

SUCCESSFUL ANTI-CORRUPTION STRATEGY & INTERNATIONAL GOOD PRACTICES

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I. SHORT HISTORY AND THE ACHIEVEMENT OF THE ICAC

Hong Kong was definitely one of the most corrupt places on earth in the 1960s and early 70s. Corruption was widespread and regarded as a “way of life”. It existed “from womb to tomb”. Corruption in the public sector, particularly the law enforcement agencies were well organized and syndicated, hence making a mockery of the criminal justice system. As a taxi-driver, you could even buy a monthly label from the corrupt syndicate and stick on your taxi and it would guarantee you from any traffic prosecution during that month! Such was the scale of open corruption in Hong Kong. After the establishment of the Independent Commission Against Corruption, and within five years, all the overt and syndicated corruption were eradicated and now Hong Kong was regarded as one of the most corruption free societies in the world. The Hong Kong case was regarded as one of the very few successful model of turning a very corrupt place to a clean one. It demonstrates that corruption can be effectively controlled, no matter how serious and widespread the problem is.

In its 37 years of history, ICAC has achieved the following successes:

- Eradicated all the overt and syndicated type of corruption in the Government. Corruption now exists as a highly secretive crime, and often involved only satisfied parties. Citizens rarely suffered from extortion from government officials;
- Amongst the first in the world to effectively enforce private sector corruption, providing an excellent business environment for Hong Kong and a level playing field for all investors;
- Ensure that Hong Kong has a clean election in its transition from a British colony to a democracy;
- Pioneer solutions through corruption prevention studies in most corruption prone areas and promulgate best practice guidelines in areas such as public procurement, construction, financial sectors, staff management etc;
- Change the public’s attitude to no longer tolerating corruption as a way of life; and support the fight against corruption in not only willing to report corruption, but be prepared to identify themselves in the reports. Before ICAC was set up, most corruption reports are anonymous. Now more than 75% of the reports came from non anonymous sources;
- As an active partner in the international arena in promoting international co-operation. ICAC is the co-founder of the International Anti Corruption Conference (IACC).

II. ICAC’S SUCCESS FACTORS

As a result of the success of the Hong Kong model in fighting corruption, many countries followed Hong Kong’s example in setting up a dedicated anti-corruption agency. However, many of them are not effective and hence there are queries as to whether the Hong Kong model can be successfully applied to other countries. The point is whether there is a thorough understanding of the working of the Hong Kong model. From my experience, it consists of the following eleven indispensable components.

A. Three-Pronged Strategy

There is no single solution in fighting corruption. Hong Kong ICAC adopts a three pronged approach: deterrence, prevention and education. As a result, the Commission consists of three separate departments: the Operations Department to investigate corruption and to prosecute the offenders: the Corruption

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Prevention Department to examine the systems and procedures in the public sector, to identify the corruption opportunities and to make recommendations to plug the loopholes; and the Community Relations Department to educate the public against the evil of corruption and to enlist their support and partnership in fighting corruption.

B. Enforcement-Led

The three prongs are equally important, but unlike many anti-corruption agencies (ACA), ICAC places priority in resources on enforcement. It devotes over 70% of its resources in the Operations Department. The reason is that any initiatives in corruption prevention and education are doomed to fail in a corrupt country where the corrupt officials are still around and powerful. Any successful fight against corruption must start with effective enforcement on major targets, so as to get rid of the obstacles, and demonstrate to the public the political will and determination to fight corruption at all costs, as well as to demonstrate the effectiveness of the anti-corruption agencies. Without that, the ACA is unlikely to get the public support, which is a key to success. Successful enforcement also assists in identifying problem areas for corruption prevention review and can clear any human obstacle in the review. The successful enforcement stories also provide basis for public education and act as deterrence for the other corrupt officials.

