

CHAPTER 05

第五章

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。

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 trade 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.

工作回顧

年內，防止貪污處（防貪處）持續致力減低公共行政範疇的貪污風險，重點放在關乎民生和公眾安全及備受公眾關注的事宜，以及涉及大量公帑的項目，包括公共工程、政府採購、公眾健康和安全、政府資助計劃、執法及規管職能。此外，防貪處繼續協助維持廉潔和公平的營商環境，促進香港經濟可持續發展。

二零二三年完成的工作項目：

- 71 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 636 次防貪建議，主要涉及正在草擬／檢討的法例、政策或程序，及早加入防貪措施。
- 因應要求向私營機構提供共 1 447 次防貪建議，並透過防貪諮詢服務熱線，處理共 1 110 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 207 000 瀏覽次數，下載或閱覽防貪資源次數則約 108 100 次）。
- 向公私營機構超過 30 600 名人員提供防貪培訓。
- 出版並推廣防貪刊物例如《物業管理公司防貪指南》、《公共機構採購防貪指南》、《律師行的物業轉易及相關交易防貪錦囊》、《非政府機構的管治及內部監控防貪指南》、《建造業防貪指南》及《數碼化防貪指南》，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。

REVIEW OF WORK

During the year, the Corruption Prevention Department (CPD) continued to address and prevent corruption risks in public administration with emphasis on issues which are important to people's livelihood or public safety, issues of public interest or concern, 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 corruption-free environment and level-playing field for business with a view to facilitating sustainable economic development in Hong Kong.

Deliverables achieved in 2023:

- Completed 71 assignment reports, covering mainly detailed review of corruption risks in specific systems and related practices in government bureaux/departments (B/Ds) and public bodies, with recommendations on preventive measures.
- Provided tailored advice to B/Ds and public bodies on 636 occasions, mainly regarding the formulation/review of legislation, policies or procedures and adoption of corruption prevention safeguards at an early stage.
- Offered advisory service to private sector entities on 1 447 occasions upon request, and handled 1 110 public enquiries through the Corruption Prevention Advisory Service (CPAS) hotline.
- Provided corruption prevention information and services by leveraging the CPAS Web Portal (recorded over 207 000 visits to the web portal and about 108 100 downloads or views of corruption prevention resources).
- Conducted corruption prevention training for over 30 600 persons from both public and private sectors.
- Produced and promoted corruption prevention publications such as the *Corruption Prevention Guide for Property Management Companies*, *Corruption Prevention Guide on Procurement for Public Bodies*, *Corruption Prevention Good Practices on Conveyancing and Related Transactions for Law Firms*, *Corruption Prevention Guide on Governance and Internal Control for Non-governmental Organisations*, *Corruption Prevention Guide for Construction Industry* and *Corruption Prevention Guide – Corruption Prevention through Digitalisation*, illustrating the corruption risks and recommending safeguards for reference by different sectors. The publications were available for access 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

地區服務及關愛隊伍（關愛隊）的委任及運作

政府在十八區設立關愛隊，以凝聚社區資源和力量，支援政府地區工作和加強地區網絡。關愛隊的甄選工作由民政及青年事務局局長領導的專責小組負責。政府會向獲委任的關愛隊提供部分資源及監察其工作。防貪處早在民政事務總署制定關愛隊申請指引、資助協議及監察機制時，已向其提供防貪建議。此外，防貪處也編製了《地區服務及關愛隊伍防貪要點》，協助關愛隊提高防貪意識和能力。



PROACTIVE AND EARLY INPUT TO GOVERNMENT'S NEW INITIATIVES

Appointment and Operation of District Services and Community Care Teams (Care Teams)

The Government is setting up Care Teams in the 18 districts to consolidate community resources and forces to support the Government's district work and strengthen district networks, and the selection of Care Teams is handled by a dedicated group led by the Secretary for Home and Youth Affairs. The Government will provide the appointed Care Teams with some of the resources required and monitor their work. As an early input, CPD provided corruption prevention advice to the Home Affairs Department when the formulation of the application guidelines, funding agreements and monitoring mechanism concerning Care Teams was under way. In addition, CPD also produced the *Corruption Prevention Tips for District Services and Community Care Teams* to help enhance the corruption prevention awareness and capabilities of Care Teams.

《地區服務及關愛隊伍防貪要點》

Corruption Prevention Tips for District Services and Community Care Teams

貴重金屬及寶石交易商註冊制度

為優化香港打擊洗錢及恐怖分子資金籌集的監管制度，政府已修訂《打擊洗錢及恐怖分子資金籌集條例》（第 615 章），引入貴重金屬及寶石交易商的註冊制度。香港海關（海關）負責執行註冊規定，以及監管註冊交易商在打擊洗錢及恐怖分子資金籌集方面的操守。防貪處早於修訂條例生效前，已向海關提出一系列防貪建議，協助海關加強其註冊及執法工作程序的防貪監控措施。防貪處會繼續協助海關落實防貪措施，並在有需要時就有關規管框架提供防貪建議。

Registration Regime for Dealers in Precious Metals and Stones

To enhance Hong Kong's regulatory regime for combatting money laundering and terrorist financing, the Government amended the *Anti-Money Laundering and Counter-Terrorist Financing Ordinance* (Cap 615) to introduce a registration regime for dealers in precious metals and stones. The Customs and Excise Department (C&ED) is responsible for enforcing the registration requirements and monitoring registrants' conduct with regard to anti-money laundering and counter-terrorist financing. Before the amendment came into effect, CPD had put forward a range of corruption prevention recommendations to assist C&ED in strengthening anti-corruption controls over its registration and law enforcement procedures. CPD will continue to assist C&ED in the implementation of the corruption prevention safeguards and offer advice on the regulatory framework when necessary.

