ANTI-CORRUPTION MEASURES OF THE INDEPENDENT COMMISSION AGAINST CORRUPTION, HONG KONG SPECIAL ADMINISTRATION REGION, CHINA AND STRATEGIES AND EXPERIENCE OF ITS COMMUNITY RELATIONS DEPARTMENT

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I. INTRODUCTION

Through the efforts of the Independent Commission Against Corruption (ICAC) working in partnership with the public, Hong Kong has been transformed from a city with widespread corruption into one of the cleanest places in the world. This paper gives an overview of the history and the anti-corruption measures of the ICAC, highlighting the strategies and experience of its Community Relations Department in changing the public attitude towards corruption.

II. HISTORY AND BIRTH OF THE ICAC

Hong Kong was in a state of rapid changes in the 1960s and 70s. The massive growth in population and fast expansion of the manufacturing industry accelerated the pace of social and economic development. The Government, while maintaining social order and delivering the bare essential public services, was unable to meet the needs of the swelling population. This provided a fertile environment for the unscrupulous. Many people had to take the "backdoor route" simply to earn a living and secure the basic services. Paying "tea money", "black money", "hell money" — whatever its name — became not only familiar to many Hong Kong people, but was also accepted as a necessary way of life.

Corruption was rampant in the public sector. We had stories like an ambulanceman who demanded money before picking up a sick person or a hospital ward attendant who asked for "tips" before giving patients a bedpan or a glass of water. Offering bribes to the right officials was also "part of the procedure" when applying for housing, schooling and other public services. Corruption was particularly serious in the Police Force. Corrupt police officers offered protection to vice, gambling and drug activities. Law and order was under threat and many in the community had fallen victim to corruption.

At that time, investigation of corruption cases, as viewed like any criminal cases, was the responsibility of a dedicated Anti-Corruption Office within the Hong Kong Police Force. However, corruption remained largely unchecked and people had great doubt about government's political will in addressing the problem. Public resentment escalated to new heights when a corrupt senior expatriate police officer, Peter Godber, was able to flee to England whilst under investigation by the Anti-Corruption Office. Godber's escape unleashed a public outcry and students took to the street to demand action from the Government against rampant corruption.

In response to mounting public demand, the then Governor appointed Sir Alastair Blair-Kerr, a Senior Judge, to look into Hong Kong's corruption problem in 1973. Noting the public's loss of confidence in the ability of the police to investigate bribery cases, Sir Alastair raised the suggestion of setting up a dedicated agency separated from the civil service, including the police, to pursue corruption.

I think the situation calls for an organisation, led by men of high rank and status, which can devote its whole time to the eradication of this evil...... A further and conclusive argument is that public confidence is very much involved. Clearly the public would have more confidence in a unit that is entirely independent, and separated from any department of the Government, including the Police.

Alastair Blair-Kerr Report

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Against this background and the strong determination of the Government, the ICAC was established in February 1974 after the enactment of the ICAC Ordinance. The new agency is a statutory body specializing in fighting corruption to help keep Hong Kong fair, just, stable and prosperous. To enable the effective functioning of this new agency, the Government had conferred a unique status on the ICAC, which is also guaranteed in Article 57 of the Basic Law¹ of the Hong Kong Special Administrative Region (HKSAR), China. The ICAC is independent from the civil service and was directly accountable to the then governor (now the Chief Executive of HKSAR), mandating its operation is free from any interference. The Government lends its support to the fight against corruption and allocates sufficient resources to the ICAC. The ICAC's independent status and the grant of adequate provision of resources, which accord with Article 6² and Article 36³ of the United Nation Convention Against Corruption (UNCAC), are instrumental to the success in its anticorruption work.

III. ADOPTING THE HOLISTIC THREE-PRONGED STRATEGY

Since its inception, the ICAC has recognised that it could not win the battle against corruption only by punishing the corrupt. A holistic and coordinated strategy embracing detection of crime, prevention of potential loopholes and education on the evils of corruption was required. Hence, from the outset, the ICAC has been advocating its three-pronged strategy to fight corruption by:

- building a strong enforcement arm to make corruption a high risk crime;
- implementing system changes to minimize corruption opportunities; and
- transforming social values and behavior patterns to reinforce the principles of justice and fairness.

