

The Honorable Ronald Arculli, GBS, JP  
Chairman, Committee on Review of  
Post-Service Outside Work for Directorate Civil Servants  
10/F., West Wing  
Central Government Offices  
11 Ice House Street  
HONG KONG

20 March 2009

Dear Hon Ronald,

**Review of Post-Service Outside Work for Directorate Civil Servants**

As an association representing over 120 architects in the Housing Department, we would like to express our views on the above public consultation document as follows-

**POLICY OBJECTIVE – ISSUE 2**

**(1) Suggest that the existing regulations should be further relaxed for D3 or below officers.**

We are of the opinion that rule-abiding civil servants should not be unduly penalized by sporadic cases (the two widely reported cases that occurred at level D4 or D8) that have drawn special attention of the general public. The existing internal guidelines or regulations governing the integrity and working procedures of civil servants are already stringent enough in preventing possible conflict of interest. We would suggest that Hong Kong should make reference to the more relaxed rules of other overseas jurisdictions (Chapter 4 refers). In comparison with open societies in Australia, Britain or Canada, Hong Kong is, in our view, rather backward in this regard. We should follow the steps of Australia to honour trust and goodwill.

**PERIOD OF RESTRICTIONS – ISSUE 3**

- (2) Suggest that the restrictions should only apply to senior civil servants at the upper echelon at levels above D4.** Most directorate grade retirees are professionals, who have genuine needs to practice continuously to maintain their professional standards. Without any doubt, retired professionals, regardless whether they are doctors, accountants, lawyers,

architects or engineers are a valuable asset to the community. The experience they collected over the years can contribute positively to the advancement of their respective professions and the betterment of Hong Kong as a whole if their right to employment is honored. We should bear in mind that most professionals in the Civil Service work at the frontline and only a handful of them are holding senior policy-setting positions (at D4 or above) which may have linkage to the Property Sector Business (paragraph 5.36 refers).

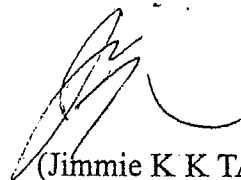
PROCESS - ISSUE 4

**(3) Suggest that the Administration should give a pledge that any application will be decided (approve or otherwise rejected) within 4 weeks' time for D3 officers and below.**

The existing application procedures are too cumbersome and too tedious. Under the current system, the application will take at least several months to process. An applicant will lose the chance to get the job if a decision is not made by the authority in good time. The procedures must be simplified. Clearer guidelines should be put into place to allow efficient and expedient assessment of any post-service employment application. There should be a separate set of rules governing the senior directorate officers at level D4 above, i.e., those who had previously held special or sensitive positions before retirement.

We sincerely hope you would consider our views as expressed above before making a final recommendation to the Administration.

Yours faithfully,



(Jimmie K K TAM)

Chairman

JKKT/jt

c.c. Members

