It takes a whole society: why Hong Kong's ICAC cannot succeed alone

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Abstract

Purpose – To show that establishing an anti-corruption agency (ACA), by itself, is not likely to be a successful anti-corruption strategy. Instead, a solid base of social trust, participation, and support is just as essential as creating an ACA with significant powers and resources.

Design/methodology/approach – This is a historical review of the origins and development of the Independent Commission Against Corruption (ICAC) of Hong Kong, and an assessment of its three-pronged approach strategy at both strategic and tactical levels.

Findings – An ACA requires broad and deep social support and participation if it is to succeed. That the ICAC remains nearly unique in developing such a base of support provides important lessons for those countries with ineffective ACAs.

Originality/value – A reassessment of the ICAC after a half-century shows that the Hong Kong case, despite its familiarity, has much to teach us if we understand it in its broadest implications.

Keywords Hong Kong, ICAC, Corruption, Chinese traditions, Civil society, *Guanxi*

Paper type Research paper

Hong Kong's ICAC: a rare success

Sooner or later, any society confronting serious corruption problems is likely to consider establishing a dedicated anti-corruption agency (ACA). Such organizations have proliferated in recent years as concern over corruption has intensified, and as prominent scandals have made headlines in societies around the globe. There is no single authoritative listing of the world's ACAs, in part because they come in a variety of institutional and legal forms and have differing sorts of relationships with other investigative and prosecutorial bodies. Moreover, while many countries – particularly smaller and unitary states - have a single national ACA, others have several with responsibilities in provinces, states, other subdivisions, or sectors of government. Still, the International Association of Anti-Corruption Authorities (IAACA) counts over 140 national and regional affiliates (IAACA, 2022), and other listings point to at least a hundred ACAs around the world (Transparency International, 2022c).

Calls to establish ACAs almost invariably invoke the examples of Hong Kong's Independent Commission Against Corruption (ICAC) and Singapore's Corrupt Practices Investigation Bureau (CPIB), citing their successes and broad social benefits. And indeed their records and systemic impact have been formidable: while both societies once had reputations for extensive and entrenched corruption, both have seen major and sustained improvements in the ways they are perceived internationally and domestically. Those improved global reputations quickly began to pay economic dividends as well: while we can hardly attribute their spectacular growth solely to corruption controls, there is little doubt that both have benefited from being seen as safe places for investment and enterprise, and that standards of living and the business climate have improved dramatically over the years. ACA advocates elsewhere often portray such agencies as the cornerstones of any corruption

control strategy, particularly in emerging societies and argue that the Hong Kong and Singapore experiences can be replicated elsewhere.

Just how realistic such scenarios might be, however, is open to serious question. Hong Kong and Singapore are not typical of many places other than themselves; indeed, neither they nor their reform strategies are identical. Gathering a nation's anti-corruption resources, powers, and officials within a single organization has a natural attraction for anyone who conceives of corruption control primarily as a law-enforcement proposition; but that approach has its vulnerabilities, and a variety of other social, economic, historical, regional, and cultural influences must be addressed as well. Perhaps for those reasons ACAs in other societies collectively have an indifferent record at best. While there are success stories to be told, as in the cases of Botswana (Jones, 2017), Georgia (Kaputadze, 2017), or the Australian state of New South Wales (Cowdery, 2017), others have been outright failures or have become targets for investigation in their own right. Still, while there is no inherent magic in the ACA model, successful examples are worth careful examination, if only because the worldwide anti-corruption industry has struggled to make progress in so many cases.

This article focuses upon Hong Kong – perhaps the best-known of the world's ACAs (for a detailed discussion of Singapore's case, see the article by Jon Quah in this special issue). Whether it is the more successful of the two is open to debate, but it does present a wider range of strategies and tactics, particularly as they relate to social values, types of leadership, and civil society. Indeed, those connections will be among my central concerns, for I will argue that free-standing ACAs, taken on their own, are unlikely to succeed. They must be integral parts of much more comprehensive anti-corruption efforts and receive sustained support both from leadership and within civil society. Singapore's CPIB has capitalized upon the city-state's strongly centralized, quasi-authoritarian structure of government power, complementing a potent mix of investigation and punishment with positive incentives in the form of dramatic improvements in government-sector salaries, to deliver clean and effective government. In Hong Kong, by contrast, corruption control has required not only those sorts of institutional assets but also the backing of the whole society. The ICAC has cultivated, and still relies upon, strong social legitimacy and trust, active social support, and a careful regard for traditional and cultural values. Such trust can be difficult to establish and, once in place, cannot be taken for granted. As I will discuss in a later section, citizen reports of corruption can be a useful proxy measure for trust in the agency and, with some fluctuations, have remained frequent over the years, both before and after the return to China in July 1997. But more recent events and the COVID-19 pandemic are likely to put such trust under considerable strain. Those effects are matters of conjecture at this point, but the basic contention of this article remains that establishing an ICAC by itself without extensive attention to its social foundations and broader base of support will usually accomplish little.