Under the ICAC Commissioner and serviced by the Administration Branch, three distinct but interdependent functional departments, namely, the Operations Department (Ops), Corruption Prevention Department (CPD) and Community Relations Department (CRD) strategically carry out their anti-corruption missions enshrined in the ICAC Ordinance.

A. Operations Department

The Ops is the investigative arm of the ICAC. It is the largest department in the Commission, comprising about 70% of the ICAC's workforce of about 1,500. Its statutory duties include:

- receive and consider allegations of corrupt practice;
- investigate any alleged or suspected offences under the ICAC Ordinance, Prevention of Bribery Ordinance (POBO) and Elections (Corrupt and Illegal Conduct) Ordinance (ECICO)⁴;
- investigate any alleged offences of blackmail committed by a prescribed officer through misuse of office; and
- investigate any conduct of a prescribed officer, which is connected with or conducive to corrupt practices and report thereon to the Chief Executive.

The three pieces of legislation, ICAC Ordinance, POBO and ECICO provide the legal basis for combating corruption. The ICAC Ordinance provides for the appointment of the Commissioner and his officers and other matters relating to the management of the ICAC. It also sets out the duties and responsibilities of the Commissioner and empowers the ICAC to investigate corruption-related offences. The POBO sets out the offences of bribery and corruption in both the public and private sectors and the penalties for them. The ECICO governs the conduct of public elections and sets out the offences to be investigated by the ICAC.

¹ Article 57 of the Basic Law of HKSAR: A Commission Against Corruption shall be established in the Hong Kong Special Administrative Region. It shall function independently and be accountable to the Chief Executive.

² Article 6 of UNCAC: Each State Party shall grant the corruption prevention body or bodies the necessary independence, in accordance with the fundamental principles of its legal system, to enable the body or bodies to carry out its or their functions effectively and free from any undue influence.

³ Article 36 of UNCAC: Such body or bodies or persons shall be granted the necessary independence, in accordance with the fundamental principles of the legal system of the State Party, to be able to carry out their functions effectively and without any undue influence. Such persons or staff of such body or bodies should have the appropriate training and resources to carry out their tasks

⁴ More information on the ICAC Ordinance, POBO and ECICO can be accessed from the Bilingual Law System (https://www.elegislation.gov.hk/)

The ICAC is given wide-ranging powers to investigate corruption offences which are difficult to detect and investigate because of their secretive nature. The ICAC Ordinance sets the parameters of the ICAC investigation, the procedures for handling suspects and disposal of property connected with relevant offences. It also gives the investigators the power of arrest, detention, search and seizure to deal with bribery offences as well as offences which are facilitated by or connected with bribery. The POBO gives the ICAC special powers of investigation, such as searching bank accounts held by the suspect, his family members or associates. With judicial supervision, the investigators may freeze accounts or restrain assets, require suspects and any person to provide information, surrender travel documents and not to leave Hong Kong. All these powers are essential to the investigation of corruption.

The increasing mobility in international travel, rapid development of financial and banking systems as well as the advancement of information technology make corruption a transnational crime. International cooperation between the ICAC and other jurisdictions has been well-established under UNCAC and bilateral agreements of mutual assistance on criminal matters, bringing the culprits to justice no matter where they are

B. Corruption Prevention Department

The CPD believes "Prevention is better than cure". Opportunities for corruption can be removed through transparent and accountable procedures; effective leadership and supervisory control; and improved system controls and safeguards. Its statutory duties are to:

- examine the practices and procedures of government departments and public bodies, and secure revision of any methods of work or procedures that may be conducive to corruption; and
- advise upon request of private organisations or individuals on how to prevent corruption.

The CPD monitors developments in public policies, law and government initiatives to provide timely advice to government bureaux, departments and public bodies to ensure anti-corruption measures are built in from the start through consultation. Concurrent corruption prevention advice is also given in the process.

The CPD conducts assignment studies to make recommendations to minimise opportunities for corruption and monitors completed studies to ensure effective implementation of the agreed recommendations. Almost all government departments and most public bodies have had their key procedures studied, including all major public functions such as law enforcement, licensing and regulatory systems, procurement, contract administration, staff management and public works, etc.

Also, the CPD has been increasingly proactive to provide advice for private organisations. Its Corruption Prevention Advisory Services team provides tailor-made corruption prevention advice to individual private companies upon request. It adopts a cross public-private sector strategy in preventing corruption in the private sector where public interest is involved, e.g. grantees in subvention schemes, contractors of works projects, etc.

