CHAPTER 7

Independent Commission Against Corruption

**Preventive education and
enlisting public support against corruption**

**Audit Commission
Hong Kong
28 March 2013**

Report No. 60 of the Director of Audit contains 8 Chapters which are available on our website at http://www.aud.gov.hk

PREVENTIVE EDUCATION AND ENLISTING PUBLIC SUPPORT AGAINST CORRUPTION

Contents

Appendices   **Page**

PREVENTIVE EDUCATION AND ENLISTING PUBLIC SUPPORT AGAINST CORRUPTION

Executive Summary

1.　　　The Independent Commission Against Corruption (ICAC) was established in 1974 under the ICAC Ordinance (Cap. 204).　The ICAC has adopted a three-pronged approach of law enforcement, community education and prevention to combat corruption.　Its work is carried out through three functional departments: (a) the Operations Department; (b) the Community Relations Department (CRD); and (c) the Corruption Prevention Department.

2.　　　In 2012-13, of the ICAC's total estimated expenditure of $876 million, $152 million is for the CRD to provide the public with preventive education and enlist public support against corruption.　According to the annual surveys conducted by the ICAC between 2010 and 2012, more than half of the respondents commented that publicity and education work for anti-corruption should be strengthened.　The Audit Commission (Audit) has recently conducted a review of the work of the CRD.

Preventive education

3.　　　*Preventive education for the private sector.*　According to the ICAC's analysis, building management was the area with the most private sector corruption complaints/reports between 2008 and 2012.　In 2012, 55% of the pursuable building management cases involved the operation and management of Owners' Corporations (OCs).　Some cases were serious allegations of irregularities between OC members and building management practitioners over large renovation projects.　However, the number of OCs reached by the CRD for providing preventive education decreased from 922 in 2008 by 16% to 779 in 2012.　With the Government's financial support, the number of building renovation projects is likely to remain high for some time.　The CRD should review whether more OCs could be reached (paras. 2.10, 2.11, 2.14 and 2.15).

4.   ***Preventive education for the public sector.***   Audit analysed the CRD's preventive education coverage for staff of the public sector from 2008 to 2012. Audit found that in terms of CRD talks for the 10 government departments which had the largest number of corruption complaints/reports, substantially all of the staff of three departments were covered. However, the coverage of the other seven departments varied from 18% to 44%. As regards the 10 public bodies which had the largest number of complaints/reports, the coverage ranged from 3% to 191%. Audit also found that between 2008 and 2012, the CRD had not provided preventive education talks to 14 bureaux/departments (B/Ds) and 62 public bodies, some of which were involved in corruption complaints/reports. There is a need to review the preventive education coverage for the B/Ds and public bodies concerned, and to provide preventive education talks to politically appointed officials who are not included in the civil servant target group. As an effort to improve the efficiency of preventive education, the CRD should also explore the feasibility of web learning (paras. 2.28 to 2.34).

5.   ***Preventive education for the youth.***   The CRD disseminates anti-corruption messages to students in secondary schools and tertiary institutions through various means. Between academic years 2007/08 and 2011/12, the CRD did not reach four of the 17 degree-awarding tertiary institutions to conduct talks. While the CRD conducted interactive dramas or talks for about 310 secondary schools each year, it did not reach out to 45 secondary schools. The CRD needs to extend its preventive education programme to these schools and institutions (paras. 2.37(d), 2.38 and 2.40).

6.   ***Preventive education for candidates and electors.***   In 2012, there was a surge in corruption complaints received by the ICAC concerning District Council Election/By-election. Many of the complaints concerned electors providing false residential addresses. As at December 2012, following ICAC investigations of the complaints, a total of 45 persons had been convicted of various voting offences, including vote-rigging, providing false information in the voter registration and conspiracy to defraud. Audit considers that, in addition to the ICAC enforcement action, the CRD needs to further educate electors to ensure clean elections (paras. 2.49 and 2.51).

Enlisting public support

7.   The CRD enlists public support against corruption by organising community activities, publicising ICAC activities in the mass media and encouraging the reporting of corruption. The CRD's community activities include: (a) regularly visiting district organisations and conducting talks; (b) organising multi-faceted activities jointly with district organisations; and (c) holding meet-the-public sessions regularly (paras. 3.2 and 3.3).

8.   According to the ICAC, face-to-face contacts with different segments of the community and the general public is one of the most effective ways to get the anti-corruption messages across. However, Audit analysis of the CRD's community activities in the five years from 2008 to 2012 revealed significant decreases in the numbers of organisations and people reached. For example, for the CRD's multi-faceted activities, the number of organisations reached decreased from 1,664 in 2008 by 25% to 1,250 in 2012, and the number of people reached decreased from 450,000 in 2008 by 24% to 340,000 in 2012. Audit notes that changes in the nature, scale and format of the CRD's activities would affect the numbers of organisations and people reached. In Audit's view, the CRD needs to review its strategies and resource deployment for enlisting public support (paras. 3.4, 3.6 and 3.7).

Strategic planning and performance measurement

9.   The CRD only prepares an annual work plan but not a formal strategic plan. A strategic plan will help ICAC senior management review the CRD's longer term strategic objectives and monitor its use of resources in achieving them. Audit also notes that of the four performance targets set for preventive education, two had all along been lower than the actual performance. Too easy-to-achieve targets may not serve the purposes of motivating and measuring performance (paras. 4.3, 4.8 and 4.10).

Audit recommendations

10.   **Audit recommendations are made in the respective sections of this Audit Report. Only the key ones are highlighted in this Executive Summary. Audit has *recommended* that the Commissioner, ICAC should:**

Executive Summary

Preventive education

(a)   **step up preventive education efforts on building management with focus on management of renovation projects (para. 2.22(a));**

(b)   **review whether the CRD should make additional efforts with a view to reaching more OCs for providing preventive education (para. 2.22(b));**

(c)   **review the need to provide more preventive education to the departments and public bodies having corruption complaints/reports, particularly those without CRD talk arrangement or with fewer staff who attended such talks between 2008 and 2012 (para. 2.35(b) and (d));**

(d)   **provide preventive education talks to politically appointed officials after they have joined the Administration (para. 2.35(c));**

(e)   **explore the feasibility of web learning for all government staff above certain ranks (para. 2.35(e));**

(f)   **make efforts to extend the CRD's preventive education programme to cover all secondary schools and tertiary institutions as appropriate (para. 2.45(a));**

(g)   **review the CRD's publicity and education campaigns to see what further work could be performed to help electors better understand and comply with the legal provisions on public elections (para. 2.55(a));**

Enlisting public support

(h)   **review the CRD's strategies and resource deployment for enlisting public support (para. 3.8(a));**

(i)   **based on the review results in (h) above, set appropriate targets for the numbers of organisations and people reached by the CRD's community activities (para. 3.8(b));**

Strategic planning and performance measurement

(j)   **consider the need for the CRD to prepare a strategic plan setting out the longer term objectives and direction for preventive education and enlisting public support against corruption (para. 4.4(b)); and**

(k)   **regularly review the performance targets to determine whether more meaningful ones should be set to reflect the latest situation (para. 4.11(b)).**

Response from the ICAC

11.   The Commissioner, ICAC agrees with the audit recommendations.

PART 1: INTRODUCTION

1.1   This PART describes the background to the audit and outlines the audit objectives and scope.

Background

1.2   The Independent Commission Against Corruption (ICAC) was established in 1974 under the ICAC Ordinance (Cap. 204) to combat corruption. The ICAC's independence is guaranteed in Article 57 of the Basic Law and established by the Commissioner, ICAC being formally and directly responsible to the Chief Executive of the Hong Kong Special Administrative Region. According to the Corruption in Asia Report 2011, Hong Kong's ICAC is widely credited with doing a good job of fighting corruption in both the public and private sectors (Note 1). The ICAC is independent of the Hong Kong civil service.

1.3   Since its inception, the ICAC has adopted a three-pronged approach of law enforcement, community education and prevention to combat corruption. Its three functional departments (see Appendix A) are as follows:

  (a)   *Operations Department.*   The Department receives, considers and investigates alleged corruption offences in accordance with comprehensive procedures (see Appendix B). In 2012, excluding election-related cases, it completed the investigation of 2,939 cases and the prosecution of 231 persons, with 175 persons convicted;

  (b)   *Community Relations Department (CRD).*   The Department provides the public with preventive education and enlists public support against corruption through tailor-made educational and training programmes for individual target groups, face-to-face contact with the community and the use of mass media. It operates seven ICAC Regional Offices at various locations (see Appendix C) to reach out to the local communities. In 2012, the Department provided preventive education to about

---

Note 1:   *According to the ICAC's website, this is a quote from the Corruption in Asia Report issued by the Political and Economic Risk Consultancy, Ltd. in March 2011.*

41,000 staff of business organisations, 29,000 civil servants/staff of public bodies (Note 2) and 79,000 secondary/tertiary students, and through its multi-faceted activities reached about 340,000 people to enlist their support against corruption; and

(c) ***Corruption Prevention Department.*** The Department, through assignment studies, examines practices and procedures of bureaux/departments (B/Ds) and public bodies and makes recommendations to minimise corruption opportunities. It also provides corruption prevention advisory services to private organisations upon request. In 2012, the Department completed 66 assignment reports and provided advice to private organisations on 415 occasions.

1.4   The ICAC's expenditure is met from the Government General Revenue Account. The Commissioner, ICAC is the Controlling Officer accountable for the expenditure. As part of the Government's budgetary exercise, the ICAC is required to submit estimates of its annual expenditure for the approval of the Legislative Council. In 2012-13, of its total estimated expenditure of $876 million, $152 million is for the programmes of preventive education and enlisting public support against corruption, including the costs of 220 ICAC staff responsible for the programmes.

1.5   Figure 1 shows the numbers of corruption reports received by the ICAC since its inception. In 2012, the ICAC received 3,731 corruption reports, comprising 2,483 complaints involving the private sector, 1,192 complaints involving B/Ds and 257 complaints involving public bodies (totalling 3,932 corruption complaints — Note 3).

Note 2: *According to the Prevention of Bribery Ordinance (Cap. 201), public bodies include the Executive Council, the Legislative Council, District Councils and those listed in Schedule 1 of the Ordinance. As at 31 December 2012, the Schedule listed 113 public bodies (including public utilities companies, public transport companies, public hospitals and tertiary education institutions).*

Note 3: *As a corruption report may contain multiple complaints involving different private sector organisations, B/Ds and public bodies, the total number of complaints was greater than the total number of reports.*