C. Professional Staff

Fighting corruption is a very difficult task, because you are confronting with people who are probably very intelligent, knowledgeable and powerful. Thus the corruption fighters must be very professional in their jobs. The ICAC ensures that their staff are professionals in their diverse responsibilities – the Operations Department has professional investigators, intelligence experts, technical experts, accountants and lawyers as their staff. The Corruption Prevention Department has management experts and the Community Relations Department pools together education, ethics and public relations experts. Apart from professionalism, all ICAC staff are expected to uphold a high level of integrity and to possess a passion and sense of mission in carrying out their duties. ICAC strives to be highly professional in their investigation. ICAC is one of the first agencies in the world to introduce the interview of all suspects under video; they have a dedicated surveillance team with over 120 specially trained agents who took surveillance as their life-long career. They also have a number of specialized units such as witness protection, computer forensic and financial investigation.

D. Effective Deterrence Strategy

The ICAC's strategy to ensure effective enforcement consists of the following components:

- An effective public complaint system to encourage reporting of corruption by members of the public and referrals from other institutions. ICAC has a report centre manned on 24 hours basis and there is a highly publicized telephone hotline to facilitate public reporting;
- Effective confidentiality system and protection of whistleblowers and witnesses;
- A quick response system to deal with complaints that require prompt action. At any time, there is an investigation team standing by, ready to be called into action;
- The ICAC adopts a zero-tolerance policy. So long as there is reasonable suspicion, all reports of corruption, irrespective of whether it is serious or relatively minor in nature, will be properly investigated;
- There is a review system for the purpose of check and balance to ensure all investigations are professionally and prompted investigated, free from political interference;
- Any successful enforcement will be publicized in the media to demonstrate effectiveness and to deter the corrupt.

E. Effective Prevention Strategy

The corruption prevention strategy aims at reducing the corruption opportunities in government departments and public institutions. The general principle is to ensure efficiency, transparency and accountability in all government businesses.

The priority areas are public procurement, public works, licensing, public services delivery, law enforcement and revenue collection.

Comprehensive corruption prevention strategy should include enhancement in the following management systems:

- Performance Management
- Procurement Management
- Financial Management
- Human Resources Management
- Complaint Management.

Examples of some of the corruption prevention practices are:

- Identify risk in vulnerable areas and risk management
- Streamline work procedure manual
- Enhance staff supervision through surprise check system
- Enhance internal audit
- Maintain proper documentation for accountability
- Information security policy
- Job rotation policy
- Performance indicators/performance pledges (service guarantee)
- E-government and e-procurement
- Exercise transparency & fairness in staff recruitment, appraisal & promotion.

F. Effective Education Strategy

The ICAC has a very wide range of public education strategies, in order to enlist the support of the entire community as partnership to fight corruption. It includes:

- Media publicity to ensure effective enforcement cases are well publicized, through press releases, press conferences and media interviews, as well as the making of TV drama series based on successful cases;
- Media education – use of mass media commercials to encourage public to report corruption; promote public awareness to the evil of corruption and the need for a fair and just society, and as deterrence to the corrupt;
- School ethics education programme, starting from kindergarden up to the universities;
- Establish ICAC Club to encourage public to join members who wish to perform voluntary work for the ICAC in community education;
- Promote code of ethics in government and business;
- Corruption prevention talks and ethics development seminars to public servants and business sectors;
- Publish corruption prevention best practices and guidelines;
- In partnership with the business sector, set up an Ethic Development Centre as a resource centre for the promotion of business code of ethics;
- Organize exhibitions, fun fairs, television variety shows to spread the message of clean society;
- Wide use of websites for publicity and reference, youth education and ethics development.

G. Effective Legal Framework and Anti-Corruption Law

Hong Kong has a comprehensive legislation to deal with corruption. In terms of offences, apart from the normal bribery offences, it created three unique offences:

- (i) Offence for any civil servant to accept gifts, loans, discounts and passage over a certain limit, even if there is no directly related corrupt dealings, unless specific permission from senior official is given
- (ii) Offence for any civil servant to be in possession of assets disproportionate to his official income; or living above means
- (iii) Offence for conflict of interest. Any public officials abusing their authority for private gains, whether for himself or other persons. It includes a statutory requirement to report potential conflict of interest.