簡約公屋

政府於二零二二年推出簡約公屋措施，目標於五年內（即二零二三及二四年度至二零二七及二八年度）以標準簡約設計興建約 30 000 個單位。簡約公屋由建築署負責主導建造，而其營運則透過公開招標交由非政府機構或物業管理公司負責，整項措施涉款約 250 億元。為加快簡約公屋的興建過程，建築署採用“新工程合約”中“工程及建造的目標價格合約”及組裝合成建築法。為確保興建簡約公屋過程中有充足的防貪措施，防貪處與建築署開展了一系列防貪工作，涵蓋工程監督、合約管理等程序。二零二三年，防貪處就建築署工程監督人員的誠信要求、選擇組裝合成模組供應商等程序向建築署提供了防貪建議。為確保揀選營運機構的招標程序及監管營運方面亦有足夠的防貪措施，防貪處向房屋局就有關招標及營運協議文件提供防貪建議。

Light Public Housing

In 2022, the Government launched a Light Public Housing (LPH) initiative targeted to construct about 30 000 LPH units in a standardised simple design in five years (i.e. from 2023-24 to 2027-28). Whereas the construction of the LPH units would be led by the Architectural Services Department (ArchSD), the operation would be managed by non-governmental organisations (NGOs) or property management companies appointed through open tender, and the fund approved for the initiative was about \$25 billion. In order to expedite the LPH construction process, ArchSD adopted the “Engineering and Construction Target Cost Contract” option of the “New Engineering Contract” (NEC), and a Modular Integrated Construction (MiC) approach. CPD and ArchSD also launched a number of corruption prevention initiatives covering works supervision, contract administration and other procedures, so as to ensure adequate safeguards were in place in the LPH construction process. In 2023, CPD had offered advice to ArchSD on the integrity requirements for its site supervisory staff and various procedures such as the selection of MiC module suppliers. CPD also advised on the Housing Bureau's tender and contract documents for the appointment of LPH operators to ensure adequate corruption prevention safeguards in the tender procedures for selecting operators and supervision of LPH operations.

簡約公屋的室內設計

Interior design of a Light Public Housing unit



《新工程合約—工程及建造合約（香港版）》

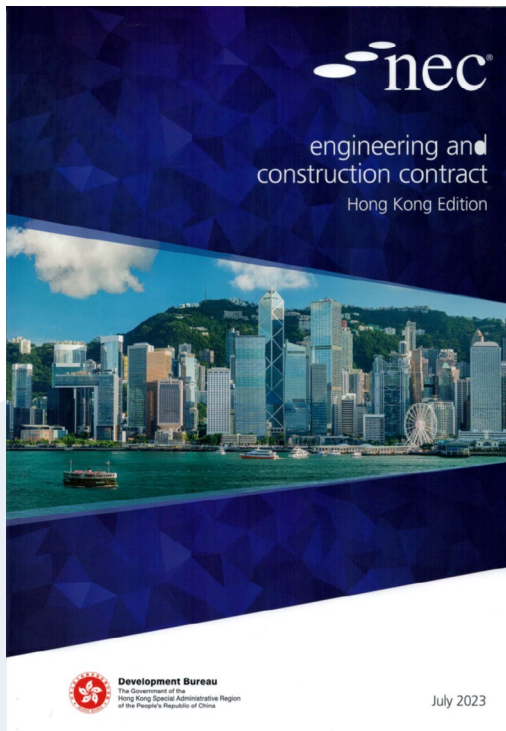
“新工程合約”中的工程及建造合約旨在促進工程管理的效率及加強項目管理團隊和承建商之間的協作。防貪處自二零零九年起一直就相關程序向發展局提供意見以確保工務部門在管理“新工程合約”時實施足夠的防貪措施。為配合本地的建築法規和慣例，

NEC Engineering and Construction Contract (Hong Kong Edition)

The NEC Engineering and Construction Contract aims to enhance project management efficiency and promote collaboration between project management teams and contractors. Since 2009, CPD has been offering corruption prevention advice to the Development Bureau (DEVB) on relevant procedures to ensure adequate safeguards are in place for NEC management

發展局於二零二三年推出了《新工程合約—工程及建造合約（香港版）》，防貪處亦有在該合約的草擬過程中向發展局提供防貪建議，當中包括工程分判、工程費用估算及推遲完工日期等的工作程序。

by works departments. To cater for the local building regulations and practices, DEVB launched the *NEC Engineering and Construction Contract (Hong Kong Edition)* in 2023. During the drafting process, CPD also offered advice to DEVB on subcontracting, estimation of project cost, deferral of completion date and other work procedures.



