

Identification				Evaluation			Mitigation			
Subject	Work Process / Item ¹	Integrity Risk ¹	Inherent Risk Level ^{2&3} (A)	Existing Practices	Mitigating Factor ⁴ (B) (if the practices meet the criteria of mitigating factor)	Residual Risk Level ³ (C=A-B)	Proposed Control Measure(s) ¹	Action By	Mitigating Factor ⁴ (D)	Revised Risk Level ³ (E=C-D)
Staff Administration	Recruitment	Solicit/accept advantages from workers/employees in return for their employment	3							
		Exercise undue discretion to select acquainted workers for appointment or continue the employment of acquainted workers	3							
		Falsify qualifications to deceive employers	3							
		Disclose privileged information (e.g. interview questions) to candidates	3							

The worked examples (including the integrity risks, work processes/items, their corresponding inherent risk levels, and the recommended control measures) are compiled based on the analysis of previous ICAC cases and are by no means exhaustive and not intended to substitute any legal, regulatory or contractual requirements

Summary of Integrity Risks and Control Measures on Staff Administration

Subject	Work Process/Item	Integrity Risk	Inherent Risk Level	Control Measures	Type
Staff Administration	Recruitment	Solicit/accept advantages from workers/employees in return for their employment	3	- Lay down a company policy on integrity, (including prohibiting employees/agents from soliciting and accepting introduction fee from workers, confidentiality and conflict of interest), and ensure staff are aware of the policy (same apply to any subsequent changes to the policy) - Use official platforms or channels for the sourcing and recruitment of workers	Preventive
				- Meet workers and interview them regarding the recruitment and payment issues - Establish a reporting channel for workers to report suspected malpractices and explicitly state the forbiddance of retaliation against personnel reporting in good faith	Detective
				Remind job seekers to stay vigilant to corrupt approach, e.g. by posters	Educational
		Exercise undue discretion to select acquainted workers for appointment or continue the	3	- Establish recruitment procedures that - predetermine selection criteria - avoid changes to the selection criteria - document assessment of recruitment process - conduct recruitment process by a team of two members or a panel - Require staff involved to declare conflict of interest	Preventive

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Summary of Integrity Risks and Control Measures on Staff Administration

Subject	Work Process/Item	Integrity Risk	Inherent Risk Level	Control Measures	Type
		employment of acquainted workers	3	Use official platforms or channels for the sourcing and recruitment of workers	
				Assign an independent staff member to review the recruitment process	Detective
		Falsify qualifications to deceive employers	3	Require job seekers to provide true copy of qualification, working experience etc.	Preventive
				Verify authenticity of submitted proof, e.g. by reference check with previous employers and/or issuing institutions	Detective
				Make known to job seekers the consequence of submitting false documents	Educational
		Disclose privileged information (e.g. interview questions) to candidates	2	- Predetermine and publicise the entry requirements and application procedures, and provide an enquiry hotline - Classify information related to recruitment, and require staff involved in the recruitment process to undertake disclosure on a need-to-know basis only	Preventive
				Make use of digital technology to detect leakage of confidential information	Detective

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