Figure 1

**Corruption reports received by the ICAC
(1974 to 2012)**
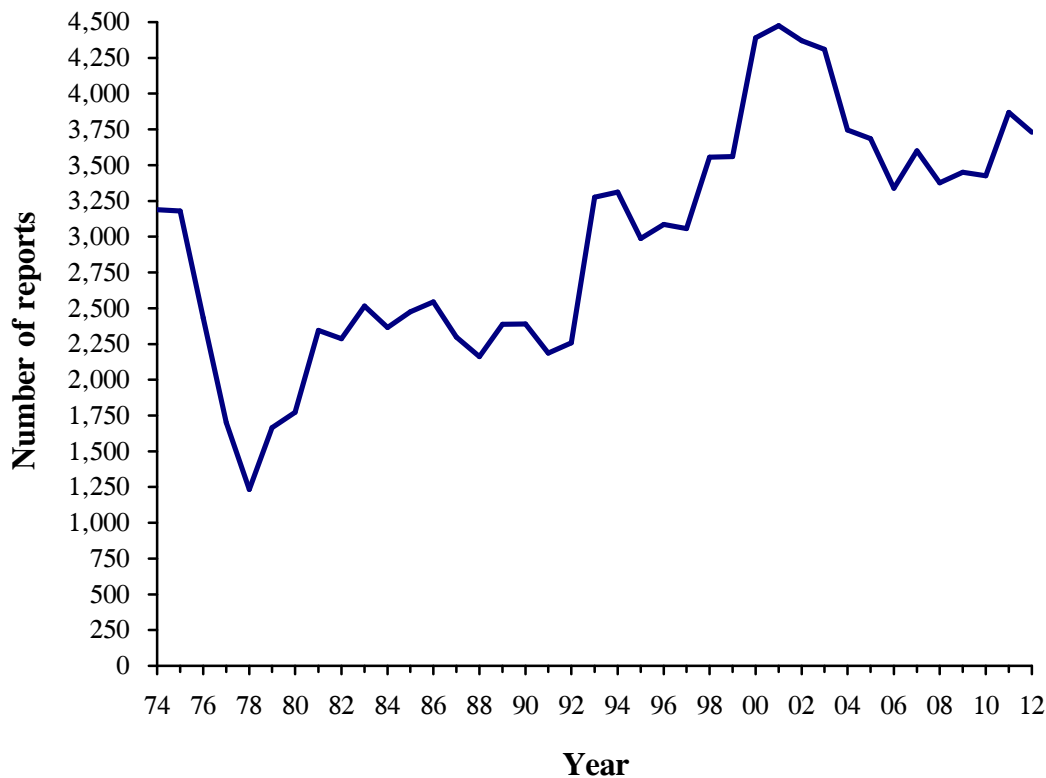
Source: *ICAC records*

Remarks: *According to the ICAC, election-related reports, which mainly arise in election years, are not included so as not to distort the year-by-year comparison of the general corruption situation.*

1.6   According to the Corruption Perceptions Index of Transparency International (Note 4), in 2012 Hong Kong was the 14th least corrupt place among 176 countries and territories around the world. The rankings were 12 in 2008, 2009 and 2011, and 13 in 2010.

Note 4:   *The Corruption Perceptions Index is published annually by Transparency International to rank countries and territories based on how corrupt their public sector is perceived to be.*

Audit review

1.7   According to the ICAC surveys in recent three years (see para. 2.6), more than half of the respondents commented that publicity and education work for anti-corruption should be strengthened. The Audit Commission (Audit) has recently conducted a review of the work of the CRD in providing preventive education and enlisting public support against corruption.   The review has focused on the following areas:

   (a)   preventive education (PART 2);

   (b)   enlisting public support (PART 3); and

   (c)   strategic planning and performance measurement (PART 4).

Audit has found room for improvement in the above areas and has made a number of recommendations to address the issues.

Acknowledgement

1.8   Audit would like to acknowledge with gratitude the full cooperation of the staff of the ICAC during the course of the audit review.

PART 2: PREVENTIVE EDUCATION

2.1   This PART examines issues relating to preventive education.   The following issues are discussed:

   (a)   preventive education for the private sector (paras. 2.9 to 2.23);

   (b)   preventive education for the public sector (paras. 2.24 to 2.36);

   (c)   preventive education for the youth (paras. 2.37 to 2.46); and

   (d)   preventive education for candidates and electors (paras. 2.47 to 2.56).

2.2   The law and rules governing corruption and taking/receiving advantages are complex and could be overlooked inadvertently.   Also, many residents (including the new generation) and new immigrants joining the workforce for the first time may not be familiar with all the rules.   Thus, education is very necessary. The education activities need to be broad-based and seek to cover as many people and as many sectors as possible.   The education efforts should then be sustained based on risk analysis and resources constraints.

Aim of preventive education

2.3   While all three functional departments of the ICAC contribute to the prevention of corruption, a programme of preventive education is set up under the auspices of the CRD.   According to the ICAC's 2012-13 Controlling Officer's Report, the aim of preventive education is to promote better public understanding of the corruption problem and encourage target groups to take positive action.   The CRD achieves the aim through a preventive education programme comprising the following five areas:

   (a)   promoting business ethics and corruption prevention in the business sector to help ensure a level playing field and enhance the competitiveness of Hong Kong as an international business centre;

   (b)   providing corruption prevention training for civil servants and staff of public bodies;

(c)   instilling positive values amongst young people;

(d)   providing corruption prevention training to office bearers and management of non-profit-making organisations; and

(e)   educating candidates and electors to ensure clean elections.

Annual surveys

2.4   The CRD conducts a public opinion survey annually to understand public attitude towards corruption and the reasons behind, identify changing public concerns regarding the problem of corruption and their underlying reasons, and gauge public opinion about the work of the ICAC. According to the CRD, the survey results serve as useful reference for the CRD in mapping out its education and work strategy to address the community's concerns.

2.5   Prior to 2010, the surveys were conducted through telephone interviews. Since 2010 the surveys have been conducted through face-to-face household interviews (by contractors) to obtain a more in-depth understanding of the public's perception and their concerns over the issue of corruption. The 2012 survey had 1,529 respondents.

2.6   Starting from the 2010 survey, respondents have been asked to comment on which aspect of work the ICAC should strengthen. In each of the 2010 to 2012 surveys, more than half of the respondents (59%, 51% and 52% respectively) commented that the ICAC should strengthen "publicity and education work for anti-corruption". "Conducting talks and seminars" was the most commonly cited format for the ICAC to strengthen corruption prevention and education work.

2.7   In this review, Audit examined the CRD's preventive education programme and identified room for improvement as detailed in paragraphs 2.8 to 2.56.

Format and content of preventive education

2.8   The CRD provides preventive education mainly by conducting talks, visits and meetings, as follows:

(a)   *Talks.* The CRD provides corruption prevention talks to a wide range of targets in different sectors, including the business sector, B/Ds, public bodies and the youth. The main objectives of the talks are to enhance the participants' knowledge on the anti-bribery laws and corruption risks, as well as to equip them with the skills to prevent corruption. Content of the talks is tailor-made, taking into account the profile of the participants and the objectives of specific talks. For staff of the business and public sectors, key messages of the talks generally include:

(i)   relevant provisions of the Prevention of Bribery Ordinance (Note 5);

(ii)   evils and consequences of corruption;

(iii)   corruption-prone areas of different functional areas (overall view for managerial staff and specific functional area for general staff depending on their profile);

(iv)   handling of conflict of interest situations;

(v)   ethical decision making; and

(vi)   role of participants in preventing corruption (e.g. tightening up system controls and managing staff integrity for managers/supervisors, and reporting corruption and malpractice for general staff).

Normally a talk lasts for 45 minutes to 1.5 hours as mutually agreed with the clients. PowerPoint presentations are conducted and training videos are used as appropriate;

Note 5:   *Staff of the public sector, irrespective of their ranks, are all briefed on the offence of Misconduct in Public Office in the context of proper handling of conflict of interest situations.*

(b)   *Visits.*   CRD staff conduct visits to managerial staff of organisations in both the business and public sectors. The main purposes are to:

  (i)   introduce ICAC corruption prevention services, including formulating/reviewing the organisations' code of conduct, consultancy services of strengthening the organisations' system controls and conducting integrity training for staff;

  (ii)   heighten the clients' awareness of the corruption risks in their organisations; and

  (iii)   encourage them to action, viz. zero tolerance of corruption and malpractice, and adopting corruption prevention measures; and

(c)   *Meetings.*   For networking purpose and entrenching support, CRD staff attend functions of organisations (e.g. inauguration ceremonies of business/professional trade associations and spring receptions).

Preventive education for the private sector

Corruption situation in the private sector

2.9   The CRD provides preventive education for the private sector, which includes business organisations, building management sector and non-profit-making organisations. According to the CRD, each year it identifies priority trades/sectors based on a number of factors (e.g. the number of corruption complaints/reports and the Government's new initiatives). Figure 2 shows the corruption complaints/reports involving the private sector between 2008 and 2012. On average, 80% of the complaints/reports were pursuable.

Figure 2

**Corruption complaints/reports involving the private sector
(2008 to 2012)**
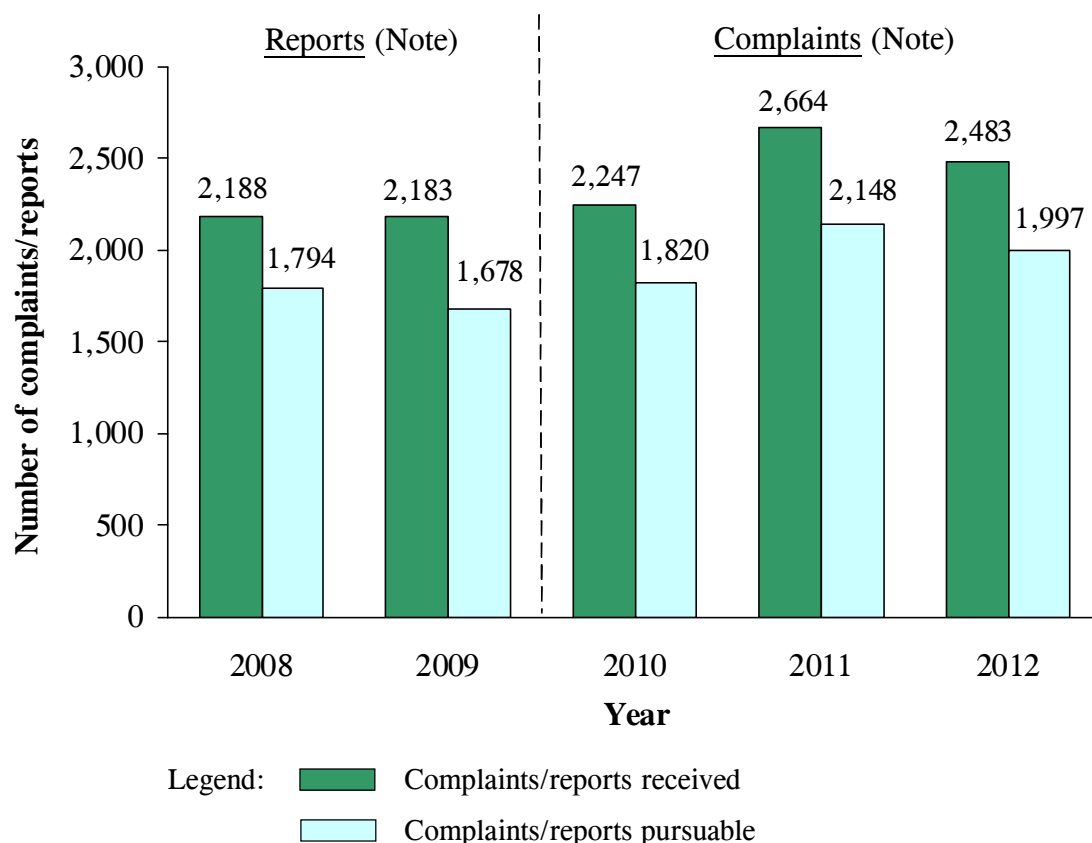
Source: *ICAC records*

Note: *Since 2010, the ICAC has compiled corruption statistics on the basis of complaints instead of reports. A report may contain multiple complaints (see Note 3 to para. 1.5).*

Building management sector

2.10   According to the ICAC's analysis of the private sector corruption complaints/reports between 2008 and 2012, building management was the area with the most complaints/reports, accounting for over 40% (Note 6). Figure 3 shows the corruption complaints/reports involving building management between 2008 and 2012. On average, 83% of the complaints/reports were pursuable.

