貪指南》，建議私營機構（例如發展商、承建商、工程顧問）在建立數碼工程監督系統時採用“SMART”原則，即精簡（Simplicity）、靈活（Mobility）、問責（Accountability）、堅穩（Robustness）及透明（Transparency），並在系統中加入足夠的防貪措施（例如將工作流程數碼化、地盤監督程序自動化等）。

Digital Works Supervision System

Manual process is usually adopted for handling the large amount of data and paper records involved in various procedures and activities of construction projects. Such an inefficient practice not only hampers effective supervision, but also increases the risks of corruption and malpractices. To reduce these risks, CPD has been encouraging the construction industry to make use of technology in works supervision and providing corruption prevention advice to the DEVB in the implementation of the Digital Works Supervision System (DWSS). CPD has also issued a *Corruption Prevention Guide On Works Supervision* to recommend the private sector (e.g. developers, contractors, consultants) to adopt the “SMART” principles (i.e. Simplicity, Mobility, Accountability, Robustness and Transparency) in developing DWSS and adopt adequate control measures in the supervision system (e.g. digitalisation of workflows and automation of site supervision processes).

《工程監督防貪指南》

Corruption Prevention Guide On Works Supervision



鐵路項目數碼工程監督系統

因應多個新鐵路項目的工程即將展開，香港鐵路有限公司（港鐵）正更新及強化其早前引入的數碼工程監督系統。防貪處向港鐵提供強化系統管控功能的建議，防止地盤監督的舞弊行為。防貪處計劃在港鐵草擬新系統的運作指引時提供進一步建議，確保港鐵有效應用已建議的管控功能。

政府土地短期租約資訊系統

為加強對政府土地短期租約的監管，地政總署準備開發新一代的短期租約資訊系統，所載的數據將比現有系統更全面、準確及完整，包括巡查結果、違規性質和相應的規管行動。防貪處建議新系統需加入管控功能，以協助監察工作進度和確保數據齊全及不被篡改。

防貪處建議工作流程數碼化

CPD recommending the digitalisation of workflows

Digital Works Supervision System for Railway Projects

In view of the impending commencement of a number of new railway projects, the MTR Corporation Limited (MTRCL) is updating and enhancing its digital works supervision system which was introduced a few years ago. CPD has advised MTRCL to strengthen the system control functions in order to prevent malpractices in site supervision, and will offer further advice to MTRCL during its drafting of the operational guidelines for the new system to ensure the effective use of the recommended control functions.

Government Land Short Term Tenancy Information System

To enhance the monitoring and management of short term tenancies of government land, the Lands Department plans to develop a new Tenancy Information System featuring a more comprehensive, accurate and complete database as compared with the existing one, and containing inspection results, nature of non-compliances and corresponding regulatory actions. CPD has recommended adding control functions in the new system to facilitate the monitoring of work progress and ensure the integrity of data.

