



2024

Annual Report of the Commission Against Corruption of Macao

廉政

Unity and Cooperation
Reform and Innovation

CONTENTS

FOREWORD.....	5
STATISTICS ON MAJOR WORK IN 2024.....	9
PART I – CASE PROCESSING SUMMARY.....	11
PART II – ANTI-CORRUPTION.....	19
I. Introduction.....	21
II. Criminal reports and cases filed for investigation.....	22
III. Summaries of some of the cases.....	23
IV. Mutual case assistance in cross-border investigation.....	28
V. Court verdicts.....	29
VI. Declaration of assets and interests.....	30
PART III – OMBUDSMAN ACTIONS.....	39
I. Introduction.....	41
II. Inquiry case summaries.....	44
III. Retrospective review.....	57
IV. Departments or entities with positive attitudes.....	60
PART IV – PROMOTION AND EDUCATION.....	61
I. Education on corruption prevention for the public sector.....	64
II. Education on corruption prevention for the private sector.....	65
III. Integrity education for young people	67
IV. Promotion actions targeting young people	72
V. Cooperation with the education sector.....	76
VI. Family and parenting education on integrity and honesty.....	77
VII. Media publicity.....	78
VIII. Promotion in the community.....	79

PART V – EXCHANGE AND TRAINING.....83

I. External visits.....	85
II. Receiving visits.....	85
III. Participation in international and regional meetings.....	86
IV. Work on the implementation of United Nations Convention against Corruption.....	87
V. Personnel training.....	87

PART VI – APPENDICES.....89

APPENDIX I – The CCAC’s complaint handling procedure.....	91
APPENDIX II – Organisation structure of the Commission Against Corruption.....	93



The Commissioner Against Corruption, Ao Ieong Seong, submitting the 2024 Annual Report of the CCAC of Macao to the Chief Executive Sam Hou Fai

FOREWORD

In 2024, the Commission Against Corruption (CCAC) performed its duties in a pragmatic manner and gave full play to its functions as a graft fighter and an ombudsman. It also achieved positive results in the work of preventing and combatting corruption and improving the relevant regimes.

As regards the work related to the fight against corruption, 113 cases were placed on file for investigation and 33 new cases were placed on file for mutual case assistance in the year, which recorded an increase compared to 2023. There was also an increase in the percentage of cases referred to the Public Prosecutions Office for handling. Among these cases, two were corruption cases that took place in the private sector. Throughout the year, there were, for the first time, cases where several integrated resort enterprises took the initiative to file complaints about suspected cases of corruption in the private sector committed by their employees, reflecting a change in society's attitude towards the handling of corruption cases in the private sector. Furthermore, the CCAC continued with perseverance to look into the illegalities detected in the cases from the previous year. It also carried out the investigation of a public fund on its own initiative and notified the entities concerned of the administrative problems and the loopholes of supervision detected so that improvement measures can be taken.

In recent years, there has been a significant decrease in typical corruption cases in the public sector where public servants take advantage of their powers and functions to accept bribes. Nevertheless, some public servants have continued to take chances in fulfilling their general duties such as the duty of assiduity. As a result, the CCAC handled several relevant cases during the year. As executors of public power, public servants' conduct directly affects the credibility and the level of integrity of public services. Therefore, public servants should, from the beginning of their duties, remain loyal and dedicated, and should avoid becoming reckless or negligent due to the increase of their seniority or professional progression. This is why the traditional professional ethics of leaders lay emphasis on "prudence", which means they must be prudent when acting alone, dealing with every detail and exercising power. Only when actions begin with prudence and are not carried out negligently can troubles be avoided.

As regards ombudsman actions, 147 cases were processed last year. They mainly involved the areas of public service regime, municipal affairs and people's livelihood, and land and public works. Among them, the public service regime remained the focus of attention, particularly about the disciplinary matters of public service workers, management and operation of public services and personnel recruitment, among other issues. In addition, the areas of municipal affairs and people's livelihood covered environmental hygiene, noise problems, administrative licences and occupation of public land and so forth. As to the area of land and public works, the issues mainly involved illegal works, land concession procedures and inadequate supervision on public works, among others.

In order to support the government to continuously improve its governance, the CCAC takes advantage of its dual function as a corruption fighter and an ombudsman in a timely manner. In 2024, the CCAC opened a comprehensive investigation file in the scope of ombudsman's office to follow up cases of claiming false sick leave initially investigated in the scope of corruption fighting. As regards the operation and the regime pertaining to sick leave of workers of the Public Administration operated by the Medical Inspection Committee, it put forward its opinions for improvement and law revision proposals with a view to helping the Public Administration prevent problems from arising at their root. The CCAC will continue to uphold the principle of legality and will, in conjunction with the principles of adequacy and proportionality, strengthen the supervision of public affairs, so as to meet public expectations.

The CCAC is delighted to witness the increasing proactiveness of the society in preventing corruption in the private sector, and it hopes to build an integrity firewall together with various sectors. In 2024, the CCAC launched an extended integrity training activity entitled "Workshop on Value of Integrity" and also produced, in collaboration with a youth association, an information programme on corruption prevention, with a view to taking forward the development of a probity culture in the private sector. Other focused promotion work included strengthening support for educators in integrity education and implementing the "youth-oriented" approach so as to allow young people to have more opportunities to directly participate in the work of integrity building.

As mentioned at a meeting related to the United Nations Convention against Corruption, effective and timely communication and cooperation between States Parties are important factors to effectively suppress cross-border crime and the flow of people involved in corruption crime. In response to the increasing complexity of the tasks in the area of integrity building, in 2024, the CCAC actively strengthened international and regional exchanges, accumulated experience in integrity building and mastered the latest technologies so as to better face new challenges in the fight against corruption and in the carrying out of the ombudsman's work.

It is worth mentioning that the year 2024 marked another milestone of the CCAC's development. With the entry into force of the revised law and administrative regulation of the CCAC, the mission and scope of activity of the CCAC have been further clarified. In addition, the regime for investigators has been optimised and the organisation structure has been improved. It is believed that all these changes will help the CCAC better fulfil its duties and safeguard public interest and will take forward the development of a more fair, transparent, and clean society.

Integrity building is not only a goal of governance, but also an important means of realising social fairness and justice and a basis for long-term social development. Therefore, the CCAC will continue to

strengthen its capacity for unity and cooperation, uphold the principles of impartiality, punishing every corrupt act and fighting every corruption phenomenon, and combat all types of corruption crimes in accordance with the law in a pragmatic manner. It will also strengthen its supervision so as to resolutely uphold the legality and reasonableness of public administration actions. In addition, the CCAC will continue to raise public awareness of integrity through innovative means and actively participate in regional and international exchanges and cooperation. Through the multidimensional integration of systems, cultures and technologies and through innovation, it will further promote the fairness and justice of the Macao society and help the Macao SAR improve its governance efficacy, so as to build a highly efficient and fair society underpinned by the rule of law.

March 2025

The Commissioner Against Corruption

Ao leong Seong

Statistics on major work in 2024

Anti-corruption and ombudsman actions

- The CCAC received a total of **768** complaints, reports and sources of information.
- Following consolidation of the complaints or reports according to the subject matters, in 2024, there were a total of **293** cases placed on file and **393** cases which did not meet the conditions to be placed on file and were sent to the Complaint Management Centre for handling.
- Along with the cases carried forward from 2023, the CCAC concluded a total of **263** investigation files in 2024.
- A total of **1,667** requests and enquiries were received.
- As regards anti-corruption actions, a total of **113** cases were placed on file for investigation and **33** cases were placed on file for mutual assistance.
- A total of **62** mutual assistance cases were followed up, including **49** cases at the requests for case assistance received from counterparts outside the region and **13** requests for case assistance made by the CCAC to counterparts outside the region.
- A total of **12,493** submissions of declaration of assets and interests were received and a total of **103** overdue notices were sent to those who failed to submit the declaration within a statutory period.
- As regards ombudsman actions, the Ombudsman Bureau completed investigation and archived a total of **143** cases.

Anti-corruption and ombudsman actions

- Of the **147** cases newly placed on file by the Ombudsman Bureau, **146** were under inquiry and **1** was under comprehensive investigation.
- 6** cases handled by the Ombudsman Bureau were included in the list of "retrospective review" for 2024.

Promotion and education

- A total of **622** seminars, talks and activities of different types were held, which recorded **41,901** participants.
- A total of **518** complaints/reports, requests for consultation and simple enquiries were received by the two Branch Offices in 2024.

PART I

CASE PROCESSING SUMMARY

PART I

CASE PROCESSING SUMMARY

In 2024, the CCAC received a total of 768 complaints, reports and sources of information, of which 741 were lodged by residents, 17 were referred by other departments, two were placed on file by the CCAC upon gathering information on its initiative, four were placed on file upon receiving information related to cases from judicial bodies and four involved information obtained from internal information exchange between the Anti-Corruption Bureau and the Ombudsman Bureau. In addition, the CCAC received a total of 1,667 requests and enquiries throughout 2024. Meanwhile, at the request from law-enforcement agencies outside the Macao SAR, the CCAC placed 33 cases on file for mutual assistance.

Statistics on sources of information recorded in 2024

Sources of information	2024	
	Total	Percentage
Complaints or reports lodged by residents	741	96.49%
Cases referred by other public bodies	17	2.21%
Cases placed on file for investigation on the initiative of CCAC	2	0.26%
Cases placed on file for investigation by judicial bodies	4	0.52%
Cases intervened by both Anti-Corruption Bureau and Ombudsman Bureau	4	0.52%
Total	768	100%

Upon receiving a complaint or report, the CCAC will conduct a preliminary analysis. Then the Commissioner Against Corruption will assign the case to the Anti-Corruption Bureau, which is responsible for dealing with corruption cases, or the Ombudsman Bureau, which is responsible for handling administrative illegalities, depending on the issue that the complaint or report involves and the nature of the case. However, if the content of the complaint does not mention any specific targets or is hard to be traced, then the CCAC needs to request the complainant for more information in order to decide whether the complaint can be followed up or referred to the Complaint Management Centre for archiving. If the CCAC is not competent to handle the subject matter of the complaint or report, it will decide whether or not to refer the case to the relevant department for follow-up according to the situations.

When comparing the number of complaints or reports and that of the cases placed on file and processed, there may be a difference because the CCAC combines the complaints or reports with similar

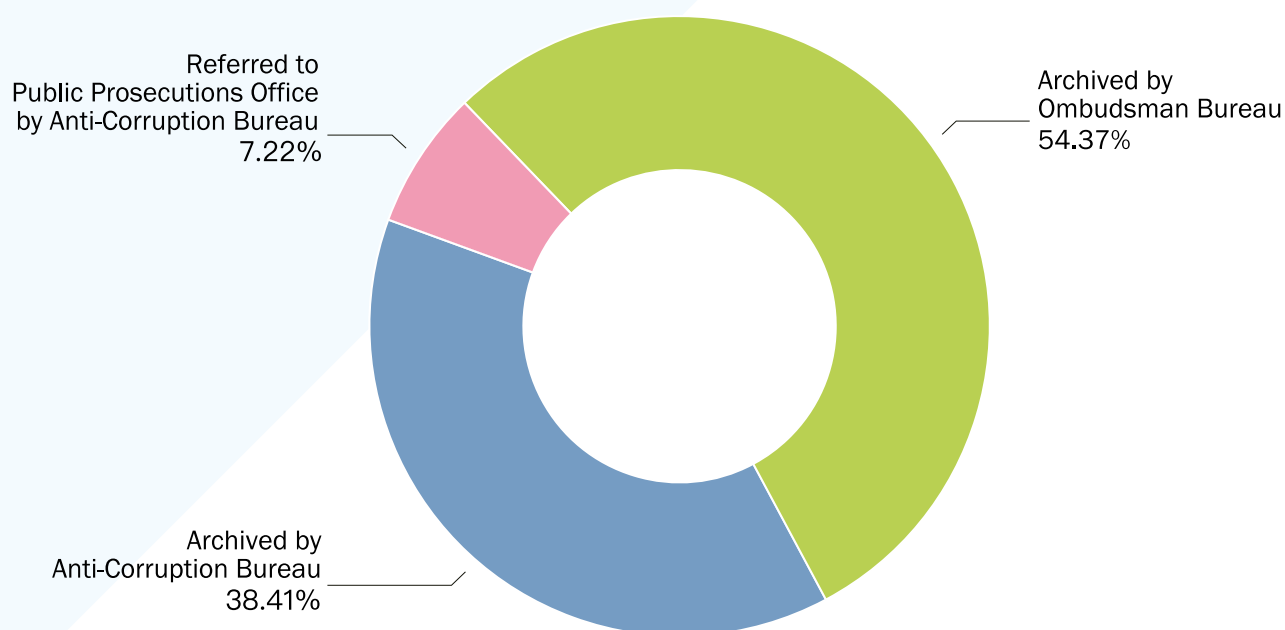
content and handles them together in order to avoid unnecessary procedures and enhance the efficiency of case handling. Therefore, in 2024, the CCAC placed a total of 293 cases on file, including 33 requests for case assistance, 113 cases being processed by the Anti-Corruption Bureau and 147 cases being processed by the Ombudsman Bureau. In addition, there were a total of 393 cases which did not meet the conditions to be placed on file and were sent to the Complaint Management Centre for handling, of which 208 were archived and 185 were referred to competent departments for follow-up.

Statistics of Complaint Management Centre in 2024

Type		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Requests/ enquiries of different nature		137	142	123	112	160	130	155	115	151	162	146	134	1,667
Sources of complaints	Complaints or reports lodged by residents (together with cases referred by other public bodies)	56	52	56	71	63	73	76	59	70	69	62	51	758
	Complaints or reports from other sources	1	0	2	0	0	0	2	0	2	2	1	0	10
Distribution of complaints	Cases placed on file by Anti-Corruption Bureau	7	9	8	10	6	10	7	17	8	14	9	8	113
	Cases placed on file by Ombudsman Bureau	8	9	7	11	17	13	13	14	16	18	13	8	147
	Cases handled by Complaint Management Centre	29	31	33	39	30	34	45	25	37	33	32	25	393

Along with the cases carried forward from 2023, the CCAC concluded a total of 263 cases in 2024. Among the 120 cases concluded by the Anti-Corruption Bureau (including 91 corruption cases and 29 mutual assistance cases), 19 were referred to the Public Prosecutions Office and the remaining 101 were archived. Among the 143 cases concluded by the Ombudsman Bureau, there were 28 cases in which the departments concerned had improved and optimised their measures and works and given positive response and six cases included in the list of “retrospective review” in order for another review.

Statistics on cases concluded in 2024

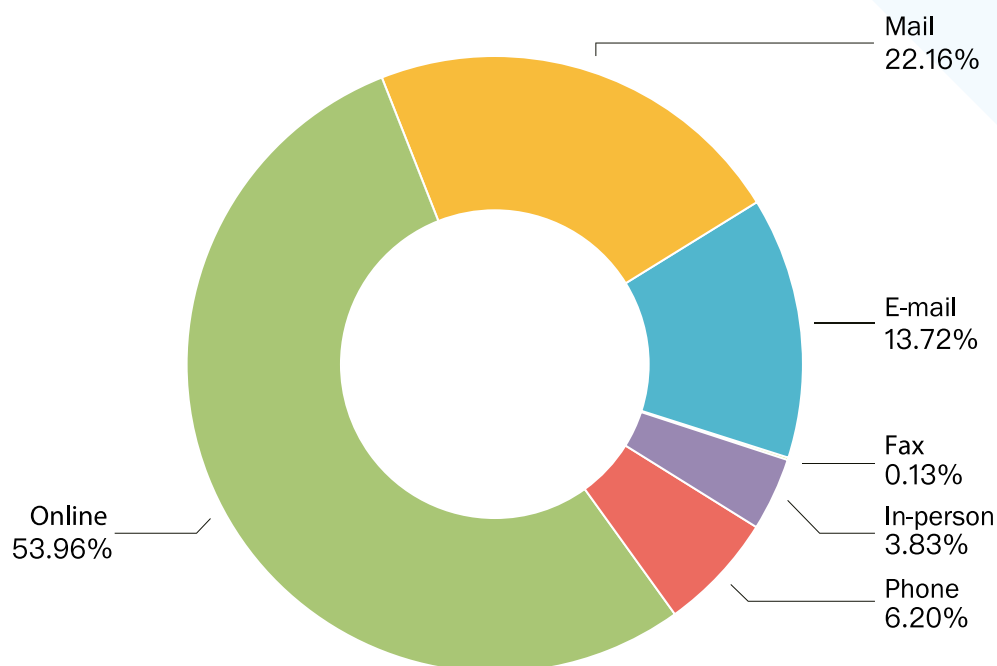


The numbers and percentages of the complaints and reports received by the CCAC in 2024 through different channels: 29 received in person; 47 received through the complaint hotline; 409 received through the online complaint system; 168 received by mail; 104 received by e-mail; one received by fax (See the percentages in the following table.)

Statistics on methods to lodge complaints and reports in 2024¹

Methods to lodge complaints or reports	Number	Percentage
In-person	29	3.83%
Phone	47	6.20%
Online	409	53.96%
Mail	168	22.16%
E-mail	104	13.72%
Fax	1	0.13%
Total	758	100%

Statistics on methods to lodge complaints and reports in 2024



The CCAC has been encouraging residents to file real-name reports or complaints and therefore attaches much importance to the confidentiality of whistleblowers' personal data. All individuals unrelated to the procedures do not have the right to access whistleblowers' personal data and the content of complaints. The CCAC can even protect residents' personal data to a larger extent at their request. The CCAC calls on

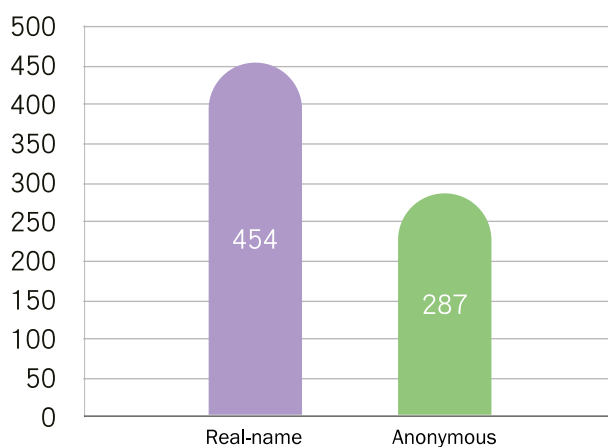
¹ Including referrals from public bodies.

residents to continue to file reports in a rational and responsible manner as well as reminds them not to falsely accuse someone else or fabricate crimes for personal purposes or else they will violate criminal laws.

