廉政公署
ICAC

CPAS 防貪諮詢服務
Corruption Prevention Advisory Service

CORRUPTION PREVENTION GUIDE FOR PROPERTY MANAGEMENT COMPANIES

2.4.11 CONTROL THROUGH DIGITALISATION

- Assess areas, duties or tasks which digitalisation could have significant advantage, or such that the corruption risks concerned can be effectively and satisfactorily prevented/ reduced compared to the existing conventional controls (e.g. attendance of staff, handling of payments).
- Where a need of digitalisation is identified, identify and build in functionalities or innovation and technological solutions that serve to enhance corruption prevention in the process, for instance –

Data Capture and System Integration

- Auto-capture the data, steps, and outcome of important operations in the computer system to uphold accountability.
- Integrate correlated computer systems/modules (e.g. finance, human resources, procurement) to ensure seamless data flow and process alignment.

Supervisory Monitoring

- Build in automatic alerts or red flag functions to facilitate compliance checks and detection of irregularities, and promptly notify supervisors or management of any abnormal patterns or irregularities detected.
- Implement data analytics, visualisation tools or dashboards to facilitate the monitoring of operations (e.g. using data analytics for facilities management, adopting visualisation tools or dashboards to convert complex data sets into easy-to-understand charts, graphs, or other visual formats to enable more informed decision-making).
- Use advanced technologies such as artificial intelligence (AI) to detect fraudulent behaviour in the operations, for instance –
    - Anomaly detection – train a machine learning (ML) model using data/information of respective operations to learn what normal operations looks like (e.g. staff attendance at designated posts), and if a new mode of operation (e.g. staff absence for a significantly long period of time) comes in that significantly deviates from the normal pattern, the ML model can flag it as an abnormal case or a potential fraud requiring attention.
    - Text analysis – AI can be used to analyse the text of documents to detect unusual language or terms that may indicate fraudulent activities (e.g. the same exact amount billed twice in a short period of time).

Automation of Workflow

- Implement an automated workflow to guide staff through the whole processes of individual property management functions to ensure all necessary steps are taken (e.g. each completed action could trigger an automatic notification to the next responsible party in the computer system via email).
- Ensure the automated workflow is consistent with the policies and guidelines of the PMC/OO.

Management of Conflict of Interest

- Require the staff to declare conflict of interest via the computer system.
- Automate the workflow for forwarding a declared conflict to designated authority to determine appropriate mitigating measures.
- Use auto-matching or AI to help match or analyse the key personnel and particulars of counterparts having business dealings with the PMC/OO with a view to identifying potential conflict of interest situations and detect irregularities.

- Foster a change in culture for digitalisation through various communications and training, identify and educate staff on the benefits of digital transformation for them and the PMC.

Q5. Would implementing anti-corruption controls in a PMC incur high costs?

A PMCs can implement corruption prevention measures that are appropriate for their specific operational needs, taking into account their size, available resources, and level of risk exposure. Small-scale PMCs may need to adopt a more adaptable approach when establishing their internal control system due to resource constraints, while still adhering to the recommended best practices. The Corruption Prevention Advisory Service (CPAS) of the Corruption Prevention Department (*Section 8.2*) will provide free, confidential and tailor-made corruption prevention services on request.