Figure 3

**Corruption complaints/reports involving building management
(2008 to 2012)**
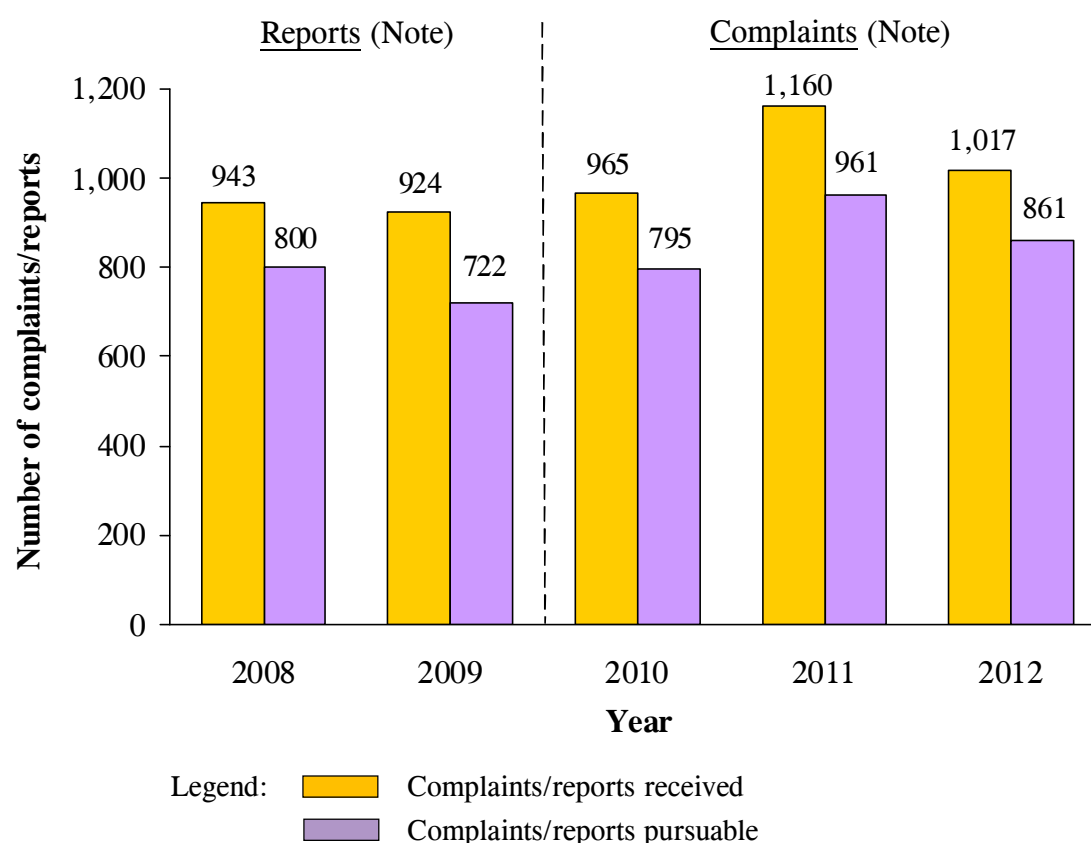
Source: ICAC records

Note: Since 2010, the ICAC has compiled corruption statistics on the basis of complaints instead of reports. A report may contain multiple complaints (see Note 3 to para. 1.5).

Note 6:   *Other areas (e.g. catering and entertaining services, finance and insurance services, and construction industry) each accounted for less than 10% of the corruption complaints/reports.*

2.11   In 2012, 55% of the pursuable building management cases involved the operation and management of Owners' Corporations (OCs). While the cases were mostly of a minor or speculative nature, some were more serious allegations of irregularities between OC members and building management consultants, contractors and other professionals over large renovation projects.

2.12   In response to the above mentioned phenomenon, the CRD provided corruption prevention education on building management to OCs in specific and the general public at large through multi-faceted channels. These included producing and distributing toolkits to OCs, approaching newly-formed OCs to offer a visit to each of them and to introduce ICAC services, organising territory-wide/regional seminars/workshops, conducting roving and mobile exhibitions, producing television spot series and radio programmes, and launching a designated website. In particular, from May 2008 to March 2011, the CRD organised a three-year Integrity and Quality Building Management Programme in collaboration with the Home Affairs Department, the Hong Kong Housing Society, the Urban Renewal Authority, relevant professional bodies and 18 District Councils. Between 2008-09 and 2011-12, about 80,000 people were reached through roving and mobile exhibitions on building management.

2.13   Audit welcomes the CRD's additional efforts in organising various preventive education activities for building management. Overall, the number of people reached each year increased from 12,700 in 2008 to 38,900 in 2012. However, the number of OCs reached had decreased since 2010. Table 1 shows the details.

Table 1

OCs reached by the CRD
(2008 to 2012)

Year	Number of OCs reached			
	Talks	Visits/ Meetings	Seminars/ Workshops	Overall (Note)
2008	135	182	648	922
2009	105	95	524	704
2010	78	132	842	1,029
2011	64	46	768	871
2012	56	52	680	779
Total	438	507	3,462	4,305

Source: ICAC records

Note: As some OCs were reached in more than one way, the overall number of OCs reached was less than the sum of the number of OCs reached through talks, visits/meetings and seminars/workshops.

2.14   As at 31 December 2012, there were 9,670 OCs in Hong Kong. Table 1 shows that between 2008 and 2012, the CRD reached 4,305 OCs through talks, visits/meetings and seminars/workshops. However, the number of OCs reached decreased from 922 in 2008 by 16% to 779 in 2012.

2.15   With the financial support of the Government's "Operation Building Bright Scheme" (Note 7), the number of building renovation projects is likely to remain high for some time.   Past corruption cases have indicated that the management of renovation projects is a high risk area calling for additional preventive education efforts.   In addition, as 55% of the pursuable building management cases involved the operation and management of OCs (see para. 2.11), the CRD should review whether more OCs could be reached for providing preventive education (see also para. 4.9).

Business organisations

2.16   According to the CRD, it promotes best practices, high ethical standards and good corporate governance in the business sector through:

(a)   visits to companies and organising talks/seminars for specific trades and industries (e.g. construction, banking and finance) to raise businessmen's awareness of anti-corruption laws and corruption risks;

(b)   helping companies to formulate codes of conduct, training their staff on legal and ethical issues through talks, and encouraging them to establish system controls; and

(c)   setting up the Hong Kong Ethics Development Centre in 1995 to collaborate with six major chambers of commerce to promote business and professional ethics on a long-term basis.

2.17   Between 2007-08 and 2011-12, the CRD organised a total of 4,431 talks for business organisations.   Table 2 shows an analysis of the number of business organisations by the number of talks held for them.

Note 7:   *In May 2009, the Government launched the "Operation Building Bright Scheme" to provide subsidies to owners of dilapidated buildings to carry out repair and maintenance works.   In October 2010, the Government launched a second round of the Scheme.   The total funding of the Scheme amounted to $3.5 billion.*

Table 2

**Talks organised for business organisations
(2007-08 to 2011-12)**

Number of talks	Number of business organisations				
	2007-08	**2008-09**	**2009-10**	**2010-11**	**2011-12**
1 to 5	286	301	291	330	320
6 to 10	23	32	19	24	21
11 or more	14	11	4	7	8

Source: ICAC records

2.18   As shown in Table 2, for some business organisations, more than 10 talks a year were organised by the CRD. In January 2013, upon enquiry, the CRD informed Audit that:

(a)   responses of business organisations in using CRD services were entirely voluntary. They were likely to be more responsive in arranging talks for their staff when they had a large staff size, and their management placed greater emphasis on integrity training. Some of them might also have been affected by corruption problems in the past. These organisations usually had regular arrangements of ICAC talks (e.g. talks for newly recruited staff and refresher talks for newly promoted supervisors/managers); and

(b)   for other business organisations, depending on the size of their workforce and training needs, they might choose to organise ICAC talks on an irregular interval.

2.19   Audit noted that, of the 4,431 talks, 173 (4%) talks each had an audience of only 10 staff or less. Of these small audience talks, 43 were for business organisations for which the CRD had held other talks (more than five) in the same year. According to the CRD, the reasons for few participants in these 43 talks were as follows:

(a)   seven talks were for senior management, three talks were in English and one was a train-the-trainer talk;

(b)   six talks were a component of the licensing/professional development courses organised by regulatory/professional bodies which were the CRD's strategic partners. The CRD normally could not cancel the talk regardless of the number of trainees; and

(c)   the remaining 26 talks were largely talks for front-line staff/new recruits of companies as part of their induction/refresher courses. The actual number of trainees was less than the number the CRD was told beforehand.

In Audit's view, the CRD needs to improve the planning of talks for cases such as those in (c) above. For example, it should plan its talks for the same business organisation in a year with due regard to its past attendance records, and combine the talks where appropriate.

Non-profit-making organisations

2.20   As stated in the ICAC's 2012-13 Controlling Officer's Report, one of the CRD's five preventive education programme areas is providing corruption prevention training to office bearers and management of non-profit-making organisations (see para. 2.3(d)). According to the CRD:

(a)   non-profit-making organisations covered OCs and other non-governmental organisations;

(b)   over the years, the CRD had been providing extensive preventive education for OCs (see paras. 2.12 to 2.15); and

(c)   other non-governmental organisations mainly included voluntary agencies and charitable organisations. Between 2008 and 2012, the Corruption Prevention Department had taken initiatives to provide corruption prevention services to such organisations, including providing Best Practice Modules, and seminars and talks thereon, to help them enhance the integrity of various systems and functions, and conducting assignment

studies of areas such as procurement and outsourcing of services. As such, the CRD had not accorded priority to them in recent years. It only provided preventive education services (e.g. talks on anti-bribery law) upon the request of individual organisations.

2.21   Audit noted that in the light of the Corruption Prevention Department's initiatives relating to non-profit-making organisations between 2008 and 2012, the CRD had not treated such organisations as priority targets. However, as mentioned in paragraph 1.3, the CRD and the Corruption Prevention Department have different duties in combating corruption. In Audit's view, the CRD needs to regularly review its strategy and priority for providing preventive education for non-profit-making organisations to determine whether more proactive efforts are needed, taking account of the corruption complaints involving such organisations.

Audit recommendations

2.22   **Audit has *recommended* that the Commissioner, ICAC should:**

(a)   **step up preventive education efforts on building management with focus on management of renovation projects;**

(b)   **review whether the CRD should make additional efforts with a view to reaching more OCs for providing preventive education;**

(c)   **improve the planning of talks for the same business organisation in a year with due regard to its past attendance records, so as to enhance cost-effectiveness; and**

(d)   **regularly review the CRD's strategy and priority for providing preventive education for non-profit-making organisations to determine whether more proactive efforts are needed.**

Response from the ICAC

2.23   The Commissioner, ICAC agrees with the audit recommendations. He has said that:

(a)   the CRD will continue its vigorous efforts in promoting clean building management, including building renovations; and

(b)   the Corruption Prevention Department has been providing technical and professional information in respect of building maintenance and renovations to OCs in response to their increasing need in this regard.

Preventive education for the public sector

2.24   The CRD provides preventive education for the public sector, which comprises B/Ds and public bodies (see Note 2 to para. 1.3(b)). According to the CRD, it promotes a clean and honest civil service culture through:

(a)   preventive education for all officers in B/Ds (Note 8) on the pitfalls of corruption and advising them what to do if they are offered bribes or advantages;

(b)   seminars for supervisors on how to manage staff integrity; and

(c)   integrity building programmes in collaboration with B/Ds.

2.25   For public bodies, the CRD helps them uphold their employees' integrity through corruption prevention seminars/workshops for their employees and practical training materials for their managers and front-line staff.

Corruption situation in the public sector

2.26   Figure 4 shows the corruption complaints/reports involving the public sector between 2008 and 2012. On average, 68% of the complaints/reports involving B/Ds were pursuable. For public bodies, the percentage was 70%.

