



# The Golden Key to Unlock Good Governance:

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## Managing with Equality

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21 January 2025

# Outline

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- Part 1: Anti-discrimination Ordinances
  - Concept of equal opportunities
  - Major unlawful acts
- Part 2: Equal Opportunity Governance
  - Case study and discussion
  - Good management practices



# Equal Opportunities Commission

- A statutory body set up in 1996
- Fully funded by Government
- **Independent**
- Chief Executive appoints Members of the EOC
  - one full time Chairperson
  - 16 Members from various sectors, including women, persons with disabilities, ethnic minorities, employment groups, social service sector, legal professionals, accounting professionals, academics, etc.



# Functions

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1. Complaints handling
  - Investigation
  - Conciliation
2. Legal review and assistance
3. Policy advocacy, research and training
4. Promotion and publicity

# Part 1 Anti-Discrimination Ordinances

# Context for Anti-Discrimination Laws

## International

- Universal Declaration of Human Rights (1948)
- International Covenant on Civil and Political Rights (1966)
- International Covenant on Economic, Social and Cultural Rights (1966)
- Convention on the Elimination of All Forms of Discrimination Against Women (1979)
- Declaration on the Rights of Persons with Disabilities (2007)

## Local

- Bill of Rights Ordinance (1991)
- The Basic Law (1997)
- Sex Discrimination Ordinance (1996)
- Disability Discrimination Ordinance (1996)
- Family Status Discrimination Ordinance (1997)
- Race Discrimination Ordinance (2009)

# Anti-Discrimination Ordinances

1

**Sex Discrimination Ordinance (SDO), 1996**

2

**Disability Discrimination Ordinance (DDO), 1996**

3

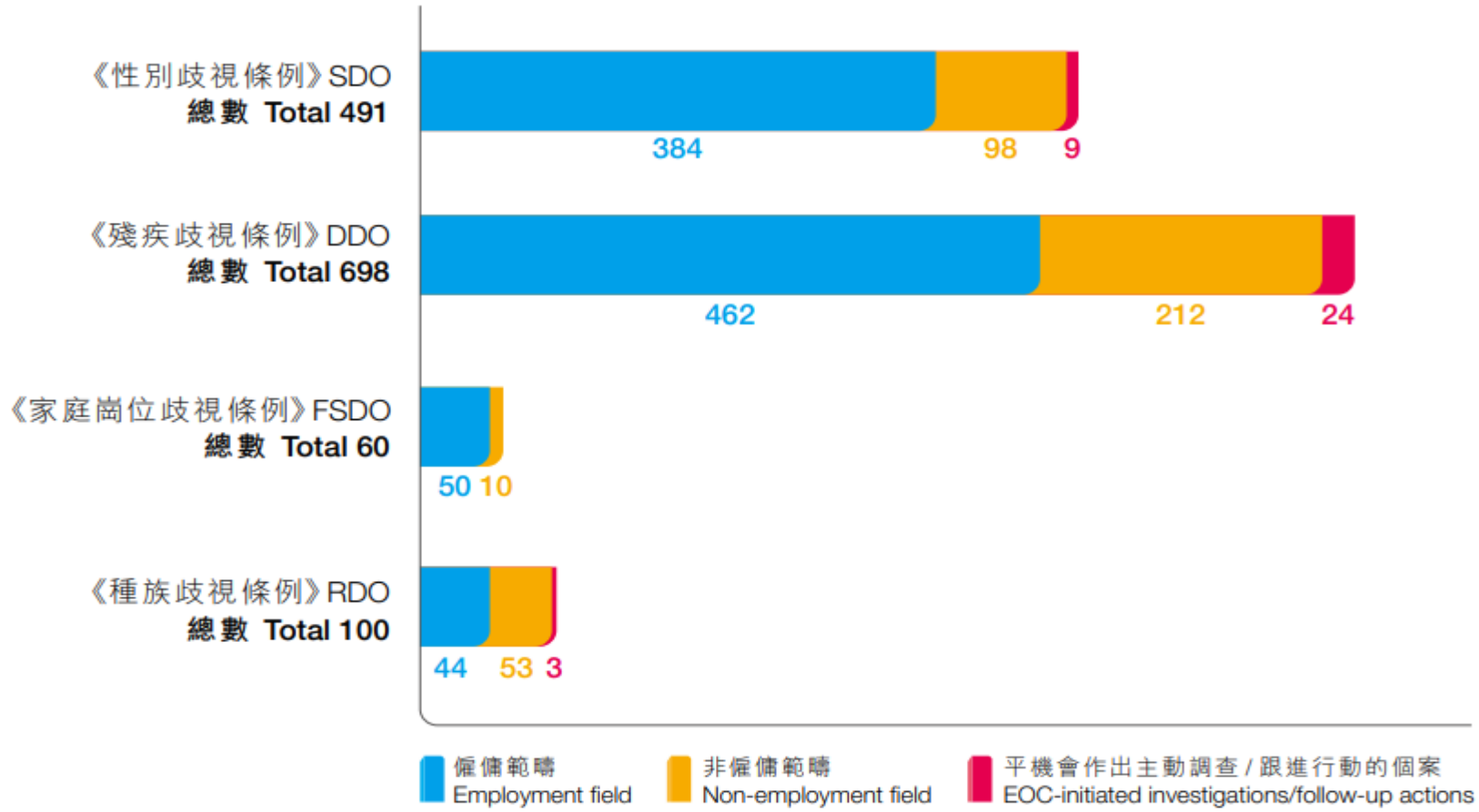
**Family Status Discrimination Ordinance (FSDO), 1997**