On investigative power, apart from the normal police power of search, arrest and detention, ICAC has power to check bank accounts, require witnesses to answer questions on oath, restrain properties suspected

to be derived from corruption, and hold the suspects' travel documents to prevent them from fleeing the jurisdiction. If justified and in serious cases, they can apply proactive investigation technique such as telecommunication intercept, surveillance, undercover operations etc. Not only are they empowered to investigate corruption offences, both in the Government and private sectors, they can investigate all crimes which are connected with corruption.

The ICAC cases are prosecuted by a selected group of public prosecutors to ensure both the quality and integrity. The Judiciary of Hong Kong is the strong supporter of fighting corruption, who ensured that the ICAC cases are handled in courts by highly professional judges with fairness. The conviction rate for ICAC cases is very high, around 80%.

H. Review Mechanism

With the provision of wide investigative power, there is an elaborate check and balance system to prevent abuse of such wide power. One unique feature is the Operations Review Committee. It is a high powered committee, with majority of its members coming from the private sector, representing the citizens from all sectors to act as watchdog on ICAC. The committee reviews each and every report of corruption and investigation, to ensure all complaints are properly dealt with and there is no "whitewashing". It publishes an annual report, to be tabled before the Legislature for debate, thus ensuring public transparency and accountability. In addition, there is an independent Complaint Committee where members of the public can lodge any complaint against the ICAC and/or its officers and there will be an independent investigation. It also publishes an annual report to be tabled before the Legislature for debate.

I. Equal Emphasis on Public & Private Sector Corruption

Hong Kong is amongst one of the earliest jurisdiction to criminalize private sector corruption. ICAC places equal emphasis on public and public section corruption. The rationale is that there should not be double standard in the society. Private sector employees vastly outnumber the public sector employees and unless they maintain the similar ethical standard, the society can never achieve corruption free status. Indeed private section corruption can cause as much damage to the society, if not more so than public sector corruption. Serious corruption in financial institution can cause market instability; corruption in construction sector can result in dangerous structure. Effective enforcement on private sector corruption can be seen as a safeguard for foreign investment and ensures Hong Kong maintains a level playing field in its business environment, thus a competitive advantage in attracting foreign investment.

J. Partnership Approach

You cannot rely on one single agency to fight corruption. Every one in the community and every institution have a role to play. ICAC adopts a partnership approach to mobilize all sectors to fight corruption together. The key strategic partner of ICAC is the government agencies. The head of government agency should appreciate that it is his solemn responsibility to clean his own house. Every government agency should have a tailor made anti-corruption strategy, translated into anti corruption action plan and should have a high power management committee to monitor the progress of the action plan, which should be subject to annual review and revision.

Other important partners of ICAC include:

- Civil Service Commission
- Business community
- Professional bodies
- Civil Societies & community organizations
- Educational institutions
- Mass media
- International networking.

K. Top Political Will, Independence and Adequate Resources

The most important factor in fighting corruption is "political will". In Hong Kong, there is clearly a top political will to eradicate corruption, which enables the ICAC to be a truly independent agency. ICAC is directly responsible to the very top, the Chief Executive of Hong Kong. This ensures that the ICAC is free from any interference in conducting their investigation. The strong political support was translated into

financial support. The ICAC is probably one of the most well-resourced anti-corruption agencies in the world! In 2008, its annual budget amounted to US\$90M, about US\$15 per capita.