Note 8:   *As at 31 December 2012, there were 79 B/Ds. Internal preventive education provided by some B/Ds for their staff is not covered in this audit review.*

Figure 4

**Corruption complaints/reports involving the public sector
(2008 to 2012)**

Year	Reports (Note)		Complaints (Note)		
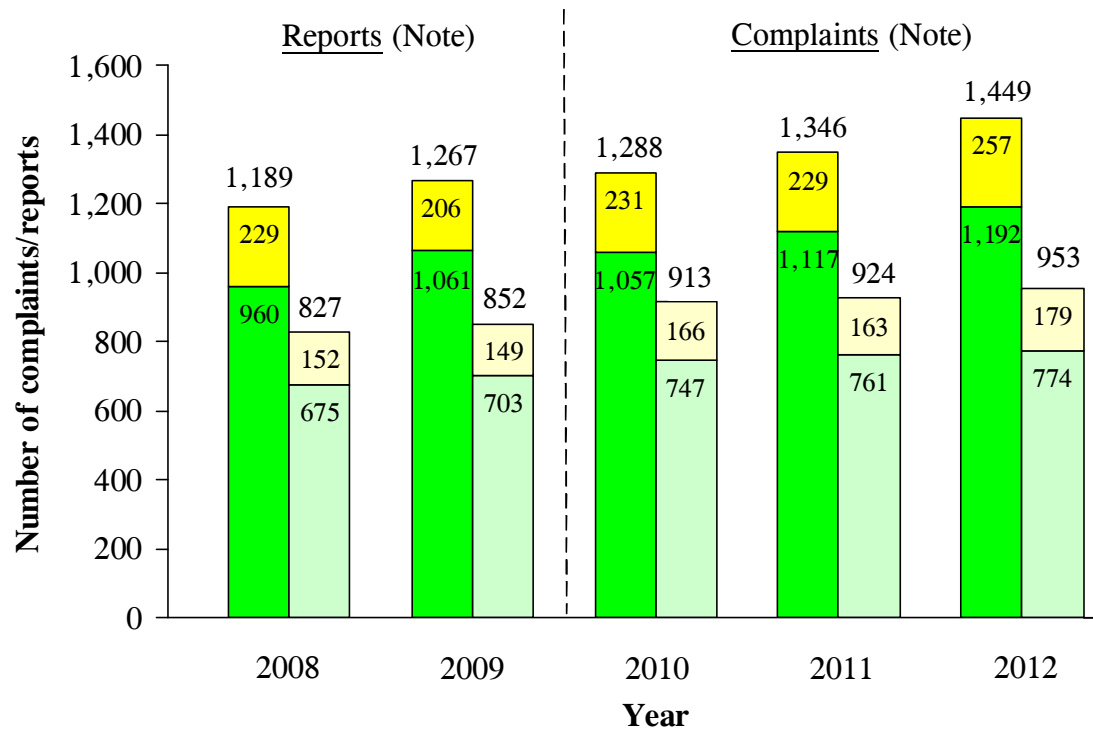
Legend:
- ▮ (yellow) Complaints/reports received (involving public bodies)
- ▮ (green) Complaints/reports received (involving B/Ds)
- ▯ (pale yellow) Complaints/reports pursuable (involving public bodies)
- ▯ (pale green) Complaints/reports pursuable (involving B/Ds)

Source: ICAC records

*Note: Since 2010, the ICAC has compiled corruption statistics on the
            basis of complaints instead of reports.   A report may contain
            multiple complaints (see Note 3 to para. 1.5).*

2.27   Figure 4 shows an increasing trend in the number of public sector corruption complaints.   In Audit's view, the significant increases warrant the attention of the ICAC.   The CRD needs to closely monitor the overall corruption situation in the public sector and, where necessary, strengthen its preventive education work.

Bureaux/departments involved in more corruption complaints

2.28   According to the CRD, it closely monitors the corruption scene and gives priority to the following B/Ds in preparing its work plan:

(a)   the disciplined forces;

(b)   works-related B/Ds;

(c)   B/Ds having a large workforce; and

(d)   B/Ds topping the list of corruption complaints.

For the 10 departments which had the largest number of complaints/reports among all B/Ds between 2007 and 2011, Audit analysed the preventive education (in the form of CRD talks) coverage of their staff between 2008 and 2012. Table 3 shows the results.

Table 3

**Preventive education provided for top 10 departments
(2008 to 2012)**

Departments with the largest number of complaints/ reports	Average annual number of complaints/ reports (Note 1)	Number of staff (Note 2)	Number of staff who attended CRD talks					
			2008	2009	2010	2011	2012	Total
Hong Kong Police Force	311	32,708	3,958	6,670	6,523	6,488	5,699	29,338
Food and Environmental Hygiene Department	137	9,981	221	682	704	1,132	922	3,661
Lands Department	65	3,752	88	246	122	163	174	793
Housing Department	63	7,624	920	1,543	1,288	2,102	3,712	9,565
Correctional Services Department	42	6,669	158	42	224	363	436	1,223
Leisure and Cultural Services Department	35	7,887	516	721	503	547	493	2,780
Fire Services Department	32	9,796	639	1,054	737	1,253	676	4,359
Customs and Excise Department	28	5,453	454	281	307	370	434	1,846
Buildings Department	25	1,144	465	367	82	60	191	1,165
Immigration Department	22	6,538	814	331	499	385	730	2,759

Source: ICAC and Civil Service Bureau records

Note 1: The numbers were averages for 2007 to 2011. The CRD took into account the numbers of complaints/reports of the preceding years in preparing its annual work plans for 2008 to 2012.

Note 2: The numbers were strength of civil servants in the respective departments as at 31 March 2012.

Preventive education

2.29   Assuming that the staff who attended CRD talks each year within the five-year period shown in Table 3 were not the same people (Note 9), substantially all of the staff of the Hong Kong Police Force, the Housing Department and the Buildings Department received preventive education (mainly because their management took the initiatives to request more talks for their staff). The coverage (i.e. the number of staff who had attended CRD talks as a percentage of total number of staff) of the other departments in Table 3 varied from 18% to 44%. For these other departments having a relatively higher level of corruption complaints/reports, the CRD needs to review whether it can provide more preventive education for their staff. For example, the CRD should work with them to ensure that:

(a)   preventive education is conducted every year; and

(b)   each staff should attend the training at least once within each cycle (say a period of five years) to keep up to date of the new rules/practices and new trends.

Public bodies involved in more corruption complaints

2.30   Similar to B/Ds, the CRD stands ready to provide training to all public bodies. It closely monitors the corruption scene and gives priority to public bodies topping the list of corruption complaints. For the 10 public bodies which had the largest number of complaints/reports among all public bodies between 2007 and 2011, Audit compared the number of CRD talks provided for their staff between 2008 and 2012. Table 4 shows the details.

Note 9:   *There were no statistics on the number of staff who attended more than one talk. The five-year period used to aggregate the total number of staff who had attended CRD talks from 2008 to 2012 is not an absolute measure but provides an indication of the level of attendance over an extended period.*

Table 4

**Preventive education provided for top 10 public bodies
(2008 to 2012)**

Public bodies with the largest number of complaints/ reports	Average annual number of complaints/ reports (Note 1)	Number of staff (Note 2)	Number of staff who attended CRD talks					
			2008	2009	2010	2011	2012	Total
A	38	61,000	1,261	1,214	1,852	903	795	6,025
B (Note 3)	34	506	981	–	–	–	399	1,380
C	17	26,000	373	271	394	158	169	1,365
D	10	12,000	780	1,005	1,009	1,340	1,600	5,734
E	9	5,500	–	226	52	133	150	561
F	7	3,520	165	56	23	51	24	319
G	6	1,218	680	377	529	464	275	2,325
H	6	6,517	–	35	45	35	60	175
I	6	992	75	86	–	21	–	182
J	6	6,888	45	64	67	47	85	308

Source: ICAC records and websites of the public bodies

Note 1: The numbers were averages for 2007 to 2011. The CRD took into account the numbers of complaints/reports of the preceding years in preparing its annual work plans for 2008 to 2012.

Note 2: The numbers were obtained in January 2013 based on the latest information available from the websites of the public bodies.

Note 3: For Public Body B, the number of staff represented the number of its members only as the number of their assistants was not available from the website. The number of staff who attended talks included both its members and their assistants.

2.31   Again, assuming that the people who attended CRD talks were not duplicative in the five-year period, the coverage of preventive education for the public bodies (excluding Public Body B — see Note 3 to Table 4) ranged from 3% to 191%. For most of the public bodies, the coverage was a lot lower than the government departments in Table 3.

Reaching more bureaux/departments and public bodies

2.32   Audit found that for the five years between 2008 and 2012, the CRD conducted talks and visits/meetings for 65 B/Ds and 98,000 civil servants (i.e. slightly over 60% of the total of 160,000 civil servants). However, during the five-year period, the CRD did not reach out to 14 B/Ds to conduct talks. In January 2013, upon Audit enquiry, the CRD explained that although no talk was conducted for the 14 B/Ds, during the period all of them sent representatives to attend workshops organised under the Ethical Leadership Programme (Note 10).

2.33   Audit also found that between 2008 and 2012, through talks and visits/meetings, on average each year the CRD reached 38 public bodies and 6,200 staff of public bodies. However, during the five-year period, there were 62 public bodies without CRD talk arrangement. In January 2013, upon enquiry, the CRD informed Audit that:

   (a)   public bodies were free to use CRD services on a voluntary basis. Some requested regular talk arrangement (e.g. incorporating in their regular induction programme for new recruits), some arranged talks only once in a few years, and some preferred indirect training (e.g. showing of CRD training videos). For public bodies with a very small set-up (e.g. boards and committees), they normally would not need CRD services as their secretariats were supported by relevant B/Ds;

Note 10:   *The Ethical Leadership Programme was jointly launched by the ICAC and the Civil Service Bureau in 2006. Under the Programme, a network of Ethics Officers nominated by B/Ds has been set up. Integrity messages have been conveyed to all B/Ds through the network in the format of integrity management workshops organised regularly and a dedicated intranet for Ethics Officers to share integrity training materials.*

(b) some public bodies were reached through their affiliated organisations. Some became inactive and CRD services were suspended or shifted to their affiliated organisations as appropriate; and

(c) both the CRD and the Corruption Prevention Department of the ICAC contributed concerted efforts in providing corruption prevention and education services to public bodies. To minimise disruption to the public bodies, public bodies approached/reached by either one department would not be approached by another at least in the near future.

2.34 Audit considers that:

(a) for the 14 B/Ds not reached between 2008 and 2012, the CRD needs to determine which B/Ds have the preventive education need for their staff over a defined period (in addition to the Ethical Leadership Programme established for all B/Ds) and conduct talks and visits/meetings for them accordingly. Of these 14 B/Ds, priority should be given to 11 B/Ds because an average of seven corruption complaints/reports each year between 2008 and 2012 were related to them. In addition, preventive education talks should be provided to politically appointed officials who may not be conversant with government rules and regulations. At present, they are not included in the civil servant target group;

(b) for the 62 public bodies without talk arrangement between 2008 and 2012, the CRD needs to identify those requiring follow-up action (e.g. 18 public bodies which had not used any ICAC service between 2008 and 2012; and those previously reached by the Corruption Prevention Department should be approached by the CRD after a period of time) and ensure that CRD staff contact them at an appropriate time to offer suitable CRD services. Same as for B/Ds, priority should be given to 23 public bodies because they were involved in an average of 31 corruption complaints/reports each year between 2008 and 2012; and

(c) as an effort to improve the efficiency of preventive education, the CRD should explore the feasibility of web learning, by uploading the training materials to a learning website and requiring all government staff above certain ranks to view the presentation within a defined period of time.