《新工程合約—工程及建造合約（香港版）》

NEC Engineering and Construction Contract (Hong Kong Edition)

防止貪污處人員觀察模擬票站運作

Officers of the Corruption Prevention Department observing operation of a mock polling station



公眾關注的事宜

防貪處就關乎民生、公眾安全、備受公眾關注，以及涉及大量公帑的範疇進行防貪審查。有關的工作包括：

廉潔選舉

鄉郊一般選舉及區議會一般選舉分別於二零二三年一月和十二月舉行。防貪處審視了政府為候選人所擬備的指引及投票程序的新建議，並於投票當日派員實地視察投票和點票

ISSUES OF PUBLIC CONCERN

CPD conducts corruption prevention review on areas concerning people's livelihood, public safety, issues of public concern and those involving substantial public money. The relevant corruption prevention work includes:

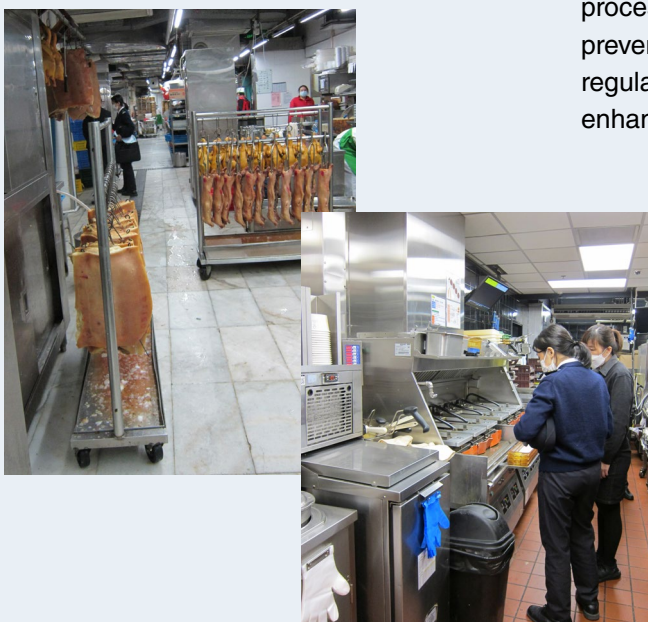
Clean Elections

The Rural Ordinary Election and District Council Ordinary Election were held in January and December 2023 respectively. CPD reviewed the government guidelines for candidates and new proposals on voting procedures, and

的運作。防貪處就上述兩個公共選舉，向政府提供進一步完善投票及點票程序的意見，以減低貪污風險。

食肆及食物製造廠的發牌及監管

為確保食物安全和環境衛生及便利食物業的經營者和顧客，食物環境衛生署（食環署）在現行食物業處所發牌機制中，引入專業核證制度，以“先發牌、後審查”的方式，率先應用於簽發小食食肆及食物製造廠的正式牌照。食環署也會就食物業處所的違規情況採取執法行動。考慮到公眾健康和 safety，以及相關發牌制度和執法程序可能出現的貪污風險，防貪處審視了食環署就食肆及食物製造廠的發牌及監管制度，並提供防貪建議，以加強程序中的管控。



食物環境衛生署人員巡查持牌食肆

Inspection on licensed restaurants by officers of the Food and Environmental Hygiene Department

deployed officers to observe the polling and vote-counting processes on the election days. Recommendations on further improvement of the polling and vote-counting procedures in relation to the two public elections were made to the Government so as to reduce corruption risks.

Licensing and Control of Restaurants and Food Factories

To ensure food safety and environmental hygiene, and for the benefit of food business operators and customers, the Food and Environmental Hygiene Department (FEHD) has introduced a Professional Certification System under the current licensing mechanism for food premises. The Professional Certification System, which adopts a “licence first, inspection later” approach, will first be applicable to light refreshment restaurants and food factories for the issue of full licences. FEHD will also take enforcement action against irregularities of food premises. In view of public health and safety, and possible corruption risks associated with the licensing system and enforcement processes, CPD has reviewed and made corruption prevention recommendations on FEHD’s licensing and regulatory systems for restaurants and food factories to enhance procedural controls.

《公共機構採購防貪指南》

近年，公共機構須承擔更廣泛和多元的公共職能。執行這些職能往往涉及大規模和大量金錢的物品和服務採購。然而，進行物品和服務採購時較容易存在貪污舞弊風險。為協助公共機構增強防貪能力，防貪處研究相關的貪污風險，並制定《公共機構採購防貪指

Corruption Prevention Guide on Procurement for Public Bodies

In recent years, public bodies have been increasingly entrusted to assume a broader array of public functions, which inevitably involve the procurement of goods and services, often on a substantial scale and with considerable amount of money. However, procurement is inherently prone to corruption and malpractice. To assist public bodies

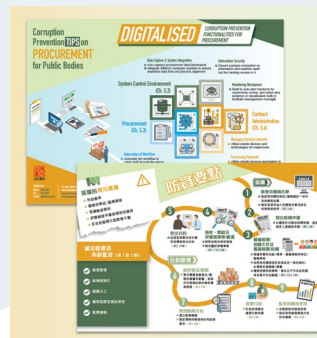
南》，羅列出常見的監控缺失、防貪警示、個案分析，以及相應防貪措施。防貪處亦以資訊圖表方式把該指南的重點內容編製成小冊子，供前線採購人員參考。該指南及小冊子已分發給相關公共機構，並已上載於防貪諮詢服務網站。



《公共機構採購防貪指南》旨在提高公共機構人員對採購時常見貪污漏洞的警覺性，以及提供相關的預防措施減低貪污風險

The Corruption Prevention Guide on Procurement for Public Bodies aiming to enhance the awareness of personnel of public bodies to common corruption loopholes in procurement and provide them with relevant preventive measures to reduce corruption risks

in enhancing their corruption prevention capabilities, CPD conducted a review on the relevant corruption risks and developed the *Corruption Prevention Guide on Procurement for Public Bodies*, which sets out the common inadequacies, red flags, case studies in procurement with corresponding corruption prevention measures. CPD has also developed an infographic pamphlet which summarises the key content of the Guide for reference by frontline procurement personnel. The Guide and pamphlet have been distributed to relevant public bodies and uploaded to the CPAS Web Portal.