A new remedy for an old problem

Corruption had long been a fact of life in Hong Kong when yet another scandal surfaced in the early 1970s (this discussion draws upon Quah, 2021; Scott and Gong, 2019; Manion, 2004). Peter Godber, a Chief Superintendent of the Royal Hong Kong Police Force (RHKPF) and Deputy District Commander in Kowloon, had begun to attract attention to his considerable wealth, apparently amassed via bribery schemes over the years. When in 1973 police anti-corruption authorities gave him one week in which to account for that wealth he resigned his post, arranged for his wife to leave Hong Kong, and the next day – 8 June 1973 – used his police credentials to avoid passport control at Kai Tak Airport, and fled to England.

Public reactions were rapid and angry, leading to mass demands for major change. Godber's corruption, along with outrage over possible official connivance in his escape, led students and growing numbers of supporters to mount major public demonstrations.

The case also dispelled a self-serving myth that expatriate officials were somehow not vulnerable to the colony's corrupting processes and temptations. As in other British jurisdictions, the RHKPF had the primary responsibility for corruption control and were thus, in effect, empowered to investigate and police themselves. Predictably, police corruption was rife and ordinary citizens were exposed to a range of demands and abuses. Hong Kong, at the time a British Crown Colony, was (and remains) in no sense a mass democracy, but officials there likely recalled how in 1966-1967 disruptions related to the rise of the Red Guards in the People's Republic of China had spilled over into riots and bombings in the city. For a variety of reasons, action was in order.

Shortly after Godber's escape, Sir Alastair Blair-Kerr, a Senior Judge, was named head of a Commission of Inquiry that produced two reports. One detailed the escape itself, but the second, more general analysis, concluded that anti-corruption powers had to be taken out of the hands of the police. In October 1973, Sir Murray MacLehose, then Governor of the Colony, addressed the Legislative Council and called for the establishment of an independent anti-corruption organization. There is some controversy over the actual extent of MacLehose's commitment to checking corruption (Yep, 2013): some regarded him as an ambitious reformer, while others saw him as more ambivalent, with the real push for reform coming from London. In any event, on 15 February 1974, the ICAC came into being, charged with what became the "three prongs" of its strategy: law enforcement, prevention, and public education. The ICAC's remit was ambitious and newsworthy, but in order to have any real credibility, it first had to bring Godber to justice. That it did, extraditing him to Hong Kong early in 1975, trying him on charges of conspiracy and acceptance of bribes, and sending him to jail for four years.

The ICAC was not the world's first independent dedicated anti-corruption body – Singapore's CPIB debuted in 1952 – but it embodied a number of innovations. In addition to taking corruption control out of the hands of police, following Singapore's example in 1952, the ICAC's goals of prevention (as opposed to just investigating offences *post hoc*) and public education combined to form an unprecedentedly broad mandate. In addition, the ICAC's jurisdiction was not limited to public organizations and officials: the Colony's globally important banks, and other businesses large and small, lay within the ICAC's remit as well. Further, the prevention aspect of the ICAC strategy meant that it would become an important source of legal and technical assistance, a goal that would require the accumulation of considerable data and research capacity.

The ICAC: recent developments

Since the colony's return to the People's Republic of China in July 1997, the ICAC has been responsible for corruption control in the Hong Kong Special Administrative Region (HKSAR). It is headed by a Commissioner who reports to the HKSAR Chief Executive (at the outset, Tung Chee-hwa, and since 2022, John Lee) who is elected by an Election Committee of 1500 members and appointed by the State Council of the Central Government in Beijing. The ICAC retains its original three-pronged strategy, delegated to its Operations Department (investigation), Corruption Prevention Department, and Community Relations Department respectively. The ICAC is charged with enforcing the Prevention of Bribery Ordinance, 1971 (POBO) as amended (Fang, 2022), Hong Kong's main anti-corruption law. It possesses law enforcement powers (e.g. arrest, search and seizure, and detention) vested in it by the ICAC Ordinance, and also enforces the Elections (Corrupt and Illegal Conduct) Ordinance (ICAC, 2017).