Audit recommendations

2.35   **Audit has *recommended* that the Commissioner, ICAC should:**

(a)   **closely monitor the overall corruption situation in the public sector and, where necessary, strengthen the CRD's preventive education work;**

(b)   **review the need to provide more preventive education to the departments and public bodies which had fewer staff who attended CRD talks between 2008 and 2012 (see paras. 2.28 to 2.31), having regard to the number of corruption complaints/reports they were involved;**

(c)   **provide preventive education talks to politically appointed officials after they have joined the Administration;**

(d)   **review the need to provide preventive education to the 14 B/Ds and 62 public bodies not reached or having no talk arrangement between 2008 and 2012, with priority given to those 11 B/Ds and 23 public bodies having corruption complaints/reports; and**

(e)   **explore the feasibility of web learning, by uploading the training materials to a learning website and requiring all government staff above certain ranks to view the presentation within a defined period of time.**

Response from the ICAC

2.36   The Commissioner, ICAC agrees with the audit recommendations. He has said that:

(a)   the CRD has given due consideration to the overall corruption situation when mapping out its work plans. The CRD will continue to monitor the situation and fine-tune the preventive education work for the public sector as necessary;

(b)   the CRD stands ready to provide preventive education services to all B/Ds and public bodies, which are free to use the services on a voluntary basis. The CRD will strive to work with the B/Ds and public bodies concerned to review their training needs;

(c)   two briefings were conducted to the politically appointed officials and non-official Executive Council Members respectively in 2012. It will be a standing practice of the CRD to offer talks to politically appointed officials of a new term.   The ICAC also stands ready to provide corruption prevention services to politically appointed officials as and when necessary; and

(d)   the CRD has been promoting a probity culture in the civil service through the Internet or intranets in the following ways:

(i)   integrity messages have been uploaded to the Resource Centre on Civil Service Integrity Management website for reference of general civil servants;

(ii)   integrity-related reference materials have been provided to Ethics Officers of B/Ds through a dedicated website for their use; and

(iii)   from time to time, the CRD also provides softcopies of training materials to various B/Ds for uploading to their departmental intranets.

The CRD will explore the recommendation in paragraph 2.35(e) with the Civil Service Bureau.

Preventive education for the youth

2.37   The CRD promotes moral education among young people through:

    (a)   producing multi-media moral education packages for secondary/primary schools and kindergartens which dovetail with the curriculum;

    (b)   organising learning projects for students on the importance of upholding positive values;

    (c)   producing cartoons embedded with anti-corruption messages for kindergarten and primary students;

    (d)   disseminating anti-corruption messages to students in secondary schools and tertiary institutions through various means (e.g. interactive dramas and talks on personal and professional ethics);

    (e)   jointly organising territory-wide projects with schools, tertiary institutions and youth-related organisations for young people to take ownership in promoting positive values;

    (f)   maintaining the Moral Education Website (in Chinese only) to provide a comprehensive range of moral education materials developed by the ICAC for teachers' use; and

    (g)   operating a youth website iTeen Camp (in Chinese only) that inculcates positive values in the younger generation.

Reaching more secondary schools and tertiary institutions

2.38   Hong Kong has 17 degree-awarding tertiary institutions, comprising nine publicly-funded institutions and eight self-financing institutions. Audit analysis of the tertiary institutions reached by the CRD between academic years 2007/08 and 2011/12 revealed that for 11 tertiary institutions (comprising eight publicly-funded institutions and three self-financing institutions), the CRD reached them every year to conduct talks on personal and professional ethics for their first-year and final-year students. For two tertiary institutions, the CRD conducted talks for one in 2007 and the other in 2011. During the five-year period, the CRD did not reach the other four tertiary institutions to conduct talks.

2.39   For secondary schools, the CRD disseminates anti-corruption messages to their students through interactive dramas performed by contractors, or talks (if dramas cannot be arranged due to scheduling difficulties). According to the CRD, every year it sends out invitations to all government, aided and direct subsidy scheme schools to offer the services. However, some aided and direct subsidy scheme schools declined the services for various reasons (e.g. tight teaching schedule). For private and international schools, in consideration of its resources, the CRD provides preventive education only upon their requests.

2.40   Audit noted that between school years 2007/08 and 2011/12, on average, the CRD conducted interactive dramas or talks for about 310 secondary schools each year. However, during the five-year period, the CRD did not reach out to 45 secondary schools (comprising five aided/direct subsidy scheme schools (Note 11), 16 private schools and 24 international schools). According to the CRD, young people are an important target group for its education work. In Audit's view, the CRD needs to make efforts to cover all secondary schools and tertiary institutions.

Incorporating integrity messages into curricula

2.41   In the academic year 2010/11, the CRD developed a teaching module on integrity education for tertiary students with an aim to enhance their understanding of ethical challenges and equip them with the necessary skills in making ethical decisions. Promotion and launch of this personal ethics module is by phase with regard to the targets' feedback and resources. As at December 2012, 10 of the 17 tertiary institutions had incorporated the module into the general education or other relevant programmes for their students, and another tertiary institution had indicated interest in doing so for the academic year 2013/14. In Audit's view, the CRD needs to continue its efforts to seek the support of other tertiary institutions to incorporate the module into the programmes for their students.

Note 11: *As far as could be ascertained, the ICAC had not sent invitations to three of the five schools.*

Extending ICAC Ambassador Programme

2.42   In 2008, the CRD launched the ICAC Ambassador Programme to recruit tertiary students as ICAC Ambassadors.   The Ambassadors regularly organise on-campus activities for their fellow students with a view to fostering a probity culture.   In 2010, the CRD formed an association called i-League to maintain contact with the former and incumbent Ambassadors.   It regularly organises activities for the i-League members to bolster their enthusiasm and engage their support for the anti-corruption work.

2.43   Audit applauds the CRD's efforts in launching the ICAC Ambassador Programme and forming the i-League.   As at December 2012, the CRD had extended the Programme to 11 of the 17 tertiary institutions.   In Audit's view, the CRD needs to consider extending the Programme to all tertiary institutions.

Maintaining bilingual education websites

2.44   As mentioned in paragraph 2.37(f) and (g), the CRD maintains its Moral Education Website and youth website iTeen Camp in Chinese only.   In Audit's view, the CRD needs to explore whether the two websites could be maintained in both Chinese and English to further enhance their usefulness, especially for the non-Chinese students.

Audit recommendations

2.45   **Audit has *recommended* that the Commissioner, ICAC should:**

 (a)   **make efforts to extend the CRD's preventive education programme to cover all secondary schools and tertiary institutions as appropriate;**

 (b)   **continue the efforts to seek the support of tertiary institutions to incorporate the personal ethics module developed by the CRD into relevant programmes for their students;**

 (c)   **consider extending the ICAC Ambassador Programme to all tertiary institutions; and**

(d) **explore whether the Moral Education Website and youth website iTeen Camp could be maintained in both Chinese and English to further enhance their usefulness.**

Response from the ICAC

2.46 The Commissioner, ICAC agrees with the audit recommendations. He has said that:

(a) the CRD will continue to make efforts to extend its preventive education programmes to all secondary schools and tertiary institutions;

(b) regarding the personal ethics module and the ICAC Ambassador Programme, it has been the CRD's plan to reach the tertiary institutions by phases due to resources consideration. In 2013-14, the CRD will seek the support of six other tertiary institutions for these two programmes; and

(c) the CRD will implement the recommendation in paragraph 2.45(d) if resources permit.

Preventive education for candidates and electors

2.47   According to the CRD, it promotes clean and fair elections through:

(a)   arranging briefings, producing information booklets and guidelines to electors, and providing the election enquiry hotline service to help candidates, election agents, election helpers and electors better understand the Elections (Corrupt and Illegal Conduct) Ordinance (Cap. 554);

(b)   mass media publicity and involving the public in activities organised to promote the clean elections message; and

(c)   launching district projects, such as the joint projects with District Councils in 2011 on promoting clean elections.

Election-related corruption complaints

2.48   Figure 5 shows the election-related corruption complaints/reports between 2008 and 2012. The percentages of complaints/reports pursuable were 97% for 2008, 95% for 2009, 71% for 2010, 91% for 2011 and 99% for 2012.

Figure 5

**Election-related corruption complaints/reports
(2008 to 2012)**
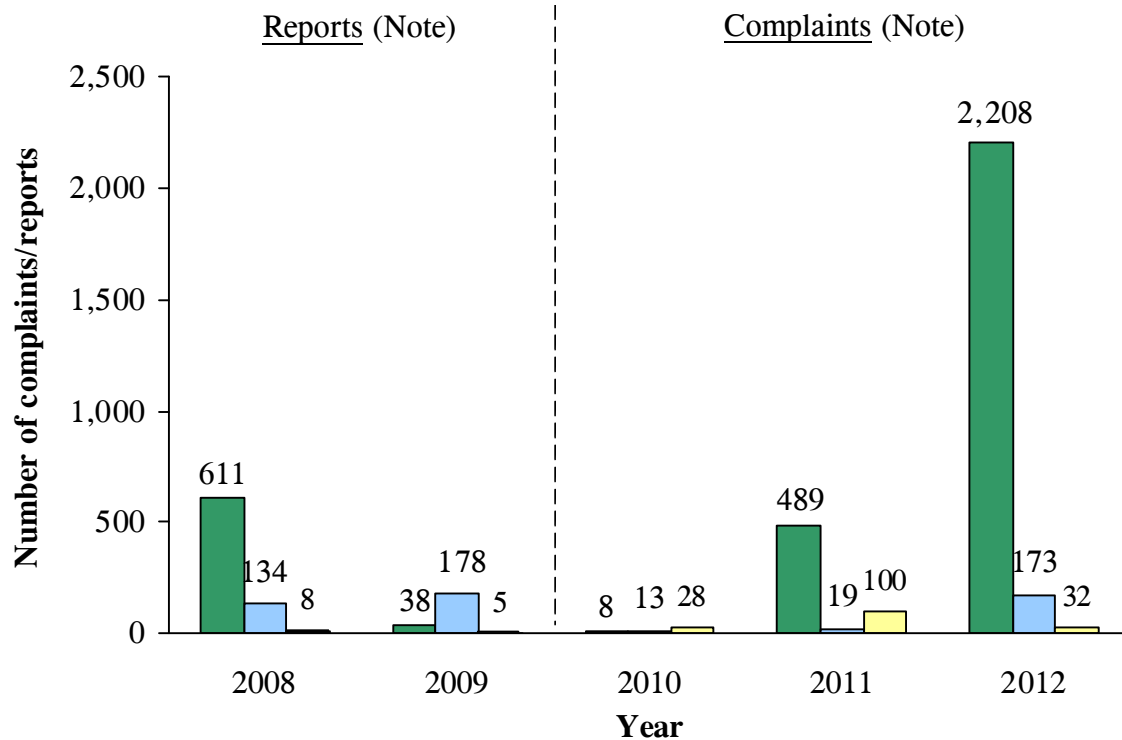
Legend: ■ District Council Election/By-election

         ■ Legislative Council Election/By-election

         ■ Other elections (including Chief Executive Election)

Source: *ICAC records*

Note: *Since 2010, the ICAC has compiled corruption statistics on the basis of complaints instead of reports. A report may contain multiple complaints (see Note 3 to para. 1.5).*

Remarks: *1. A District Council Election was conducted in November 2007 and another in November 2011.*

        2. A Legislative Council Election was conducted in September 2008 and another in September 2012.

Surge in complaints

2.49   As can be seen from Figure 5, there was a surge in election-related corruption complaints received by the ICAC in 2012, mainly concerning the November 2011 District Council Election and the 2012 District Council By-election. Many of the complaints concerned electors providing false residential addresses (Note 12). As at December 2012, following ICAC investigations of the complaints, a total of 45 persons had been convicted of various voting offences, including vote-rigging, providing false information in the voter registration and conspiracy to defraud.

2.50   According to the CRD, it reminded electors of the provisions of the Elections (Corrupt and Illegal Conduct) Ordinance through extensive publicity and education campaigns. The ICAC information booklets, briefings/talks, publicity video, website, exhibitions and pamphlets all covered the relevant legal provisions. District projects to promote the clean elections message also included explanations of the provisions. Specifically, a flier containing explanations of the provisions was sent to all electors prior to all public elections.

