

**For discussion
on 17 March 2025**

Legislative Council Panel on Security

Proposed Retention of a Time-limited Directorate Supernumerary Post of Assistant Director, Commission Against Corruption in the Independent Commission Against Corruption

PURPOSE

This paper seeks Members' support for the proposed retention of the existing time-limited supernumerary post of Assistant Director, Commission Against Corruption ("AD, CAC")¹ [Independent Commission Against Corruption ("ICAC") Pay Scale ("IPS") Point 46, equivalent to Directorate Pay Scale Point 2 ("D2")] of ICAC, designated as Assistant Director / International Cooperation ("AD/IC"), for the period from 6 July 2025, or from the approval of the Finance Committee ("FC") of the Legislative Council (whichever is the later), to 31 March 2027.

BACKGROUND

2. With the full support of the Central People's Government ("CPG") and the Government of the Hong Kong Special Administrative Region ("HKSAR"), the then Commissioner, ICAC ("C/ICAC") ran for the election of the presidency of the International Association of Anti-Corruption Authorities ("IAACA")² and was successfully elected at the IAACA General Meeting in January 2022 for a three-year term. The IAACA Constitution provides that the President should establish a Secretariat of the Association, which should be headed by a Secretary-General ("SG").

3. The incumbent C/ICAC was appointed as the IAACA President by the IAACA Executive Committee in September 2023. He was subsequently elected

¹ The establishment of the Government includes posts on the permanent establishment and those on the non-permanent establishment (i.e. time-limited posts). Time-limited directorate posts are referred to as "supernumerary directorate posts", which are time-limited posts on the non-permanent establishment. It does not mean they are not counted towards the establishment.

² IAACA is an independent and non-political anti-corruption organisation comprising institutions around the world which are responsible for the investigation, prevention and prosecution of corruption. Its objectives are to promote the effective implementation of the United Nations Convention against Corruption ("UNCAC"), foster constructive collaboration among its members, and promote various aspects of international cooperation to combat and guard against corruption. IAACA was established in 2006, with the then Supreme People's Procuratorate ("SPP") of the People's Republic of China hosting its first General Meeting. The Prosecutor General of the SPP served as the IAACA President from 2006 to 2016, followed by Qatar's Attorney General from 2016 to 2022. ICAC has held the presidency since January 2022.

at the IAACA General Meeting as the IAACA President in December 2023, for a new three-year term until around early 2027³.

4. Two supernumerary directorate posts, viz. Senior Assistant Director, Commission Against Corruption [IPS Point 47, equivalent to Directorate Pay Scale Point 3 (“D3”)], designated as Director of International Cooperation and Corporate Services (“DIC”), and AD/IC were approved by the FC in June 2022 for three years up to 5 July 2025 for discharging duties, inter alia, pertaining to C/ICAC’s role as the IAACA President, which include –

- (i) supporting the President in formulating and developing strategies and initiatives for IAACA;
- (ii) coordinating the secretariat work of IAACA, including supporting the Executive Committee and its sub-committees, organising General Meetings and other meetings, handling membership affairs, etc.;
- (iii) enhancing anti-corruption capacity of graft-fighters worldwide by organising international / regional conferences, professional training and other initiatives jointly with the Hong Kong International Academy Against Corruption (“HKIAAC”) and/or other agencies;
- (iv) expanding IAACA’s network in the international community by organising and participating in conferences, meetings and visits; and
- (v) connecting IAACA members and graft-fighters worldwide through IAACA’s website, newsletters, social medias and other channels.

5. It is through the taking up of the presidency of IAACA that ICAC is able to form a tripartite partnership with both IAACA and HKIAAC to advance the anti-corruption cause around the world, including countries under the Belt and Road Initiative. The strong synergy achieved has been instrumental to disseminating the good anti-corruption stories of our country and Hong Kong, the importance and success of “one country, two systems”, as well as promoting Hong Kong’s rule of law and integrity culture to the international community, manifesting Hong Kong as a “super-connector” between our country and the world.

6. Since taking over the Secretariat, ICAC has made significant progress in IAACA’s work in fulfilling the mission of promoting effective implementation of the United Nations Convention against Corruption (“UNCAC”) and assisting

³ According to the IAACA Constitution, IAACA shall convene a General Meeting annually. The IAACA President shall serve for a term commencing immediately after the General Meeting at which he/she was elected, and ending at the conclusion of the third General meeting thereafter. Applying this requirement, the IAACA Presidency of the incumbent C/ICAC started from the General Meeting in December 2023, and will last until the conclusion of the third General Meeting thereafter, which is expected to be held in around early 2027.

anti-corruption authorities (“ACAs”) in enhancing their capabilities in preventing and fighting corruption⁴.