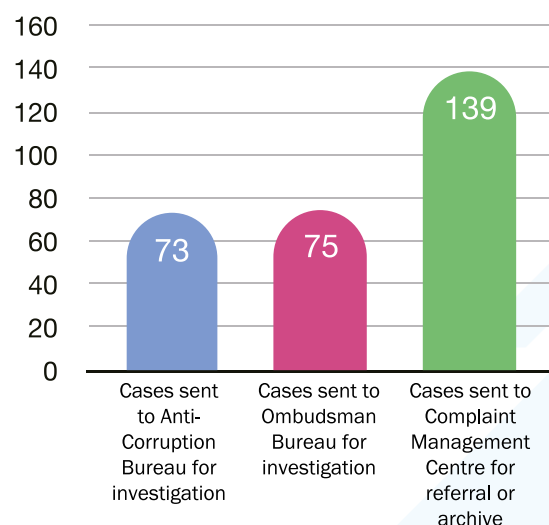
Ever since the CCAC launched the service of online appointment for in-person complaint in 2022, it has found that the relevant usage rate has been continuously increasing. Some residents even raised suggestions on possible improvement. Therefore, the CCAC keeps on improving and optimising the relevant appointment service by updating the content of the appointment notification and adjusting the procedures of appointment cancellation and change of time, among other improvements. According to statistics, in 2024, 127 appointments were made through the system and the complainants showed up for 91 appointments, accounting for 71.65% of all appointments made throughout the year. In addition, in 2024, 132 walk-in in-person complaints or enquiries were lodged or made at the office at Dynasty Plaza, NAPE and the Branch Offices in Areia Preta and Taipa of the CCAC. This will increase the waiting time of residents and may even affect the use of the instant reception service. Therefore, the CCAC hopes that residents can make more use of the appointment system.

Among the complaints or reports in 2024, 454 were lodged under real names (including some complainants or informants requested to remain anonymous) and 287 were lodged anonymously. Among the 287 anonymous complaints or reports, 73 and 75 were passed to the Anti-Corruption Bureau and the Ombudsman Bureau for investigation respectively, while 139 were sent to the Complaint Management Centre for referral or archiving due to anonymity and failure to meet the conditions to be placed on file.

Statistics on real-name and anonymous complaints or reports in 2024



Anonymous complaints or reports handled in 2024



In order to facilitate residents to file complaints or reports online, the online complaint platform was launched on the webpage of the CCAC in 2015 and its usage rate has been increasing. In 2024, there were 409 complaints or reports received lodged by residents through the online complaint system, making up the highest proportion of all methods to lodge complaints or reports throughout the year (53.96%). Taking into account the fact that online complaining will still be one of the main ways for the CCAC to receive complaints and reports in the future, the CCAC will continue to optimise the content, page and operation flow of the online complaint system.

Meanwhile, the CCAC also found that a few residents repeatedly submitted complaints, through the online complaint platform within a short period of time, with the same content which was untrue, slanderous and even illegal. Given that such situation might affect normal operation of the system or implicate illegalities, the CCAC, in addition to curbing the situations appropriately by technical means, also considered referring the cases to other law-enforcement agencies for follow-up in the event of serious situations.

In 2024, the CCAC received 104 complaints or reports by e-mail (around 13.72% of total complaints received). The CCAC encourages residents to make more use of the online complaint system because it can effectively integrate the content of the complaints, the relevant information and other files submitted and uploaded by them. It not only facilitates the initiation of investigation procedures but also allows the whistleblowers to immediately receive the enquiry codes for checking the case follow-up progress or receiving additional information.

According to the statistics on the issuance and use of the enquiry codes, in 2024, the CCAC sent a total of 934 enquiry codes (including those for submissions of additional details of complaints) and almost 36% of them were used for making enquiry, of which 80% of the receivers submitted additional information when using the enquiry codes, reflecting that the residents who checked the case follow-up progress often submitted additional information through such a convenient channel. At the same time, the CCAC also hopes that more residents will choose to file real-name reports through the online complaint platform because when they check the basic follow-up progress of ombudsman-related cases by using the enquiry codes sent to them, they will obtain more detailed information related to the investigation.

In addition, at an earlier time, there were residents who reflected opinions on the interface of follow-up progress enquiry. Therefore, the CCAC has promptly improved and optimised it and will keep on optimising the enquiry code system according to the actual needs and usage conditions.

The CCAC continued to exert all efforts to promote computerisation of case processing. Up to December 2024, computerisation of around 97% of the cases under processing was completed, while around 77% of the archived cases over the years have been completely computerised.

PART II
ANTI-CORRUPTION

PART II

ANTI-CORRUPTION

I. Introduction

The year 2024 marked a milestone in the history of the development of the CCAC. In this year, the newly amended law and administrative regulation of the CCAC entered into force, which have clarified the mission and scope of activity of the CCAC, highlighted economic and financial crimes, optimised the powers of the CCAC by introducing the power of cooperation in order to promote the integrity operation and management model in the public and private sectors, updated the investigators' regime by introducing the premium for long-term service, and improved the organisation structure by establishing the Investigation Department 4 of the Anti-Corruption Bureau. The said amendment of the law and the administrative regulation constitutes a legal guarantee for the long-term development of the CCAC in harmony with the development of the times.

Meanwhile, some suggestions made by the CCAC were adopted in the newly amended *Electoral Law of the Legislative Assembly*, which entered into force in April 2024, as part of its amendment, which will contribute to a smoother supervision on the 8th Legislative Assembly Elections.

At the Decorations, Medals and Certificates of Merit Awards Ceremony held in January 2024, the Special Investigation Group (Group L) of the Anti-Corruption Bureau of the CCAC was awarded the Medal for Bravery by the SAR Government. This was the second time that the CCAC received this medal ever since its establishment, which has significantly uplifted CCAC workers' morale.

The anti-corruption work in 2024 had the following characteristics:

Firstly, among the cases placed on file for investigation by the CCAC over the last three years, there was an increase in proportion of those referred to the Public Prosecutions Office (MP) for follow-up. Those ratios of the cases placed on file to that referred to the MP over the last three years were 103:10 in 2022 (accounting for 9.7%), 102:9 in 2023 (accounting for 8.8%) and 113:19 in 2024 (accounting for 16.8%).

Secondly, the proportion of cases in the private sector increased year by year. In 2024, the CCAC concluded two cases of bribery occurred in the private sector and referred them to the MP for follow-up. Such situation was rarely seen over the years. According to the statistics of the cases of corruption occurred in the public and private sectors that the CCAC placed on file over recent years, it was found that the number of cases of corruption in the private sector increased year by year, while the proportion of cases of corruption in the public sector decreased gradually. At the same time, there was also a bigger change

in society's attitude towards the handling of corruption cases in the private sector. For example, in 2024, there were, for the first time, cases where several integrated resort enterprises took the initiative to file complaints about suspected cases of corruption in the private sector committed by their employees, which was undoubtedly a very good start of the combat of corruption in the private sector.

As to the public sector cases, there were some involving attendance record fraud committed by public servants. In recent years, there has been a significant decrease in typical corruption cases in the public sector where public servants take advantage of their powers and functions to accept bribes. Nevertheless, some public servants have continued to take chances in fulfilling their general duties such as the duties of assiduity, punctuality and not engaging in incompatible activities.

Following the CCAC's suppression over the years, there was a significant drop in the cases of defrauding the Government, but the CCAC still remained highly cautious and spared no effort to take action once a new sign was found. In 2024, the CCAC took the initiative to investigate the doubts revealed in the audit report on a public fund made by the Commission of Audit. Although no crime was found, some administrative problems and loopholes of supervision were detected in the investigation. The CCAC then requested the fund to improve the relevant subsidising procedures and supervisory means. At the same time, in 2024, the CCAC looked into and handled two cases involving some associations that allegedly defrauded the Science and Technology Development Fund and the Social Welfare Bureau, which demonstrated that the fight against corruption is an ongoing process.

In addition, the CCAC, imbued with the spirit of perseverance, continued to investigate the illegalities found in the cases last year and probed deeply into the cases of fraud against the Government committed by security companies and fraudulent investment residency. The CCAC will never give up on these investigations.

II. Criminal reports and cases filed for investigation

In 2024, the CCAC placed 113 cases on file for investigation, including 68 related to the public sector and 45 related to the private sector. Among the 91 cases with investigations completed in the year, 60 were related to the public sector and 31 were related to the private sector. Among the 91 corruption cases with investigations completed, 19 were referred to the Public Prosecutions Office and 72 were archived.

Meanwhile, there were 33 mutual assistance cases placed on file in 2024 and a total of 62 mutual assistance cases were handled in the year, reaching a historical high.

III. Summaries of some of the cases

Among the cases in the anti-corruption area concluded in 2024, some of the cases were referred to the judicial bodies for follow-up have been selected and summarised as follows:

(I)

In 2024, the CCAC solved two cases of fraudulent application for investment residency.

In the first case, it was discovered in the investigation that three approved applicants for residency of household through real estate investment were suspected of making false statements that they had jointly purchased two immovable properties. However, in fact, the properties were owned by one of their relatives. At the same time, the trio also falsely claimed that they possessed high school qualification in order to meet the requirement of academic background for application for residency through real estate investment. One of them even allegedly submitted false proof of kinship.

It was discovered in the investigation that the original owner of the properties involved (the applicants' relative) received the money of the purchase from the three applicants and then transferred it back to them in a circuitous manner, while the two properties involved were inhabited by the original owner all along. It was not until the applicants and their family members obtained permanent residency that they returned the properties to the original owner through simulated transaction. Eventually, the three applicants and their family members, totalling 15 people, were granted the residency and got Macao permanent resident identification cards.

In the second case, it was found in the investigation that a local businessperson, in the name of investing in a company under his corporation, allegedly assisted his relatives and his employees' relatives so that they falsely acquired the shares of the company in an attempt to apply for major investment residency with the then Macao Trade and Investment Promotion Institute (IPIM). As a result, their applications were approved. Subsequently, when they applied for renewal, the businessperson, on the one hand, played the same old trick by simulating an increase of his shares in the company under his corporation and, on the other hand, colluded with a businessperson of another company to assist the applicants once again in applying for renewal of major investment residency with the then IPIM based on the simulated increase of shares.

The applicants and businesspersons involved in the two cases allegedly committed document forgery provided for and punishable by the *Law of Illegal Immigration and Deportation*. The two cases were referred to the Public Prosecutions Office for follow-up.

(II)

The CCAC received some reports indicating that a police officer from a police station of the Public Security Police Force (CPSP) took advantage of his position and frequently left his duty and even the territory when he was on duty. Then he requested his fellow officers from the same station to clock in and out on his behalf in order to fraudulently obtain salary.

Following an investigation, it came to light that between 2018 and 2024, the police officer involved, on several occasions, requested his fellow officers from the same station to clock in and out on his behalf to falsify his attendance records in order to conceal his situations of failing to clock in on time for the reason that he left the territory or leaving work early and thus escape the consequences and sanctions that might result from the unjustified absence. It was also found that the police officer, taking advantage of the loophole of not requiring workers in some positions to sign any documents to record their attendance, left his duty without approval and left Macao, which caused the mistakes made by the CPSP in the verification and payment of the salary and supplementary remuneration to the police officer involved, resulting in losses to the SAR Government.

The police officer involved and the police officers who assisted him in clocking in and out allegedly committed several counts of fraud and forgery committed by a public servant provided for and punishable by the *Penal Code*. The case was referred to the Public Prosecutions Office for follow-up in February 2024. In addition, the CCAC reported the disciplinary offences allegedly committed by the relevant officers to the CPSP for follow-up.

(III)

Following in-depth investigations, the CCAC successively detected three suspected cases of undue and prolonged absence due to illness by the personnel of the Macao Customs Service (SA) with the connivance of doctors.

During the investigation, it was found that three former customs officers and one in-service customs officer had, from 2016 onwards, sought medical consultations on the grounds of lower back problems or leg pain, thus obtaining medical certificates to justify their absences due to illness. However, the aforesaid four personnel frequently travelled in and out of Macao, including travelling overseas for pleasure, on the days when they obtained a medical certificate or during the period of absence due to illness. The acts carried out by the aforesaid personnel did not accord with the claimed medical conditions, and despite the fact that the SA had arranged lighter tasks for these personnel according to their physical conditions, they continued to be absent from work on the grounds of illness for prolonged periods of time.

During the investigation, it was also found that the four customs officers knew each other and they often went to a hospital in Macao at close time intervals to seek medical consultations from two doctors involved in the aforesaid cases. The sick leave certificates issued by these two doctors were not granted based on the actual medical conditions of the aforesaid four personnel, but on the dates of their treatment at the hospital and the number of days of sick leave that lasted for longer periods as requested by the personnel themselves. The doctors in question were therefore able to receive money as “commissions” from the aforesaid medical consultations. Following the investigation, it was found that the two doctors involved continuously granted sick leave to the aforesaid four personnel for more than two years, albeit with the knowledge that their illness were mild. The acts of the two doctors resulted in the continuous receipt of salaries by the four customs officers in spite of their absence from work for prolonged periods of time, thus causing losses to the Macao SAR Government.

The four customs officers were suspected of having exaggerated their medical conditions relating to lower back and leg problems in an attempt to falsely obtain sick leave. Through such means they obtained hundreds of sick leave certificates and were absent from work due to illness for over 900 to 1,400 days. During their absence due to illness, each of them received between MOP600 thousand and MOP1.7 million as remuneration. The aforesaid personnel were suspected of committing the crime of fraud involving considerably high value provided for and punishable by the *Penal Code*. The two doctors involved were suspected of committing the crime of fraud involving considerably high value and the crime of falsifying certificates, due to their issuance of hundreds of medical certificates to the aforesaid four SA personnel.

The four customs officers and the two doctors involved in the aforesaid three cases were referred to the Public Prosecutions Office for handling. In the meantime, the alleged breach of discipline by the customs officers involved were also reported to the SA and the two doctors involved already left service.

(IV)

The CCAC received a complaint claiming that two personnel of the Financial Services Bureau (DSF) helped each other clock in during working hours one day in 2023, thus falsifying their attendance records.

During the investigation, it was found that the aforesaid two DSF personnel had a superior-subordinate relationship. According to the evidence collected by the CCAC from different sources, during the period between October 2022 and August 2023, to take advantage of the convenience provided by the DSF to allow the use of fingerprints or attendance cards to record attendance, the two workers agreed to leave their attendance cards in the office and clock in for each other with each other’s card when either of them came in late to work or left early, thus falsifying attendance records for each other that looked normal in the DSF’s electronic attendance system.

Moreover, it was also found in the investigation that the duo were frequently absent or left their posts early or even did not work overtime at all during the periods of overtime work. Also, by taking advantage of having the competences as the persons responsible for making the shift schedules and the inspector, the duo entered the falsified attendance records contained in the electronic attendance system in the relevant verification documents, thus misleading the DSF in calculating their overtime work remuneration and managing to fraudulently obtain an amount exceeding MOP14,000 during the aforesaid period.

The two personnel were suspected of committing the crime of computer falsification provided for and punishable by the *Law on Combatting Computer Crimes*, the crimes of forgery by a public servant and fraud provided for and punishable by the *Penal Code*. The case was referred to the Public Prosecutions Office for handling in April 2024.

(V)

The CCAC received a report claiming that a man was suspected of having made false statements about his employment at a hair salon in order to illegitimately obtain financial aid for combatting the epidemic for employees granted by the government.

It was found after investigation that the aforementioned man and his friend were introduced to work in a hair salon through an intermediary for a short period of time. However, the duo subsequently quitted their jobs, but the owner of the hair salon did not declare the termination of employment at the Financial Services Bureau and continued to pay contributions for the duo. In addition, during investigation, it was revealed that between 2018 and 2023, the owner of the hair salon allegedly had false labour relations with nine Macao residents in order to ensure the minimum number of at least eight local workers were employed so as to meet the conditions of obtaining the quota of six to eight non-resident workers granted by the Labour Affairs Bureau.

The owner of the salon allegedly committed the crime of document forgery provided for and punishable by the *Penal Code*. The case was referred to the Public Prosecutions Office in April 2024 and the CCAC had already notified the Labour Affairs Bureau and the Social Security Fund.

Moreover, since the aforementioned nine Macao residents were declared to be employed by the hair salon and thus were granted the financial aid for combatting the epidemic for employees issued by the government, the salon also illegitimately received the financial aid for combatting the epidemic for companies. The CCAC notified the Financial Services Bureau, which was the issuing entity, and the Macao Foundation of the situations for their follow-up actions.

(VI)

An integrated resort enterprise sent a representative to file an in-person report at the CCAC, indicating that a former executive chef of the food and beverage department of the company, between September 2020 and February 2023, allegedly requested some workers to pay him a placement fee of MOP1,000 to MOP5,000 every month after being employed by the company. The company requested to pursue his accountability for his illegal act.