《公共機構採購防貪要點》資訊圖表小冊子，旨在便利前線採購人員了解並提醒他們在進行採購時建議採取的防貪措施

Corruption Prevention Tips on Procurement for Public Bodies infographic pamphlet, aiming to conveniently equip frontline procurement personnel with and remind them of the corruption prevention measures in procurement

輸入勞工計劃

為應對勞工短缺的問題，政府於二零二三年中分別推出了院舍、建造業及運輸業的行業輸入勞工計劃，以及“補充勞工優化計劃”。防貪處就有關計劃向勞工處及相關政府決策局／部門和公共機構提供防貪建議，以強化計劃的防貪措施，當中包括嚴禁中介索取或收受非法回佣、提升處理和審核申請的透明度及公平性，以及確保相關政府決策局／部門和公共機構有效監督成功申請者遵守計劃要求等。此外，防貪處透過有關計劃的僱主簡介會，向有意申請者提供防貪培訓。

Labour Importation Schemes

To cope with manpower shortage, the Government launched sector-specific labour importation schemes respectively for residential care homes, construction and transport sectors, and the “Enhanced Supplementary Labour Scheme” in mid-2023. To strengthen corruption prevention safeguards of the schemes, CPD provided recommendations to the Labour Department, relevant B/Ds and public body, including prohibiting agents from soliciting or accepting illegal rebates, strengthening the safeguards to enhance transparency and fairness in the processing and assessment of applications, and ensuring the effectiveness in monitoring the successful applicants’ compliance with scheme requirements by the relevant B/Ds and public body. Moreover, CPD also participated in the briefings for employers under the schemes to provide integrity training to prospective applicants.

基層醫療健康藍圖

為強化基層醫療健康系統制定發展方向及策略，醫務衛生局於二零二二年十二月公布《基層醫療健康藍圖》（藍圖），以建立一個可持續的醫療系統及提升全民健康。在藍圖下的“慢性疾病共同治理先導計劃”，合資格人士在政府資助下，可自行挑選家庭醫生為他們進行篩查及診治。為確保此計劃具備足夠的防貪措施，防貪處向醫務衛生局提供了一系列的防貪建議。



醫務衛生局推出“慢性疾病共同治理先導計劃”

“Chronic Disease Co-Care Pilot Scheme” launched by the Health Bureau

建造業的工人招聘

建造業即將進入高速發展黃金期，一系列大型基建項目相繼開展。有見及此，防貪處聯同發展局及建造業議會制定了一系列防貪措施，以“防貪組合拳”形式，協助業界打擊非法介紹費問題。當中包括於二零二三年五月聯同發展局及建造業議會合辦“齊建廉潔文化 共享公平『誠』果”建造業防貪峰會，推動業界支持由防貪處編製的《誠信行動綱領》，並採用一系列針對非法介紹費的防貪措施。防貪處又透過建造業議會在建造工地張貼反貪海報，向工友派發反貪小冊子及播放反貪短視頻，加強前線工友的反貪意識。防貪處亦已分別為總承建商及分包商推出招聘工人的誠信風險管理計劃書，涵蓋一系列涉及工人招聘程序的誠信風險及管控措施，幫助業界加強誠信管理。

Primary Healthcare Blueprint

The Health Bureau released the *Primary Healthcare Blueprint* (the Blueprint) in December 2022 to formulate the direction of development and strategies for strengthening Hong Kong's primary healthcare system, with a view to establishing a sustainable healthcare system and enhancing the overall health of citizens. Under the “Chronic Disease Co-Care Pilot Scheme” in the Blueprint, eligible persons are subsidised by the Government to undergo screening and medical treatment by a family doctor of their own choice. To ensure that adequate safeguards were in place for the Scheme, CPD provided the Health Bureau with corruption prevention inputs.

Recruitment of Construction Workers

With an array of mega infrastructure projects in the pipeline, the construction industry is set for a golden era of rapid development. In view of this, the ICAC has collaborated with the DEVB and Construction Industry Council (CIC) to formulate corruption prevention measures for combatting the illegal referral fee malpractice by adopting a “corruption prevention combo punch” approach. For instance, the ICAC, DEVB and CIC co-organised the “Building a Clean and Fair Construction Industry Through Collaboration - Anti-Corruption Summit” in May 2023 to appeal to the industry to support the *Integrity Action Agenda* drawn up by CPD and to implement corruption prevention measures against illegal referral fees. The ICAC also worked with CIC in displaying anti-corruption posters at construction sites as well as distributing anti-corruption brochures and showing training videos to frontline workers with a view to enhancing their anti-corruption awareness. In addition, two Integrity Risk Management Plans for Recruitment of Workers covering a variety of integrity risks and control measures related to worker recruitment procedures were published for main contractors and sub-contractors respectively to facilitate the industry in enhancing integrity management.