7. As at the end of 2024, the IAACA Secretariat had organised two General Meetings for its members and eight Executive Committee meetings for discussing work strategies and plans. To take forward the initiatives of facilitating experience sharing among member authorities and ACAs around the world, IAACA organised ten conferences, seminars and training programmes with HKIAAC and/or other key partners, especially the United Nations Office on Drugs and Crime (“UNODC”).

8. In particular, in May 2024, IAACA partnered with ICAC to organise the 8th ICAC Symposium, which also served as the 11th Annual Conference of IAACA. A record high of over 500 representatives from about 180 anti-corruption and law enforcement agencies of nearly 60 jurisdictions gathered in Hong Kong to chart a new path to combat corruption. During the Conference, IAACA adopted the “Hong Kong Declaration on Strengthening International Cooperation in Preventing and Fighting Corruption”, which was the first ever anti-corruption declaration named after Hong Kong. IAACA and HKIAAC also jointly organised a back-to-back international training programme, including a study tour to Changsha of Mainland China to enable overseas delegates to learn first-hand the latest development and anti-corruption work of our country.

9. Separately, IAACA has developed the *Policy Guide for National Anti-Corruption Authorities on Meaningful Youth Engagement in Anti-Corruption Work* jointly with ICAC and UNODC. Launched in December 2023, the Policy Guide provides practical references to global ACAs for enhancing youth participation in promoting the fight against corruption. Putting this Policy Guide into practice, a tailor-made training programme on meaningful youth engagement for about 150 anti-corruption practitioners and youth of Brunei Darussalam was held in January 2025.

10. IAACA Secretariat has been actively promoting IAACA’s presence in the international community. In the past three years, the President and/or his delegates attended 15 international / regional events in relation to anti-corruption development during which the work of IAACA and the anti-corruption development of Hong Kong were shared with counterparts worldwide. Around 120 meetings with ACAs, international organisations and non-governmental organisations were held to promote IAACA and explore future collaboration. The IAACA Secretariat also strengthened its connection with IAACA members and other stakeholders through diversified means such as its website, Facebook Page and e-newsletters to provide comprehensive information and updates about the Association to graft-fighters globally. With ICAC’s tremendous efforts, IAACA’s

⁴ When the People’s Republic of China became a signatory of UNCAC in February 2006, UNCAC entered into force for China and by virtue of which, the Convention is also applicable to HKSAR. At the same time, CPG designated ICAC as the authority for HKSAR to assist other signatories in developing and implementing corruption prevention measures under Article 6 of UNCAC.

organisational membership has significantly expanded from around 120 in January 2022 to 180 in December 2024.

11. The impact of ICAC's work on raising international collaboration in the anti-corruption cause has been highly visible since ICAC took over the presidency and secretariat of IAACA. Having regard to a host of factors, including the Government's current financial situation and the operational needs of the IAACA Secretariat, we propose to retain only the AD/IC post to tie in with the new three-year term of C/ICAC as IAACA President until around early 2027 (elaborated in paragraphs 12 to 15 below).

JUSTIFICATIONS

12. DIC served as the SG of IAACA from January 2022. He also headed the International Cooperation and Corporate Services Department, overseeing international cooperation and Mainland liaison as well as the overall corporate services of ICAC. DIC was underpinned by AD/IC and Assistant Director / Corporate Services (a permanent AD, CAC post). When ICAC assumed the IAACA presidency in 2022, the SG was pitched at D3 level, as the SG played a very crucial role to liaise and to meet with the heads of various ACAs and international organisations on behalf of the President. As fighting corruption is becoming the world's recognised goal, ICAC's commitment and involvement in IAACA and international cooperation have become increasingly significant and are expected to further increase in the years to come. Yet, under the current geopolitical environment, the work has also become ever more challenging, requiring high-level attention.

13. On the other hand, ICAC always strives to adhere to the principle of exercising fiscal prudence. After critically reviewing the overall situation, in particular the financial position of the Government, ICAC decided not to retain the DIC post and took the further initiative to vacate the post from 1 March 2025 to reduce expenditure at the earliest possibility. The incumbent of the AD/IC post has taken up the role of SG originally performed by DIC. The IAACA Secretariat will continue to organise and/or support activities in or outside Hong Kong in 2025-26 and 2026-27, with major ones tentatively including (*the figures in bracket denote the number of events to be organised over the period*) –

- (i) IAACA meetings, such as General Meeting and meetings of Executive Committee (8);
- (ii) Training and experience sharing events, such as conferences, workshops, seminars and training courses (10);
- (iii) Joint research / publication projects with international / regional organisations (2);
- (iv) Meetings with IAACA's stakeholders, such as Vice Presidents, Executive Committee Members, IAACA members, international /

regional organisations, ACAs, non-governmental organisations, etc. (100); and

- (v) Participation in international / regional conferences and seminars (10).