After investigation, it came to light that the former executive chef of the food and beverage department of the company had the power to recruit, dismiss and promote workers in his department. By taking advantage of his power derived from his position, he solicited pecuniary advantage with a total amount of MOP240,000 from five workers, who were also his subordinates, as kickback for recommending them to enter the company and for renewing their contracts. Such act allegedly violated passive bribery in the private sector provided for and punishable by the law of *Prevention and Suppression of Bribery in the Private Sector*.

The case was referred to the Public Prosecutions Office for handling in May 2024.

(VII)

The CCAC received a report, indicating that some former stewards of an integrated resort enterprise offered an amount of more than RMB20,000 to some individuals for securing a job in the steward department of the enterprise.

After investigation, it came to light that the Executive Chief Steward of the enterprise was responsible for the personnel recruitment and interview work. In February 2023, the enterprise recruited stewards. Upon hearing the news, the girlfriend of the aforementioned person-in-charge of the steward department identified some individuals from the Chinese mainland through an intermediary and introduced them to the person-in-charge. Afterwards, the person-in-charge of the steward department took advantage of his power to assist the individuals to enter the enterprise successfully and his girlfriend solicited a placement fee of RMB15,000 to RMB25,000 from each applicant. The intermediary also took advantage from such act by charging each individual who successfully entered the enterprise an amount of RMB1,000. The enterprise lodged a written complaint to pursue the criminal responsibilities of the relevant individuals.

The person-in-charge, his girlfriend and the intermediary allegedly violated passive bribery in the private sector provided for and punishable by the law of *Prevention and Suppression of Bribery in the Private Sector*. The aforementioned individuals from the Chinese mainland who offered money for the purpose to enter the enterprise allegedly violated active bribery in the private sector provided for and punishable by the same law. The case was referred to the Public Prosecutions Office in July 2024 for handling.

(VIII)

The CCAC received a report claiming that some leaders of a Macao civic association allegedly manipulated some companies to procure goods and defrauded over money during the application of subsidies for organising scientific education activities from the Science and Technology Development Fund (FDCT).

Investigation showed that the chairman and a former vice chairman of the involved civic association applied for subsidies to carry out various scientific education activities in the name of the civic association to the FDCT. After the approval of the application of subsidies, in order to meet the requirements of the FDCT regarding procurement of goods that quotations from at least three suppliers should be obtained and that the contract should be granted to the one offering the lowest prices, the two leaders of the civic association quoted the prices through some teaching aid companies which were actually manipulated by them and produced some false invoices to carry out bid-rigging in order to create a false impression that quotations from three suppliers had been obtained. In fact, the companies relevant to the false quotations were opened by the duo or were fraudulent. The purpose was to secure the contracts to be granted. In addition, in order to defraud over the maximum amount of subsidies granted by the FDCT, the duo exaggerated the expenses of the projects and produced false receipts to the FDCT in order to reimburse the subsidies. The amount involved in the case was more than MOP1 million.

The two leaders of the civic association allegedly violated fraud and document forgery provided for and punishable by the *Penal Code*. The case was referred to the Public Prosecutions Office in October 2024.

IV. Mutual case assistance in cross-border investigation

In 2024, the CCAC handled a total of 62 mutual assistance cases, including 49 cases at the requests for case assistance received from counterparts outside the region, of which 35 were made by agencies of the Chinese mainland and 14 by the Independent Commission Against Corruption (ICAC) and law enforcement agencies of Hong Kong. Meanwhile, the CCAC made 13 requests for case assistance to counterparts outside the region, of which eight were made to agencies of the Chinese mainland, two to the ICAC of Hong Kong and three to both agencies of the Chinese mainland and the ICAC. Among the 62 cases handled by the CCAC in 2024, 36 were concluded and 26 were still being followed up (see the following table).

Item	Case assistance requests made by agencies outside the region to the CCAC		Total	Case assistance requests made by the CCAC		Total
Places	Hong Kong	Chinese mainland		Hong Kong	Chinese mainland	
Cases placed on file for investigation in 2024	6	27	49	1	2	13
Cases in 2024 including those carried forward to 2024	8	8		1	6	
				3 case assistance requests made to both Hong Kong and the Chinese mainland		
Cases being followed up	9	11	20	1	3	6
				2 case assistance requests made to both Hong Kong and the Chinese mainland		
Cases archived (case assistance completed)	5	24	29	1	5	7
				1 case assistance request made to both Hong Kong and the Chinese mainland		

V. Court verdicts

According to the statistics provided by the courts, a total of 122 criminal cases processed by the CCAC were tried in 2024, involving 203 suspects. Among those cases, there was a case solved by the CCAC involving fraud committed by a bank worker in collusion with a crime syndicate, which was divided into 111 cases by judicial agencies, involving 149 suspects. In 2024, final judgements were rendered on 96 cases and some of the charges of three cases.

The aforesaid 96 cases with final judgements rendered and three cases in which final judgements have been rendered on some of the charges involved crimes such as active bribery, passive bribery to perform illicit acts, forgery committed by a public servant, abuse of power, inaccurate data, computer forgery,

illegitimate collection, use or provision of computer data, money laundering, fraud, fraud involving a high value, fraud involving a considerably high value, document forgery, use of forged document and malicious accusation, among others.

VI. Declaration of assets and interests

Established in 1998, the legal regime of declaration of assets and interests of public servants in Macao has been implemented for 26 years. As one of the measures to prevent corruption practised by public servants, it plays a significant role in the promotion of integrity building of Macao. The implementation of the regime increases the transparency of public servants' performance of public functions, whereby encouraging them to uphold integrity and justice and building for the Government an effective firewall against corruption in order to meet the public's expectation of building a clean Government. Among the cases tried by the courts in 2024, there were two involving inaccurate data in asset declaration and one involving unexplained wealth in which the conviction was made. At the same time, a case of untrue declaration of assets and interests was solved in 2024.

The CCAC has always been attaching importance to the work related to declaration of assets and interests and the perfection of the relevant system. In addition to supervising the regularity and administrative correctness of the acts related to declaration of assets and interests in accordance with the law, the CCAC always reviews the execution of the work, maintains close communication with various departments in terms of the relevant work, actively optimises the current services and internal operation and complements the work with the use of the electronic systems relating to declaration of assets and interests and the promotion actions. The CCAC hopes that the work related to asset declaration will always play a dynamic and effective role in the prevention of corruption.

In 2024, the CCAC received and processed a total of 12,493 submissions of declaration forms (see Table I). A majority of the declarants complied with the duty of declaration by the statutory deadline, but there was a small number of people who failed to submit the declaration by the deadline. The CCAC proactively followed up the cases of failure to submit the declaration and sent a total of 103 overdue notices (see Tables II and III) to the relevant individuals (declarants and their spouses or cohabiting partners), registering a decrease of 35.22% compared to 159 overdue notices sent in the previous year. After receiving the overdue notices, all the recipients submitted the missing declarations in time and provided reasonable justification. In addition, in 2024, there was no case in which the declarant was legally liable for failure to submit the declaration without justifiable reason or irregularities in the formalities in the declaration. Therefore, the overall work related to asset declaration achieved the expected goals.

Table I
Statistics of submission of declaration of assets and interests in 2024

Reason for submitting declaration	Total number of submissions
Appointment	1,426
Change of position	3,859
Termination of office	1,080
Renewal every five years	4,041
Renewal with that of spouse	544
Pursuit of data-provision	1,197
Voluntary renewal	346
Total	12,493

Table II
Statistics on overdue notices sent in 2024
(Recipients: declarants)

No.	Department/entity in which the declarant works	No. of overdue notices sent
1	Civil Aviation Authority	2
2	Fire Services Bureau	4
3	Public Security Police Force	11
4	Gaming Inspection and Coordination Bureau	5
5	Legal Affairs Bureau	1
6	Transport Bureau	1
7	Government Headquarters Affairs Bureau	2
8	Correctional Services Bureau	3
9	Education and Youth Development Bureau	5
10	Financial Services Bureau	3
11	Public Security Force Affairs Bureau of Macau	2
12	Identification Services Bureau	1

No.	Department/entity in which the declarant works	No. of overdue notices sent
13	Environmental Protection Bureau	2
14	Government Information Bureau	1
15	Municipal Affairs Bureau	8
16	Social Welfare Bureau	2
17	Cultural Affairs Bureau	3
18	Sports Bureau	1
19	Housing Bureau	1
20	Printing Bureau	1
21	Macao Trade and Investment Promotion Institute (Current "Commerce and Investment Promotion Institute")	1
22	Judiciary Police	2
23	Customs of the Macao Special Administrative Region	2
24	Public Administration and Civil Service Bureau	2
25	Health Bureau	8
26	University of Macau	21
27	Macao Polytechnic University	4
Total		99

Table III
Statistics on overdue notices sent in 2024
(Recipients: *Spouses or cohabiting partners* of declarants)

Recipient	No. of overdue notices sent
<i>Spouses or cohabiting partners</i> of declarants	4

Nowadays, we are living in an era of rapid development of electronic technology and providing electronic services is an important measure to improve the work related to governance. Grasping the timing of construction of electronic governance, the CCAC developed and launched some applications and electronic platforms and applied them to the work related to declaration of assets and interests. Up to 2024, the CCAC developed three specific systems related to declaration of assets and interests for public departments and declarants to use. The systems that were created and launched by the CCAC included the “notification processing system of declaration of assets and interests” (hereinafter referred to as “electronic notification platform”) and the “online appointment system for the declaration of assets and interests” (hereinafter referred to as “appointment system”). The electronic notification platform facilitates public departments’ delivery of notifications online, while the appointment system makes it easier for declarants to arrange the time for submission of declaration. The use of the two systems not only provides great convenience for the departments and declarants but also enhances the quality and efficacy of the management of the work related to asset declaration. In addition, in order to strengthen the cooperation between the two depository entities of the declarations, the CCAC and the Office of the President of the Court of Final Appeal jointly created the “information sharing platform on the declaration of assets and interests”. Through the information sharing function of the platform, the interoperability of data between each other will be strengthened, so that the execution of the work related to asset declaration will be smoother and more effective.

In 2012, the CCAC commenced the development of the electronic notification platform, which officially came into operation in 2013. It has been launched for over ten years. With the CCAC’s promotion and active cooperation with various departments/entities, the system has yielded positive results. In order to encourage more departments/entities to use the system, in 2024, the CCAC communicated with the departments/entities that had not yet become users of the electronic notification platform. Within the year, three of the departments/entities requested to join the platform as users. The CCAC was happy to see that a newly established department/entity took the initiative to make the request for becoming a user. Currently, there are a total of 74 departments/entities using the electronic notification platform (see Table IV). In 2024, the CCAC received a total of 3,900 letters/notification letters, of which 3,767 were uploaded through the platform, representing 96.59% of the total number of letters/notification letters received (see Table V). The CCAC hopes that the departments/entities that have yet to use the platform will become users of the “notification processing system of declaration of assets and interests” as soon as possible in response to the SAR Government’s promotion of e-governance so as to streamline the workflow and enhance the effectiveness of work.

Table IV
**List of users of the “notification processing system of
 declaration of assets and interests” in 2024**

No.	Department/Entity	No.	Department/Entity
1	Civil Aviation Authority	37	Academy of Public Security Forces of Macao
2	Monetary Authority of Macao	38	Fisheries Development and Support Fund
3	Commission of Audit	39	Cultural Development Fund
4	Fire Services Bureau	40	Science and Technology Development Fund
5	Consumer Council	41	Macao Foundation
6	Commission Against Corruption	42	Pension Fund
7	Talent Development Committee	43	Social Security Fund
8	Legal and Judicial Training Centre	44	Government Information Bureau
9	Judiciary Magistrates Council	45	Office of the Prosecutor General
10	Medical Litigation Mediation Centre	46	Office of the President of the Court of Final Appeal
11	Committee of Medical Error Expertise	47	Municipal Affairs Bureau
12	Public Security Police Force	48	Social Welfare Bureau
13	Macao Post and Telecommunications Bureau	49	Cultural Affairs Bureau
14	Macao Economic and Cultural Office in Taiwan	50	Sports Bureau
15	Gaming Inspection and Coordination Bureau	51	Housing Bureau
16	Legal Affairs Bureau	52	Printing Bureau
17	Labour Affairs Bureau	53	Commerce and Investment Promotion Institute
18	Marine and Water Bureau	54	Pharmaceutical Administration Bureau
19	Government Headquarters Affairs Bureau	55	Macao Investment and Development Limited
20	Transport Bureau	56	Macao Light Rapid Transit Corporation, Limited

No.	Department/Entity	No.	Department/Entity
21	Cartography and Cadastre Bureau	57	Macau Slaughter House Ltd.
22	Correctional Services Bureau	58	Macao Science Center Limited
23	Statistics and Census Service	59	Macau Urban Renewal Limited
24	Education and Youth Development Bureau	60	Public Security Police Force Welfare Association
25	Economic and Technological Development Bureau	61	Judiciary Police
26	Policy Research and Regional Development Bureau	62	Customs of the Macao Special Administrative Region
27	Financial Services Bureau	63	Supporting Office to the Legislative Assembly
28	Public Security Force Affairs Bureau of Macau	64	Public Administration and Civil Service Bureau
29	Public Assets Supervision and Management Bureau	65	Secretariat of the Executive Council
30	Identification Services Bureau	66	Macao Industrial Parks Development Co., Ltd.
31	Meteorological and Geophysical Bureau	67	Unitary Police Service
32	Public Works Bureau	68	Health Bureau
33	Environmental Protection Bureau	69	University of Macau
34	Personal Data Protection Bureau	70	Macao Polytechnic University
35	Land and Urban Construction Bureau	71	Macao University of Tourism
36	Macao Government Tourism Office		
List of departments that activated and started to use the “notification processing system of declaration of assets and interests” in 2024			
No.	Department/Entity		
72	The Islands Healthcare Complex – Macao Medical Center of Peking Union Medical College Hospital		
73	Teledifusão de Macau, S.A.		
74	Preparatory Office for the 15 th National Games, the 12 th National Games for Persons with Disabilities and the 9 th National Special Olympic Games in Macao		

Table V
Use of the “notification processing system of declaration of assets and interests” in 2024

Number of notification letters received through the “notification processing system of declaration of assets and interests” in 2024	3,767
Total number of notification letters of declaration of assets and interests received in 2024	3,900
Percentage of notification letters received through the “notification processing system of declaration of assets and interests” in 2024	96.59%

In order to facilitate the management of work related to declaration of assets and interests and the provision of services to the public, the CCAC launched the “online appointment system for the declaration of assets and interests” at the end of 2021. According to statistics, in 2024, a total of 1,305 people used the online appointment system of the CCAC, of which 1,049 turned up as scheduled, representing 8.4% of the total number of people who submitted the declaration in the year (see Table VI). Despite the discrepancy between the number of appointments actually made and the estimated number of appointments, the appointment system had positive impact on the management work carried out by the CCAC. Looking back at the time when it was still necessary to maintain limited operation in spite of severe epidemic situation, the online appointment system was an essential part of the crowd control measures. In addition, the appointment system also has the function of “enquiry/change/cancellation of appointment”. In 2024, 84 people cancelled their appointments and 172 people did not turn up as scheduled, representing 6.44% and 13.18% of the total number of users of the online appointment system respectively (see Table VII). Through the webpage of appointment, declarants may schedule a time slot for submission of declaration in a flexible manner. From the submission of request for appointment to the receipt of confirmation by SMS (for local mobile phone numbers only) /e-mail, the whole appointment making process is simple and automatic, which makes it easy for declarants to use. Therefore, the CCAC suggests declarants making good use of the system to make appointments. If they expect that they cannot show up at the scheduled time, they should cancel the appointments in advance or reschedule them to the time slots which are convenient for them on the relevant webpage to decrease the no-show rate as much as possible, so that the CCAC may properly arrange manpower and plan the work more effectively.