III. COMPARISON WITH OTHER ACAs

Some critics argue that the Hong Kong model can only work in Hong Kong because of the unique Hong Kong situation and cannot be applied to other countries. They usually give the following reasons:

1. Hong Kong is a small city, whilst most corrupt countries have a large geographical area. This argument cannot stand. Hong Kong is a large city with a population of over seven million. If any corrupt country can apply the Hong Kong model as a pilot scheme just in its capital city, and achieve equal success, it would have a tremendous impact on the whole country. If there is a central and powerful national anti-corruption agency, it can develop adequate sub-offices throughout the country (with centralized control, not subject to local government interference), there is no reason why the successful model cannot be applied throughout the country. The FBI in the US and the RCMP in Canada are national police agencies. Through the branches established all over the country, they are successful in law enforcement. Corruption enforcement should be no different.
2. The country does not have the resources like of Hong Kong ICAC. It is true that the HK ICAC has a large budget. But it merely accounts for 0.38% of the national budget. In most corrupt countries where the ACA are not seen to be effective, their budgets invariably are below 0.01% of the national budget; that speaks for the political will of these countries! If a corrupt country can raise its anti-corruption budget to 1% of the national budget, which clearly is justified, the budget should be more than adequate for any national anti-corruption agency.
3. The country has a unique cultural tradition of gift-giving and nepotism. Hong Kong had the same corruption-friendly culture in the past, if not more prevalent. The Chinese tradition of giving “Laisee” or “red packet” containing money to all children and business associates in the Chinese New Year was an open way of giving/receiving bribes in the past. The Hong Kong experience is that through effective public education campaigns and law enforcement, this cultural problem can be solved.

Hence the problem is not that the Hong Kong model is not applicable. It is more the case of the lack of political will to fully adopt the Hong Kong model.

IV. NEW APPROACH TO FIGHTING CORRUPTION

In order to properly assess the corruption problem in the country, thorough research should be carried out in the following areas:

- Public perception & attitude towards corruption - assessing the local public perception and attitude towards corruption;
- Political & Legislative Framework – assessing the political will, the role of the National Congress and political parties and the adequacy of anti-corruption legislation;
- Integrity Institutions and System - assessing the effectiveness of the integrity institutions, i.e. anti-corruption institutions, National Audit Office and Civil Service Commission etc;
- Rule of Law - assessing the integrity in the three key organizations in the upkeeping of rule of law, i.e. police, prosecution authority and judiciary;
- Administrative Quality - assessing the efficiency, transparency and accountability in the Government Ministries and their effort to fight corruption;
- Voice & Accountability- assessing the freedom of the media and the role of civil societies.

In most corruption-prevalent countries, they usually share the following major problems:

At the national level:

- Lack of or inadequate top political will and support to fight corruption;
- Inadequate resources in financing the work of the anti-corruption institutions;
- Lack of independence - corruption investigations are often subject to political interference;

- Frequent political interference in human resources management, licensing and public procurement;
- Inadequate investigative power given to anti-corruption institutions, often on the excuse of protecting human rights;
- There is general public apathy to corruption;
- Low salary of public servants;
- Lack of strategic partnership in fighting corruption;
- Lack of zero tolerance attitude toward corruption.

At the government institutions, the following problems are common:

- The heads of government institutions fail to accept their responsibility to combat inhouse corruption;
- Inadequate and ineffective in-house anti-corruption strategy and action plans;
- Lack of integrity and ethics among civil servants;
- Lack of enforcement of ethical conduct and ethical training;
- Human resources policy/management do not include adequate corruption prevention measures;
- Poor public service delivery due to bureaucracy;
- Outdated regulations and poor enforcement, resulting in a lack of transparency and accountability;
- Nepotism and conflict of interest are common, and rules are absent;
- Lack of effective mechanisms to check and balance abuse of power;
- Lack of adequate procurement procedures;
- Weak internal audit and monitoring systems.

I recommend that the government should take a step-by-step approach in formulating measures on how to combat corruption in the country.