14. Retaining the SG at D2 level is absolutely necessary to enable the incumbent to appropriately represent IAACA to maintain effective dialogue and attend meetings with heads of ACAs and international organisations as well as other senior officials and executives of overseas agencies and institutions. These duties require trust-building with these high-level counterparts and authorities for decision-making during the liaison process.

15. Apart from international cooperation, AD/IC will also oversee Mainland liaison of ICAC. He will take the lead in formulating long-term international cooperation and liaison strategies which tie in with the international anti-corruption development and the Belt and Road Initiative, expanding connections with counterparts worldwide, identifying potential partners and participants for the training programmes organised by HKIAAC, liaising with the Office of the Commissioner of the Ministry of Foreign Affairs in the Hong Kong Special Administrative Region and mainland authorities, etc.

16. Following vacation of the DIC post, opportunity will be taken to transfer the AD/IC post and its underpinning International Cooperation Branch to the Operations Department, which also takes charge of international cooperation in law enforcement matters (such as financial investigation, asset recovery, economic crimes and mutual legal assistance) as well as overseeing HKIAAC. As law enforcement cooperation is of growing prominence in the international community, placing the IAACA Secretariat under the Operations Department can facilitate the Secretariat in providing suitable assistance to member authorities for the effective implementation of UNCAC. The organisation charts of ICAC before and after the proposed restructuring are at **Annexes A1 and A2** respectively. The job description of AD/IC is updated at **Annex B**. The revised job description of the Director of Investigation concerned, who will oversee the work of AD/IC and the underpinning International Cooperation Branch after the proposed restructuring, is at **Annex C**.

17. ICAC will review its position and decide in due course whether re-election of the next term of the IAACA Presidency should be sought.

ALTERNATIVES CONSIDERED

18. All other directorate officers in ICAC are fully engaged with each responsible for a distinct function of law enforcement, corruption prevention, community education and corporate services. It is therefore operationally necessary to retain the AD/IC post, which is having a strategic and focused portfolio.

FINANCIAL AND ESTABLISHMENT IMPLICATIONS

19. The proposed retention of the time-limited AD, CAC post will incur an additional notional annual salary cost at mid-point of \$2,480,040 and a full annual average staff cost (including salaries and staff on-cost) of \$3,248,652. Necessary provision has been / will be included in the estimates of the years concerned to meet the cost of this proposal.

20. As this time-limited post has been included in the establishment, retention of it will not additionally increase the overall Government establishment.

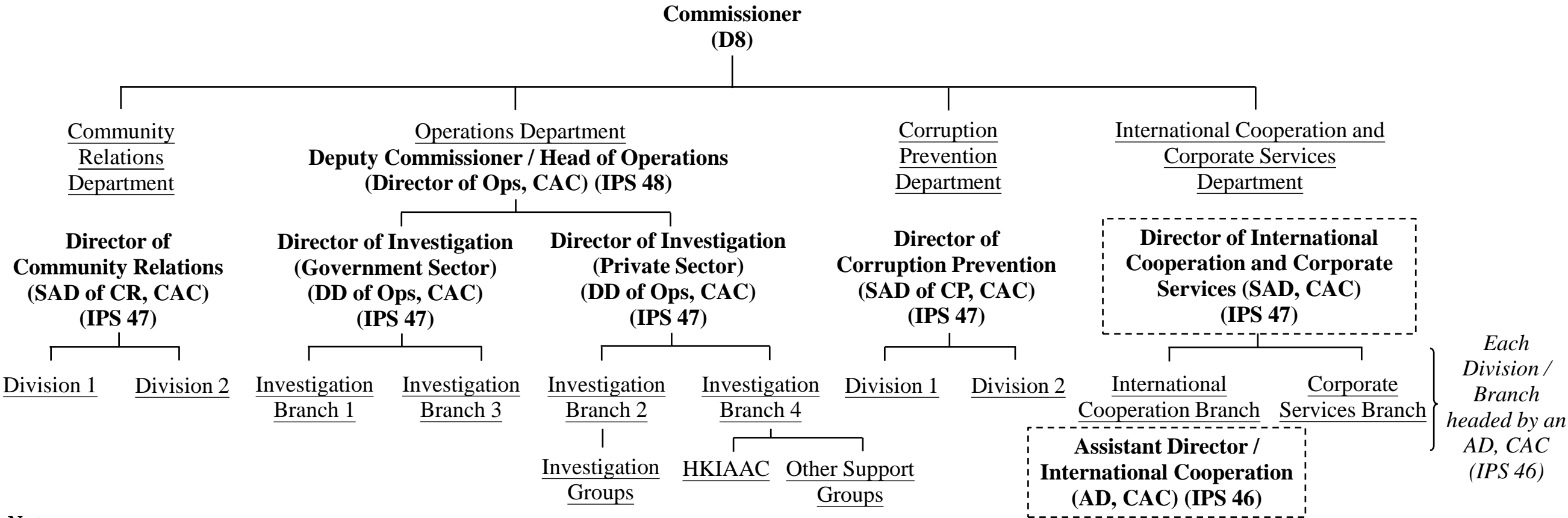
21. To continue the support for the operation of the IAACA Secretariat, seven time-limited non-directorate posts will also be retained for two years from 2025-26 to 2026-27. The retention of the seven non-directorate posts will incur an additional notional annual salary cost at mid-point of \$5,483,880 and a full annual average staff cost (including salaries and staff on-cost) of \$7,260,780.