Table VI
Situation of declaration submission with an appointment and without an appointment in 2024

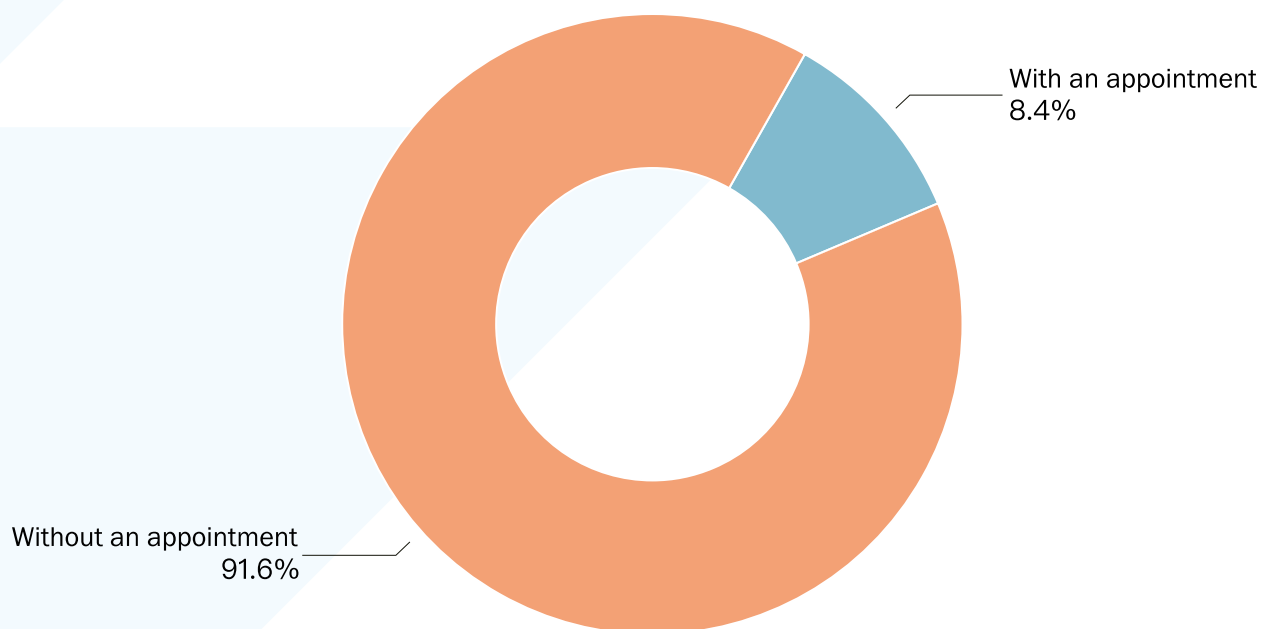
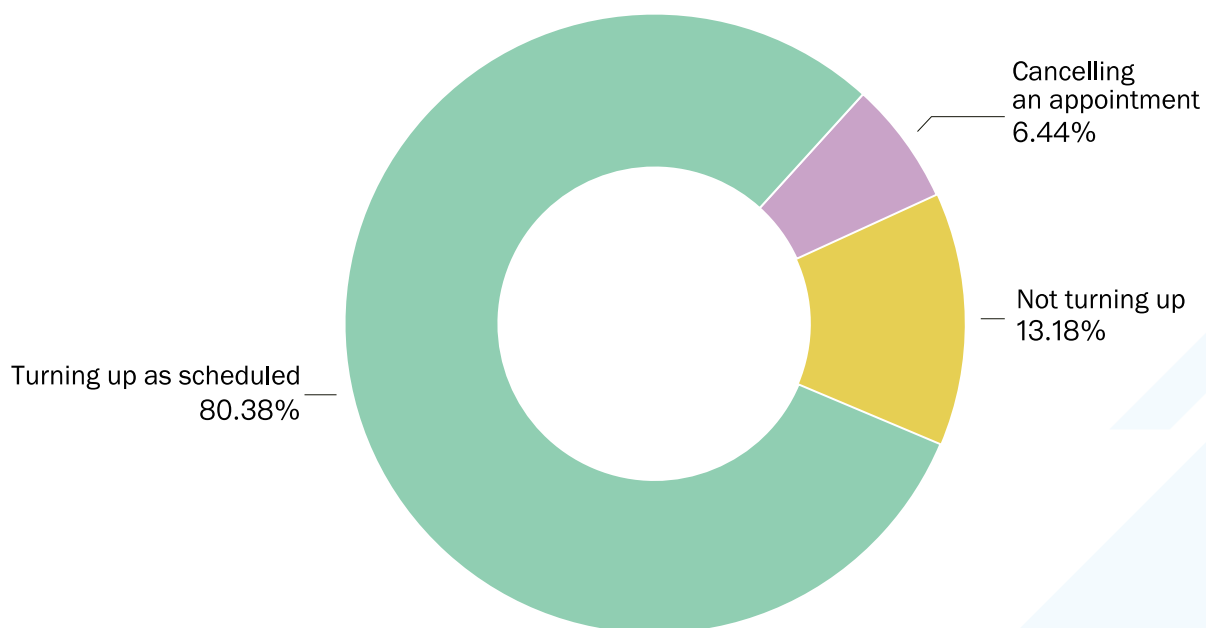


Table VII
Use of the online appointment system for the declaration of assets and interests in 2024



In order for public servants to have a deeper understanding of the specific content of the legal regime of declaration of assets and interests, the CCAC keeps on carrying out relevant promotion and dissemination activities through different channels, including publishing information about declaration of assets and interests on the webpage, printing pamphlets and providing the guidelines and samples of declaration of assets and interests in printed and electronic formats, among others. In addition, in 2024, the CCAC held three clarification sessions on declaration of assets and interests for departments with more new recruits, with the attendance of nearly 300 people. Through explanation, interaction and prompt responses to questions on the spot, public servants were able to better understand the correct way to fill in the declaration form and the relevant legal responsibilities. It is believed that with the CCAC's persistence in governance in accordance with the law and carrying out publicity and promotion actions, public servants may comply with the duty of declaration provided by the law more generally and their awareness of integrity and self-discipline will be strengthened at the same time.



PART III

OMBUDSMAN ACTIONS

PART III

OMBUDSMAN ACTIONS

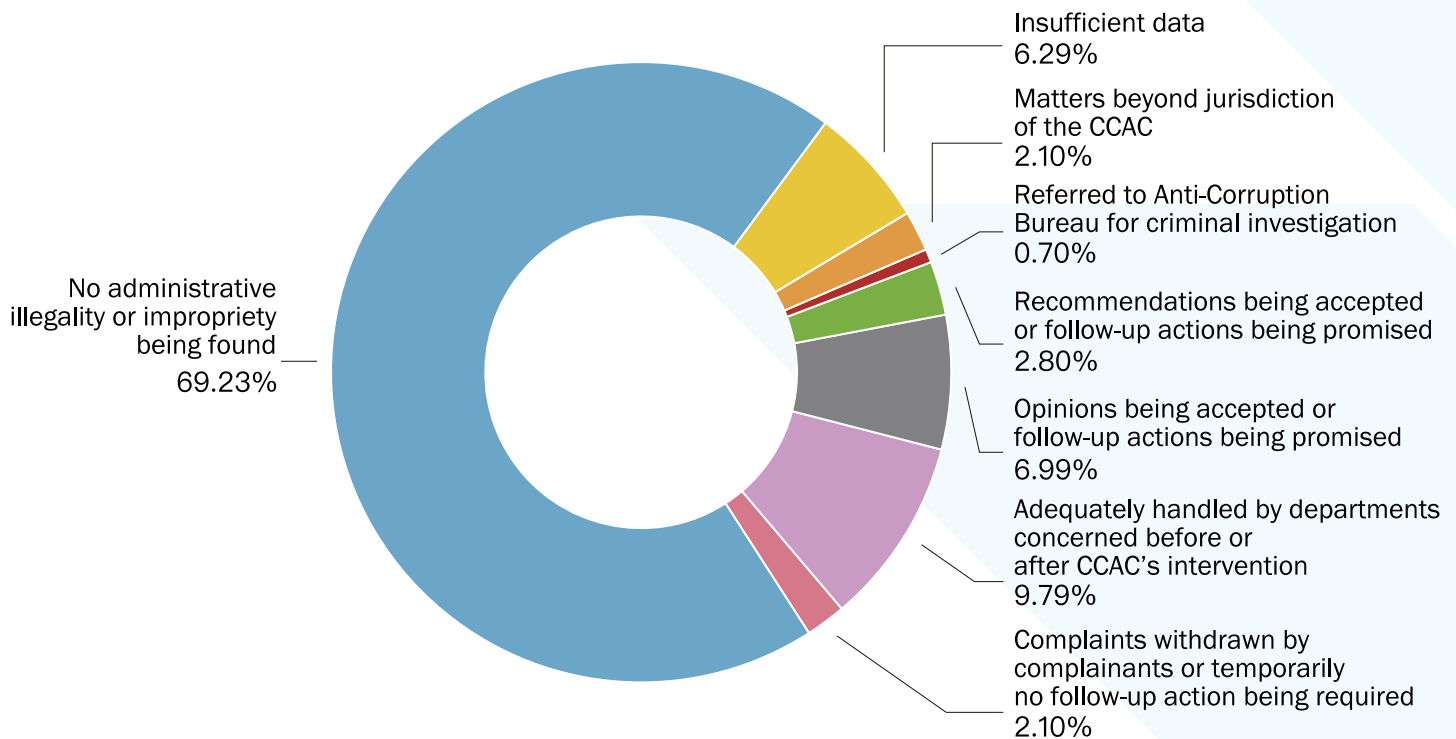
I. Introduction

In 2024, the CCAC followed the content of the important speech made by the Secretary-General, Xi Jinping, at the 20th National Congress of the Communist Party of China, particularly under the guidelines of the importance of the construction of the rule of law highlighted in a separate chapter and the commitment to joint promotion of governance of the country in accordance with law and exercise of ruling and administration in accordance with law, as well as the fundamental concept of integrated construction of a country, government and society bound by rule of law with an aim to continuously fulfil the demand of full observance of law, strict enforcement of law and bringing all offenders to account and implement the governance objectives.

As regards ombudsman actions, in 2024, the CCAC initiated investigation of 146 new inquiry files and one comprehensive investigation file. Along with the cases carried forward from the previous year, the CCAC has to follow up a total of 288 inquiry files. The CCAC concluded investigation and archived a total of 143 inquiry files in the area of ombudsman actions, of which six were newly added to the list of “retrospective review” and seven were removed from the list upon retrospective review.

Among the cases concluded in 2024, 99 cases were archived due to no evidence of administrative illegality or impropriety, nine archived due to insufficient data, three archived due to their not falling within the jurisdiction of the CCAC, one case within the scope of the Ombudsman Bureau being referred to the Anti-Corruption Bureau for carrying out criminal investigation due to its investigation objective, four concluded due to recommendations being accepted or follow-up actions being promised, ten concluded due to opinions being accepted or follow-up actions being promised, 14 concluded due to the adequate handling by relevant departments before or after the intervention of the CCAC and three concluded due to withdrawal of complaints by complainants or follow-up actions temporarily not being required and other situations.

Cases concluded by the Ombudsman Bureau in 2024



In 2024, the CCAC gave a total of seven suggestions which involved one comprehensive investigation case, and four recommendations. Most of them were accepted immediately by departments with follow-up actions being carried out or being promised.

In 2024, the cases received by the Ombudsman Bureau of the CCAC involved a single subject matter or various subject matters. According to statistics, three areas which covered the public service regime, municipal affairs and matters of land and public works accounted for half of the total number of cases. The public service regime remained the focus of attention, which took up 30% of the total number of cases, particularly involving the disciplinary matters of public service workers, management and operation of public services and personnel recruitment, among others. In addition, the total number of cases which fall within the areas of municipal affairs and land and public works took up more than 10% of the overall number. The area of municipal affairs mainly involved environmental hygiene, noise problems, administrative licenses, occupation of public land and so forth. As to the area of land and public works, the issues mainly involved illegal works, land concession procedures and inadequate supervision on public works, among others. The CCAC will continue to uphold the principle of legality and will, in conjunction with the principles of adequacy and proportionality, strengthen the supervision of public affairs, so as to meet public expectations.

In fact, to tie in with the measures to encourage self-confidence in administration, the CCAC always immediately gives its opinions and expresses its stance to relevant departments or entities during the investigation processes in order for the latter to have more room to carry out self-review and self-improvement and avoid passively waiting for the opinions or recommendations of the CCAC for subsequent follow-up actions. As such, the departments or entities can be encouraged to rectify and improve their operational mechanisms or system building more autonomously in accordance with the opinions given in advance.

II. Inquiry case summaries

(I)

"Inquiry report on Chief Executive Order no. 57/2024 (involving selling prices of independent units for economic housing projects located at Lots B4, B9 and B10 of New Urban Zone Area A)"

In April 2024, the CCAC received several complaints about the selling prices of the economic housing units at Lots B4, B9 and B10 of New Urban Zone Area A as well as the subsidy ratios published in the Chief Executive Order no. 57/2024. Upon analysis, the CCAC considered that the content of the complaints was not related to illegalities or improprieties of administrative procedures or administrative acts. It just involved regulatory acts or administrative measures of the Public Administration. Therefore, the CCAC carried out an inquiry into the matters within its jurisdiction.

Regarding the issues involving the pricing for economic housing projects located at the involved lots, after analysis, it was considered that in 2019, when the Housing Bureau (IH) published the relevant application notice, the minimum limit of monthly total income earned by an applicant with a two-member household was MOP17,680 according to the Chief Executive Order no. 169/2019. This stipulation was just one of the requirements for vetting and approval of the applications. In 2024, when the selling prices of economic housing projects located at the involved lots were announced, the minimum limit of monthly total income earned by an applicant with a two-member household was MOP19,270 according to the Chief Executive Order no. 151/2023. Such limit was used for calculation of affordable mortgage repayment by an applicant, which served as one of the parameters of purchasing power of the applicant.

Provided that Article 32 of the *Economic Housing Law* revised in 2015 (hereinafter referred to as the "former *Economic Housing Law*") where the statutory selling prices are set forth is complied with, the Public Administration has the discretionary power to decide on the year from which the figures are used as the basis for calculation and there is no mandatory stipulation in the law. In the past, when the Public Administration announced all selling prices of economic housing units, it used to use the then minimum limit of monthly total income earned by economic housing applicants at the time when the selling prices were announced for calculation of affordable mortgage repayment by an applicant, which served as one of the parameters of purchasing power of the applicant. It never used the minimum limit of income effective during the periods of application or even earlier as the basis for calculation.

Regarding the fact that the minimum limit of income earned by economic housing applicants was set to be the same as the maximum limit of income earned by social housing applicants, the Public Administration

considered that there should be no gap between them and the purpose was to comply with the principle of complementarity of economic housing enshrined in law and converge the policies of social housing, economic housing and private housing market.

According to the content of the complaints, it seemed that there was a confusion between the prerequisites for vetting and approval of applications such as the minimum limit of applicant's monthly income and the pricing criteria for economic housing. In fact, the two factors were not necessarily in line with each other in accordance with law, but the Public Administration only exercised its discretionary power in the implementation of the policies when considering the criteria of applicants' purchasing power. In general, the maximum limit of the monthly income of a two-member household of social housing or the minimum limit of the monthly total income of a two-member household of economic housing at the time when the selling prices were announced served as one of the parameters of the calculation.

Regarding the subsidy ratios of economic housing, the market price of an economic housing unit applied in the calculation is always determined based on the IH's comprehensive evaluation and the estimated prices suggested by three professional property valuation companies. In addition, the IH always clearly indicates the formulas to calculate the subsidy ratios of economic housing. The provision about the formulas to calculate the subsidy ratios in the case of re-selling economic housing units provided for in the former *Economic Housing Law* also did not necessarily stipulate how to choose the market price of the unit. This matter falls within the scope of discretionary power of the Public Administration. Therefore, the accusation that the Public Administration violated the regulations regarding the subsidy ratios was groundless and it was difficult to question the rationality of the relatively objective evaluation means adopted by the Public Administration when exercising its discretionary power.

Following a comprehensive analysis, it was concluded that the content of the Chief Executive Order no. 57/2024 accorded with the stipulations under the former *Economic Housing Law* in terms of its application. Facing the doubts about the selling prices of economic housing in society, the Public Administration and the relevant departments already clarified to the public the calculation methods of the selling prices and subsidy ratios of economic housing in different ways immediately in order to verify the legality of the relevant calculation methods.

The *Economic Housing Law* in force, which was revised and republished in 2020, replaced the criteria of purchasing power with the criteria of cost because the applicants' purchasing power, the location of the buildings and the orientations of the units involved a certain degree of subjectivity, which will make the selling prices not correspond to the real costs. After changing the criteria or factors for determining the selling prices of economic housing as the land premium, construction cost and administrative cost, there

will be no consideration of and dispute over the applicants' purchasing power regarding the criteria for determining the selling prices of the economic housing projects in the New Urban Zone Area A in the future.

The CCAC reported to the Chief Executive on the results of the investigation according to law and it suggested the relevant departments paying more attention to the work of disseminating preliminary information and broadening the general public's knowledge of the legal regime of economic housing in order to enhance residents' knowledge of the purpose and role of construction of economic housing.

(II)

Appropriate supervision over absence due to illness

After the CCAC reported suspected cases of claiming false sick leave by customs officers in April 2024, the Public Administration was highly concerned about the incidents. The CCAC therefore commenced a comprehensive investigation and carried out investigation and analysis on the Medical Inspection Committee's operation and system in relation to sick leave of workers of the Public Administration in a holistic manner. After clarifying the practices of the committee as well as the actual problems encountered and inspecting the implementation of the relevant legal provisions, the CCAC put forward practicable recommendations at a regulatory and operational level.

After a comprehensive analysis of the *Statute of Personnel of the Public Administration of Macao* in force and in particular Articles 104 and 105 therein, and Article 33 of Decree Law no. 81/99/M in force and other legal provisions as well as relevant judicial opinions related to the Medical Inspection Committee, and after in-depth understanding of the practical operating procedures of the aforesaid Committee, the CCAC confirmed that the Health Bureau has already learned from the experience through some court decisions so as to improve the content of the opinions issued by the committee and the notification procedures, etc. In addition, it also reminded other departments to remind their employees to arrange their personnel to receive assessment of their health status by the aforesaid committee as soon as possible through the circulars issued by the Public Administration and Civil Service Bureau, so as to ensure compliance with the relevant legal requirements.

However, there is still room for improvement in terms of its operation. In particular, the Public Administration should strengthen the legal training for the members of the Medical Inspection Committee, restructure the composition of the personnel and reasonably increase the distribution of resources, so as to create conditions for the sound operation of the Medical Inspection Committee for the effective implementation of the duties conferred on it by law.

As regards the regime, the Public Administration may draw reference from the relevant legislative orientation from abroad (particularly Portugal) and make it compulsory, through the regime, for public services and workers subject to assessment of the conditions of illness to present, on their own initiative, medical reports, among other documents and information that may truly reveal the medical conditions. In addition, the duty of prior consent of workers subject to assessment of the conditions should be reinforced, and when necessary, the competence of the Medical Inspection Committee to consult information may be strengthened so as to ensure that it has sufficient conditions to promptly conclude the assessment of the medical conditions or the ability to return to work of these workers, which allows the committee to better fulfil its legal duties, thus safeguarding the effectiveness and sound operation of the regime of absence due to illness.

In addition, the CCAC also submitted, in accordance with its powers, a proposal to revise the law on the measures and systems used to verify whether personnel who is absent from work due to illness is recovering from the illness at home.

After the results of the investigations and suggestions for improvement were presented by the CCAC to the Chief Executive, the cases received great attention from the Public Administration. The Secretariat for Administration and Justice and the Secretariat for Social Affairs and Culture agreed with and accepted the opinions and suggestions stated in the report, thus initiating the review of the regime of absence due to illness provided for in the *Statute of Personnel of the Public Administration of Macao* and carrying out review and improvement of the operation of the Medical Inspection Committee.