A full analysis of how the July 1997 handover affected the ICAC and Hong Kong's overall corruption situation lies well beyond the scope of this discussion, and in fact that question deserves considerably more research attention than it has received in the literature. The same

is certainly true of trends and events since the "Umbrella Movement" that began in 2014 (BBC, 2019), and the anti-extradition, other protests and official crackdowns that have taken place since 2019. Suffice it to say that neither the sort of politicized takeover by Beijing that some feared, nor the massive wave of PRC-driven corruption others expected to flood into the HKSAR (Poole, 1997), immediately materialized. Kumar (2004) offered a generally positive appraisal of the ICAC's emergence and performance as of 2004 but urged a revision of strategies to uphold good government as a basic human right. But Wong (2003) observed that "mainlandization" was introducing new tensions between formal institutions and the Chinese-style political system that had begun to emerge. More recent analyses point to a gradual but steady deterioration in enforcement and prevention, a parallel decline in the quality of ICAC management and internal coordination, and the growth of high-level collusion in the economy (Smart, 2018) along with favouritism and conflicts of interest (Li and Lo, 2018). Tso (2018), for example, recounts several high-level scandals occurring between 2013 and 2018, including the dismissal in 2016 of a senior ICAC investigator, Rebecca Li, for her alleged "underperformance". Li's controversial dismissal led to the resignation of another principal investigator, Dale Ko, and, according to the *South China Morning Post,* the ICAC had to postpone its annual staff dinner because many of its officers boycotted it in protest (Iyengar, 2016). Hong Kong's scores on the Transparency International Corruption Perceptions Index (CPI), to the extent that they tell us anything about corruption trends there, have held broadly steady for a generation (Transparency International, 2022a).

Other developments may have shifted the ICAC's tactics and priorities. Scott, for example, has observed that the ICAC's traditional emphasis on rules-based corruption controls has been supplemented by values such as personal integrity. On its face that would seem a logical and welcome development, but Scott (2013) worries that may create new tensions among formal rules, informal standards, and traditional values that could complicate both the ICAC's work and government officials' day-to-day decisions.

Assessing the ICAC's record

Despite all of these complexities, Hong Kong, along with Singapore, embodies the most successful corruption-control models in Asia (Quah, 2021). A powerful, well-organized, and fully-resourced ACA is a primary reason for that success and offers important lessons for other societies. The same is true of ensuring top-level political support, not relying on the police for corruption control, and analyzing and attacking the root causes of corruption problems rather than just punishing the immediate miscreants. Still, the ICAC could not likely have attained such success on its own, as the author will suggest below. The ICAC's public education and civil society strategies, implemented and sustained over nearly a half-century, have complemented the investigation and prevention functions and have become equally important. First, however, to appreciate the scope of those successes a brief survey of trends in corruption indicators is in order.

Corruption and governance indices

Assessing the ICAC's impact on Hong Kong's perceived extent of corruption is a complex challenge. For reasons ranging from the lack of an agreed definition to the fact that most corrupt dealings are clandestine, we have no valid, reliable and precise measures of corruption itself. Most of the metrics we have rest on *perceptions* – how much corruption do various respondents think a society experiences – which are indirect evidence at best. Moreover, because those measures usually rank whole countries on a single dimension, they tell us nothing about variations within countries or qualitative contrasts among them (Johnston, 2005; Johnston, 2014). That latter point is particularly problematical: few would

say that corruption in Denmark is exactly the same thing as corruption in the Philippines, varying only by amount. Moreover, a poor index score may suggest that corruption is a serious problem in a given society but tells us nothing about its causes or what must be done to control it. Issues involving the underlying data and their processing also mean that comparing scores over time must be done with considerable caution. In any event we have no indices that apply to Hong Kong's corruption situation prior to the ICAC's inception.

Still, perceptions of corruption – particularly in a city-state like Hong Kong with extensive economic and cultural ties to the outside world – are far from trivial. Accurate or not, they affect aid, trade, investment, and lending decisions and can have geopolitical implications too. Some perception surveys tap the views of people who have good reasons to keep informed about corruption, governance, and other issues. Moreover, one important consequence of the ICAC's work, with its emphases on public education and prevention, has been to shape perceptions and expectations regarding integrity in a society. And indeed, a look at the two leading perception-driven measures suggests – with all of the above *caveats* firmly in mind – that Hong Kong has long been widely regarded as exercising effective corruption control. At the same time, the complexities of those assessments, and recent events, justify watchful concern about where the HKSAR goes from here.

Transparency International's Corruption Perceptions Index
The venerable CPI has been published since 1995 and, over the years, has become the best-known and most widely used corruption-related metric. From the beginning it has been controversial on methodological grounds; despite a number of refinements (notably in 2012), it continues to draw criticism today (van Hulten, 2012). At the same time, it has helped keep corruption high on the international policy agenda – no small accomplishment when we consider the scant levels of interest the issue drew as recently as the late 1980s (Johnston and Fritzen, 2021, p. 3). Moreover, the CPI directs worldwide attention to regimes and practices whose key figures had rather we looked elsewhere. Its annual release of results by Transparency International (TI) touches off useful – if often overheated – debates in societies whose anti-corruption performance seems to be stalled or deteriorating.