A. National Anti-Corruption Strategy

First the government should come up with a national strategy. The strategy should acknowledge that there is no single solution in combating corruption, and should identify how the country should combat corruption through enforcement, prevention and education, and which agency should be responsible for taking the fight, ideally an independent ACA.

B. Independence

Anti-corruption agencies are subject to different forms of independence. Some are answerable to the Chief Executive (Prime Minister or President), such as in Singapore and Pakistan. Some are answerable to the Parliament or Congress, such as the Australian ICAC New South Wales. Some share the responsibilities with different agencies. Examples are in the Philippines (Office of the Ombudsman and the Presidential Anti Graft Commission), Nigeria (Independent Authority Against Corruption and Code of Conduct Bureau), and China (Procuratorate, Supervision Ministry and Central Party Discipline Committee).

C. Appointment of Head of Anti-corruption Agency

The appointment of the head of anti-corruption agency is crucial to ensure independence of the agency. In Tanzania, the candidate is nominated by the President, but needs to be endorsed by the Parliament. In India, the appointment is made through a selection commission of the Parliament, members of which should include the opposition party. In the Philippines, once the head is approved, he cannot be removed during his term of office except through impeachment in Congress.

D. Authority to Prosecute

Some anti-corruption agencies have full power to investigate and prosecute offenders, such as in the Philippines. Others maintain a check and balance system where the anti-corruption agency investigates and the Department of Justice authorize the prosecution, such as in Singapore and Hong Kong.

E. Special Court for Corruption Trial

In countries where there is a corruption problem in the judiciary, a special court with new judges appointed is set up to deal with corruption trials, such as Pakistan and the Philippines.

F. Jurisdiction

There are varying degrees of jurisdiction of anti-corruption agencies. Some do not have the power to investigate, such as South Korea's KICAC. Other agencies can only investigate corruption in the public sector, such as Tanzania. Some can only react to complaints under strict rules (eg. sworn affidavit), such as in Timor Leste, others adopt a proactive strategy and can initiate investigation through intelligence developed, such as in Hong Kong.

G. Effective Anti-Corruption Law

The law should provide adequate investigative power and a full range of corruption offences. Some ACAs have very restricted power of investigation, have no access to bank accounts. Some does not even have power of arrest and have to call upon police to assist in taking arrest action. They are doomed to fail. It should be appreciated that corruption is a secret crime and extremely difficult to investigate. Hence, the ACA should be given wide power, including telephone intercept, surveillance, undercovers capability etc. Of course there should be a check and balance system built in to prevent abuse.

H. Resources for ACA

It would be reasonable to set a percentage of the government budget for the ACA, such as 0.3% as in Hong Kong, ideally higher. In Mongolia, there is a law prohibiting any reduction of the budget of ACA, compared with the year before. This is an effective guarantee for continued political will for ACA.

I. Professional ACA

This is the area where most ACAs fail. Whilst the ACA is established, even with good laws and resources, the staff are unprofessional or incompetent to perform the difficult task of combating corruption. Unless there is adequate capacity building effort put into the new ACAs, they have little chance of success. The anti-corruption consultant recommending the establishment of the ACA should have the responsibility to provide capacity building input to see through its success.

J. Role of Government Ministries

All government ministries should be ordered to take an active role in combating in-house corruption. I assisted the President of the Philippines and the Prime Minister of Mongolia in conducting anti-corruption summits for their heads of ministries. It was amazing to note that initially these heads did not consider fighting corruption as their prime responsibilities. But it is interesting to note that after the workshop, they then came to have a better understanding of their responsibilities to clean their own house and that they agreed that there were indeed many things which they can or should do. In the Philippines, together with the Philippines Development Academy, a model of the Ministry's Action Plan was designed. It has four pillars, namely:

1. Ethical Leadership
2. Staff Integrity
3. System Integrity
4. Monitoring & Deterrence.

All government ministries and agencies should develop their own anti-corruption action plan based on their unique circumstances. A specimen action plan can be illustrated as below:

1. Ethical Leadership
 - a. Agency Heads should publicly pledge their commitment to combat corruption by issuing public statements on zero tolerance, values and ethics;
 - b. Agency Heads should allocate a fixed percentage of the agency's budget for anti-corruption activities;
 - c. Set up a declaration system for conflict of interest, including relatives of senior management involved in business in the same sector;
 - d. Establish a top level Steering Committee on an Anti-Corruption Action Plan to map out, coordinate and to monitor the agreed action.
2. Staff Integrity
 - a. Every Agency should adopt an agency-specific Staff Code of Ethics including clear guidelines for gifts, loans and entertainment;

- b. Staff recruitment will adopt principles that ensure transparency, openness and fairness;
 - c. Agencies will conduct staff ethics training and development activities, such as seminars, workshops, slogan competitions and promoting a healthy life style;
 - d. Integrity will be included in the job description of staff contracts, and in staff appraisal.
3. System Integrity
 - a. Agencies will set up a risk management unit to assess corruption vulnerability in the organization, to review systems and procedures, making them more efficient, transparent and accountable;
 - b. Agencies will examine possibilities to introduce e-Government and e-procurement;
 - c. Agencies will conduct public service feedback survey on an ongoing basis;
 - d. An anti-corruption clause will be included in all contracts of agencies;
 - e. Contractors will be blacklisted, and their names will be published and will be open to the public;
 - f. Job rotation systems will be implemented.
 4. Monitoring and Deterrence
 - a. Mandate that employees report corruption, suspected corruption, and attempted corruption;
 - b. Set up a confidential hotline for receiving complaints;
 - c. Formulate policies and procedures to protect the confidentiality of whistle-blowers;
 - d. Set up internal audit and surprise check system;
 - e. Set up an internal investigation section to investigate complaints.

K. Enabling Environment

Even with the best strategy and law, it is necessary to build in the enabling environment of the country to support the fight against corruption. The civil servants salary and staff management structure should be reviewed and improved. The prosecution authority and judiciary should be free from corruption, the public administration should be required to become more efficient, transparent and accountable. The media should be given the freedom to expose corruption. The public and civil societies should be mobilized to support the fight against corruption.

L. Adopting International Best Practices

Some international best practices in combating corruption can be adopted. The best guideline is the UN Convention Against Corruption. Having travelled to different countries as an international anti-corruption consultant, I have collected some examples of the international best practices, such as:

- In South Korea, the public sector, the business sector and the civil societies joined hands in forming a coalition called Korea-PACT. Over 800 organizations signed the PACT and undertook to implement the agreed action plan. The progress was reviewed annually by an international evaluation team;
- In the Philippines, an expert team is going through the government ministry one-by-one to carry out a comprehensive integrity audit check and to make recommendations on what measures the government ministry should implement to combat internal corruption problems;
- New Zealand requires all heads of government agencies to submit an annual anti-corruption action plan;
- In the Philippines, all public procurement in government ministries should be conducted through a “Bids and Award Committee”, and an independent observer should be appointed as a member to represent the public to monitor the decision making progress;
- In Canada, all public officers have a legal obligation to report corruption;
- In Pakistan, the Philippines and Indonesia, special anti-corruption courts were formed to hear corruption trials;
- In Nigeria, government officials and politicians are not allowed to have overseas bank accounts;
- In Singapore, civil servants cannot accumulate personal debts of more than three months’ salary;
- Malaysia set up its own Malaysian National Integrity Index to monitor the integrity progress in the country.

