

Integrity - Our Winning Edge
CORRUPTION PREVENTION

TIPS FOR
**HOTEL
INDUSTRY**

Integrity - Our Winning Edge

The tourism industry is one of the important pillars of Hong Kong's economy. To maintain the city's competitive edge as an international tourist destination, every practitioner should put customers first and serve them with sincerity. In addition to delivering high-quality services to enhance their travel experience, upholding professional integrity is essential for earning tourists' trust and confidence. This commitment ensures the healthy and sustainable development of the tourism industry and strengthens Hong Kong's position as a world-class premier destination.

To enhance the integrity of practitioners in the hotel industry, this pamphlet uses simple and easy-to-understand scenarios to illustrate common corruption and malpractice pitfalls in the industry, anti-corruption laws and practical tips for preventing corruption. It aims to raise awareness of corruption risks and encourage practitioners to uphold integrity in their work, collectively safeguarding the good reputation of Hong Kong's tourism industry.





Room reservation

Noting the high demand for hotel rooms during peak season, an employee of a travel agent offers “kickback” to a hotel staff as a reward for securing room reservations.

COUPON

★ Smart tips

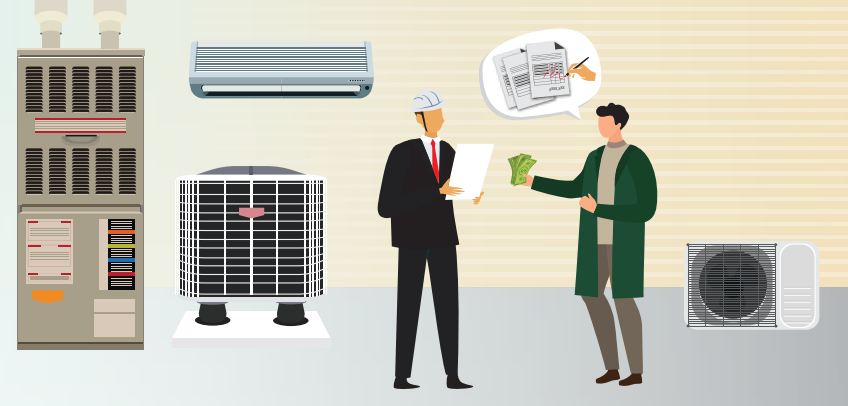
It is an offence under the Prevention of Bribery Ordinance (POBO) for hotel staff to accept “kickbacks” without the hotel’s permission when performing their duties. Staff members should adhere to the hotel’s guidelines regarding the acceptance of advantages.

Handling of hotel guests

A hotel concierge accepts dining discounts from a friend for recommending the restaurant owned by that friend to hotel guests.

★ Smart tips

Discount is a kind of advantage. If hotel staff accept advantages for abusing their position, they may violate the POBO. Even if corruption is not involved, employees should remain vigilant at all times to avoid conflicts of interest.



Purchasing

Three employees of a hotel’s engineering department conspire to deliberately inflate the quotations of a works contract. They accept an illegal commission of \$1.1 million from a contractor as a reward for awarding him an engineering contract worth \$5 million.

★ Smart tips

Staff members responsible for procurement must safeguard the interests of the hotel and refrain from reaping personal gains. If they abuse their position for accepting advantages from contractors, they would commit a bribery offence. Employees should strictly adhere to the hotel’s established procedures and guidelines regarding purchasing and tendering processes.

Administration

A part-time worker is employed by a hotel to provide hospitality services at a banquet. In order to travel with her boyfriend, she asks another part-time worker to forge her signature on the attendance record sheet, falsely claiming that she has worked at the hotel to deceive it of wages.

★ Smart tips

A hotel staff who purposely uses false attendance record to deceive the hotel of wages may breach the POBO or commit other criminal offences such as deception, fraud, etc. Anyone who assists in falsifying such a record may also be liable for conspiracy to defraud.



INTEGRITY QUIZ

1. If someone in your company has committed an act of corruption, you will:
A. turn a blind eye
B. gossip with your “buddies” in the company and secretly look for another job
C. report to your supervisor and the ICAC
2. You attended a client’s spring gathering on behalf of your company and won a \$5,000 cash coupon in a lucky draw. You will:
A. treat your colleagues to dinner
B. report the cash coupon to your company for disposal
C. keep the cash coupon for yourself
3. When asked to lie to the supervisor to cover up for your colleague, who left the office earlier in order to moonlight, you will:
A. hesitate to give a definite answer
B. agree to help
C. turn him down right away
4. You are responsible for receiving goods in your daily work. Recently, the supplier often treated you to dinner, and offered samples of goods and concert tickets, you will:
A. accept them happily because treating others and offering gifts are common social practices in the business world
B. handle the entertainment and gifts in accordance with your company’s code of conduct
C. join the feast since entertainment is not counted as an advantage, but reject the other gifts

Scores: 1. A(1) B(2) C(3) 2. A(2) B(3) C(1)
3. A(2) B(1) C(3) 4. A(1) B(3) C(2)

Quiz Results (Add up your scores for the four questions and see the following analysis)

12 marks Based on the score you attain, you are a prudent and cautious person who is able to adhere to the professional code of conduct, legal requirements and company rules when making decisions. Keep this up and continue to put professional ethics into your daily practice.

9-11 marks According to your score, you incline to judge from your intuition and your decisions can easily be influenced by others. You are advised to make reference to the relevant Ordinances and company code of conduct before taking any action.

4-8 marks Your score reflects that you are vulnerable to temptation and will easily fall prey to the persuasion of those behaving unlawfully. You are strongly advised to revisit the related Ordinances and your company’s code of conduct immediately because you tend to focus too much on personal benefits and pay too little attention to the requirements of Ordinances and company rules. Beware not to breach the law inadvertently and clarify with your company or the ICAC if in doubt.

Model Answer: 1-C, 2-B, 3-C, 4-B

WHAT IS BRIBERY?

Section 9 of the Prevention of Bribery Ordinance (POBO)

- Any agent (e.g. hotel employee)
- Without the principal’s approval (e.g. hotel)
- Solicits or accepts any advantage
- An act in relation to his principal’s affairs or business
- Both the offeror and recipient shall be guilty of the offence



Advantage

Includes, irrespective of the value, any gift, loan, fee, reward, commission, office, contract, service, favour and discharge of loan or liability, but does not include entertainment.



Entertainment

Refers to the provision of food or drink, for consumption on the occasion when it is provided, and of any other entertainment connected with, or provided at the same time.

Section 9(3) of the Prevention of Bribery Ordinance (POBO)

Any agent who, with intent to deceive his principal, uses false, erroneous or defective receipt, account or other document shall be guilty of an offence.



Penalty

The maximum penalty is a fine of HK\$500,000 and 7 years’ imprisonment.

Tips for being a professional and smart staff -

Be alert to corruption risks

Enquire if in doubt

Say no to temptations

Must declare conflict of interest

Avoid over-socialisation with business associates

Report any suspected corruption

Total compliance with the law and company code of conduct

**BE
SMART**

Adopt zero tolerance! Report corruption!

In Person: ICAC Report Centre (24-hour service); or any Regional Offices

By Phone: 25 266 366 (24-hour hotline)

By Mail: G.P.O. Box 1000, Hong Kong



Regional Offices