2.51   Audit notes the CRD's efforts in promoting clean and fair elections. However, the surge in election-related corruption complaints in 2012 requires the attention of the CRD. In Audit's view, in addition to the ICAC enforcement action, the CRD needs to review its publicity and education campaigns to see what further work could be performed to help electors better understand and comply with the legal provisions on public elections.

Mobile exhibitions

2.52   For the general public, the CRD promotes the clean elections message through various activities, including specially designed mobile exhibition trucks

---

Note 12:   *According to the Elections (Corrupt and Illegal Conduct) Ordinance, a person engages in corrupt conduct at an election if he votes at the election: (a) knowing that he is not entitled to do so; or (b) after having given to an electoral officer information that he knew to be materially false or misleading, or knowingly omitted to give material information to an electoral officer, or recklessly given to an electoral officer information that was materially false or misleading.*

running throughout numerous locations over the territory (Note 13).   Audit examination revealed issues relating to the holding of such exhibitions. Details are in paragraphs 2.53 and 2.54.

2.53   *Specifying service requirements.* In 2010, the CRD awarded a lump sum contract of $0.95 million for the provision of truck service for holding mobile exhibitions on 135 days in the contract period. However, the CRD actually used the truck on only 122 days. Specifying more service requirements than actually needed leads to wastage. In Audit's view, the number of service days required could have been accurately determined through better planning. The CRD needs to ensure that the service requirements properly reflect the actual need.

2.54   *Selecting exhibition locations.* For the 2011 District Council Election, the CRD held mobile exhibitions on a total of 172 days at 179 locations. In a review of the exhibitions in February 2012, the CRD noted that some exhibitions had lower visitor figures due to unfavourable locations selected by the Regional Offices and poor weather. Audit examination revealed that the exhibitions at 15 locations each reached less than 100 people (averaging 62 people). For example, a four-hour exhibition at the So Uk Estate, which was in the process of being demolished, reached only 11 people. In Audit's view, the CRD needs to select appropriate locations for holding mobile exhibitions, paying due regard to the number of people that could be reached.

Audit recommendations

2.55   **Audit has *recommended* that the Commissioner, ICAC should:**

   (a)   **review the CRD's publicity and education campaigns to see what further work could be performed to help electors better understand and comply with the legal provisions on public elections;**

   (b)   **remind CRD staff to specify the service requirements in line with the actual need in procuring exhibition services; and**

Note 13:   *Mobile exhibitions generally include display of reference materials, digital exhibits, computer games and video shows.*

(c)   **ensure that CRD staff select appropriate locations for holding mobile exhibitions, paying due regard to the number of people that could be reached.**

Response from the ICAC

2.56   The Commissioner, ICAC agrees with the audit recommendations. He has said that:

(a)   the CRD will review its publicity and education campaigns to see what further work could be performed to help electors better understand and comply with the provisions of the Elections (Corrupt and Illegal Conduct) Ordinance, which covers all levels of public elections and is enforced by the ICAC; and

(b)   CRD staff will be regularly reminded to specify the service requirements in line with the actual need and select appropriate locations for holding mobile exhibitions.

PART 3: ENLISTING PUBLIC SUPPORT

3.1   This PART examines issues relating to enlisting public support against corruption. The following issues are discussed:

     (a)   community activities (paras. 3.3 to 3.9);

     (b)   encouraging the reporting of corruption (paras. 3.10 to 3.20); and

     (c)   expenditure control (paras. 3.21 to 3.26).

Aim of enlisting public support

3.2   According to the ICAC's 2012-13 Controlling Officer's Report, the aim of enlisting public support is to promote public awareness of the evils of corruption, foster public confidence in and support for the work of the ICAC, and encourage the reporting of corruption offences. The CRD achieves the aim by:

     (a)   organising community activities to keep the public abreast of the work of the ICAC;

     (b)   publicising the activities of the ICAC in the mass media, including the production of television drama series based on real corruption cases, in order to enhance public understanding of its anti-corruption work; and

     (c)   encouraging the reporting of corruption.

Community activities

3.3   The CRD's community activities include the following:

     (a)   ***Talks, visits and meetings.*** The CRD attends meetings of district consultative committees and regularly visits district organisations (e.g. residents associations) and conducts talks to enlist the support of district leaders and community groups (e.g. District Council Members and members of District Fight Crime Committees and Area Committees);

(b)   *Multi-faceted activities.* The CRD organises multi-faceted activities (such as roving exhibitions and various types of competitions and games) jointly with the 18 District Councils and other district organisations to reinforce the community's commitment to sustaining a probity culture and to sustain public support for the ICAC's anti-corruption work. Where appropriate, it arranges members of the ICAC Club (Note 14) to participate in and provide assistance for the activities as a manifestation of their support for the anti-corruption cause; and

(c)   *Meet-the-public sessions.*   The CRD holds meet-the-public sessions regularly with members of the public from different walks of life to enhance the transparency of the ICAC and gauge public views on anti-corruption work.

According to the CRD, where appropriate it invites district organisations as partners to join/sponsor the community activities.   Providing sponsorship to the CRD's activities is an important form of public support and participation. Involvement and support of the sponsors enhance the desired impact and expand the scope and coverage of the activities.

Reaching more organisations and people

3.4   Audit analysis of the CRD's community activities in the past five years revealed significant decreases in the numbers of organisations and people reached (except for an increase of 65 people reached by meet-the-public sessions). Tables 5 to 7 show the details.

Note 14:   *The CRD established the ICAC Club in 1997. Any resident aged 12 or above who is keen to assist in the fight against corruption is welcome to join the Club.*

Table 5

**Organisations and people reached by talks, visits and meetings
(2008 to 2012)**

Year	Number of talks, visits and meetings	Number of organisations reached	Number of people reached
2008	1,507	529	31,324
2009	1,244	466	26,691
2010	905	381	21,866
2011	790	385	18,594
2012	1,040	389	23,416
Decrease from 2008 to 2012	–467 –31%	–140 –26%	–7,908 –25%

Source: ICAC records

Table 6

**Organisations and people reached by multi-faceted activities
(2008 to 2012)**

Year	Number of activities	Number of organisations reached	Number of people reached
2008	243	1,664	450,000
2009	244	1,601	402,000
2010	293	1,706	344,000
2011	240	1,100	300,000
2012	292	1,250	340,000
Increase/Decrease from 2008 to 2012	+49 +20%	–414 –25%	–110,000 –24%

Source: ICAC records

Table 7

**People reached by meet-the-public sessions
(2008 to 2012)**

Year	Number of sessions	Number of people reached
2008	35	386
2009	29	522
2010	30	475
2011	18	248
2012	33	451
Increase/Decrease from 2008 to 2012	−2 −6%	+65 +17%

Source: ICAC records

3.5   Audit analysis also revealed a significant decrease in community activities with sponsorship. Table 8 shows the details.

Table 8

**Community activities with sponsorship
(2008 to 2012)**

Year	Number of activities with sponsorship	Number of sponsors	Amount of sponsorship ($ million)
2008	38	38	3.7
2009	41	48	2.1
2010	39	32	2.5
2011	27	34	2.4
2012	20	22	0.9
Decrease from 2008 to 2012	−18 −47%	−16 −42%	−2.8 −76%

Source: ICAC records

3.6   In January 2013, the CRD informed Audit that:

(a)   the nature, scale and format of activities organised would affect the numbers of organisations and people reached, the number of sponsors and the amount of sponsorship in different years;

(b)   much of the CRD's staff resources were diverted to conducting large scale, territory-wide and even international activities to enhance the visibility of the CRD's district entrenchment work. Such activities, though generated great publicity, might not necessarily reach a large number of people (e.g. the International Anti-corruption Public Service Announcement Video Competition and Workshop organised in December 2011 only reached about 200 participants, but from 21 countries and places);

(c)   much resources were also diverted to research and development work for producing publications like toolkits for various trades, as well as tailor-made presentation contents with case studies to meet the need of the CRD's clients;

(d)   without additional resources for completing such tasks of greater complexity and intensity, the number of activities would inevitably be cut. Also, more cost-effective ways of conducting ongoing activities had been adopted, including attending district consultative committee meetings and ceremonial functions strictly on a need basis; and

(e)   changes in cooperation format would also affect the number of sponsors over the years. For example, starting from 2010-11, the CRD began to use the platform of the District Fight Crime Committees to disseminate probity messages, rather than joining hands with them to conduct fight crime activities. This would inevitably result in a smaller number of sponsors and sponsorship but the level of support from the Committees remained unchanged because it was enlisted in a more cost-effective way.

3.7   Audit notes the CRD's explanations of changes in its strategies and resource deployment for enlisting public support.   However, Audit is concerned about the significant decreases in the numbers of organisations and people reached by the CRD's community activities.   As stated in the ICAC's website, face-to-face contacts with different segments of the community and the general public is one of the most effective ways to get the anti-corruption messages across.   In Audit's view, the CRD needs to review its strategies and resource deployment for enlisting public support, and set appropriate targets for the numbers of organisations and people reached by its community activities, paying due regard to the nature, scale and format of the activities.   The CRD also needs to remind its staff to strive to seek the involvement and support of sponsors where appropriate, with a view to enhancing the desired impact and expanding the scope and coverage of the activities.

Audit recommendations

3.8   **Audit has *recommended* that the Commissioner, ICAC should:**

  (a)   **review the CRD's strategies and resource deployment for enlisting public support;**

  (b)   **based on the review results in (a) above, set appropriate targets for the numbers of organisations and people reached by the CRD's community activities, and establish controls to monitor the achievement of the targets; and**

  (c)   **remind CRD staff to strive to seek the involvement and support of sponsors where appropriate in organising community activities.**

Response from the ICAC

3.9   The Commissioner, ICAC agrees with the audit recommendations.   He has said that:

(a)   the CRD has constantly reviewed its work strategies in response to changes in the external environment. The CRD will continue to review its strategies and resources for enlisting public support and set appropriate targets; and

(b)   the CRD has adopted a partnership approach in its work of providing preventive education services and enlisting support from the public for the fight against corruption. Partners may provide their names, expert knowledge, network and/or financial sponsorship to support the anti-corruption cause. For the past five years, the CRD has annually enlisted the support of about 500 organisations as co-organisers or assisting organisations of the CRD's projects to promote probity messages to different sectors. The CRD will continue to seek the involvement and support of partners and/or sponsors where appropriate in organising community activities.

Encouraging the reporting of corruption

Enlisting greater public support

3.10   According to the CRD's 2008 to 2012 surveys (see paras. 2.4 and 2.5), public confidence in and support for the work of the ICAC remained strong. A majority of the respondents considered the ICAC's anti-corruption work effective. Almost all respondents considered that the ICAC deserved their support. Table 9 shows the details.

Table 9

Public views on the work of ICAC
(2008 to 2012 ICAC surveys)

Response	Percentage of respondents				
	2008	**2009**	**2010**	**2011**	**2012**
Effectiveness of the ICAC's anti-corruption work:					
(a) Very effective/quite effective	72.4%	68.3%	87.4%	87.8%	88.4%
(b) Average (Note)	26.6%	23.9%	–	–	–
(c) Not quite effective/very ineffective	0.7%	2.2%	4.7%	5.5%	6.5%
(d) Don't know/no opinion	0.3%	5.6%	7.9%	6.7%	5.1%
Support for the ICAC:					
(a) Deserved	99.4%	97.9%	97.1%	98.0%	98.7%
(b) Not deserved	0.5%	0.6%	0.3%	0.1%	0.4%
(c) Don't know/no opinion	0.1%	1.5%	2.6%	1.9%	0.9%

Source: ICAC records

Note: This choice has not been provided in the questionnaire since 2010.

3.11   As mentioned in paragraph 3.2(c), the aim of enlisting public support includes encouraging the reporting of corruption. Table 10 shows the findings of the CRD's annual surveys on respondents' willingness to report corruption.