防止貪污處助理處長於“齊建廉潔文化 共享公平『誠』果”建造業防貪峰會中主持有關建造業防貪及誠信管理的研討會

Assistant Director of Corruption Prevention hosting a panel session on corruption prevention and integrity management in the construction industry as part of the “Building a Clean and Fair Construction Industry Through Collaboration - Anti-Corruption Summit”

新建樓宇工程的質量監督

香港私人發展項目的建築或街道工程受《建築物條例》（第123章）規管。該條例訂明業主委任的專業人士及承判商須提交監工計劃書，並按計劃書聘請適任技術人員監督工程的質量。由於糾正工程質量問題通常涉及巨額費用及導致工程延誤，承建商有可能透過貪污手段，以換取監督人員對不合規格的工程視而不見。有見及此，防貪處審視了屋宇署的相關程序及作出防貪建議，以加強參與新建樓宇工程質量監督人員的問責性，並建議屋宇署應用創新科技以減低有關程序中的貪污風險。

Quality Control of Works of New Buildings

Building works or street works of private developments in Hong Kong are governed by the *Buildings Ordinance* (Cap 123), which provides that professionals and contractors appointed by owners have to submit supervision plans and employ technically competent persons for quality control purpose. As the rectification of substandard works will often incur substantial costs and result in delay of works, contractors may induce supervisory staff through corrupt means to turn a blind eye to substandard works. As such, CPD has reviewed the relevant procedures of the Buildings Department (BD) and made recommendations to enhance the accountability of staff involved in the quality control of works of new buildings. Moreover, CPD has also recommended the BD to apply innovative technology for mitigating corruption risks therein.



招聘工人的誠信風險管理計劃書

Integrity Risk Management Plans for Recruitment of Workers

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。防貪處於二零二三年的重點工作包括：

《物業管理公司防貪指南》

《物業管理服務條例》（第 626 章）下的發牌制度於二零二三年八月全面落實，公眾對物業管理公司（物管公司）秉持專業和誠信的期望與日俱增。由於物管公司的服務範疇多元化，而當中有關樓宇管理和維修的程序複雜和容易存在貪污舞弊風險，因此物管公司須制定有效的內部監控系統和防貪措施，以減低貪污舞弊風險。有見及此，防貪處於二零二三年十二月推出《物業管理公司防貪指南》，涵蓋了物管公司須遵守的監管規定和良好管治架構的基本要素、個案分析和防貪警示，以及主要物管範疇（如一般管理服務、樓宇維修、採購和人事管理等）中常見的貪污風險和預防措施，以協助物管公司有效預防貪污及進行風險管理。防貪處將於二零二四年為持牌物管公司管理層舉辦“物業管理人員反貪專業課程”，藉著分享和實踐該指南，提升物管公司的防貪管治。



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 2023 includes:

Corruption Prevention Guide for Property Management Companies

Since the full implementation of the licensing regime under the *Property Management Services Ordinance* (Cap 626) in August 2023, there have been growing public expectations on the professionalism and integrity of property management companies (PMCs). Given the diversified services provided by PMCs, coupled with the complex and corruption-prone procedures involved in building management and maintenance, PMCs need to put in place an effective internal control system and corruption prevention measures to reduce corruption risks. To address the issues concerned, CPD launched a *Corruption Prevention Guide for Property Management Companies* in December 2023, covering the regulatory compliance required of PMCs, the basic elements of good governance, case studies, red flags, and the common corruption risks in the major areas of property management (such as general management services, building maintenance, procurement and staff management) with recommendations on preventive measures, so as to assist PMCs in effective corruption prevention and risk management. CPD will organise the “Professional Anti-corruption Training in Property Management” for management of licensed PMCs in 2024 to enhance the governance of PMCs from the corruption prevention perspective through sharing and implementation of the guide.

《物業管理公司防貪指南》提供有效和切實可行的指引，以協助物業管理公司識別和緩解物業管理相關的貪污風險及建立誠信文化

The *Corruption Prevention Guide for Property Management Companies* offering effective and practicable guidelines to help property management companies identify and reduce corruption risks in property management and build an ethical culture

香港律師會 – 律師事務所的物業轉易防貪服務

為提升律師行在物業轉易及相關交易中的內部監控，防貪處在香港律師會的支持下，編製了《律師行的物業轉易及相關交易防貪錦囊》。有關防貪錦囊旨在為律師行提供在處理物業轉易及相關交易時的主要貪污風險、防貪警示及相關的內部監控措施作參考，以減低貪污舞弊風險。



《律師行的物業轉易及相關交易防貪錦囊》旨在闡釋處理物業轉易時的貪污風險、防貪警示及相關的內部監控措施，供律師行參考

The *Corruption Prevention Good Practices on Conveyancing and Related Transactions for Law Firms* highlighting the corruption risks and red flags in handling conveyancing transactions and providing law firms with handy references on internal control measures

防止貪污處在香港律師會的支持下，編製了《律師行的物業轉易及相關交易防貪錦囊》。在編製過程中，防止貪污處人員與香港律師會代表深入交流，以了解律師行在處理物業轉易及相關交易過程中所扮演的角色

With the support of the Law Society of Hong Kong, the Corruption Prevention Department has compiled a set of *Corruption Prevention Good Practices on Conveyancing and Related Transactions for Law Firms*. In compiling the Good Practices, Corruption Prevention Department officers made extensive exchanges with representatives of the Law Society of Hong Kong to understand the roles of law firms in handling conveyancing and related transactions



非政府機構的防貪工作

非政府機構透過接受政府資助及公眾捐款等，向有需要人士提供福利服務。由於其所提供的服務日趨多元化，市民大眾對非政府機構的誠信要求亦日益提高。有見及此，防貪處編製全新版的《非政府機構的管治及內部監控防貪指南》，以協助非政府機構在日常營運中建立及加強防貪能力，和鞏固其廉潔文化。指南內容涵蓋反貪法例、良好管治及有效內部監控，並列舉非政府機構主要營