After due consideration and consultation, a national anti-corruption action plan should be adopted. An example of a country action plan is as follows, which should be further improved after having taken consideration of all the above mentioned ideas:

Corruption Risk Mitigation Plan – Corruption

Corruption: Risk Mitigation Plan		
Major Corruption Risks	Action Plan	
Anti-corruption laws are not adequate	<ul style="list-style-type: none"> National Congress to pass anti-corruption law based on the UN Convention Against Corruption, including criminalization of private sector corruption; illicit enrichment, criminal conflict of interest 	•
Conflict of interest amongst public officials in their private investment and interference with public procurement	<ul style="list-style-type: none"> Enactment of criminal conflict of interest law Introduce a declaration system for conflict of interest 	•
	•	•
Establishment of independent anti-corruption commission	<ul style="list-style-type: none"> Provide adequate resource & capacity building support in the three areas of enforcement, prevention & public education 	•
Civil Service Commission is not effective in ensuring integrity in civil service appointment	<ul style="list-style-type: none"> Set up open and fair recruitment, promotion and disciplinary system, with proper check & balance Introduce integrity vetting system Design code of ethics and staff ethical training 	•
General Audit Office is not perceived to be effective	<ul style="list-style-type: none"> Provide resources, capacity building and independence Improve public accountability of the Office through publication of annual report 	•
	•	•
Law enforcement agencies are perceived to be corrupt	<ul style="list-style-type: none"> Strengthen internal complaint and investigation 	•
The Prosecutors Office and Judiciary are not perceived to be upholding justice	<ul style="list-style-type: none"> Dedicated team of selected prosecutors and judges to deal with corruption cases 	•
Administrative Quality <ul style="list-style-type: none"> Cumbersome/outdated licensing procedure and selective enforcement lead to corruption Lack of fair & transparent public procurement system Poor service delivery Nepotism, conflict of interest & political interference in civil service appointments & promotion Lack of ethical value in civil service Weak internal audit and control 	<ul style="list-style-type: none"> Order for all ministries to submit Action Plan for 2009, including Organizing centralized workshops and seminars on the following: staff ethical training, setting up public/internal complaint system, training for internal investigation technique, corruption prevention technique, internal audit technique, e-government, conflict of interest, media relations workshop, etc. Formulate tailor made code of ethics for ministries Establish a one stop enquiry service & hotline Establish a declaration of conflict of interest system for all ministries Establish a Certified Integrity Officer Scheme to train officers to act as the Ministry/Agency's Integrity Officer Launch annual ministries benchmarking survey on corruption and service delivery Introduce independent assessor in the tender evaluation committees 	•

	<ul style="list-style-type: none"> • Promulgate a performance pledge (service guarantee) system for all ministries • Introduce Citizen Report Card • Promote greater transparency of government procedure through pamphlets, public noticeboard etc. • Ministries to adopt e-government & e-procurement service 	
Lack of constructive partnership amongst government, private sector & civil societies in combating corruption	<ul style="list-style-type: none"> • Establish the Public Council of citizens' representative from all sectors into the Council to formulate a partnership strategy 	•
Media is not functioning as a watchdog on corruption	<ul style="list-style-type: none"> • Allow freedom of the press and legislate Freedom of Information Act, establish Press Council to govern the code of ethics for media 	•
Corrupt officials have unexplained huge assets	<ul style="list-style-type: none"> • Introduce Asset declaration system and launch a Public Reporting Hotline to encourage the public to report undisclosed assets 	•
High degree of public tolerance to corruption & public are unable to distinguish between bribe payment and gift giving	<ul style="list-style-type: none"> • Launch a media campaign on integrity and anti corruption • Include integrity in school curriculum 	•

V. CONCLUSION

There is no single solution in fighting corruption. Every country has to examine its unique circumstances and come up with a comprehensive strategy, but any strategy must embrace the three pronged approach - deterrence, prevention and education. Ideally there should be a dedicated and independent anti-corruption agency tasked to co-ordinate and implement such strategy, and to mobilize support from the community.

The Hong Kong experience offers hope to countries with serious corruption problems which appear to be insurmountable. Hong Kong's experience proved that given a top political will, a dedicated anti-corruption agency and a correct strategy, even the most corrupt place, like Hong Kong, can be transformed to a clean society, within a rather short period of time.