(III)

Procedures and forms should be decided according to law

The CCAC received a complaint claiming that the Cultural Affairs Bureau (IC) suddenly suspended the written consultation process for the activity entitled “2022 Christmas and New Year’s Eve Concerts” without any justification and hired a private consultancy company to carry out the relevant procurement of goods and services on behalf of the IC, thus suspecting the existence of “under-the-table deals” and transfer of interest and requesting the intervention of the CCAC.

After investigation, it was found that in 2022, the IC and the six integrated resort enterprises in Macao cooperated and reached a consensus that the expenses for holding the “2022 Christmas and New Year’s Eve Concerts” would be borne by the latter. Subsequently, the IC conducted a written consultation for the

procurement of “stage performance” and “lighting and audio” services for the aforesaid activity. However, due to internal procedural issues, the consultation procedure had to be terminated. Despite that there was no evidence proving the existence of unlawful acts in the case, the lack of clear written records and the failure to provide timely clarification to the companies invited under the said consultation caused the relevant procedure to give rise to various types of suspicion.

However, following the investigation, it was found that there was no written agreement as such on the cooperation between the IC and the six integrated resort enterprises, and therefore there were no express provisions on such aspects as the concrete work to be performed and the distribution of responsibilities between the two parties. This means that the application of the provisions of the *Administrative Procedure Code* on administrative contracts in the establishment of cooperation relations with private individuals was neglected in this case. Later on, as regards the work related to the procurement of services, which should originally be carried out by the six integrated resort enterprises or coordinated by a consultancy company hired by them for this purpose, the IC directly hired a consultancy company for the six integrated resort enterprises under the regime of procurement of goods and services provided for in Decree Law no. 122/84/M and provided support in the respective procurement and award procedures in the name of that company. This demonstrates that the private procurement activity was wrongly treated as a public activity. At the same time, representatives of the six integrated resort enterprises were allowed to form, together with the IC, an evaluation committee to select and evaluate the proposals. Moreover, there was a lack of regulation of the means of appeal in the procedure of procurement of goods and services concerned. All of these demonstrate the non-compliance with the legal provisions in force.

Given the above situations, the CCAC issued recommendations to the IC urging it to conduct a thorough and serious review of the decisions and actions taken in relation to the activity in question. In particular, it should appropriately choose the form of the cooperation agreement, correctly define the various legal relationships involved and ensure the legality and reasonableness of the procedure for the procurement of goods and services.

The IC accepted the CCAC’s recommendations and set up an interdepartmental internal working group to conduct a thorough analysis of the content of the recommendations. After a comprehensive review of the coordination work and the procedures, the IC stated that, when organising events in the future, it will clearly define the objectives and grounds for organising them in the relevant proposals, and that when an event involves co-organisation by other parties, a written agreement will also be established in which the rights and responsibilities of all parties involved will be clearly defined and different legal regimes and administrative procedures will be applied depending on specific situations.

(IV)**Sports training should be carried out in accordance with
the principle of proportionality**

The CCAC received a complaint stating that members of a sports team of the disciplinary forces did not need to report for duty when training for and playing in the competitions organised by the relevant local general sports association and the time spent on such activities was counted as working hours, thus giving rise to suspicions of administrative illegality and injustice to the personnel who were not the members of the team.

It was discovered in the investigation that the police officers who joined the Sports Group of the Public Security Police Force (CPSP) did not work at the police stations for 10 to 15 hours every week due to training for the competitions, but such hours were still considered as working hours. As 44 hours of weekly work are the minimum required for receiving additional remuneration, the time spent on regular training alone already occupied 23% to 34% of the statutory weekly working hours. On competition days, the time spent for this purpose (including the time before and after the competition) was seven to nine hours, which were also counted as working hours and, therefore, the number of hours of training sessions and competitions per week increased to 17 to 22 hours, taking up 40% to 50% of the total number of weekly working hours.

Following a legal analysis, the CCAC considered that participation in competitions organised by local general sports associations does not fall within the scope of the exemption from performing duties provided for in Article 18 of Decree Law no. 67/93/M. Unless there is information that demonstrates and confirms that the activity is of an official nature, counting the relevant time as working hours will give rise to suspicions of administrative illegality. In addition, the significant number of hours spent on training sessions and competitions compared to the number of working hours also implies a violation of the principle of proportionality. Furthermore, as police work involves many instant practical tasks, the police officers' participation in sports training or competitions not only caused inconvenience due to the need of replacing their posts but also gave rise to possible conflicts between co-workers.

The CPSP accepted the recommendations rendered by the CCAC. In addition, the competent entity issued an instruction following a review of the issues of public security personnel's participation in sports training and competitions, which stipulates the participation in sports competitions or activities under the name of a department or the welfare association of a department, in principle, is not considered as carrying out duties assigned by the superior and the case of exemption from exercise of duties, unless they represent Macao in the competitions as provided for in Article 18 of Decree-Law no. 67/93/M or participate in the

sports competitions against the counterparts outside the Region and the relevant training. However, in the latter case, the number of training hours shall not exceed the required maximum. Eventually, the relevant departments adopted measures in accordance with the instruction.

(V)

Training of speech training personnel should be under proper supervision

The CCAC received a complaint indicating that the Education and Youth Development Bureau (DSEDJ) had organised short-term courses to train a lot of speech trainers over the years, while the speech training services provided by them at social service organisations were similar to the professional services provided by speech-language therapists, which was unfair to the speech-language therapists who had bachelor's degrees and licenses to practise the profession.

Following an investigation, the CCAC verified that the DSEDJ used to organise courses to train speech trainers due to high demand for speech therapy and training for local students and insufficient number of speech-language therapists in Macao. Therefore, it provided training on speech training skills for professionals including qualified teachers, counsellors and social workers so that upon completion of the courses, they could provide speech training services for students in need at schools or social service organisations, but the content of the relevant courses did not involve speech therapy. During the investigation, the CCAC did not find that the speech trainers who had completed the courses "usurped" the positions of speech-language therapists by providing the services that only they were qualified to provide.

However, the CCAC also found in the investigation that the DSEDJ has not yet established any clear instructions to regulate the scope of functions of the speech trainers and the consequences of violating the relevant regulations, which is not conducive to the carrying out of supervision. After the CCAC raised the opinions, the DSEDJ formulated the *Guidelines on the Job Content of Speech Trainers* for implementation by the schools and organisations subsidised to provide speech training services in order to improve the relevant supervision work.

(VI)

Strengthening supervision to avoid confusions

In the exercise of its duties, the CCAC found that there were deficiencies in the supervisory mechanism of the Education and Youth Development Bureau (DSEDJ) and the former Education Development Fund regarding the construction works and procurement of information technology equipment of subsidised

schools. Therefore, it took the initiative to commence an inquiry file in order to follow up the matter.

Following the investigation, it was discovered that the subsidising regulations and the relevant instructions formulated by the competent authorities in the past lacked specifications on the procedure of selecting recipients of written consultations, the recusal system and the consequences of not abiding by the rules, among other issues, making it disadvantageous to the carrying out of the supervision. After the CCAC expressed its views, the DSEDJ and the newly established Education Fund expressed agreement on the views and adopted measures to review and improve the relevant regulations and instructions, namely by requiring the procurement personnel of the schools to declare whether they should recuse themselves from the procedures and stipulating the consequences of violating the regulations, among others. Furthermore, they also drew up a checklist regarding the relevant procurement procedures, which allowed the schools to accurately verify whether all procurement work was carried out in accordance with the stipulated requirements. In addition, driven by the CCAC, the competent authorities commenced the establishment of a database of suppliers of information technology equipment, from which the schools should randomly select the recipients of written consultations in the future in order to regulate the method of their selection of the recipients of written consultations.

Meanwhile, after reviewing the reports submitted by the schools that had joined the subsidy scheme, the Education Fund required some of the schools that failed to meet the requirements for subsidy claim to return the respective funds. At the same time, it also improved the relevant subsidising procedures and strengthened the supervision in order to ensure that the procurement procedures carried out and the documents submitted by the schools are in accordance with the relevant laws and instructions.

(VII)

Shift allowance should be paid according to the work actually done

Some nursing workers (nurses and health assistants) of the Health Bureau (SS) complained to the CCAC that when the mass nucleic acid tests took place, some nursing workers carried out shift work for which the shift allowance should be paid according to the law, but they lost the shift allowance because they were not arranged to provide services on any day of the weekends or public holidays in that month.

Following the investigation, it was discovered that according to the relevant special career regime of the SS, shift work is counted on a monthly basis, including that carried out on Saturdays, Sundays and public holidays. Therefore, the premise that the shift allowance can be granted only when the worker has been on duty on any day of the Saturdays, Sundays or public holidays in that month has been introduced.

Following an analysis, it was found that the shift allowance for nursing workers should be calculated based on each of the shift periods in accordance with the relevant special career regime, while working on shift during daytime on Saturdays, Sundays and public holidays is considered to be one of the situations in which the shift allowance should be paid for. Therefore, as long as the shift period is that specified by the lawmaker, the shift allowance should be paid. Also, it was not found that the lawmaker has stipulated any other prerequisites. In fact, according to the proposal on the bill of the *Career Regime of Nurses* made by the temporary committee formed for analysis of the bills related to the public service regime in the past, the purpose of the lawmaker's change of the night work allowance to be shift allowance calculated based on the specific period in which the work is carried out was to implement the principle of "getting more pay for working more" and compensate the shift workers for extra physical and mental exhaustion. In this sense, the premise introduced by the SS that the shift allowance should be granted "only if the shift work has been carried out on any day of the Saturdays, Sundays or public holidays in a month" apparently contradicts the legislative intention of "getting more pay for working more".

After the CCAC expressed the stance described above, the SS accepted the suggestions of the CCAC. Starting from February 2024, all personnel in the special career categories of the SS can be granted the shift allowance even if they have not carried out shift work on Saturdays, Sundays or public holidays.

(VIII)

Right to receive notification about contract awarding shall be defended in accordance with law

In the course of handling a case involving an awarding (invitation tender/consultation tender) of tourism promotion services at the tourist information counters by the Macao Government Tourism Office (MGTO) between January 2020 and December 2022, the CCAC found that the ways of notifying the results of the contract awarding were relatively casual and non-compliant with any rules. For example, in the same consultation tender process, the notification to the successful tenderer was sent by mail, but the notification to the unsuccessful tenderers was made by phone. In another invitation to submit proposals, the notification of the results was made by e-mail, regardless of whether the recipients were successful or unsuccessful tenderers. In addition, in the open tender processes for procurement of services carried out between 2024 and 2025, the notification of the results was not made in the statutory way (by registered mail with advice of delivery).

Meanwhile, the CCAC also found that an "objection" filed by a complainant over the result of a consultation tender was treated by the MGTO as an enquiry and opinion. In addition, in the relevant

notification of the awarding result, the MGTO did not mention to the unsuccessful tenderers the reasons for not being awarded the contract as well as the information about filing an objection in accordance with the law (including the entities competent to process the objection about the decision of the awarding, the deadline for the submission of the objection and the possibility of filing a judicial appeal, among others). In the response to the relevant enquiry, the aforesaid information was not provided. Apparently, the complainants' rights to file an objection and judicial appeal, that were protected by the law, could not be exercised effectively. It was impossible for them to defend their legally protected rights and interests through objection and/or judicial means.

When the CCAC discovered the problem, more than two years had passed since the issuance of the relevant notifications and the period for filing a judicial appeal had already expired. The voidable defect has been redressed as the period for judicial appeal has elapsed.

According to the data collected, since 2020, in various tenders for provision of services at the Tourist Information Counters under the MGTO, regardless of the procurement method (written consultation or public tender) and the form of notification (by phone, by e-mail or via the MGTO's website), the reasons for failure to be awarded the contracts were not indicated in almost all the notifications of the results made to the unsuccessful parties, including both the submitters of quotations and tenderers. Also, the information such as the means of and deadlines for filing an objection and the possibility to file a judicial appeal, etc. were not indicated in all of the notifications.

Considering that the Public Administration shall act in accordance with the law, be responsible for the information provided in writing and act in good faith, it is necessary to draw the MGTO's attention to the mandatory indication of the reasons for the decision of awarding, the means of filing an objection and the possibility to file a judicial appeal, among other information, in future notifications, as well as the implementation, in practice, of the provisions regarding the administrative guarantees such as complaints and hierarchical appeals.

Following the CCAC's intervention, the MGTO started making all notifications in written form, while the notifications about open tendering were sent by registered mail with advice of delivery in accordance with the law. At the same time, in the written response to the CCAC, the MGTO promised to provide the personnel responsible for the relevant work with further clarification of the procedure and the form of notification and encouraged them to take the relevant training courses in order to ensure that they would thoroughly understand and abide by the relevant laws.

Meanwhile, in the written response to the CCAC, the MGTO also admitted that when assessing the letter from the complainant, it only took into consideration its contents and neglected its purpose. The MGTO promised that when dealing with the requests or complaints with identical or similar doubts on the scoring criteria or content in the future, it would give priority to the consideration that the relevant requests or complaints should be complaints against the results, and the relevant responses would be made in accordance with the procedures of handling objections. Furthermore, when the response is about rejection to the objection, the information on the possibility to file a hierarchical appeal, the competent body that receives and accesses the hierarchical appeal, the deadline and the possibility to file a judicial appeal, among other information, will be indicated in the relevant notification in accordance with the law.

In addition, the MGTO also stated to the CCAC in writing that in order to optimise the specific content of the notifications of contract awarding, in February 2024, the MGTO, through internal notice, reminded its subunits that when the interested party is notified of the administrative act (the decision of awarding), Article 70 of the *Administrative Procedure Code* shall be complied with, particularly the provisions under Paragraphs c) and d) of the article, and relevant content shall be detailed in a table and specified with examples.

The above shows that after the intervention of the CCAC, the MGTO accepted its stance, realised the problems existing in the previous practices and adopted corrective measures in order to prevent the reoccurrence of similar problems in the future.

(IX)

Vetting procedure must be carried out according to the regulations when there is an increase in standard

According to a complaint, the complainant who obtained approval for a motorcycle model involved in the case from the Transport Bureau (DSAT) in 2020 submitted a report of compliance with the new exhaust gas emission standard according to Chief Executive Order no. 111/2022, but on the grounds that the production of the motorcycle model involved in the case had ceased, the DSAT rejected the continual use of the original approval. Therefore, the complainant doubted if there was administrative illegality and impropriety of the DSAT in handling the matter.

After investigation, it was found that the approval for the motorcycle model originally held by the complainant was valid and legal. However, since the exhaust gas emission standard has been enhanced according to Chief Executive Order no. 111/2022, it is necessary to submit a report of compliance with the

new standard within the effective dates in order that the approval can be used continuously. According to Paragraphs 1 and 5 of Article 4 of Administrative Regulation of *Setting the Limits for Emissions of Gaseous Pollutants to be Complied with by New Imported Motorcycles and Mopeds*, applicants who have already been granted approval only need to submit proofs of compliance with the new standard to the DSAT when the vehicles are imported for the first time and it is not necessary to re-examine all other statutory documents.

Nevertheless, the DSAT started afresh the vetting and approval procedures and “cancelled” the approval originally obtained by the complainant based on the reason unrelated to the new exhaust gas emission standard. Moreover, the DSAT failed to provide the complainant with chances to be heard and directly disapproved his application, resulting that the applicant’s right to be heard could not be safeguarded.

After the intervention of the CCAC, the DSAT already rectified the vetting and approval procedures regarding the new exhaust gas emission standard. For vehicles which were granted approval prior to the entry into force of Chief Executive Order no. 111/2022, if reports of compliance with the new standard are submitted within the effective dates, the approval granted can be used continuously until the expiry date. The DSAT also stated that it will optimise its vetting and approval procedures and ensure that the implementation is carried out according to Article 93 and relevant regulations of *Administrative Procedure Code*, including holding a hearing for interested parties, notifying them of the body to which complaints can be filed and the period for filing complaints when decisions have been made.

(X)

Existing written record may serve as evidence

A parent filed a complaint to the CCAC, claiming that he had raised an objection against a decision made by the class committee of the public school where his son was studying regarding the dispute on his son’s academic results, but the complainant has not yet received any result of the complaint.

Upon analysing the document provided by the Education and Youth Development Bureau (DSEDJ), the CCAC realised that the DSEDJ had met with the complainant and his lawyer for three times successively, during which the DSEDJ informed and explained to the complainant about the issues relevant to the complaint and the lack of legitimacy to file the relevant complaint.

However, the aforementioned document was prepared by the DSEDJ only at the request of the CCAC. The DSEDJ actually did not make any written document such as minutes or records of meetings or others

based on their conversations and decisions during the meetings. As such, there was a lack of a written record which included the signature of the complainant and which demonstrated that the complainant had clearly understood the informed content. The aforementioned lack easily raised doubts as to the authenticity and certainty of the relevant meetings and the informed content. It was exactly after the meetings that the complainant filed a complaint to the CCAC, claiming that the DSEDJ failed to reply to his complaint.

Therefore, the CCAC suggested the DSEDJ make a written record for the decisions made regarding any objections or complaints in the future and make a written record upon in-person notification which serves as evidence of the relevant act of notification. For example, the DSEDJ can write a remark in the case file showing the date of a notification act and including the signature of the person being notified, or the DSEDJ can obtain a declaration from the person being notified who declares that he clearly understands relevant content, coupled with his signature and the date.

III. Retrospective review

In 2024, to continuously exercise the CCAC's power of supervising the improvement of governance of competent departments and entities conferred upon by the law, the CCAC sustained its efforts in implementing the work related to "retrospective review" within the scope of the ombudsman's duty. In 2024, six cases were included in the list of "retrospective review".