C. Community Relations Department

The ICAC had a difficult start in 1974. With a skeptical public that believed the Government condoned corrupt practices. The real challenges for the ICAC were to bring about a drastic and collective change of public attitude towards tolerating corruption and rebuilding public confidence in Government's determination in fighting corruption. Sir Jack Cater, the founding Commissioner of ICAC wrote in the first ICAC Annual Report:

Success in the Operations Department and success in the Corruption Prevention Department are essential as a springboard to the work of the Community Relations Department. And this is vital, for there can be no real victory in our fight against corruption unless there are changes of attitude throughout the community.

To effect a change in people's attitude towards corruption was no easy task at the early time. While it was considered mission impossible, the mammoth task of changing public attitude is entrusted to the CRD, with the following statutory duties:

- educating the public against the evils of corruption; and
- enlisting public support in combating corruption.

In carrying out these duties, the CRD extensively uses multimedia publicity and reaches out to the society through a network of seven Regional Offices located in densely populated and strategic areas to initiate proactive and intensive communication with the general public. It promotes public awareness of the evils of corruption, fosters public confidence in and support for the work of the ICAC, explains the laws relating to corruption and encourages the public to report corruption.

IV. THREE-PRONGED ANTI-CORRUPTION STRATEGY IN PRACTICE: THE CONSTRUCTION INDUSTRY AS AN EXAMPLE

The three-pronged anti-corruption strategy has been put in practice in different fields in both the public and private sectors. One of the significant examples is the construction industry. The construction industry, which ranks 7th in terms of its contribution to our GDP of US\$16 billion in 2016⁵, is one of the major pillars of the economy of Hong Kong, embracing all the construction activities of major infrastructure and real estate properties, and involving many stakeholders such as real estate developers, professionals, academics, contractors, workers and government officials. Corruption in the construction industry is of particular public concern because, monetary costs aside, public safety is at risk.

One could see how costly corruption was when Hong Kong was plagued by two major cases in the construction industry. The first one occurred in 1982 involving the use of substandard cement for building up concrete structures of 26 public housing blocks through bribery. While investigating the case, the ICAC investigators vetted a mountain of documents and records, enquired 3,730 persons/companies and visited overseas countries like Australia, Canada, Cyprus, New Zealand, Spain, United Kingdom and United States of America. In the end, three contractors and seven serving or former civil servants were among the accused and charged with a total of 46 corruption-related offences under the POBO. The culprits were charged and sentenced for 3 to 33 months' imprisonment. The 26 public housing blocks had to be demolished, and 78,000 people had to be relocated. The re-building costs amounted to US\$100 million. The second case took place in 2001 concerning the short-piling problem in a housing project. The staff of the piling sub-contractor fabricated site records to conceal the short-piling construction. In the end, the offenders were sentenced for 42 months to 12 years imprisonment. The two housing blocks involved had to be pulled down, resulting in a loss of US\$83 million.

Under the three-pronged strategy, other than criminalizing the corrupt by law enforcement, we turned the observations gained from investigations into system enhancement to plug corruption loopholes and lessons to learn in training and mass education programmes.

On the prevention front, the CPD identified the common causes to the problems and proposed corruption resistant measures to plug loopholes, including recommending the Government to implement drastic site supervision system, stringent probity requirements concerning acceptance of advantages, handling of conflicts of interest and confidential information. Moreover, the CPD produced a Best Practices Checklist to alert practitioners about the corruption risks and preventive measures in the construction field. The Best Practices Checklist covers specific vulnerable areas such as the award and administration of construction contracts and consultancy agreements, as well as testing of materials. The CPD also helps individual private companies to strengthen their corporate governance and internal controls through a dedicated team, the Corruption Prevention Advisory Services. A set of capacity building training package containing common corruption pitfalls in the construction industry and their preventive safeguards was also produced with the collaboration of major stakeholders. The electronic version of the package has been uploaded onto the ICAC website for public access.

On the education front, the CRD aims at heightening awareness of ethical values and strengthening

⁵ Hong Kong in Figures in 2016" by the Census and Statistic Department, HKSARG (www.censtatd.gov.hk/hkstat/hkif/index. jsp)

integrity throughout the construction industry. We organised integrity trainings, seminars and workshops for the professionals, contract administrators, site supervisory staff and students of construction related courses. Besides, anti-corruption talks are regularly arranged for staff members of individual companies, alerting them to important issues such as bribery and misconduct in public office, managing staff integrity and handling conflicts of interest, etc.