The CPI began as a poll of polls averaging out available survey evidence regarding various countries' corruption. Later on it became an expert survey, and more recently, it has been a survey of experts and businesspeople (Transparency International, 2022a). Scores, currently reported for 180 countries, now range from zero ("highly corrupt") to 100 ("very clean"). TI warns – rightly – against concluding that the lowest-scoring society is "the most corrupt country in the world", as several dozen others are not covered at all by the data. (When journalists and others routinely ignore that advice that is but one example of how TI should not be held responsible for the misuse of its results.) TI says that since 2012 results have been comparable from one year to the next, a claim not universally accepted by researchers; if nothing else, some of the underlying surveys ask respondents to judge corruption over the previous two years' time (Transparency International, 2022a). Another common criticism is that corrupt dealings shaping perceptions of one country – particularly those in the Global South – may well originate in affluent societies elsewhere without affecting their perception scores (see Galtung, 2006 for a comprehensive critique of the CPI).

The CPI results should therefore be viewed with skepticism, much as we would all rely on indirect and proxy measures. Still, it is notable that Hong Kong has consistently received strongly favourable CPI scores over time. On the old zero-to-ten scale, its 1997-2008 average was a strong 7.96, compared to 9.21 for Singapore, 7.3 for Japan, 5.62 for Taiwan, 3.36 for China and 2.3 for the Philippines (Sun and Johnston, 2010). Since 2012, on the zero-to-100 scale, Hong Kong has continued to score well, and its rankings among other countries in the region have generally held steady, as shown in Table 1.

World Bank's Control of Corruption Indicator

A somewhat better perspective can be derived from the World Bank's World Governance Indicators (WGI), published annually and available online (World Bank, 2022). The WGI series, compiled on a biennial basis between 1996 and 2002 and annually thereafter, includes indices for six components of governance, one of which is termed Control of Corruption. Like the CPI, the WGI are based on perceptions, and to an extent draw upon the same underlying data. But its base of evidence is considerably wider, including some proprietary governance indices and other indicators along with the mass and expert surveys, and it includes 214 societies (but excludes the Netherlands Antilles, Cook Islands, Monaco and Niue). In addition, the data are processed and presented in more sophisticated fashion: each dimension of the WGI, including Control of Corruption, is a normally distributed variable with a mean of zero, a standard deviation of 1.0, and a maximum and minimum of +2.50 and -2.50 respectively. Country scores can thus be compared to each other and over time with known margins of error and, therefore, less risk of overinterpreting statistically insignificant differences (Kaufmann *et al.*, 2010).

Figure 1 presents the Control of Corruption results for Hong Kong, several neighbouring countries, and a 14-country regional average, from 1996 to 2020, the most recent results available.

Here too it is evident that Hong Kong's reputation for effective corruption control has remained intact across an extended and, at times, tumultuous time span (when post-2020 results appear they will bear careful scrutiny). It is impossible to say just how large a contribution the ICAC by itself has made to these index scores, although it seems likely that an agency with its visibility and reputation, operating in a city-state of great international significance, would influence perceptions in significant ways.

These results reflect well on the ICAC but do not justify complacency, or suggest that it has succeeded for all time. From a high of 1.96 in 2010 the HKSAR's scores have declined to about 1.65 – high by comparison to most of its neighbours, but likely reflecting the internal problems and wider developments noted earlier in this article. Still, barring changes in Beijing's treatment of Hong Kong in years to come, an abrupt collapse in anti-corruption performance seems unlikely. Current opportunities and ways of doing business are too profitable for too many people and firms to be simply abandoned, and the favourable reputation built up by the ICAC and the HKSAR itself is of immense value to the Party leadership.

ICAC and civil society

In its public education and organization-building efforts and its success in persuading citizens to report corruption, the ICAC has integrated itself into local social values and expectations of governance, creating what Gong and Xiao (2017) have accurately termed