ADVICE SOUGHT

22. Members are invited to give their views and indicate support for the proposed retention of the time-limited AD/IC post. Subject to the support of the Panel on Security, we will submit the proposal to the Establishment Subcommittee for recommendation to FC for approval.

Independent Commission Against Corruption
March 2025

Existing Organisation of Independent Commission Against Corruption

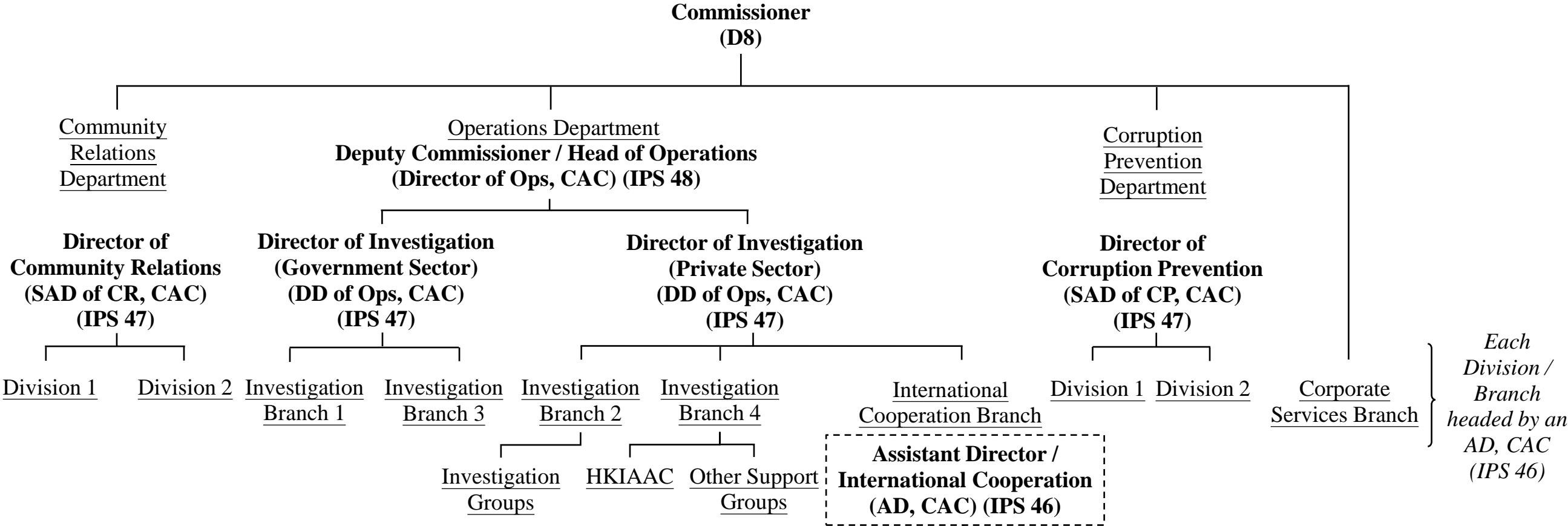


Note
[] denotes time-limited directorate posts approved by the Finance Committee for the period from 6.7.2022 to 5.7.2025 inclusive