According to the data, along with the cases brought forward between 2021 and 2023 which were still effective, eight cases were included in the list of "retrospective review". In 2024, seven cases were removed from the list upon completion of retrospective review.

(I)

As regards the implementation of the carrying out of measures to reinforce the recusal system by the Collegiate Bodies of the Macao Foundation, the CCAC included the relevant case in the list of "retrospective review" in 2022. Upon carrying out the relevant work of retrospective review in 2023, given that the Macao Foundation has already carried out various measures to reinforce the carrying out of the recusal system and implement effective regulations that members of the Collegiate Bodies should recuse themselves from participating in the vetting and approval and voting procedures, the CCAC removed the relevant case from the list of "retrospective review".

(II)

As regards the implementation of reinforcement of supervision over sports associations and the youth academies by the Sports Bureau (ID), the CCAC included the relevant case in the list of "retrospective review" in 2022 and carried out the work of retrospective review in 2023.

Information showed that in response to the suggestions by the CCAC, the ID has already carried out measures to improve and optimise the operational mechanism and the means of selection of the youth academies and stipulated various supervision measures and recusal mechanisms, among others, in the agreements entered into with the sports associations. However, during the process of "retrospective review", the CCAC found that the "disclaimer" contained in the rules and regulations of a competition by a sports association had allegedly violated the law of *General Contractual Clauses*. Therefore, the CCAC once again reflected its opinions to the ID, which replied afterwards, saying that it had already requested the relevant sports association to optimise the wordings of the rules and regulations of the competition and

it would continue to carry out respective supervision.

As the ID has already carried out various improvement measures and exercised the functions of supervising sports associations according to law, the CCAC removed the relevant case from the list of "retrospective review".

(III)

The CCAC received a complaint from a staff of the Macao Government Tourism Office (MGTO), claiming that he had served in the class of 1st grade senior officer for two years and should be entitled to promote to the next rank according to law. However, the MGTO considered that the two special assessments conducted to the complainant during which he was temporarily appointed as 2nd grade senior officer had already served as the purpose for promotion to the position of 1st grade senior officer. In spite of the fact that he had served in the class of 1st grade senior officer for two years, he had just completed one ordinary assessment and one summative assessment during his time of service in his original rank. In order to meet all the requirements necessary for promotion to the 2nd grade, an ordinary assessment had to be conducted for the second time and a certain rating had to be achieved. Therefore, the complainant doubted if the MGTO had misinterpreted the statutory requirements relevant to the rank and class promotion as stated in Articles 13 and 14 of the *Regime of Public Service Positions*, which led to unfair treatment between civil servants admitted in the first and second half of the year respectively.

Upon intervention by the CCAC, it was verified that the Public Administration and Civil Service Bureau (SAFP) had provided its opinions to the MGTO and agreed with how the MGTO handled the relevant case. However, after random inspection by the CCAC, it was found that currently some departments handle matters of promotion to the next class with ways which are more favourable to their staff. As long as an ordinary assessment is conducted to a relevant staff with an assessment rating of "very satisfactory" during his time of service in his original rank, the requirements of the rank and class promotion are met.

After analysis, the CCAC considers that the legislation currently in force does not expressly stipulate that ratings of ordinary assessment should be obtained twice in order to be qualified to be promoted. To ensure all departments implement the system uniformly, the CCAC has requested the SAFP to coordinate such matter.

In order to continuously supervise the implementation of relevant measures, the CCAC included the case in the list of "retrospective review" so as to follow up the progress regarding the collaboration between the SAFP and other departments in order to promote the standardisation and transparency of the implementation of the system.

(IV)

According to a complaint received by the CCAC, a complainant claimed that the China-Macau Dragon Boat Association (CMDDB), despite having received subsidies regularly from the Sports Bureau (ID), continued to charge fees from its members for using the dragon-boats for training at the Nam Van Lake Nautical Centre. The complainant therefore doubted about the inappropriateness of such actions.

It was verified after investigation that the CMDDB indeed lent some dragon boats to the public for carrying out regular training at the Nam Van Lake Nautical Centre and charged them fees in accordance with the principle of a non-profit organisation in order to pay for expenses for lifeguards, insurance and maintenance of boats, among other expenses. The relevant regular training and the charging plan had already been approved by the ID.

However, during the investigation, it was found that the ID was negligent in the process of vetting and approving the aforementioned applications and did not notice that the CMDDB had repurposed the dragon boats used by training teams to carry out training free of charge as rental dragon boats used by its members, despite the fact that the dragon boats were purchased under government subsidies. The purpose of subsidies has been changed by nature. The ID did not analyse and follow up issues relevant to the rationality about the change of the purpose of subsidies, the supervision measures and so forth. As regards the information submitted by the CMDDB, the ID also failed to make a thorough inspection. It was not until the intervention of the CCAC that the ID discovered that half of the involved dragon boats were public assets purchased through public procurement procedures and were not assets freely manipulated and used by the CMDDB.

Moreover, during the investigation, the CCAC also found out that the ID intended to open the Nam Van Lake Nautical Centre to the public through the regular training scheme carried out by the CMDDB. However, the ID did not thoroughly consider that a series of legal problems would arise from the opening of the facility through the aforementioned scheme of the CMDDB, particularly about the attribution of responsibilities if incidents occurred.

Upon the intervention of the CCAC, the ID stated that the CMDDB had already suspended the relevant regular training scheme and that the ID would take this opportunity to review the situation of the implementation of the scheme by the CMDDB in the past, evaluate the sustainability of the scheme, supervision ways and issues of charging fees and would take reference from the opinions of the CCAC in order to optimise the content of the scheme.

The CCAC has already included the case in the list of “retrospective review” in order to continue to pay attention to the supervision conducted by the ID regarding any scheme or follow-up actions concerning the use of the Nam Van Lake Nautical Centre by the relevant team and its personnel.

IV. Departments or entities with positive attitudes

In 2024, the CCAC increased exchange opportunities and direct communication with departments and entities, namely with the Cultural Affairs Bureau, the Health Bureau, the Education and Youth Development Bureau, the Legal Affairs Bureau, the Public Administration and Civil Service Bureau, among others, where some complicated legal issues or specific governance measures were discussed and a consensus was reached. This type of useful contacts undoubtedly favoured the CCAC to exert its function as an Ombudsman and facilitated administrative departments or entities to govern according to law in a more precise way.

Departments or entities	Involved issues	Responses to CCAC's opinions	Follow-up actions by the departments
Housing Bureau	Permission given by the management body of a building to the residents to park vehicles in public places of the building which affects fire safety	The department has taken appropriate actions.	The department has already performed its duty to recommend the management body of the building to carry out corrections and transferred the part involving fire safety issues to the competent departments for follow-up actions.
Correctional Services Bureau	Work guidelines of the Youth Correctional Institution regarding the delivery of articles from outside to juvenile delinquents	The department has taken appropriate actions.	The department has carried out measures to optimise its relevant guidelines and handling procedures.

The background features a series of overlapping geometric shapes in various shades of blue, creating a dynamic, layered effect. A prominent dark blue horizontal band serves as a platform for the text. Several thin white lines are scattered across the composition, some connecting different geometric elements and others extending independently. At the bottom right, there is a solid white trapezoidal shape.

PART IV

PROMOTION AND EDUCATION

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In 2024, the CCAC implemented the “youth-oriented” approach in its promotion work. Through launching some brand-new activities and arranging young people and volunteers to visit the Greater Bay Area or to strengthen their communication with the young people in the GBA, it aimed to further widen the international perspectives and the horizons about integrity of young people and allow them to have more opportunities to directly participate in various types of work related to integrity building. The CCAC also launched training on integrity awareness and education specially for educators so as to strengthen its support for integrity education.

The CCAC was dedicated to strengthening the awareness of integrity in the public and private sectors. Based on the characteristics of the cases investigated by the CCAC, it optimised the training materials and introduced new ones in a timely manner to suit different targets and explained the relevant topics by case examples. It also continuously carried out training through online and offline approaches in order to heighten the integrity and law-abiding awareness of public servants and personnel of private entities. The law of *Prevention and Suppression of Bribery in the Private Sector* and the law of *Prevention and Suppression of Bribery in External Trade* were highlighted in the relevant promotion work according to the long-term promotion plan “All for Integrity”, so as to allow the general public to have better understanding of the corruption prevention laws in the private sector.

As regards its regular education work, in 2024, the CCAC held a total of 622 seminars, talks, training workshops and activities of different types, which recorded 41,901 participants who were mainly public servants, leaders and employees of private entities, teenagers, students of higher education institutions, secondary schools, primary schools and kindergartens and the general public. The statistics are shown in the following table:

Statistics of education on corruption prevention in 2024

Topic	Target	No. of sessions	No. of participants
Seminars on Integrity and Observance, Public Procurement, Noble Character and Righteous Conduct, Declaration of Assets and Interests	Public servants	75	5,196
E-learning course entitled "Uphold Your Integrity"	Public servants	4	331
Talk on the law of <i>Prevention and Suppression of Bribery in the Private Sector</i>	Private entities, public departments, education institutions	79	4,438
Seminars/activities on integrity awareness	Civic associations, public departments, education institutions	40	1,381
Seminars/activities on integrity education	Teenagers, students of higher education institutions, secondary schools, primary schools and kindergartens and organisation members	424	30,555
Total		622	41,901

I. Education on corruption prevention for the public sector

The CCAC has all along been working closely with public departments so as to deepen public servants' understanding of corruption prevention laws and enhance their alertness to corruption risks. In recent years, it has been carrying out corruption prevention education targeting public entities through online and offline approaches. By promoting the information about integrity through regular seminars and WeChat infographics as well as launching learning videos of different topics on the dedicated webpage entitled "Webpage on information about integrity for public servants", it aims to encourage public servants to engage in self-directed learning and continuously strengthen their integrity awareness.

(1) Seminars on integrity for public servants

In order to consolidate the probity culture of public departments and the integrity awareness of public servants, the CCAC continuously organises integrity seminars of different topics and optimises the training materials as well as introduces new ones in a timely manner. Take, for instance, the training activity targeting public servants to be promoted to Grade 5. A modular seminar “Rights and Responsibilities of Public Servants – Integrity and Law-abiding Awareness” has been added to it so as to deepen public servants’ understanding of the relevant laws and reduce the risk of inadvertent violation of the laws. In 2024, the CCAC held a total of 75 seminars for 5,196 public servants from 19 departments/institutions.

(2) Ongoing launch of an e-learning course entitled “Uphold Your Integrity” and update of the “Webpage on information about integrity for public servants”

To tie in with the government’s promotion of online learning, the CCAC continues to launch the e-learning course entitled “Uphold Your Integrity” in collaboration with the Public Administration and Civil Service Bureau to strengthen the integrity and law-abiding awareness of public servants. In 2024, a total of four sessions of the aforesaid e-learning course were launched, recording 331 participants from 45 departments/institutions.

In addition, the CCAC has been continuously updating the “Webpage on information about integrity for public servants”, with videos of different topics adapted from cases detected by the CCAC being regularly uploaded to the column “Academy of Integrity”, with a view to introducing to public servants the provisions about exclusiveness under the legal regime of public service and those about other commonly seen duty-related crimes, such as abuse of power, document forgery, embezzlement and breach of secrecy.

II. Education on corruption prevention for the private sector

The CCAC strives to establish partnership with private entities in corruption prevention. It strengthens communication with the sectors and carries out relevant corruption prevention education such that the probity culture can take root in society. In 2024, the CCAC focused its promotion on the law of *Prevention and Suppression of Bribery in the Private Sector* and the law of *Prevention and Suppression of Bribery in External Trade*.

(1) Seminars on integrity for the private sector

The CCAC continuously organises talks for the private sector on the law of *Prevention and Suppression of Bribery in the Private Sector*. It also provides professional training courses at the invitation of education institutions in Macao. In addition to introducing the provisions of the law, it also designs the content of seminars or courses according to the needs of individuals or institutions from different sectors. In 2024, the

CCAC held a total of 79 talks for bank employees, employees of integrated resort enterprises, small and medium enterprises, personnel of subsidised institutions and intermediaries of real estate agencies, which recorded a total of 4,438 participants.

(2) Facilitating and participating in the compilation of the *Guide on Doing Business with Integrity for the Guangdong-Hong Kong-Macao Greater Bay Area*

As the motherland has further deepened the development of the Guangdong-Hong Kong-Macao Greater Bay Area, the Guangdong Provincial Commission of Supervision, the Independent Commission Against Corruption (ICAC) of Hong Kong and the CCAC of Macao have all along been maintaining close cooperation to jointly take forward integrity building and anti-corruption work. To actively foster a clean business environment in the Great Bay Area, the graft fighters of the three places are joining hands to compile the *Guide on Doing Business with Integrity for the Guangdong-Hong Kong-Macao Greater Bay Area* (hereinafter referred to as the *Guide*), which will serve as a useful corruption prevention guide for businesspersons.

In April 2024, the representatives of the CCAC attended the “Working Meeting of the Guide on Doing Business in the Three Places” in Guangzhou, Guangdong, where they had discussion with the Guangdong Provincial Commission of Supervision and the ICAC of Hong Kong about the details to be set out in the *Guide*. The compilation of the *Guide* was taken forward in an orderly manner.

(3) Tying in with promotion plan “All for Integrity” by launching brand-new promotion and education projects to enhance the probity culture of the private sector

In 2024, the CCAC continued to take forward the promotion plan “All for Integrity”. Based on the essence of the law of *Prevention and Suppression of Bribery in the Private Sector* and the law of *Prevention and Suppression of Bribery in External Trade*, it launched brand-new integrity promotion projects, including the launch of the workshop promoting the value of probity culture of the private sector and the production of practical information programmes that facilitated small and medium enterprises to know corruption prevention techniques, so as to gradually foster a corruption prevention culture in the private sector.

1. Launch of the “Workshop on Value of Integrity”

As the private sector is attaching greater importance to and has a higher demand for integrity training, the CCAC has optimised its integrity education activities targeting employees and management of the private sector based on its existing training. In April 2024, the Branch Office in Taipa launched the more targeted “Workshop on Value of Integrity” as an extension training activity on integrity. Through case

analyses, questionnaires on integrity, interactive discussions, guided tours and visits, it aimed to increase the participants' understanding of the anti-corruption laws and integrity in the workplace and foster a probity culture in the workplace with enterprises and civic associations. The CCAC organised a total of 14 sessions of the workshop in the year, which recorded 269 participants from some enterprises and civic associations.

2. Production of an information programme on corruption prevention entitled *Doing Business with Integrity* for youth entrepreneurs

To allow youth entrepreneurs and management personnel of start-ups to understand the provisions of corruption prevention laws for the private sector and to keep companies away from corruption risks, the CCAC joined hands with the Macao Youth Federation to produce an information video programme on corruption prevention entitled *Doing Business with Integrity* for youth entrepreneurs, where the personnel of the CCAC acted as the moderators and visited different local private enterprises. Practical tips on corruption prevention were provided according to the characteristics of each industry and information about integrity was also promoted to audience. The aforesaid programme was broadcast by different media platforms starting from October 2024.

3. WeChat quiz game entitled "Make a Coffee for Yourself"

The CCAC launched a WeChat quiz game entitled "Make a Coffee for Yourself" between August and September in 2024, aiming to introduce the law of *Prevention and Suppression of Bribery in the Private Sector* and the law of *Prevention and Suppression of Bribery in External Trade* through fun games and make residents have deeper understanding of the anti-corruption work of the CCAC.

4. Other relevant promotion

The CCAC continuously uploads learning videos of different topics at its dedicated webpage of the law of *Prevention and Suppression of Bribery in the Private Sector* and introduces the functions of the CCAC, the aforesaid law and the relevant corruption prevention laws on duty-related crimes through WeChat infographics and thematic clips.

III. Integrity education for young people

The CCAC attaches importance to nurturing the new generation of Macao and hopes to help young people establish correct moral values such as integrity and honesty. In 2024, in addition to carrying out education work for students of higher education, secondary schools, primary schools and kindergartens through diversified approaches and multi-faceted promotion, the CCAC also further cooperated with the education sector so as to strengthen its support for integrity education, make shared efforts to promote the

culture of probity and honesty among young people and actively lead the new generation of Macao to gain a deeper understanding of the importance of integrity building for social development.

Statistics of integrity education work for young people in 2024

Programme	No. of sessions	No. of participants
Seminar on Honesty for Higher Education Students	12	680
Education Programme on Honesty for Teenagers	128	9,835
A Talk on Honesty for Graduates	19	1,722
"New Generation of Integrity" – Education Programme on Honesty for Primary Students	157	5,005
Theatre-in-education activity "Spend the Children's Day with the Messenger Bear William 2024 - An Unpleasant Memory about Greed"	35	5,753
"Love Integrity" – On-Campus Activity for Primary Students	32	6,135
Integrity Study Tour – Integrity Experience Programme for Young People	41	1,425
Total	424	30,555

(1) Integrity and honesty education for higher education students

1. Thematic seminars on integrity and honesty education for higher education students

The CCAC has all along been maintaining liaison and collaboration with higher education institutions of Macao. Together with the University of Macau, the Academy of Public Security Forces of Macao and the Macau University of Science and Technology, it held a total of 12 sessions of the “Seminars on Honesty for Higher Education Students” in 2024, with the participation of 680 students. With the *law of Prevention and Suppression of Bribery in the Private Sector* as the theme, the seminar aimed to make students reflect on the harmful impact of corruption on society and individuals and develop a zero-tolerance attitude towards corruption.

2. Providing internship opportunities for young students to participate in integrity promotion

The CCAC endeavoured to strengthen the honesty education for young students and cooperation with higher education institutions through providing internship opportunities for students of higher education institutions. In 2024, a total of nine students from year three onwards and postgraduates from the University of Macau, the Macao Polytechnic University and the Macau University of Science and Technology participated in the “internship programme for students of higher education institutions”, where they mainly provided assistance in the integrity promotion and education work for the CCAC. In 2024, some of the interns even assisted in the shooting of the CCAC’s micro-movie about the fight against corruption.