Country/Region	2012	2016	2021
Singapore	87	84	85
Hong Kong SAR	**77**	**77**	**76**
Japan	74	72	73
Taiwan	61	61	68
South Korea	56	52	62
China	39	40	45
Philippines	34	35	33
Source: Transparency International (2022b)			
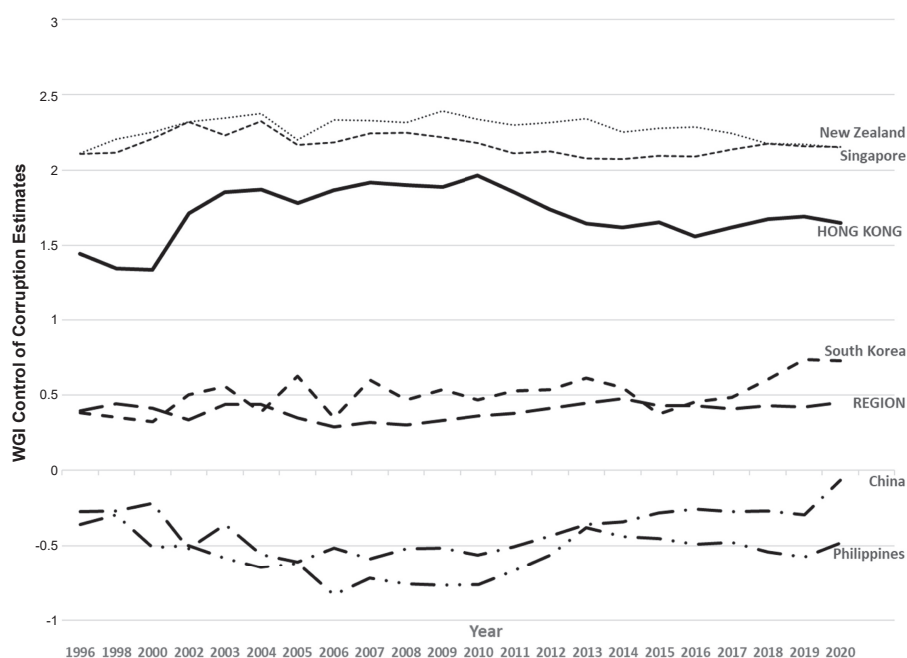
Note(s): Before 2002-2003, scores were reported over two-year intervals

Source(s): Data from World Bank (2022). Graph compiled by the author. Regional score is an annual unweighted average for Australia, China, Japan, North Korea, South Korea, Laos, Macao SAR, Malaysia, New Zealand, Philippines, Singapore, Taiwan, Thailand, and Vietnam

Figure 1.
WGI control of
corruption scores,
1996-2020 - Hong Kong
and 14 Regional
countries/regions

"Socially embedded anti-corruption governance". This unique accomplishment is a central focus of this article – that ambitious and well-supported as the ICAC's investigation and prevention efforts have been, it would not have been so effective without the acceptance and active support from Hong Kong society. That conclusion is reinforced when we consider the often-dismal records of ACAs elsewhere that have been unable to build strong social foundations for their efforts. It is also made clear when we look at how the ICAC has gone about winning such support.

As noted earlier, the first major step toward acceptance for the ICAC was to pursue, and then to imprison, Peter Godber. Later developments built on that success. In 1975 the Community Relations Department became operational, and early on was charged with two basic tasks: "to educate the public against the evils of corruption" and "to enlist and foster public support in combating corruption" (Scott, 2013, p. 14). The former became an ambitious effort – one that still has few parallels around the world – to change public attitudes. That process came to include anti-corruption classes and school curricula, widespread and often quite clever mass media and poster campaigns, and aggressive publicity regarding ICAC activities and accomplishments. Young people were an important target for such efforts, as the ICAC frequently sponsored youth-oriented sporting events, concerts, and the like. ICAC Clubs, launched in 1997 to appeal to a wider constituency, offer social opportunities, awards, and other incentives essential to building and sustaining collective action (Johnston and Kpundeh, 2004), along with discussions and lessons on ethics and corruption. Other efforts addressed public reactions to corrupt activities themselves; an understanding that citizens

and families, as well as the whole society, were harmed by corruption and stood to benefit from effective controls; and attitudes toward anti-corruption institutions. There the agenda was to enhance trust in those institutions and positive perceptions of their effectiveness.

A second major thrust, launched in 1974, was the active solicitation of citizen reports of corrupt treatment and events, accompanied by credible guarantees of safety for those filing reports. Citizens can go to an ICAC office or reporting location, file reports by telephone, or submit them by mail. This process too has been backed up by extensive publicity, often emphasizing that people of humble status such as fishermen and street hawkers can and should report corruption (Scott and Gong, 2015; Chan, 2005, p. 99). Those guarantees are backed up by action – even when reports do not justify a full investigative response they are acknowledged and taken seriously. Over time those principles became credible,

> In 1974, when the agency was newly established, only 35 per cent of the complainants reporting corruption were willing to identify themselves, but in 2002 this figure stood at almost 72 percent. In 1993, 36.7 percent of respondents said they would not tolerate corruption in. . . the private [or] public sector; the level of intolerance rose to about 80 percent in the late 1990s and stood at 90 percent in 2002. In 1993, 44.5 percent of respondents expressed tolerance of private sector corruption, a figure that fell to 13 percent in 2002. Respondents indicating "willingness to report" corruption stood at 54.4 percent in 1993 but rose to 64.7 percent in 2000, and 67 percent in 2002 (Chan, 2005, p. 104).