Table 10

Public willingness to report corruption
(2008 to 2012 ICAC surveys)

Response	Percentage of respondents				
	2008	**2009**	**2010**	**2011**	**2012**
(a) Willing	81.3%	75.3%	75.9%	77.2%	79.3%
(b) Unwilling	6.2%	8.1%	5.3%	4.7%	5.1%
(c) Depending on circumstances	12.4%	13.5%	15.9%	15.5%	14.1%
(d) Don't know/no opinion	0.1%	3.1%	2.9%	2.6%	1.5%

Source: ICAC records

3.12   It can be seen from Table 10 that the majority of the respondents (75.3% to 81.3%) were willing to report corruption. For the 4.7% to 8.1% of respondents who were unwilling to report corruption, the main reasons included:

(a)   that it was troublesome (no further details provided);

(b)   that the reporting procedures/follow-up interviews by the ICAC were troublesome; and

(c)   that it did not concern them.

3.13   For the 12.4% to 15.9% of respondents who might report corruption, depending on circumstances, the main considerations included:

(a)   the likely effect on their and their relatives'/friends' work and safety;

(b)   whether the public interest was affected; and

(c)   the likely benefit to them and their relatives/friends.

3.14   Strong public support, including their willingness to report corruption, is essential in combating corruption effectively. Overall, while the majority of the

respondents expressed their willingness to report corruption, some 20% of the respondents were unwilling to do so or had some reservations about doing so. In Audit's view, there is a need to address the concerns and issues raised by these respondents (see paras. 3.12 and 3.13). In this respect, Audit noted that before 2010 the CRD's annual surveys included questions to gauge public opinion about the ICAC's work in encouraging the reporting of corruption (Note 15). Between 2005 and 2009, less than half (42.6% to 47.4%) of the respondents considered that the ICAC had put sufficient or very sufficient efforts in this regard.

Receiving reports and enquiries through Regional Offices

3.15 The CRD operates seven ICAC Regional Offices at various locations (see Appendix C) to provide face-to-face preventive education services to the public and reach out to the local communities to enlist support for the ICAC's work. According to the CRD, the Offices also serve as focal points for receiving corruption reports and answering enquiries about corruption. They are either wholly or partly located on ground floors to facilitate walk-in complaints and enquiries.

3.16 Audit analysis of the corruption reports received by the ICAC between 2008 and 2012 revealed that:

(a) the number of corruption reports received through the Report Centre in the ICAC Headquarters increased from 2,478 (73% of total reports received) in 2008 to 3,025 (81% of total) in 2012;

(b) correspondingly, the percentage of corruption reports received through the Regional Offices decreased from 27% of total reports received in 2008 to 19% of total in 2012; and

(c) the numbers of corruption reports received through individual Regional Offices in 2012 ranged from 47 to 201.

Note 15: *The questions were taken out in 2010 when the CRD started to conduct surveys through face-to-face household interviews (see para. 2.5). According to the CRD, this allows more time for open-ended and scenario-type questions which are useful for gauging a more in-depth understanding of the public's perception and their concerns over the issue of corruption.*

Table 11 shows the details.

Table 11

**Analysis of corruption reports received by ICAC
(2008 to 2012)**

Office	Number of reports received				
	2008	**2009**	**2010**	**2011**	**2012**
Report Centre in ICAC Headquarters	2,478 (73%)	2,616 (76%)	2,640 (77%)	3,191 (82%)	3,025 (81%)
Regional Offices					
Hong Kong West/Islands	62	57	51	54	47
Hong Kong East	138	122	112	77	63
Kowloon West	200	207	245	188	201
Kowloon East/Sai Kung	154	114	86	68	82
New Territories South West	122	101	85	86	93
New Territories North West	109	99	95	98	112
New Territories East	114	134	113	106	108
Sub-total	899 (27%)	834 (24%)	787 (23%)	677 (18%)	706 (19%)
Total	3,377 (100%)	3,450 (100%)	3,427 (100%)	3,868 (100%)	3,731 (100%)

Source: ICAC records

Remarks: Election-related reports were not included in the analysis.

3.17   Audit analysis also revealed a decreasing trend in the numbers of enquiries about corruption received through the Regional Offices. In 2012, the numbers of enquiries received through individual Regional Offices ranged from 93 to 617 only. Table 12 shows the details.

Table 12

**Enquiries received by Regional Offices
(2008 to 2012)**

Office	Number of enquiries received				
	2008	**2009**	**2010**	**2011**	**2012**
Hong Kong West/Islands	455	465	415	328	244
Hong Kong East	418	555	513	375	398
Kowloon West	277	470	474	400	372
Kowloon East/Sai Kung	922	932	804	706	617
New Territories South West	212	236	207	190	176
New Territories North West	246	119	138	100	93
New Territories East	482	425	293	507	404
Total	3,012	3,202	2,844	2,606	2,304

Source: ICAC records

Remarks: The Report Centre of the ICAC maintains records of all information received from the public, including enquiries. The ICAC however does not compile statistics on the enquiries received by the Report Centre.

3.18   In Audit's view, in view of the small and decreasing numbers of corruption reports and enquiries received through the Regional Offices, the CRD needs to review the cost-effectiveness of locating them wholly or partly on the ground floor of a commercial building which costs higher rent. For example, as can be seen from Appendix C, part of the Hong Kong West/Islands Office is located on

the ground floor of a commercial building in Sheung Wan and part on the 10th floor of a government building in Central. The Sheung Wan office, rented at a monthly rental of $83,000 and manned by a duty officer and an Office Assistant, received only 291 corruption reports or enquiries in 2012 (i.e. on average about one corruption report or enquiry each day).

Audit recommendations

3.19   **Audit has *recommended* that the Commissioner, ICAC should:**

(a)   **explore ways to more effectively address the concerns and issues raised by the survey respondents who expressed unwillingness to report corruption or had some reservations about doing so, with a view to further encouraging the reporting of corruption; and**

(b)   **in view of the small and decreasing numbers of corruption reports and enquiries received through the Regional Offices, review the cost-effectiveness of locating these Offices wholly or partly on the ground floor of a commercial building at a higher rental cost.**

Response from the ICAC

3.20   The Commissioner, ICAC agrees with the audit recommendations. He has said that:

(a)   the CRD attaches great importance to encourage the public to report corruption and will continue to explore more effective ways in the light of technological advances and development in the advertising strategy; and

(b)   Regional Offices serve not only as convenient points for the public to report corruption and make enquiries in person, but also as focal points for the ICAC to reach out to the community to promote anti-corruption messages. Therefore, they have to be located at visible and easily accessible places to facilitate the public to come forward. The CRD will review the cost-effectiveness of locating the Regional Offices wholly or partly on the ground floor, with due regard to the above considerations.

Expenditure control

3.21 The ICAC's Commission Standing Orders (Note 16) stipulate the following controls over entertainment expenses:

(a) an officer may be reimbursed expenses incurred for provision of official entertainment which has been approved in advance; and

(b) unless the Commissioner has approved otherwise, the expenditure per head, inclusive of food, beverages and tips, is subject to a ceiling of $350 for lunch and $450 for dinner (Note 17).

3.22 In examining the expenses for two major community activities, Audit noted the following issues on the entertainment expenses incurred by CRD staff in organising the International Anti-corruption Public Service Announcement Video Competition and Workshop (see para. 3.6(b)) in December 2011:

(a) *Dinner on 6 December 2011.* The Commissioner approved a budget of $450 per head. The actual cost of the dinner at the restaurant concerned was $431 per head. However, when including six bottles of wine bought separately for the dinner and dessert at a separate shop (totalling $92 per head), the actual expenditure was $523 per head; and

(b) *Dinner on 8 December 2011.* The cost of the dinner, approved by an Assistant Director of the ICAC, was $1,045 per head.

3.23 In February 2013, upon enquiry, the CRD provided Audit with the following explanations:

Note 16: *According to section 11(1) of the ICAC Ordinance, the Commissioner may make standing orders providing for various matters such as the financial regulation of the ICAC.*

Note 17: *The ceilings are in line with the guidelines on expenditure on official entertainment issued by the Director of Administration in December 2010.*

(a)   ***Dinner on 6 December 2011.***   The cost of the dinner at the restaurant concerned was treated as an entertainment expense because only the guests invited by the Commissioner attended the dinner.   Twelve bottles of wine were bought for general use in various social programmes in the event.   The cost of the wine was charged to publicity funds of the project. Only six bottles were consumed during the dinner and the remaining six bottles were kept for use in future official meals.   The dinner and the dessert were two separate functions.   During the dinner, some participants showed an interest in Hong Kong's local life and delicacies.   As an impromptu social programme, the participants were taken to a dessert shop to try Chinese dessert right after the dinner.   The cost of the dessert was treated as a separate entertainment expense; and

(b)   ***Dinner on 8 December 2011.***   The dinner was part of the social programmes for networking among the 110 participants from different places around the world and for the ICAC to extend its hospitality.   As the dinner was a component activity of the event (included in the programme brochure), which targeted all conference attendees, the cost of the dinner was charged to publicity funds of the project.   The use of publicity funds was approved by an Assistant Director according to the schedule of authority of the ICAC.

3.24   Audit is concerned that while the dinners on 6 and 8 December 2011 were both in the nature of official entertainment, only the former was treated as an entertainment expense subject to the requirements of the Commission Standing Orders.   Audit is also concerned that the Commission Standing Orders do not clearly specify that the costs of all food and beverages (e.g. the wine and dessert mentioned in para. 3.23(a)) should be included as part of the lunch/dinner expenditure for control purposes.   In Audit's view, the ICAC needs to tighten the control over the expenditure on official entertainment.

Audit recommendations

3.25   **Audit has *recommended* that the Commissioner, ICAC should tighten the control over the expenditure on official entertainment by:**

(a) **applying the requirements of the Commission Standing Orders to all expenditure on official entertainment, including lunches and dinners which form part of any publicity and education programme; and**

(b) **specifying that the costs of all food and beverages should be included as part of the lunch/dinner expenditure for control purposes.**

Response from the ICAC

3.26   The Commissioner, ICAC agrees with the audit recommendations.   He has said that the ICAC will follow up on them.

PART 4: STRATEGIC PLANNING AND PERFORMANCE MEASUREMENT

4.1   This PART examines the following issues relating to strategic planning and performance measurement:

   (a)   strategic planning (paras. 4.2 to 4.5); and

   (b)   performance measurement (paras. 4.6 to 4.12).

Strategic planning

4.2   Effective strategic management is vital to an organisation in meeting the challenges of a changing environment and new demands. An organisation needs to review its position and direction regularly, and develop a strategic plan for establishing what it intends to achieve over a period of time. To ensure that it remains responsive to changing environment, the plan should be periodically reviewed and rolled forward prior to commencing the annual planning cycle.

4.3   Audit notes that the CRD has not prepared a formal strategic plan for preventive education and enlisting public support against corruption. It only prepares annual work plans which do not include information about the CRD's intended achievements over a period of time (e.g. three to five years). Audit considers that preparing a formal strategic plan is useful because:

   (a)   from time to time the CRD needs to organise multi-year projects to address high corruption risks arising in specific areas (e.g. the three-year Integrity and Quality Building Management Programme for building management — see para. 2.12). On the other hand, there are other specific areas where the required CRD efforts are more in some years and less in other years (e.g. more preventive education for candidates and electors are required in election years). A strategic plan will help the CRD prepare annual work plans to effectively allocate resources to these specific areas and other areas over a period of time (e.g. three to five years);

(b)   having gone through a structured strategic planning process will help the CRD analyse new challenges posed by changes in the economic, social and political environment, and make appropriate adjustments to its programmes to ensure that it continues to discharge its duties effectively and efficiently; and

(c)   preparing a formal strategic plan will help ICAC senior management and the Citizens Advisory Committee on Community Relations (Note 18) effectively review the CRD's longer term strategic objectives and direction, and monitor the CRD's use of resources for achieving them.