Corruption Prevention Work for Non-governmental Organisations

NGOs rely on government fundings and public donations to provide welfare services to people in need. Given the increasingly diversified services provided by NGOs, public expectations on their integrity standards are on the rise. Hence, CPD has compiled a new edition of the *Corruption Prevention Guide on Governance and Internal Control for Non-governmental Organisations* to assist NGOs in building and strengthening their corruption prevention capabilities in daily operation and entrenching a culture of integrity. The Guide covers the anti-corruption law, good governance and effective internal controls, and sets out the corruption risks and corresponding preventive measures pertaining to

運範疇(包括財務管理、提供福利服務、採購、工程及維修合約管理等)的貪污風險及相關防貪措施。該指南亦透過各類型的個案分析和防貪警示，加強非政府機構對貪污風險的了解；並同時更新了社會福利界非政府機構董事會成員及職員行為守則範本，除更清晰列出誠信要求(例如索取和接受利益及款待的政策)外，亦加強處理已申報利益衝突的指引。防貪處已於二零二三年底推出該指南，並會向非政府機構推廣，以及因應個別非政府機構的要求提供防貪服務。

the key operation areas (including financial management, provision of welfare services, procurement, management of works and maintenance contracts) of NGOs. It also presents various case studies with analysis and red flags to enhance NGOs' understanding of the corruption risks. Additionally, the Guide provides the updated *Sample Codes of Conduct for Board Members and Staff of Non-governmental Organisations in Social Welfare Sector*, setting out clearly the integrity requirements (such as the policies on solicitation and acceptance of advantages and entertainment) and the enhanced guidance on managing declared conflicts of interest. Following the launch of the Guide in late 2023, CPD would further promulgate the Guide to NGOs and offer corruption prevention services to individual NGOs on request.



《非政府機構的管治及內部監控防貪指南》

Corruption Prevention Guide on Governance and Internal Control for Non-governmental Organisations



防止貪污處人員在編製《非政府機構的管治及內部監控防貪指南》期間舉行工作會議

Officers of the Corruption Prevention Department discussing the production of *Corruption Prevention Guide on Governance and Internal Control for Non-governmental Organisations* in a work meeting

組裝合成建築法的《防貪速學短片》

有見政府將更廣泛地採用組裝合成建築法以加快房屋供應，防貪處繼二零二一年編製了《防貪錦囊－組裝合成建築項目》後，今年亦推出了相應的《防貪速學短片》，以協助業界人士更好了解當中不同範疇(即誠信管理、在廠房內組裝以及完成組裝後)的貪污風險及防貪措施。

Short Training Videos on Corruption Prevention for Modular Integrated Construction

Given the Government's initiative to expedite housing supply through wider adoption of MiC, CPD has launched a series of *Short Training Videos on Corruption Prevention for MiC* this year, following the *Corruption Prevention Checklist – Building Projects Adopting Modular Integrated Construction* published in 2021. The training videos aim to enhance practitioners' understanding about the corruption risks involved in different aspects (namely integrity management, fabrication at MiC factory and processing after fabrication) of MiC, and the corresponding mitigating measures.



組裝合成建築法的《防貪速學短片》

Short Training Videos on Corruption Prevention for Modular Integrated Construction

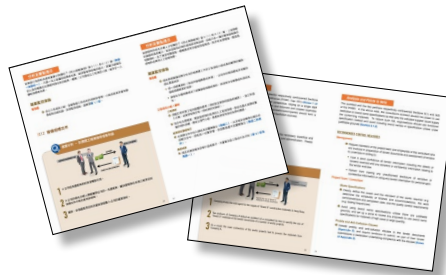
《建造業防貪指南》

因應近年建造業的貪污風險以及行業發展，防貪處於二零二三年九月，推出重新編製的《建造業防貪指南》，內容涵蓋建造業界一些常見的舞弊手法，包括工程顧問的管理、工程合約的判授和管理，以及工程質量控制測試過程中的貪污風險和建議防貪措施。該指南亦新增了個案分析以協助工程人員理解有關程序中的貪污風險，並提升他們的防貪意識和能力。



Corruption Prevention Guide for Construction Industry

In response to the emerging corruption risks and development of the construction industry in recent years, CPD published a new edition of the *Corruption Prevention Guide for Construction Industry* in September 2023. The Guide sets out the common malpractices in the construction industry, including the management of consultants, letting and administration of works contracts and construction quality control testing, and illustrates the corruption risks and recommended corruption prevention measures. As an added feature, it also includes case studies to assist project staff better understand the corruption risks inherent in the procedures concerned, and enhance their corruption prevention awareness and capabilities.