Such trends have continued through to recent times, although not without some hitches: a partial amnesty for corrupt police officers in 1977 significantly reduced trust in the ICAC for a time as reflected in a temporary reduction of citizen reports (Scott, 2013). Still, in 2016, 70 per cent of Hong Kongers expressed a willingness to report corruption. In 2020, the same percentage of those filing reports with the ICAC were willing to state their identities. The importance of credible guarantees of safety becomes evident when we consider that while a similar survey in an important Mainland China city found levels of intolerance for corruption broadly similar to those in Hong Kong, only 32 per cent expressed a willingness to file reports (Yuan, 2016; Hsieh, 2017).

Gong and Xiao (2017) conclude that low tolerance for corruption by itself does not necessarily translate into citizen willingness to participate in corruption control. Trust in the anti-corruption authorities, both in respect of how they will treat citizen participants and of how effective the agency actually is, is equally important. The ICAC's efforts are strong and effective in no small part because its public relations strategies have succeeded on both criteria.

Citizen reports: a continuing success

The strategy of soliciting citizen reports of corruption began to pay dividends early on (the following data are from ICAC, 2022a; 2022b). In 1974, there were 3,189 reports, a figure that would not be exceeded until 1993 (3,276) and 1994 (3,312). As noted above, reports fell off for a time after the 1977 police amnesty, with just 1,700 reports received in 1977, 1,234 in 1978, and 1,665 in 1979. But by 2000 and the years thereafter, the total frequently exceeded 4,000, and after 2010 – when data on reports were adjusted to reflect the fact that some involved multiple instances of corruption – the totals ran as high as 4,010. More recently, 2,297 reports were filed in 2019, 1,924 in 2020, and 2,264 in 2021. Those figures, reflecting as they do citizen willingness to object to abuses of power and their trust that they can do so safely and effectively, are all the more remarkable given the political uncertainties of life in the HKSAR since 2014 and 2019. Here again, figures for 2022 and later years will bear careful scrutiny.

The flow of reports reflects many influences, and thus we should not oversimplify the significance of year-by-year comparisons. For one thing, of the 1,924 reports received in 2020 just 1,454 could be actively pursued. Early on, complaints against police were quite common; then, after the police were taken out of the anti-corruption picture and police governance

improved, emphasis shifted toward banks and the private sector. Private-sector corruption continues to dominate the flow, with 59 per cent of the 2020 reports; 33 per cent regarded government departments, and 8 per cent public bodies (ICAC, 2021).

Engaging with traditional values

The ICAC operates in a society where, despite the sweeping social changes of recent generations, traditional ways of thinking continue to shape people's attitudes toward their own and others' conduct and interactions. Chinese history offers a rich heritage of texts and thinkers that can guide such an analysis, but generalizations about those values and their salience must still be made with caution: fundamental and enduring traditions may be ill-suited to explaining many of the diverse and rapidly-changing actions we see in contemporary societies. Moreover, it can be difficult to distinguish between "cultural values" and the behaviours and outcomes they are presumed to encourage or inhibit. Facile generalizations can lead to circular arguments in which "culture" supposedly shapes behavior, yet we divine the nature of culture by watching behaviour, or by selectively applying whatever aspects of tradition that might seem relevant at the moment.

Social diversity adds to the complexities: Confucian ways of thinking influence social interactions for many in Hong Kong, but other traditions – Taoism, for example – are also important parts of the social mix. In addition, we should not regard such values solely as religious influences; indeed, "in a 2014 survey conducted by the Gallup Poll, 75.55% of Hong Kongers said that religion was not important to their daily lives" (*Cultural Atlas*, 2022). While traditional values inform Hong Kong citizens about integrity in many ways, they do not reduce to a simple list of do's and don'ts about personal integrity.

Instead, we are considering densely intertwined and broadly applicable principles regarding how people ought to live, both in their own dealings and in a society. Harmony – a "proper and balanced coordination between things", for example, is a deeply important Confucian value with far-reaching implications. But it has definite limits,

> Confucius said, "The gentleman aims at harmony, and not at uniformity (*junzi he er bu tong*, 君子和 而不同)." Thus, a gentleman may hold different views, but he does not blindly follow others. Instead, he seeks to coexist harmoniously with them (Zhang, 2013, p. 2).