Audit recommendations

4.4   **Audit has *recommended* that the Commissioner, ICAC should:**

(a)   **review the CRD's existing practice of preparing only annual work plans; and**

(b)   **consider the need to prepare a strategic plan setting out the longer term objectives and direction for preventive education and enlisting public support against corruption.**

Response from the ICAC

4.5   The Commissioner, ICAC agrees with the audit recommendations. He has said that the CRD organises strategic planning workshops at a five-year interval. The last two strategic planning workshops were held in 2004 and 2009 respectively, and the next one will be organised in 2014.

Note 18:   *The Committee's terms of reference are to: (a) advise the Commissioner, ICAC measures to be taken to foster public support in combating corruption and to educate the public against the evils of corruption; (b) receive and call for reports on action taken by the CRD in pursuance of the above; and (c) monitor community response to the ICAC's work and public attitudes towards corruption in general.*

Performance measurement

4.6   Performance measurement, including setting performance targets/indicators and their reporting, helps enhance government performance, transparency and accountability. According to the Guidelines issued by the Financial Services and the Treasury Bureau, Controlling Officers should focus on targets when developing their performance measures and apply the most relevant indicators that measure economy, efficiency and cost-effectiveness of the resources deployed.

4.7   As mentioned in paragraph 2.3, the CRD's preventive education programme covers five programme areas, as follows:

(a)   business sector;

(b)   public sector;

(c)   the youth;

(d)   non-profit-making organisations; and

(e)   candidates and electors.

4.8   In the 2012-13 Controlling Officer's Report, the ICAC reported 11 performance measures on preventive education, comprising four targets and seven indicators. Table 13 shows the details.

Table 13

**Performance measures on preventive education
(2010 to 2012)**

Programme area	Activity	Target	2010 Actual	2011 Actual	2012 Plan
Business sector	Business organisations contacted	At least 1,000	1,538	1,575	1,500
Public sector	B/Ds/public bodies reached	At least 60	124	129	120
The youth	Secondary schools visited	At least 400	415	396	400
The youth	Tertiary institutions reached	11	11	11	11
Programme area	**Indicator**		**2010 Actual**	**2011 Actual**	**2012 Estimate**
Business sector	Business organisations which have used the ICAC's corruption prevention service		444	447	450
Business sector	Managers in the business sector who have received training in corruption prevention and business ethics		10,226	10,581	11,000
Business sector	Front-line workers in the business sector who have received training in corruption prevention and business ethics		27,667	27,728	28,000
Public sector	Civil servants/staff of public bodies who have received training in corruption prevention		26,347	27,335	27,000
The youth	Secondary/tertiary students who have received training in corruption prevention and ethics		81,323	83,318	80,000
Candidates and electors	Election candidates/agents contacted		1,830	5,802	N/A (Note)
Candidates and electors	Candidates/agents who have attended the Elections (Corrupt and Illegal Conduct) Ordinance briefings		161	2,147	N/A (Note)

Source: ICAC's 2012-13 Controlling Officer's Report

Note: An estimate could not be provided by the ICAC as it depended on the number of candidates standing for elections and by-elections, if any, in 2012.

4.9   As shown in Table 13, the ICAC set performance measures for four programme areas only, namely business sector, public sector, the youth, and candidates and electors. It did not set any performance measure for the remaining programme area (i.e. non-profit-making organisations). In Audit's view, the ICAC needs to consider setting performance measures for that programme area as well (e.g. number of OCs reached — see para. 2.15).

4.10   Audit noted that the ICAC had set the target for "Business organisations contacted" as "At least 1,000" since 2000, and the target for "B/Ds/public bodies reached" as "At least 60" since 1998. The actual performance had all along greatly exceeded the targets. For example, as can be seen from Table 13, in 2011 the actual numbers of business organisations contacted (1,575) and B/Ds/public bodies reached (129) exceeded the targets by 58% and 115% respectively. In Audit's view, setting too easy-to-achieve targets is not meaningful and may not serve the purposes of motivating and measuring performance.

Audit recommendations

4.11   **Audit has *recommended* that the Commissioner, ICAC should:**

  (a)   **consider setting performance measures for providing corruption prevention training to office bearers and management of non-profit-making organisations; and**

  (b)   **regularly review the performance targets, paying particular attention to those which have been easily over-achieved, so as to determine whether more meaningful targets should be set to reflect the latest situation.**

Response from the ICAC

4.12   The Commissioner, ICAC agrees with the audit recommendations.

Independent Commission Against Corruption
Organisation chart
(31 December 2012)

```
                    ┌─────────────────────┐
                    │    Commissioner     │
                    └─────────────────────┘
                              │
                              │              ┌─────────────────────┐
                              ├──────────────│   Administration    │
                              │              │       Branch        │
                              │              └─────────────────────┘
         ┌────────────────────┼────────────────────┐
┌─────────────────┐  ┌─────────────────────┐  ┌──────────────────────┐
│   Operations    │  │ Community Relations │  │ Corruption Prevention │
│   Department    │  │     Department      │  │     Department       │
└─────────────────┘  └─────────────────────┘  └──────────────────────┘
```
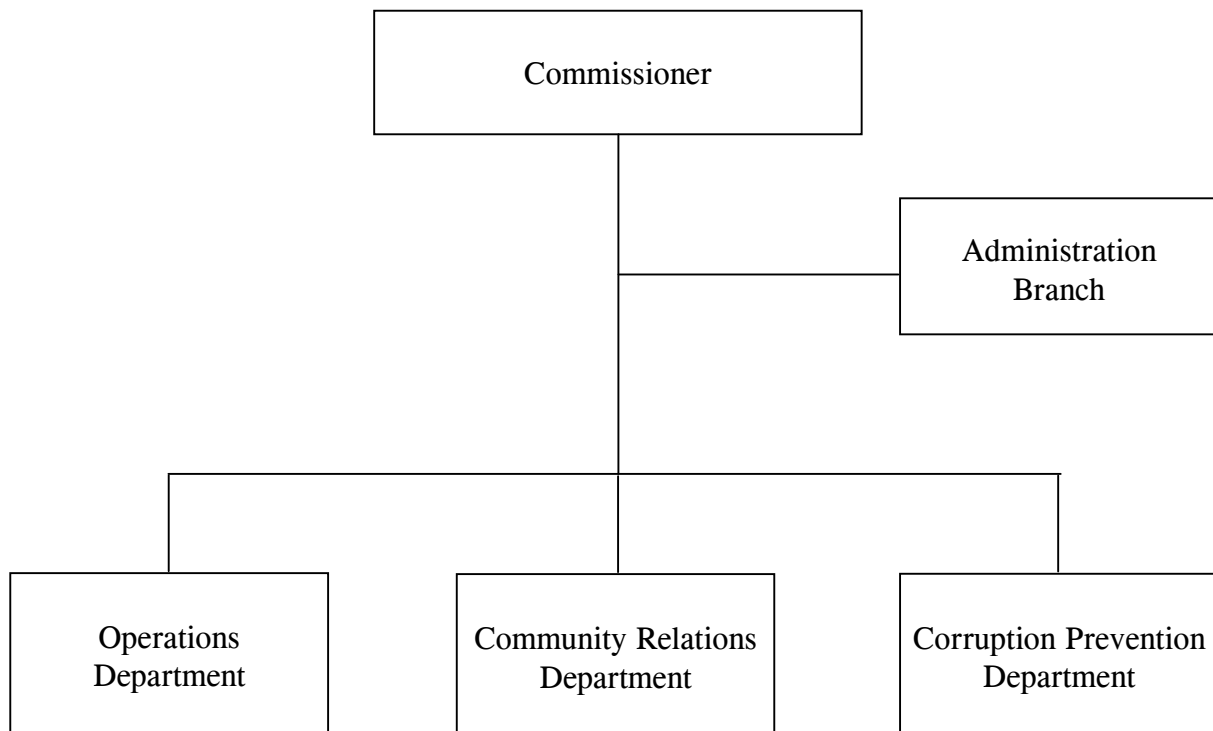
Source: ICAC records

Operations Department's complaint investigation procedures

```
                    ┌─────────────────────────────┐
                    │  Corruption reports received │
                    └─────────────────────────────┘
                                  │
                                  ▼
        ┌──────────────────────────────────────────────────────┐
        │ Directorate/Operations Department assesses corruption  │
        │ reports                                                │
        └──────────────────────────────────────────────────────┘
              │                                        │
              ▼                                        ▼
   ┌────────────────────────┐          ┌──────────────────────────────┐
   │ Pursuable corruption   │          │ Non-pursuable corruption      │
   │ reports                │          │ reports                       │
   └────────────────────────┘          └──────────────────────────────┘
              │                                  Presented to │
              ▼                                               ▼
   ┌────────────────┐   ┌──────────────────┐     ┌──────────────────────┐
   │ Investigation  │──▶│ Progress reports │────▶│                      │
   │ Sections       │   └──────────────────┘     │                      │
   │                │──▶┌──────────────────┐     │                      │
   └────────────────┘   │ Investigations   │────▶│                      │
              │         │ revealing no     │     │  Operations Review   │
              │         │ evidence         │     │  Committee (Note)    │
   To present │         └──────────────────┘     │                      │
   investigation findings                        │                      │
              ▼                                   │                      │
   ┌────────────────────┐                         │                      │
   │ Department of      │                         │                      │
   │ Justice            │                         │                      │
   └────────────────────┘                         │                      │
              │                                    │                      │
   To decide  │                                    │                      │
       ┌──────┴──────────┐                         │                      │
       ▼                 ▼                         │                      │
   ┌──────────┐   ┌────────────────┐               │                      │
   │Prosecution│   │ No prosecution │──────────────▶│                     │
   └──────────┘   └────────────────┘               │                      │
       │                                            │                      │
       ▼                                            │                      │
   ┌────────────────────┐                           │                      │
   │ Conviction/Acquittal│─────────────────────────▶│                     │
   └────────────────────┘                           └──────────────────────┘
                                                                │
                                                   To consider and
                                                   endorse │
                                                           ▼
                                           ┌──────────────────────────────┐
                                           │ Close case (where appropriate,│
                                           │ refer relevant information to │
                                           │ other bureaux/departments or  │
                                           │ public bodies for disciplinary│
                                           │ and/or administrative action) │
                                           └──────────────────────────────┘
```

Source: ICAC records

Note: The Operations Review Committee is an independent advisory committee which oversees all the ICAC investigations.

Regional Offices of Independent Commission Against Corruption

Office	Location	Rented/ Owned	Floor area (square metre)	Monthly rental ($)
Hong Kong West/Islands	G/F, Harbour Commercial Building, Sheung Wan	Rented	199	83,000
	10/F, Harbour Building, Central	Government-owned	96	N/A
		Sub-total	295	83,000
Hong Kong East	G/F and 1/F, Tung Wah Mansion, Wan Chai	Rented	234	137,400
	14/F, Tung Sun Commercial Centre, Wan Chai	Rented	121	36,200
		Sub-total	355	173,600
Kowloon West	G/F and 1/F, Nathan Commercial Building, Yau Ma Tei	Rented	299	122,600
Kowloon East/ Sai Kung	G/F, Kai Tin Towers, Lam Tin	Rented	284	275,600
New Territories South West	G/F, Tsuen Kam Centre, Tsuen Wan	Rented	271	146,100
New Territories North West	G/F and 2/F, Fu Hing Building, Yuen Long	Rented	302	131,300
New Territories East	G/F and 1/F, Shatin Government Offices, Shatin	Government-owned	272	N/A
		Total	2,078	932,200

Source: ICAC records

Acronyms and abbreviations

Audit   Audit Commission

B/Ds   Bureaux/departments

CRD   Community Relations Department

ICAC   Independent Commission Against Corruption

OCs   Owners' Corporations