This three-pronged anti-corruption strategy also applies to all trades and industries in both the private and public sectors. Our ultimate aim is to eradicate the root of corruption while bringing the issue of corruption to the forefront of public awareness.

V. MISSION OF THE CRD

The CRD believes that high ethical standards are the first line of defense against corruption. Our mission of "Ethics for All" aims at gaining the support of people from different walks of life in maintaining high ethical standards, showing zero tolerance for graft, and reporting it whenever it occurs. To achieve this, the CRD uses four effective strategies which are summarized in the acronym "TAPE":

- 1. Target-oriented strategy
- 2. All-round communication strategy
- 3. Partnership strategy
- 4. Engagement strategy

VI. THE TAPE STRATEGIES IN ACTION

A. Target-Oriented Strategy

Educating the public against the evils of corruption and enlisting public support in combating corruption are the mandate of the CRD. Driven by this ultimate objective, the thrust of CRD's efforts is to unite all segments of the community to build and sustain a culture of probity. However, individual sectors have distinctive needs and concerns in anti-corruption education. We have to be target-oriented and customise our services to cater for the needs of different target groups through segmentation. Hence, we have organised our work into various programme areas for different targets and formulate target-oriented education programmes for their specific needs. These include the government and public sector, business community, young people, non-governmental organisations, the general public, including the new arrivals and ethnic minorities, etc. Each programme area is tailored to enhance the targets' ethical standards and understanding of the anti-corruption law, equip them with knowledge about common corruption pitfalls and provide them with practical advice on how to address these problems.

The segmentation of target groups has been suitably refined and adjusted to suit the changing social and economic environment. For instance, in the business sector, we tailor-made our education and prevention programmes for different trades. Our training modules are recognised or accredited by more than 60 professional bodies as their continuing professional development courses for members, including company directors, lawyers, engineers, surveyors, estate agents, securities intermediaries, etc. Over 40,000 business executives and practitioners are reached through ICAC training sessions every year.

B. All-Round Communication Strategy

To enlist public support for the ICAC, the public needs to be constantly assured that the ICAC is capable of carrying out its duty effectively without fear or favour. The CRD integrates face-to-face contacts and multimedia publicity to spread the messages to people from all walks of life, like civil servants, private sector practitioners, young people and the general public, etc. through an all-round communication strategy via multiple platforms. The face-to-face contacts and multimedia publicity complement and supplement each other in enhancing the education efforts and publicity impact of the probity messages.

1. Face-to-Face Contacts

"Reaching out to the community" is a major feature of CRD's work. Through the network of seven Regional Offices located in densely populated or strategic areas which cover the entire geographical area of Hong Kong, the CRD officers reach out to the community by engaging in face-to-face visits and talks to members of the public, from classroom to boardroom. They also serve as the focal point of contact with local

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community leaders and organisations with which the Regional Offices jointly organise publicity activities to disseminate probity messages. The face-to-face education work enhances the cognitive understanding of the public on what corruption is; serves to impart the anti-corruption messages and dispel misconception; and helps build up the long-term rapport and public trust in the ICAC. It also facilitates our officers to grasp first-hand public sentiments and comments on the work of ICAC which could shed light on our work planning and long-term development. The Regional Offices also receive corruption complaints and enquiries from members of the public.

Moreover, the Regional Offices regularly organise meet-the-public sessions for people from different strata, from district leaders to housewives, ethnic minorities to young people, etc. to collect their feedback on our work and enlist their support for anti-corruption work.