3. Launch of the learning website on integrity awareness for higher education students entitled “Become a Person of Integrity through Self-Study”

To allow higher education students to understand the legal regimes of corruption prevention of Macao’s private sector in a flexible way and to heighten their alertness to corruption, the CCAC has launched a learning website about integrity awareness entitled “Become a Person of Integrity through Self-Study” for higher education students. The website features online learning courses for higher education students and encourages them to self-study. Students may understand the relevant regimes and legal responsibilities of the corruption prevention of the private sector through animated videos and case analyses and may obtain a certificate upon completion of an online test.

4. On-campus promotion of corruption prevention knowledge for higher education students

The CCAC participated in the “Crime Prevention Week” held by Macao Polytechnic University

in September, where it spread the messages about corruption prevention and law-abidingness so as to heighten the integrity awareness of young people. The CCAC created an evidence-gathering game for higher education students, which, by analysing the main points of corruption cases, allowed them to learn about the corruption prevention laws of Macao and the online learning resources of the CCAC.

5. "Integrity Study Tour – Integrity Experience Programme for Young People"

Positioned as an integrity education base for young people, the Branch Office in Taipa continued to organise the "Integrity Study Tour – Integrity Experience Programme for Young People" in 2024 for higher education students and secondary students. Participation in this program was initiated and organised by the education institutions themselves. Through the multi-media interactive facilities, they were able to experience and learn the functions of the CCAC and the relevant laws simultaneously. In 2024, a total of 41 sessions of the aforesaid activity were held at the Branch Office in Taipa, which recorded 1,425 participants.

(2) Integrity and honesty education for secondary and primary school students

1. Education Programme on Honesty for Teenagers

The CCAC continuously promotes the "Education Programme on Honesty for Teenagers" among secondary schools. It sends personnel to schools to discuss with secondary school students on topics such as integrity, fair competition and clean society. The CCAC designs the topics according to the different developmental stages of students, which aims to guide them to think about the importance of integrity and law-abidingness.

The "Education Programme on Honesty for Teenagers" have been supported by schools over the years. In 2024, there were 18 schools joining the programme. A total of 128 seminars were held, which recorded the participation of 9,835 students.

2. Theme-based seminars entitled "A Talk on Honesty for Secondary School Graduates"

In order to allow secondary graduates to clearly understand the anti-corruption laws in force in Macao and corruption prevention knowledge before they graduate from school and step into the society, thus understanding and abiding by the laws, the CCAC holds the theme-based seminars entitled "A Talk on Honesty for Secondary School Graduates" to introduce to secondary graduates about the practical integrity guidelines. In 2024, a total of 19 seminars were held for 1,722 students from ten schools.

3. Love Integrity” – On-campus activity for primary students

The CCAC carries out the on-campus activity “Love Integrity” for primary schools to support their integrity education. In order to accommodate the teaching needs of schools in a flexible way, the activities are held by the CCAC during lunch breaks or lessons in the forms of booth games, story sharing on honesty, video clips, VR games, quiz games on exhibition panels and seminars, etc. Alternatively, to support the competitions or curricular activities on the topic of integrity organised by schools, it spreads the messages of integrity among primary students in a fun way. Those activities have been well received by the students and have achieved positive results.

In 2024, the CCAC held 32 sessions of the aforesaid activity at six schools, namely Flora School, Luso-Chinese School in Taipa, Shá Lei Tau Cham Son School, Caritas de Macau School, Pui Ching Middle School and Saint Paul School, which recorded the participation of a total of 6,135 students and those with special educational needs.

4. Interdisciplinary thematic school activity on the theme “New Inspirations in Integrity Education from Children”

In the school year 2023/2024, the CCAC first held a thematic school activity entitled “New Inspirations in Integrity Education from Children” jointly with Salesiano School, Pui Ching Middle School and Macau Baptist College, where integrity education was integrated with the STEM/STEAM education programmes launched by schools as cross-curricular activities to allow primary students to devise and produce computer coding works and mechanic devices based on the topic of integrity. The process allows students to think in more detail about the importance of integrity and honesty for individuals and society, so that they can inspire their peers to think about the relevant subjects from their perspectives.

On 6th January 2024, the CCAC specially held an award presentation ceremony to commend 13 outstanding entries, where the respective students shared their insights and showcased the entries that were extremely innovative and full of novel ideas. The CCAC continued to launch the activity in the school year 2024/2025 and two schools, namely Affiliated School of the University of Macau and Sacred Heart Canossian College (English Section), have been added to the list of cooperating schools, so the number of participating primary schools has totalled five thus far.

5. "New Generation of Integrity" – Education Programme on Honesty for Primary Students

In 2024, the Branch Office of the CCAC in Areia Preta held a total of 157 sessions of the "New Generation of Integrity" – Education Programme on Honesty for Primary Students for 5,005 students from 24 schools.

In addition, four outstanding entries of the thematic school activity "New Inspirations in Integrity Education from Children" have been used in the education activities of two themes of the aforesaid programme for primary three students. This allows the thoughts and ideas of students to be injected in the integrity education of the CCAC for primary schools, which may enhance their understanding of the teaching content and the learning effectiveness.

6. Theatre-in-education activity entitled "Spend the Children's Day with the Messenger Bear William 2024 – An Unpleasant Memory about Greed"

In order to celebrate the Children's Day and disseminate the values of integrity and honesty among kindergarten and lower primary students, the CCAC organised 34 on-campus sessions and one off-campus session of the theatre-in-education activity entitled "Spend the Children's Day with the Messenger Bear William 2024 - An Unpleasant Memory about Greed" for 28 schools between May and June, which recorded the participation of 5,700 students.

7. On-campus reading promotion activity entitled "Reading for Honesty"

To teach young children values such as honesty and law-abidingness and to consolidate their learning outcomes through the book *Story Time with the Messenger Bear William: Stories about Integrity for Children* published by the CCAC, the CCAC started to launch the on-campus reading promotion activity entitled "Reading for Honesty" in March 2024. Mainly designed for K2 and K3 students, the activity is carried out by instructors of the CCAC who guides the young ones to learn the science knowledge they have interest in through cross-curricular teaching which incorporate moral education into subjects such as science and general studies, with a view to increasing their interest in reading storybooks about honesty and guiding them to think about integrity and practice it in daily lives. Extension activities have also been added to encourage parents to continuously read storybooks with their young kids after school hours.

IV. Promotion actions targeting young people

In 2024, to tie in with the direction of the motherland and the Macao SAR of attaching importance to youth development, the CCAC continuously promoted the value of integrity among young people through innovative ways. Through the original integrity learning activities and practice opportunities, young

people have had more chances to participate in the work of integrity building, which not only increases their sensitivity to integrity in governance but also expands their international horizons.

(1) An activity entitled “Simulated Conference of the State Parties to the United Nations Convention against Corruption”

To increase young people’s understanding of integrity building and policy making, the CCAC organised an activity entitled “Simulated Conference of the Stated Parties to the United Nations Convention against Corruption” in April, which recorded the participation of 43 students of secondary schools and higher education institutions. The young people who took part in this activity were required to receive academic training first in order to understand the rules and procedures before conducting data collection and writing their position paper according to the country they were to represent. On the day of the simulated conference, they played roles as representatives from 26 countries and spoke, discussed and negotiated on the topic of “preventing and combating corruption – fostering cross-boundary cooperation in integrity Education”. All of these young participants thought more in-depth about integrity building policies, which increased their sensitivity to integrity in governance and expanded their international horizons.

(2) “UNI Project – Integrity Promotion Programme for Higher Education Students”

To encourage higher education students to participate in integrity building, the CCAC has been continuously deepening cooperation with local higher education institutions. In January 2024, it kicked off the “UNI Project – Integrity promotion programme for higher education students of 2024”. Applications from more than 110 students from four higher education institutions were received, of which 41 were chosen by the CCAC to receive systematic and professional training. Afterwards, with the knowledge and skills they had learnt, the trainees assisted the CCAC in such work as reception of guided tours and the filming of promotion videos. All the trainees launched integrity promotion activities or prepared promotion plans for their peers in the campuses. During the activity, 15 students were given the outstanding trainee award.

In order to continue the positive results achieved, in the second half of 2024, the CCAC commenced the recruitment of trainees for the “UNI Project – Integrity Promotion Programme for Higher Education Students” for 2025. Applications from a total of 139 students from five local higher education institutions were received, of which 41 were shortlisted. Some outstanding trainees of the previous activity were also specially invited by the CCAC to give guidance to the new trainees on practice and final projects and to share experience.

(3) Exchanging views among “young people of integrity” between Macao and Hong Kong

The CCAC received the delegation of the “ICAC ELITE Youth Leadership Programme” of Hong Kong which visited Macao between 28th and 29th September 2024, during which outstanding learners of the “UNI Project” and the “Teenage ambassadors of integrity” of Macao and the representatives of the “ICAC ELITE Youth Leadership Programme” of Hong Kong had an in-depth exchange. They also shared their views and experience about participating in integrity activities in the two places. In addition, they participated in an orienteering activity entitled “Travelling through integrity” organised by the CCAC, during which they visited the sites relevant to the functions of the CCAC and cases investigated by the CCAC in the Taipa Village so as to have in-depth knowledge of the work of the CCAC of Macao and the achievement of collaboration in the fight against corruption between the two places. In addition, representatives of the “ICAC ELITE Youth Leadership Programme” also visited the CCAC headquarters and the integrity education base at the Branch Office in Taipa.

(4) Organising community activities to promote integrity with special themes for young people

In November 2024, the CCAC and the Bosco Youth Service Network organised two sessions of the activity entitled “Puzzle-solving Activity about Integrity - Community Activity to Promote Integrity among Young People” which allowed young people who participated in the activity to personally experience the harms of corruption through immersive games in an original puzzle-solving escape room activity so that they could foster correct values. The activity attracted more than 100 young people for participation.

Moreover, the Branch Office in Taipa also continuously held the special activity entitled “What Investigators Actually Do – Youth Integrity Promotion Activity” which has been well-liked by youth civic associations. A total of seven sessions of the activities were held for various civic associations or institutions.

(5) “Dissemination of Integrity in Schools” – Training of Teenage Ambassadors of Integrity and Practice Plan in Schools

In the 2023/2024 academic year, the CCAC once again held the activity entitled “Dissemination of Integrity in Schools” – Training of Teenage Ambassadors of Integrity and Practice Plan in Schools with a view to encouraging teenagers to actively disseminate the idea of integrity awareness in schools and everyday life. The activity attracted 98 secondary school students from 12 schools to participate. During the activity, students received a series of training activities. Between January and April 2024, the

ambassadors proactively carried out integrity activities in their schools, including social experiments, kin-ball competitions, dramas, orienteering activities, microfilms and creative character design, among others. The school activities reached more than 20,000 target audience. Based on the performance of each team, 14 outstanding teams were awarded by the CCAC. The award presentation ceremony was held in June 2024.

Upon completion of the activity, in order to consolidate and continuously develop the efforts of the teenage ambassadors, some of them made good use of the experience they gained during the activity to take on the responsibility for planning and holding an activity to promote integrity in July. As such, they were able to give full play to what they had acquired and facilitated future assistance to the CCAC in order to disseminate the messages of integrity and honesty.

(6) Speaking Activity on the theme of “Honesty” in campus

In order to encourage students to reflect on the meaning of honesty and integrity on everyday life and society, the CCAC held a Speaking Activity on the theme of “Honesty” in the campus which attracted students from 13 schools to participate. The evaluation was based on several factors, including presentation ways, conveyance of message, presentation skills and creativity. 26 works were selected for commendation.

The CCAC held the award presentation ceremony on 13th December 2024 where awarded students of the activity were commended. The works collected in the activity demonstrated that the students had reflected on their own behaviour and values through observation and experience in everyday life or through different proverbs and stories, and thus further thought about the meaning of integrity on everyday life and society, which facilitated them to disseminate the positive message of honesty and integrity among peers and young people.

(7) A series of activities for International Anti-Corruption Day

The United Nations has marked the theme of “Uniting with Youth Against Corruption: Shaping Tomorrow’s Integrity” for the International Anti-Corruption Day in 2024. Therefore, the CCAC specially launched a dedicated webpage, short commercials on televisions and buses, advertisements on radio and on the latest news webpage in order to widely promote to the general public about the International Anti-Corruption Day, the *United Nations Convention against Corruption* and the anti-corruption work of the CCAC. Moreover, the CCAC also arranged for members of civic associations to participate in seminars and visits to the Branch Office in Taipa so as to introduce to them the anti-corruption work carried out by the CCAC.

V. Cooperation with the education sector

The CCAC has all along been attaching importance to the cooperation with the education sector. Through proactively providing support to integrity education and creating more exchange platforms, the CCAC has formed a good mode of cooperation for mutual promotion with the education sector with a view to continuously increasing the effectiveness of honesty education among teenagers in Macao.

(1) Holding the school-based training activities about “integrity awareness and honesty education” for teaching staff

The CCAC has launched school-based training activities about “integrity awareness and honesty education” for teaching staff with a view to enhancing their knowledge about the legal regime of corruption prevention and integrity in Macao. The training activities mainly consisted of introducing the law of *Prevention and Suppression of Bribery in the Private Sector* and provisions on combatting bribery and corruption in the *Penal Code*, identifying conflicts of interest related to work and suggesting relevant solutions, introducing online resources of the CCAC entitled “Resource Database for Integrity Education” and suggesting application of such resources during teaching classes. In 2024, the CCAC collaborated with six higher education institutions and schools to organise the school-based training activities, recording 320 teaching staff to participate.

(2) Adding new video column entitled “Micro-lessons on Honesty and Integrity” in “Resource Database for Integrity Education”

The CCAC has added a new video column entitled “Micro-lessons on Honesty and Integrity” in the “Resource Database for Integrity Education”. This column, which is in the form of short videos, serves to introduce the important points and relevant knowledge about lesson plans of different themes with a view to providing support of teaching resources for teachers. In 2024, four videos were uploaded on the “Micro-lessons on Honesty and Integrity” column, covering the subjects of moral and civic education and Chinese language of upper primary, junior secondary and senior secondary school. Besides short videos, corresponding full teaching plans are also provided in order to facilitate flexible use by teachers based on actual teaching needs.

Moreover, the CCAC continued to enrich the resources of the “Resource Database for Integrity Education”, namely moral education teaching materials, short videos, animations, integrity stories and publications for children, among others. Extended activities including mini games and crafts were also provided for use by teachers and parents, which were well-liked by them.

(3) Cooperating with the “panel of advisors for teaching materials on integrity” continuously

The members of the “panel of advisors for teaching materials on integrity” of the CCAC come from 33 schools in Macao covering the areas of secondary and primary education, kindergarten and special education. The panel members regularly provide lesson plans on integrity, which enable the “Resource Database for Integrity Education” to be accumulated with stable and good-quality online resources.

In 2024, the CCAC received a total of 26 lesson plans prepared by the teacher members of the “panel of advisors for teaching materials on integrity”. After being reviewed by the expert members, the lesson plans were successively uploaded to the “Resource Database for Integrity Education” for viewing and use by education workers. Upon operation of four academic years, the panel has already provided the CCAC with a total of 70 lesson plans on themes relevant to integrity.

(4) Launching the “Integrity Lesson Plan Design Collection Activity for the Academic Year 2024/2025”

In order to enhance the professional exchange on integrity and moral education for different levels of non-tertiary education of Macao, the CCAC has held the “Integrity Lesson Plan Design Collection Activity for the Academic Year 2024/2025”. The collection activity is divided into “open group” and “student group”, with the topics of lesson plans covering honesty and righteousness, spirit of law observance and fair competitions, among others. This time, the “Integrity Lesson Plan Design Collection Activity” introduces two new items, namely creation of videos for the “Micro-lessons on Honesty and Integrity” and the teaching on the topic of “Clean Elections”.

A total of 111 people from 37 higher education institutions or schools joined the collection activity. Participants will submit their entries in the second term of the academic year 2024/2025.

VI. Family and parenting education on integrity and honesty

The CCAC proactively promotes integrity education among families. In 2024, the CCAC cooperated with a local civic association to organise a seminar on family and parental education for honesty - “Every family talks about honesty”, where the personnel of the CCAC discussed with parents on parenting education related to topics of honesty, responsibility, fairness, values of money, among others. Moreover, case analyses on short videos about family and parental education for honesty, coupled with professional suggestions from social workers were made. Such activity aimed to increase the knowledge and relevant techniques of parents related to honesty education, communication and counselling so as to better foster the moral development of children.

VII. Media publicity

The CCAC continues to raise public awareness of integrity through various media and channels, including press releases, various kinds of advertisements, internet, leaflets and publications.

(1) Producing a micro-movie on the fight against corruption entitled “Arabica”

In 2024, the CCAC finished the production of a micro-movie on the fight against corruption entitled “Arabica”. The micro-movie is planned, prepared, filmed and edited by the CCAC team, with the participation of higher education student interns, members of the Integrity Volunteer Team and members of “UNI Project – Integrity promotion programme for higher education students”.

The micro-movie, which is 45 minutes long, is adapted from a real CCAC case in the fight against corruption. The CCAC will premiere and hold other screening events in 2025 so that the micro-movie can be fully used to disseminate the message of fighting corruption in the society.

(2) Launching information videos about integrity on various online platforms

In order to tie in with the general public’s current habit of obtaining information, the CCAC has been proactively producing multi-media short-video programmes on integrity. In 2024, the CCAC continued to produce various short-video programmes on integrity entitled “Corruption Cases” and “CC A See”, among others and short videos on integrity. In addition, it also cooperated with a youth association to launch an information programme *Doing Business with Integrity* on corruption prevention for young entrepreneurs. Such programme, which was broadcast on various multi-media platforms of the CCAC and Macao, used simple and fun-filled ways to briefly introduce relevant content in order to attract the general public, especially young people, to take the initiative to learn about the information on integrity.