《建造業防貪指南》

Corruption Prevention Guide for Construction Industry

與香港中華廠商聯合會合作推出“誠信營商約章”

防貪處於二零二一年試行在建造業推出“『誠』建商約章”計劃，旨在推動建築公司實施包括誠信政策及誠信培訓的“誠信管理制度”，至今已有四百多間企業參加計劃。為進一步向其他行業推廣“誠信管理制度”，防貪處於二零二三年起分階段與本港主要商會合作，推出“誠信營商約章”（約章）推廣計劃，鼓勵商會的會員公司自願參與，計劃的首階段合作伙伴為香港中華廠商聯合會（廠商會）。約章秉持國家《“一帶一路”廉潔建設高級原則》，鼓勵私營機構強化誠信經營的原則，實施“誠信管理制度”。約章於二零

Launching Business Sector Integrity Charter in Partnership with the Chinese Manufacturers' Association of Hong Kong

As a pilot scheme, CPD launched the Construction Industry Integrity Charter in 2021, aiming to encourage construction companies to adopt an Integrity Management System (IMS) consisting of components including integrity policy and integrity training. More than 400 companies have joined the scheme to date. With a view to promoting the IMS to other industries, CPD collaborates with major local chambers of commerce in phases to launch the Business Sector Integrity Charter (the Charter) campaign, encouraging their member companies to participate voluntarily. The first phase of the campaign commenced in 2023, with the partner being the Chinese Manufacturers' Association of Hong Kong (CMA). In line with the

二三年十一月七日正式推出，啟動儀式由財政司副司長、廉政專員、廠商會會長、廠商會立法會代表，以及廠商會常務副會長主持，其他出席嘉賓包括廠商會的會董會代表。所有參與約章的公司須委派一名“誠信執行官”協助落實並監察誠信政策，同時承諾執行一套誠信政策，並參與誠信培訓。防貪處作為約章的秘書處，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。約章自啟動以來獲廠商會的企業會員積極參與，防貪處未來將逐步將約章推展至其他主要商會，展示公商積極協作，共同說好香港廉潔故事，為國家構建“廉潔絲綢之路”貢獻力量。



country's *High-level Principles on Belt and Road Integrity Building*, the Charter, which was officially launched on 7 November 2023, encourages the private sector to entrench an integrity culture and implement the IMS. The launching ceremony of the Charter was co-hosted by the Deputy Financial Secretary, Commissioner, CMA President, CMA Legislative Council representative, and CMA Executive Vice President. Other guests included representatives of CMA General Committee. All companies joining the Charter are required to appoint an “Integrity Officer” to assist in implementing and monitoring the companies’ integrity policies. Meanwhile, they must also pledge to implement an integrity policy and participate in integrity training. As the Charter Secretariat, CPD is responsible for providing free integrity training, corruption prevention advice and relevant resources for participating companies. Member companies of the CMA have been participating actively in the Charter since its launch. CPD will gradually extend the reach of the Charter to other major chambers of commerce and showcase the partnership between the public and business sectors in telling the good anti-corruption stories of Hong Kong and contributing to the country’s endeavour to build a “Clean Silk Road”.

財政司副司長和廉政專員，聯同香港中華廠商聯合會的會長、立法會代表及常務副會長主持“誠信營商約章”啟動禮

Deputy Financial Secretary and Commissioner, together with the President, Legislative Council representative and Executive Vice President of the Chinese Manufacturers' Association of Hong Kong, officiating at the launching ceremony of the Business Sector Integrity Charter



香港中華廠商聯合會的會董會代表率先參與“誠信營商約章”，並於啟動禮上進行誓師儀式

Representatives of the Chinese Manufacturers' Association of Hong Kong General Committee who joined the Business Sector Integrity Charter pledging their support at the launching ceremony

銀行業的防貪工作

銀行被稱為“百業之母”，穩健的銀行體系是香港作為國際金融中心的重要基石。防貪處與香港金融管理局（金管局）及銀行業緊密合作，於二零二二年編製了全新的《銀行防貪指南》（《指南》）；並於二零二三年展開一系列的推廣活動。首先在廉署及防貪諮詢服務網站發佈《指南》，協助銀行業減低貪污風險。另外，防貪處透過金管局及香港銀行



Corruption Prevention in the Banking Industry

The banking industry is known for its pivotal role in financing business activities. A robust banking system is fundamental to Hong Kong's role as an international financial centre. Working closely with the Hong Kong Monetary Authority (HKMA) and the banking industry, CPD published a brand new *Corruption Prevention Guide for Banks* (the Guide) in 2022, and launched a series of promotional activities in 2023. To start with, the Guide was uploaded to the ICAC and the CPAS Web Portal to help mitigate corruption risks in the banking industry. CPD also promoted the Guide to the banking industry with the help of its partners such as the HKMA and the Hong Kong Association of Banks. For example, the HKMA assisted CPD in distributing physical copies of the Guide to more than 170 authorised institutions, and issuing circulars to

發佈《銀行防貪指南》，協助銀行業減低貪污風險

Launching the *Corruption Prevention Guide for Banks* to help mitigate corruption risks in the banking industry

公會等合作伙伴向銀行業推廣《指南》，其中金管局協助防貪處向全港一百七十多間認可機構派發實體版《指南》，並發出通函，鼓勵銀行在執行新修訂的監管政策時參考《指南》的防貪措施。同年五月，金管局舉辦了疫情後首次的“與監管機構對話”專題研討會，並邀請廉署向四百五十多名銀行管理人員分享貪污個案趨勢及《指南》中的主要內容。防貪處亦因應個別銀行的要求，提供防貪意見及培訓。自《指南》推出以來，防貪處共收到及處理了超過 640 個有關銀行業的防貪諮詢服務查詢，並為不同銀行舉辦了超過 25 場防貪培訓，向超過 5 000 名銀行從業人員介紹《指南》中的內容。

encourage banks to make reference to the corruption prevention measures suggested in the Guide when implementing the newly revised regulatory policy. In May 2023, the HKMA also held the first “Regulator’s Dialogue” seminar since the pandemic, and invited the ICAC to share its insights on corruption case trends and the highlights of the Guide with over 450 bank managerial staff. Moreover, CPD provided corruption prevention advice and training upon request by individual banks. Since the launch of the Guide, CPD has provided corruption prevention advisory service by receiving and handling more than 640 enquiries related to the banking industry. It has also organised over 25 sessions of corruption prevention training for various banks and presented the contents of the Guide to over 5 000 banking practitioners.