Similarly, Westerners are familiar with references to "face" (*mianxi,* 面子) or "losing face", but their full complexity and subtlety can be elusive. According to Ho,

> Face is the respectability and/or deference which a person can claim for himself from others, by virtue of the relative position he occupies in his social network and the degree to which he is judged to have functioned adequately in that position as well as acceptably in his general conduct; the face extended to a person by others is a function of the degree of congruence between judgments of his total condition in life, including his actions as well as those of people closely associated with him, and the social expectations the others have placed upon him (Ho, 1976, p. 883; Teon, 2017, p. 3).

Clearly such principles do not reduce to a list of specific rules an individual should follow, but rather emerge and are applied in the context of extended social interactions.

Guanxi (關係), as noted earlier, is sometimes misunderstood as a type of corruption, or as a synonym for corruption itself, but that is a significant error. While the term is negatively construed in the People's Republic of China, in Hong Kong its meanings are complex and contingent, referring to a set of mutual connections and expectations that could take on a corrupt form but more generally amount to a set of mutual social credits (Fan, 2002), and might be seen as a basis for trust. As with "face", *guanxi* is a social construction or judgment deeply embedded in one's interactions with others over time. "Advantage", a term and concept central to the POBO, not only has a stated legal meaning but also a variety of subtly differentiated social meanings and applications. "Corruption" has legal meanings but it too

has a range of social connotations (Fang, 2022; Chan, 2005, pp. 105-111). Other customs and traditions are somewhat more contested: "tea money" was long seen by most as an informal but acceptable reward for, or in anticipation of, a personal favour; not surprisingly the boundaries of the concept were ill-defined. The ICAC has sought to persuade citizens that "tea money" is a bribe, and likely to lead to the sorts of gratifications that can become ingrained in compromising relationships between citizens and officials (Chan, 2005, p. 111).

A full discussion of traditional Chinese values and corruption control might include a variety of other examples, such as honesty – a highly-prized value – benevolence, righteousness, filial piety, and *Lian* (臉)–"a sense of shame in relation to social standards of morality and behaviour" (Teon, 2017, p. 6). But how might the ICAC have linked these values to corruption control?

Some of the connections are overt and participatory. Youth activities and ICAC clubs at the neighborhood level – activities that set the ICAC apart from most other ACAs – bring home the core principles and presence of the agency, often in enjoyable social settings. Anti-corruption messages and materials emphasizing values rather than laws and punishment (Laje, 2013, p. 3) have been provided for school curricula for many years. Public sporting events sponsored by the ICAC may likewise convey the message that honesty, righteousness, and fair dealings among citizens are principles that are alive and well, and backed up by a prominent and effective agency.

Mass media can make a variety of other connections. Televised dramas featuring popular stars and directors such as "ICAC Investigators", illustrating actual cases and tactics, were launched in the mid-1970s. The world premiere of a TV movie, *ICAC Investigators 2014-Better Tomorrow*, was featured at the Hong Kong film festival in 1974 to celebrate the ICAC's 40th anniversary (Chu, 2014). Shorter public service announcements, often produced in slick and creative fashion, invoke important values too: one, from the 1990s, used the image of a well-tended aquarium with a variety of different fish as an illustration of harmony, and then showed an aggressive predator (accompanied by alarming music) as a metaphor for corruption and the disruption it produces. Another featured a young functionary in a large business office who had been found to be corrupt, and had been dismissed. In the background his fellow workers avert their eyes and turn away as he is marched out of the office – having been dismissed. It is hard to escape the inference that as a result of giving in to corruption, a once-promising young man was suffering a massive loss of face. Yet another mini-drama from that same collection featured an obviously prosperous, westernized businessman as a guest on a television game show, complete with a glamourous host and an elaborate stage set featuring a giant spinning wheel of fortune. The businessman decides to play for the big all-or-nothing prize, only to realize as the wheel slows down that there is no way he can win. The "game" concludes with the businessman's wife and young children witnessing his disgrace – clearly a loss of face and, perhaps at a stretch, a reference to filial piety. Lest the message be lost on anyone, each of these announcements ends with a prominent mention of the ICAC and its telephone number for reporting corruption (ICAC, 1996).

Finally, some of the cultural influences may be quite subtle. The discussions and activities of ICAC Clubs, for example, are likely more effective over time among people who value harmony. Symbols matter as well, thanks in part to a process known as "priming" whereby exposure to some stimuli can influence responses to others later on "by activating an association or representation in memory" (Cherry, 2021). The ICAC logo, for example, includes not only the English-language initials but also a symbol, usually rendered in red and resembling a traditional Chinese seal. As Chan (2005, p. 99) points out,

A Chinese seal signifies that someone claims responsibility for his or her own work.. ... The four characters of the Chinese name for the agency appear in the "seal" script, evoking a feeling of dignity and power. Such a logo for a governmental department was novel in the colonial history of Hong

Kong. And yet such design, symbolic of credibility and a powerful weapon, succeeds in appealing to the feelings and emotions of the majority population rooted in its own traditional culture.