2. Multimedia Publicity

To change the public attitude and effectively create awareness of corruption intolerance, we have also used the mass media extensively for publicity since the establishment of the ICAC. The anti-corruption messages have penetrated into the lives of the public through different media channels, such as TV, radio, printed media and other forms of promotions. In fact, the ICAC is the first non-commercial organisation in Hong Kong to use TV advertisements to promote its messages. Over the years, we have produced many TV advertisements which are uploaded on the ICAC corporate website with different approaches and themes to maximize the publicity impact. They include:

(a) TV advertisements

- (i) Create deterrent effect to scare people off corruption by emphasising that corruption is a high risk crime which leads to grave consequences.
- (ii) Highlight evils of corruption to educate the public on the evils of corruption.
- (iii) Promote fair society to urge the young people to adopt a "zero tolerance" attitude towards corruption. We tried to speak their language and present the messages in a lively manner.
- (iv) Encourage reporting corruption and enlist support to ICAC over 90% of our investigations start with a report by a member of the public. We therefore attach great importance to encouraging this essential help from the community.
- (v) Keep close tabs on the public's concern these advertisements carry specific messages. For example, we remind voters not to sell their votes through bribery and to support clean elections during public election years.

(b) TV drama

(i) The TV drama series based on real ICAC cases depicts how the ICAC brings the corrupt to justice without fear or favour. It also educates the public on the evils and consequences of corruption. These series are very popular and effective. It is also a soft approach for brand building and educational purposes, building public trust in ICAC's ability and determination to fight corruption.

(c) Social media

(i) With the rapid development of social media, more diversified formats with interactive communication with the general public are now in place. They include the ICAC corporate website, various thematic websites, YouTube, Facebook, Weibo, mobile phone applications, and Instagram. Social media is a powerful and effective way to promote ICAC messages to a larger number of people, particularly the youth. Through the multimedia channels in Hong Kong, the community can receive anti-corruption messages anytime and anywhere.

C. Partnership Strategy

The ICAC is independent but we are not alone. The CRD sees the need to leverage on resources in the

community to serve as a multiplier for CRD's preventive education work. Our corporate slogan is "Hong Kong — the Advantage is always you and the ICAC", which underlines the importance we place on our partnership with the public in fighting the anti-corruption battle. With our efforts of district entrenchment and collaboration, our partners share the probity value of the ICAC and are willing to offer their expertise in assisting the CRD to produce anti-corruption products and online programmes. Throughout the years, the CRD has collaborated with different strategic partners in the community:

1. Business Sector

The CRD forms strategic collaborations with various trades and professions in the business sector. Pioneer work in engaging the private sector started in the 1980s and culminated into the establishment of the Hong Kong Ethics Development Centre in 1995 (now renamed as the Hong Kong Business Ethics Development Centre). Today, with 10 major chambers of commerce⁶ forming an advisory committee to steer the work of the Centre, and through networks set up respectively with over 70 trade associations of different industries and more than 70 banks, corruption prevention messages are promoted effectively to a wider business community.

2. Public Sector

In collaboration with the Civil Service Bureau of the Government (CSB), the ICAC initiated in 2006 the Ethics Officers Network which now comprises 150 officers from all bureaux and government departments. Since the set up of the Ethics Officers Network, 17 thematic workshops have been organised to enhance the Network members' capabilities to implement integrity management in their departments. Our latest initiative is the launching of a web learning portal on integrity management together with the CSB for all civil servants to complete the online training courses at their own pace and obtain online reference materials on relevant integrity issue.

3. General Public

At district level, liaison clusters with all 18 district councils, non-governmental organisations and community-based associations are established to jointly organise anti-corruption activities in the local communities. We also encourage district organisations to take ownership for anti-corruption activities so as to align them with the "Ethics for All" mission. In 2017, over 820,000 people and 1,600 organisations were reached through partnership with around 830 organisations. These collaborations reinforce the culture of probity in the local communities.

D. Engagement Strategy

Active participation is the best proof of public support. By involving and encouraging members of the public to take part in or even to take ownership of preventive education activities is the most effective means of aligning them with the anti-corruption cause.

Young people are our future. To build up a community intolerant of corruption, we disseminate probity messages to the younger generation ranging from kindergartens to universities and further engage them to spread probity messages to their peers. We have launched the Ambassador Programme in 2007/08 to mobilise tertiary students to organise activities promoting integrity messages to their fellow students on campus. After a decade of hard work, now all the 20 tertiary institutions in Hong Kong have joined the programme. Similarly, through another iTeen Leadership Programme for secondary school students launched in 2013/14 school year. The iTeen Leaders assist their teachers in organising integrity activities to instil positive values such as honesty, fairness and self-discipline into their schoolmates.