(3) Continuously promoting integrity message on social platforms

The CCAC has been continuously using its WeChat official account to widely disseminate integrity message to different sectors of the society. The concepts of some infographics are inspired by hot topics in the society of Macao or the Chinese mainland in a hope to further attract and resonate with the readers. In 2024, the CCAC launched 66 infographics on WeChat, where it disseminated the information on anti-corruption work, ombudsman actions and relevant legislations of the CCAC to the public through light-hearted writing style, comics, animations and short videos, among others. Throughout the year, they were viewed nearly 40,000 times and the number of followers of the WeChat account was nearly 15,000.

(4) Producing a new video to fight against corruption by the CCAC

Owing to the need of promotion through media, the CCAC, on its own, produced a new short video commercial and a bilingual radio advertisement in Cantonese and Portuguese. The short video commercial, with the theme of “the clock”, urged the public to “grasp the time” to report suspicious corruption and was subsequently broadcast on televisions in bus compartments and on the channels of TDM from October 2024.

(5) Producing new promotion leaflets to fight against corruption

The CCAC has produced new promotion leaflets to fight against corruption in graphic and text forms, coupled with simple examples and cases, to introduce the CCAC’s anti-corruption functions, important points of laws relevant to the fight against corruption in the public and private sectors, the CCAC’s procedures of handling reports and complaints, provisions of declaration of assets and interests and suggestions for prevention of corruption, among others, with a view to allowing the general public to understand the anti-corruption laws of Macao and encouraging them to report suspicious corruption proactively.

VIII. Promotion in the community

(1) Branch offices

1. Complaints, reports and requests for consultation received from residents

In 2024, the Branch Office in Areia Preta and the Branch Office in Taipa received a total of 518 complaints/reports, requests for consultation and simple enquiries. Details are as follows:

Statistics of reception of residents at the two Branch Offices in 2024

No. of complaints/reports		No. of requests for consultation	No. of simple enquiries	
Lodged in person	Lodged in writing		Made in person	Made by phone
15	63	58	232	150
Subtotal: 78		Subtotal: 440		
Total: 518				

In 2024, the Branch Office in Areia Preta received a total of 259 complaints/reports and enquiries, of which 18 were complaints/reports, 29 were requests for consultation while 212 were simple enquiries.

Regarding the Branch Office in Taipa, a total of 259 complaints/reports and enquiries were received. Among them, 60 were complaints/reports, 29 were requests for consultation while 170 were simple enquiries.

2. Integrity education in the community

In 2024, the two Branch Offices of the CCAC received visits from nine various entities, including schools, civic associations, institutions and organisations. A total of 13 sessions of seminars on integrity education for the community and visits took place in the Branch Offices, recording 380 participants.

To commemorate the 20th anniversary of integrity promotion and education in the community, the Branch Office in Areia Preta held the activity entitled “A Happy Journey of Integrity” Experience Day between 6th and 7th January 2024 where the facilities of the branch office were open to the public and various workshops were provided in order that participants could experience and learn the CCAC’s promotion work in the community from different perspectives. The activity was diversified which included visiting the multi-media education zone guided by the “AI Messenger Bear William”, experiencing the coding games and mechanical devices designed by primary students of Macao with the theme of honesty and experiencing the dubbing of animation teaching kits. The two-day experiential activity, which was well-received, attracted a total of around 200 residents to participate. The CCAC also introduced to the public about its education and promotion work in the community over the past 20 years through the Macao television programme entitled “Our People Our Life”.

In addition, the CCAC continued to hold an activity to promote integrity in the community entitled “A Chat on Integrity with Friends” targeting at adults and the elderly. The activity, which was participated by members of local civic associations and organisations, featured a seminar and a light-hearted short play performed by the members of Integrity Volunteer Team. Such activity enabled the participants to understand the legal knowledge in relation to ombudsman actions and corruption prevention which were closely related to them so that they were able to protect their own rights and avoid breaking the law.

(2) Expansion of community relations

1. Visiting civic associations and receiving visitors

In order to establish closer connection with civic associations, in 2024, the CCAC visited the Family Health Promotion Centre of the Bosco Youth Service Network and the Industrial and Commercial Bank of China (Macao) Limited Youth Association, where it introduced its publicity and education work, obtained the opinions of the civic associations about integrity work and discussed with them the room for cooperation on integrity education in the future. In addition, the Branch Offices of the CCAC also received various delegations from abroad. A total of 17 sessions of activities were organised.

2. Participating in community activities

The CCAC set up booth games at both the “International Children’s Day Bazaar 2024” and the “55th Caritas Macau Charity Bazaar” in order to disseminate the messages of integrity and law observance among residents and teenagers. In addition, the CCAC also organised for its staff and volunteers to participate in the “Walk for a Million of Macao 2024” with a view to participating in various community activities proactively.

3. Volunteer activities for a clean society

In 2024, the Integrity Volunteer Team assisted or participated in 13 publicity activities of different nature organised by the CCAC in order to actively dedicate itself to the integrity work. The CCAC also continued to provide members of the “Integrity Volunteer Team” with specialised training activities, including organising a trip to Zhaoqin, Guangdong in April 2024 for 30 outstanding volunteers of the “Integrity Volunteer Team” to visit the anti-corruption and integrity promotion education bases, namely “Baogong Cultural Museum” and the “Baogong Cultural Park” with a view to enhancing their integrity quality and increasing their understanding of the building and development of integrity culture in the Chinese mainland. In addition, the “Integrity Volunteer Team” also visited the National Security Education Exhibition and so forth. Outstanding members of the volunteer team were even responsible for organising a visit to Our Lady of Mercy Home for the Elderly in order to guide the volunteers to contribute to the society.

In order to develop the “Integrity Volunteer Team” and prepare for the publicity work of clean elections related to the 8th Legislative Assembly Elections 2025, the CCAC carried out a public recruitment of new members for the “Integrity Volunteer Team” in November 2024. After the selection and training processes, a total of 37 volunteers and 27 pairs of volunteers comprising parents and children were admitted.

PART V

EXCHANGE AND TRAINING

PART V

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In 2024, the CCAC successively organised delegations for external visits and also received delegations of counterparts from the Chinese mainland, Hong Kong and from abroad so as to maintain bilateral and regional communication and cooperation. Moreover, it continued to fulfil the obligations as a member of the relevant international and regional organisations by proactively sending its personnel to participate in international and regional meetings, seminars and workshops, among others. The CCAC also continued to send its personnel to receive training in the Chinese mainland and Hong Kong so as to increase their professional and law enforcement capacity and dedicate itself to promoting the work of integrity building of Macao.

I. External visits

In 2024, the CCAC successively organised delegations for some external visits in order to commit itself to strengthen exchanges with law enforcement agencies of the neighbouring regions, including:

- The visit to Hong Kong to attend the “ICAC 50th Anniversary Reception and Establishment Ceremony of the Hong Kong International Academy Against Corruption (HKIAAC)”.
- The visit to the commissions of supervision of three cities, namely Zhuhai, Zhongshan and Shenzhen of the Guangdong-Hong Kong-Macao Greater Bay Area.
- The visit to Shenyang, Liaoning, where a visit was paid to its Commission of Supervision.
- The visit to Guangzhou to attend the work meeting of “Guide on Doing Business with Integrity in the Guangdong-Hong Kong-Macao Greater Bay Area”.

II. Receiving visits

The CCAC has been maintaining close cooperation with the ICAC of Hong Kong in intelligence exchange and mutual case assistance. In order to enhance the communication among the personnel of the CCAC and the ICAC, in 2024, the ICAC was invited to participate in the “CCAC and ICAC Basketball and Badminton Friendship Matches 2024” in Macao with a view to promoting the communication and friendship among the personnel of the two places through sports activities.

Moreover, in 2024, the CCAC received delegations from different places for exchanging and sharing work experiences in the scope of integrity building, including:

- The reception of the Guangdong Provincial Commission of Supervision to exchange experiences on law enforcement and views on integrity building.
- The reception of the prosecutor delegation from the Republic of Indonesia to introduce the experiences of Macao in corruption fighting and law enforcement.

III. Participation in international and regional meetings

In 2024, international and regional organisations continued to host online and offline meetings. The CCAC kept sending its personnel to attend meetings in person or through videoconferencing so as to actively fulfil its duty as a member of international and regional organisations, including:

- The visit to Vienna, Austria to attend the “7th GlobE Network Steering Committee Meeting” hosted by the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE Network).
- The visit to Beijing to attend the “5th Plenary Meeting and the 8th Steering Committee Meeting of the GlobE Network” hosted by the National Supervisory Commission.
- The visit to Hague, the Netherlands to attend the “13th International Ombudsman Institute (IOI) World Conference” hosted by the IOI.
- The visit to Hong Kong to attend the “8th ICAC Symposium – Charting a New Path to Combat Corruption”.
- The visit to Hong Kong to attend the “International Ombudsman Summit 2024 and Hong Kong Ombudsman 35th Anniversary Reception”.
- The visit to the United Arab Emirates to attend the “2024 Asia/Pacific Group on Money Laundering (APG) Annual Meeting”.

IV. Work on the implementation of United Nations Convention against Corruption

In 2024, the CCAC continued to tie in with China in the work of implementation review of the United Nations Convention against Corruption (UNCAC). In June, at the invitation of the Office of the Commissioner of the Ministry of the Foreign Affairs of the People's Republic of China in the Macao Special Administrative Region, the CCAC assigned its personnel to attend, together with the Chinese delegation, the "15th Session of the Implementation Review Group of the UNCAC" and the "18th Session of the Open-ended Intergovernmental Working Group on Asset Recovery and the 13th Open-ended Intergovernmental Expert Meeting to Enhance International Cooperation" which were held in Vienna, Austria.

V. Personnel training

National security is an important foundation for peace and stability of the nation and concerns the well-being of its people and the stability of the society. In 2024, the CCAC arranged for its personnel to visit the National Security Education Exhibition so as to consolidate the personnel's understanding of the holistic approach to national security and further understand the progress of Macao in its sustained efforts to improve the legal regime of safeguarding national security.

In addition, in April 2024, the CCAC assigned its personnel to Shenyang, Liaoning where they participated in the training course jointly organised by the CCAC and the Criminal Investigation Police University of China with content covering collection of digital evidence, criminal psychology and training for professional skills, among others, which enabled trainees to have an in-depth understanding of the latest development of the country. The CCAC also appointed its personnel to Hong Kong to participate in the training programme of "New Era against Corruption: Leveraging Innovation and Technology in Fighting and Preventing Corruption" jointly hosted by the Hong Kong International Academy Against Corruption (HKIAAC) and the International Association of Anti-Corruption Authorities (IAACA).

The CCAC has been committed itself to enhancing the professional knowledge and law enforcement capacity of its investigators. Apart from the aforementioned courses, it also actively arranged for its personnel to participate in various online and offline training activities organised by relevant organisations or entities outside Macao which were relevant to the functions of the CCAC.

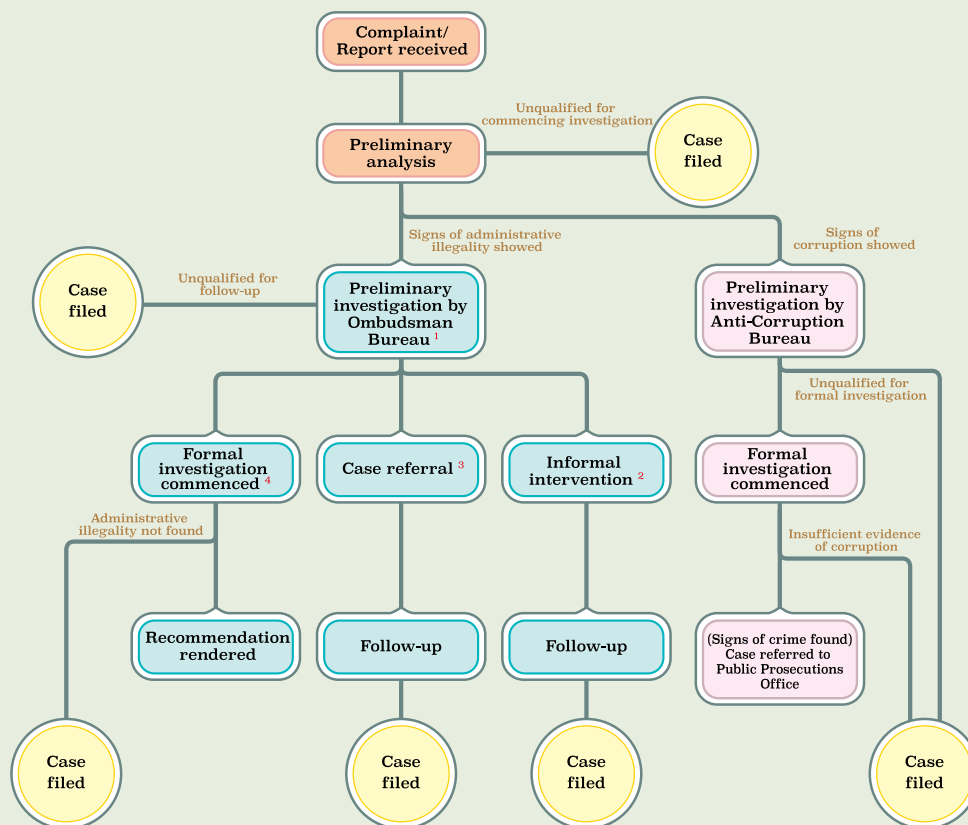
In addition, in order to enhance the personnel's understanding of the development of artificial intelligence and their application skills in this area, the CCAC appointed its developers to Hangzhou to attend the "Alibaba – Aspara Conference 2024" hosted by Alibaba Group so that they could learn the most advanced application of artificial intelligence and cloud technology worldwide. Moreover, the CCAC also invited professional instructors to host a training course in relation to artificial intelligence and new media application for the personnel working in the area of promotion and education in order that the promotion work of the CCAC can keep abreast of the times.

PART VI
APPENDICES

PART VI

APPENDIX I

The CCAC's Complaint Handling Procedure



Notes:

¹ Preliminary investigation by Ombudsman Bureau

It is conducted under the stipulation of Law no. 10/2000 (*Commission Against Corruption of the Macao Special Administrative Region*) and the *Administrative Procedure Code*. In particular, the principle of defense shall be observed. That is, both the complainant and the complained side have the chance of pleading.

² Informal intervention

If the procedure has not been completed or the relevant act has not yet entered into effect, the CCAC will guide the relevant departments or entities in this way so that they will make prompt correction.

³ Case referral

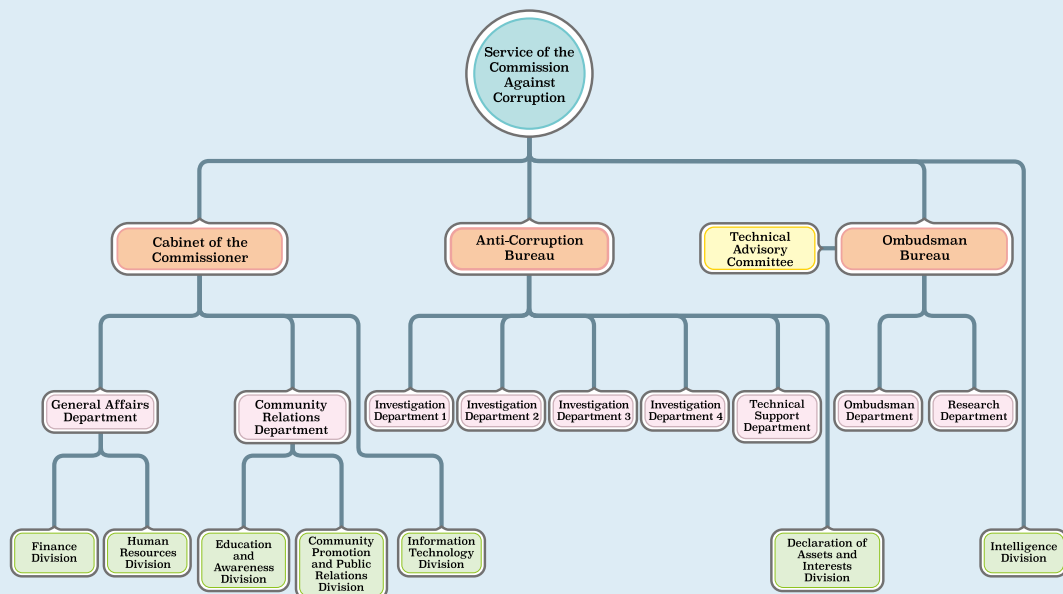
In some cases, since the relevant administrative departments are the competent departments that possess related information (the CCAC only has the information provided by the complainants, which may not be sufficient or detailed), it is appropriate for the relevant departments to handle the cases according to statutory procedures. With the complainant's consent, the CCAC will refer these cases to the competent departments or entities and will follow up their progress.

⁴ Formal investigation

Due to the severity of the case and the scope involved, the CCAC will commence a formal investigation. Under Subparagraph 13) of Article 4 of Law no. 10/2000 (*Commission Against Corruption of the Macao Special Administrative Region*), the CCAC directly renders recommendation to the competent administrative department for the purpose of rectifying illegal or unfair administrative acts or procedures. Under Article 12 of the same law, in case of non-acceptance of any recommendation, under normal circumstances, the competent department or entity shall give the CCAC its reasoned reply within 15 working days. Meanwhile, the CCAC may also report the case to the Chief Executive or reveal it to the public after communicating with the hierarchical superior or supervisory entity of the competent department or entity about the situation.

APPENDIX II

Organisation Structure of the Commission Against Corruption



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