推動科技防貪

把工作流程電子化和善用科技，不但可提升政府、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，數碼化是重點防貪策略，以下是有關推動科技防貪工作的例子：

編製及推廣《數碼化防貪指南》

為響應政府施政方針中有關加快建設數字政府的倡議，防貪處於二零二二年完成首階段有關利用數碼化加強防貪的研究，並編製了《數碼化防貪指南》，以誠信管理角度向政府決策局／部門和公共機構建議一個利用數碼化和資訊科技防貪的框架。防貪處正就如何更有效運用此框架展開第二階段研究，以配合行政長官二零二三年施政報告中提及以建設數字政府提升“治理能力”和“治理效能”的政策措施。

EMBRACING TECHNOLOGY TO ENHANCE CORRUPTION PREVENTION

Digitalisation of work processes and effective adoption of technology can improve the efficiency and service quality of the Government, public bodies and private organisations, and strengthen their anti-corruption capabilities. Riding on the momentum of the e-Government initiatives launched in recent years, digitalisation becomes a key strategy in corruption prevention. Efforts made by CPD to embrace technology in enhancing resilience against corruption are summarised below:

Production and Promotion of the Corruption Prevention Guide – Corruption Prevention through Digitalisation

To support the Government's policy initiative of advancing development of a digital Government, CPD completed its first-phase study on enhancement of corruption prevention through digitalisation in 2022, and produced the *Corruption Prevention Guide – Corruption Prevention through Digitalisation*, putting forward to B/Ds and public bodies a corruption prevention framework from the integrity management perspective incorporating the application of digital corruption prevention and information technology. CPD has embarked on its second-phase study on making more effective use of the framework to keep pace with the policy measures for developing a digital Government to enhance “governance capability” and “governance efficacy” as announced by the Chief Executive in the 2023 Policy Address.

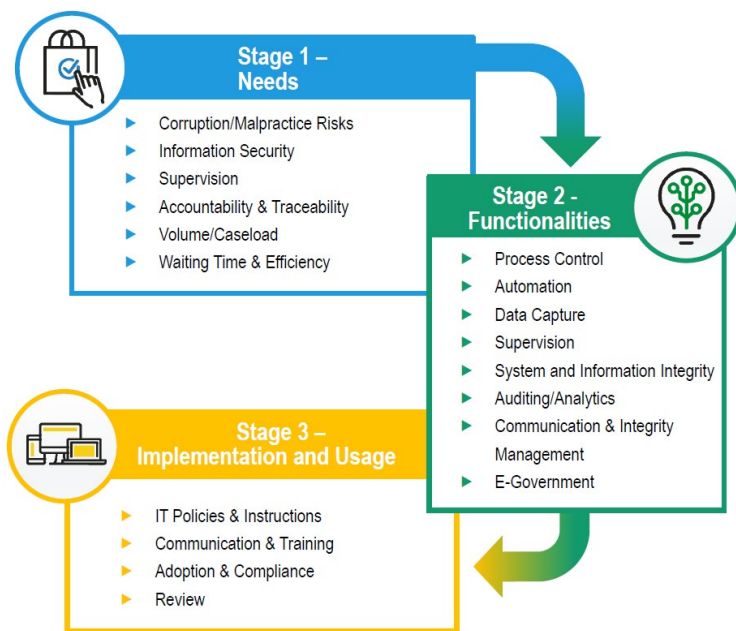


《數碼化防貪指南》

Corruption Prevention Guide – Corruption Prevention through Digitalisation

防貪處在二零二三年進行了一系列與推廣該指南有關的工作，例如以防貪審查或諮詢服務形式，向政府決策局／部門及公共機構，為 50 項公共服務工作流程提供超過 100 個數碼化防貪建議，當中包括檢視數碼化需要及優化有關功能及政策以強化防貪成效。

A series of work had been carried out in 2023 in connection with the promotion of the Guide. For example, assignment studies were conducted and consultancy services were provided for B/Ds and public bodies, whereby over 100 recommendations on digital corruption prevention for 50 public service workflows had been made, including review of their digitalisation needs, and enhancement of relevant functions and policies for improved corruption prevention efficacy.



數碼化防貪框架

Digital Corruption Prevention Framework



防止貪污處人員為政府決策局／部門就其公共服務作業資訊系統提供防貪建議

Officers of the Corruption Prevention Department offering corruption prevention advice to government bureaux/departments on their public service operational information systems

防貪處同時透過舉辦防貪培訓，推動政府決策局／部門及公共機構的管理人員支持以工作流程和公共服務數碼化加強防貪能力。此外，防貪處亦為創科界別的私營機構提供防貪培訓。

CPD also organised training for managerial staff of B/Ds and public bodies to engage their support in the digitalisation of workflows and public services for enhancement of their corruption prevention capabilities. Moreover, CPD also provided corruption prevention training to private organisations in the innovation and technology sector.



與公私營機構的管理人員及資訊科技專家交流數碼化防貪經驗

Exchanging experience in digital corruption prevention with managerial staff and information technology specialists of public and private sectors