- Federation of Hong Kong Industries,
- The American Chamber of Commerce in Hong Kong,
- The Chinese General Chamber of Commerce,
- The Chinese Manufacturers' Association of Hong Kong,
- The Hong Kong Chinese Enterprises Association,
- The Hong Kong General Chamber of Commerce,
- The British Chamber of Commerce in Hong Kong,
- The European Chamber of Commerce in Hong Kong,
- The Hong Kong Japanese Chamber of Commerce & Industry, and
- The Indian Chamber of Commerce Hong Kong.

⁶ The 10 major chambers of commerce are:

The ICAC also proactively mobilises citizens to take part in the anti-corruption drive by recruiting them as volunteers to assist in education and publicity projects, and as multipliers to spread probity messages to all walks of life. In 1997, the ICAC Club was set up to provide these supporters a platform for direct participation and engagement in ICAC activities. Currently, the ICAC Club has over 2,600 members and the accumulative service hours provided by members have exceeded 60,000.

VII. EFFECTIVENESS OF ICAC'S WORK

A. Current Corruption Situation

After over four decades of hard work, the current corruption situation and some survey findings suggest that the ICAC is effective in its anti-corruption work.

In recent years, an average of 3,000 corruption reports were received each year, with about two-thirds against the private sector and one-third concerning the public sector. Around 200 persons were prosecuted each year and the case-based conviction has been well over 80%. The overall corruption situation in Hong Kong is well under control. There is no sign of a new and notable corruption pattern that calls for concern, nor is there any deterioration in the overall corruption scene.

In recent years, the ICAC has undertaken investigation of a few high profile cases involving very senior government officials, well known businessmen and listed companies, which were widely reported in both local and overseas media. These are isolated cases and they show evidently that ICAC conducts investigations without fear or favour, regardless of the background or status of the persons involved.

B. Achievements

Hong Kong now has fundamentally a clean public service. In 1974, the ICAC's first year of operation, 86% of the corruption reports were related to government departments. With the relentless efforts of the ICAC and government departments to tackle corruption and promote integrity, the figures were substantially reduced to 40% in 2000 and 27% in 2017 respectively.

In the business sector, with the ICAC's proactive approach to outreach, the businessmen were getting convinced that the ICAC could help in protecting the erosion of profits of the company by corruption. Since the 1990s, a relationship of close cooperation was gradually built up between the ICAC and the business sector. The business sector is now more alert to business ethics and corporate governance and Hong Kong has been hailed as a place providing a level playing field for business.

Internationally, Hong Kong is now recognised as one of the least corrupt places in the world. In its 2018 Index of Economic Freedom, the Heritage Foundation ranked Hong Kong the world's freest economy for 24 consecutive years, and praised that Hong Kong has a high quality legal framework that strongly supports the rule of law, and there is little tolerance of corruption, and a high degree of transparency which enhances government integrity. Hong Kong was ranked the second most competitive economy among 63 economies in the World Competitiveness Yearbook 2018. According to Transparency International's Corruption Perceptions Index 2017, Hong Kong was ranked the 13th least corrupt place among 180 countries and territories.

Locally, as shown in the ICAC Annual Survey 2017, 99.2% of the respondents agreed that keeping Hong Kong corruption-free was important to the overall development of Hong Kong; 96.8% of the respondents expressed their support to the ICAC. Last but not least, 99.1% had not encountered corruption in the past 12 months. More importantly, over 70% of the corruption reports are lodged non-anonymously nowadays which is a great leap when compared with the 30% non-anonymous reports in the early days of the ICAC.

VIII. THE MISSION CONTINUES

To mark its 45th Anniversary in 2019, the ICAC is launching a series of activities to encourage citizens to support the ICAC in fighting corruption through a multi-year cross-sector "All for Integrity" territory-wide campaign. On the international front, the ICAC will organise the ICAC Symposium in May 2019 to provide graft busters and law enforcement officers the platform to exchange and learn from each other the latest strategies and tactics to fight corruption in its totality. Apart from that, the ICAC, through its Centre of Anti-

Corruption Studies and International Training, is ready to provide training and advisory services to other jurisdictions to fulfil our obligation under UNCAC to help other state parties in anti-corruption capacity building.

The ICAC, partnering with the international graft fighters, is always staying vigilant to fight corruption. We will continue to keep up with the changing times, strengthen our capability and professional training to maintain our effectiveness in upholding a clean community in Hong Kong. The ICAC will continue to partner with all graft-fighters over the world in fighting corruption.