Legend	
ACACO	Assistant Commission Against Corruption Officer
ACO	Assistant Clerical Officer
AD	Assistant Director
CA	Clerical Assistant
CAC	Commission Against Corruption
CACO(M/L)	Commission Against Corruption Officer (Middle/Lower)
CACO(U)	Commission Against Corruption Officer (Upper)
CP	Corruption Prevention
CR	Community Relations
D8	Directorate Pay Scale Point 8
DD	Deputy Director
EO	Executive Officer
HKIAAC	Hong Kong International Academy Against Corruption
IPS	Independent Commission Against Corruption Pay Scale
Ops	Operations
SAD	Senior Assistant Director
SCACO	Senior Commission Against Corruption Officer

1	SCACO
2	CACOs(U)
9	CACOs(M/L)
1	ACACO
1	EO I (CAC)
1	EO II (CAC)
7	ACOs (CAC)
1	CA (CAC)

Proposed Organisation of Independent Commission Against Corruption



Note
[] denotes time-limited directorate post proposed to be retained

Legend	
ACACO	Assistant Commission Against Corruption Officer
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IPS	Independent Commission Against Corruption Pay Scale
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SAD	Senior Assistant Director
SCACO	Senior Commission Against Corruption Officer

1	SCACO
2	CACOs(U)
9	CACOs(M/L)
1	ACACO
1	EO I (CAC)
1	EO II (CAC)
6	ACOs (CAC)
1	CA (CAC)

Job Description of Assistant Director / International Cooperation (“AD/IC”)

Rank : Assistant Director, Commission Against Corruption
[Independent Commission Against Corruption Pay Scale (“IPS”) Point 46, equivalent to Directorate Pay Scale Point 2]

Responsible to : Director of Investigation
(IPS Point 47, equivalent to Directorate Pay Scale Point 3)

Duties and Responsibilities –

- (1) To serve the post of Secretary-General of the International Association of Anti-Corruption Authorities (“IAACA”) to assist the Commissioner, Independent Commission Against Corruption (“C/ICAC”) (as President of the IAACA) in formulating and implementing policies and strategies related to the IAACA;
- (2) To oversee the work of the IAACA Secretariat to support the President (C/ICAC) in managing IAACA affairs;
- (3) To oversee the Independent Commission Against Corruption’s international engagement and publicity, as well as Mainland liaison, and corporate support on research; and
- (4) To direct the International Cooperation Group with the assistance of a Senior Commission Against Corruption Officer and through two sections specialising in the following work areas:
 - IAACA Secretariat – supporting IAACA President (C/ICAC) and Secretary-General (AD/IC) in formulating policies for IAACA; coordinating the secretariat work of IAACA; organising professional training to enhance anti-corruption capacity of graft-fighters worldwide; organising and participating in meetings to expand IAACA’s work with the international community; connecting IAACA members and graft-righters worldwide, etc.; and
 - Liaison and Research – liaison with overseas anti-corruption agencies, international organisations, anti-corruption authorities in the Mainland and Macao, as well as ranking institutions and their data source organisations; and conducting related researches.

Revised Job Description of Director of Investigation (Private Sector)

Rank : Deputy Director of Operations, Commission Against Corruption
[Independent Commission Against Corruption Pay Scale (“IPS”) Point 47, equivalent to Directorate Pay Scale Point 3]

Responsible to : Head of Operations
(IPS Point 48, equivalent to Directorate Pay Scale Point 4/5)

Duties and Responsibilities –

- (1) To assist the Commissioner, Independent Commission Against Corruption (“ICAC”) in discharging his/her statutory duties relating to law enforcement under the Independent Commission Against Corruption Ordinance;
- (2) To assist the Head of Operations in formulating strategies and policies on enforcement work, human resources development, staff integrity management, technology application, management and legal research, international cooperation and other areas which are conducive to the effective performance of the functions of the Operations Department;
- (3) To oversee the work of Assistant Director / Investigation Branch 2 whose main duty is to lead the branch to fight corruption in the private sector;
- (4) To oversee the work of Assistant Director / Investigation Branch 4 whose main duties are to supervise the operation and development of the Hong Kong International Academy Against Corruption, and to lead the branch to provide administrative and operational support to the Operations Department;
- (5) To oversee the work of Assistant Director / International Cooperation who is mainly responsible for (i) serving as the Secretary-General of the International Association of Anti-Corruption Authorities (“IAACA”) to assist the Commissioner, ICAC (as President of the IAACA) in formulating and implementing policies and strategies related to the IAACA, and overseeing the work of the IAACA Secretariat to support the President in managing IAACA affairs; and (ii) ICAC’s international engagement and publicity, as well as Mainland liaison, and corporate support on research;
- (6) To oversee the work of ICAC Internal Investigation and Monitoring Group; and

- (7) To enlist public support to ICAC and its anti-corruption work through engagement of various stakeholders including ICAC advisory committees, liaison contacts, media and so on.