Similarly, in one study Hong Kong experimental subjects who were shown an ambiguous image after having been "primed" with traditional Chinese- or American-oriented stimuli interpreted it in significantly different ways, with the American-primed subjects describing the image in more individualistic, rather than group-oriented, terms (Hong *et al.*, 1997, as cited in Liu *et al.*, 2014, p. 107). While we should not attribute vast psychological powers to the ICAC logo, it likely can engage other associations and values rooted in Chinese traditions. The complexity and interconnections of these networks of values underlines their power: because of their deep social roots and far-reaching consequences, if any of those values is under stress then much else is at stake too.

Many of the hopes underlying the ACA concept are legal and institutional. But the ICAC story makes it clear that there are important "relational" (Bell and Hindmoor, 2009) dimensions involved as well. Gong and Xiao (2017, p. 14) describe the "relational" as "concern [ing] how the government understands and works together with citizens and non-government organisations". Looked at this way, corruption control becomes a continuing presence in the community, involving citizens in a variety of ways. It also creates the need and opportunities not only to educate the public on applicable rules and standards, but also to link programmes and control efforts to traditional values.

Problems over the past decade notwithstanding, the persistence and consistency of the ICAC's work have been some of its most potent assets. In an era in which many anti-corruption programmes have a two- or three-year timeline, are organized and funded from outside the society in question, and in which many ACAs lose public credibility within a few years – or indeed, never win it – Hong Kong's ICAC has been following its basic three-pronged strategy for nearly half a century. In that time citizens and businesspeople have witnessed a dramatic and widely – if still unevenly – beneficial economic transformation. It would be unwise to attribute those changes solely to the ICAC, but there seems little room for doubt that its widely-recognized success in reducing corruption has been a major positive factor. As Chan concludes,

> Over time, the public saw that the ICAC really meant what it said, and at the same time they were reminded of the deep-rooted Confucian values and beliefs of an "honest", "dutiful", "righteous", "benevolent", and "upright" individual – where "rotten" and "corrupt" are never part of the makeup of a Chinese "gentleman". Protected by the due process of the common-law legal system, the people became willing to report wrongdoing and to embrace new social definitions of corruption. This mindset is a marked change from their submissive culture (Chan, 2005, p. 112).

Conclusion

Hong Kong has arguably come closer to a *de facto* zero-tolerance anti-corruption regime than all but a handful of other societies. To extract lessons for other corruption fighters in other places I return to the central theme of this analysis: the ICAC has not succeeded all by itself, but rather by involving the whole society in reform via its strategy of socially-embedded anti-corruption governance (Gong and Xiao, 2017). Other than perhaps the case of Singapore – another city-state and one that historically has been considerably more strictly governed than Hong Kong – there are few cases suggesting that zero-tolerance proclamations from the top amount to a promising response to corruption. Far more rewarding – if more demanding, and requiring continuing long-term commitment – is the approach of building resistance to corruption within society through continuing educational efforts, swift and credible responses to corruption *as citizens experience it*, and building social participation and trust. The Hong Kong case shows that if "zero tolerance" is to be more than an empty slogan, a face-

saving exercise for elites, or a pretext for repression, it is most likely to succeed when it mobilizes the whole society – and from the bottom upwards.

For corruption control to have a chance to succeed, citizens, activists, leaders, and international partners must resist the temptation to seek immediate once-and-for-all solutions, or to rely only on investigation and law enforcement. Instead, they must prepare for a lengthy struggle – one that will involve reverses from time to time, as Hong Kong and virtually every other case shows. That may require long-term, sometimes low-profile steps for which it may be difficult for anyone to claim credit, but that will be integral to the challenges of winning credibility and trust. Reformers must understand social values and traditions in depth, sometimes adapting to those ways of getting things done and at other times, modifying them through teaching and patient persuasion. Corruption control will be most effective when reformers see it not just as an institutional problem but as something people experience every day. Reform must be pursued not *for* people but *with* them, for citizens possess knowledge, social ties, and self-interested energy essential to anti-corruption work. Some of the most important guidance may come from within society as we engage with social networks and community leaders, and with the challenges they continually face.

All of that takes time, and the ICAC's anti-corruption story remains very much a work in progress a half-century since its founding. It requires a particular kind of leadership, along with knowledge that may never come to the surface unless reformers actively seek it out and put it to use. Ultimately, it requires the recognition that serious corruption is not something that "happens to" a society, to be "fixed" by laws and institutional strengthening alone. Critical as those are, they must be part of a larger response drawing upon citizens' lasting interests in justice and a better quality of life.

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