4

**Race Discrimination Ordinance (RDO), 2009**

# Total Number of Complaints Handled (2023-2024)

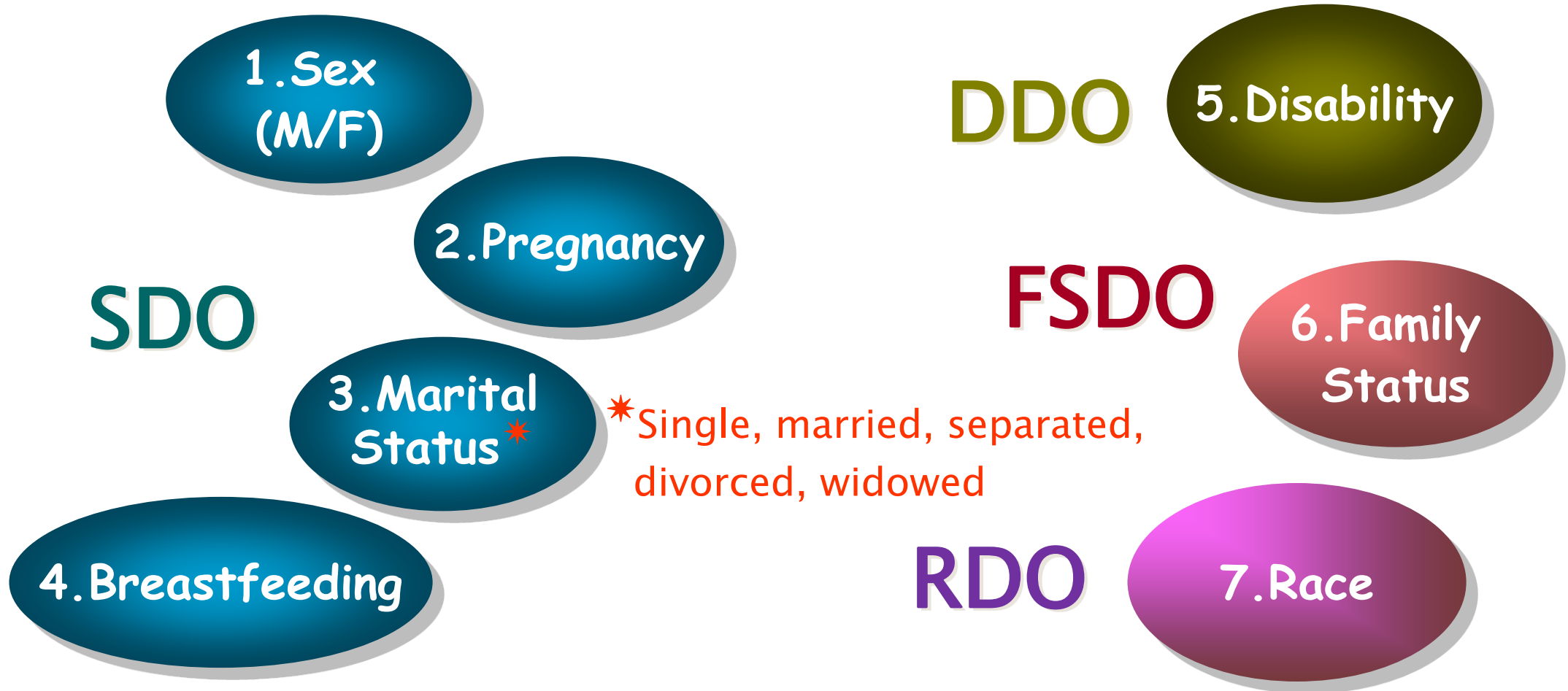
Total: 1,349. Majority (69.7%) belonged to employment field.





# Prohibited Grounds of Discrimination

It is unlawful to discriminate against a person on the grounds of:



# SDO – Protection for Breastfeeding

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## Meaning of breastfeeding

- A woman breastfeeding “a child”
- *Not “her child”*
- includes natural mother, adoption or surrogacy

# DDO: Definition of Disability

- Total or partial loss of the person's bodily or mental functions
- Total or partial loss of a part of the person's body
- The presence in the body of organism causing/capable of causing disease or illness
- The malfunction, malformation or disfigurement of a part of the person's body
- A disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction
- A disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment that results in disturbed behavior

# FSDO: Definition of Family Status

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- Person has a responsibility for the care of an immediate family member
- An immediate family member related by:
  - ⇒ blood
  - ⇒ marriage
  - ⇒ adoption
  - ⇒ affinity

# RDO: Definition of Race

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- Race
- Color
- Descent
- National origin
- Ethnic origin

# Equal Opportunity is about...

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- **respecting** differences of each other
- giving people **a fair chance** to prove what they are capable of
- not letting irrelevant factors come into play when decisions are made

# Unlawful Discriminatory Acts

## (A) Discrimination

- Direct Discrimination
- Indirect Discrimination
- Victimization

## (B) Harassment

- Sexual Harassment
- Breastfeeding Harassment
- Disability Harassment
- Racial Harassment

## (C) Vilification

- Disability Vilification
- Racial Vilification

# Unlawful Discrimination Act

## 1. Direct Discrimination

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- To treat a person **less favorably** than another person in comparable circumstances
- **on the ground** of his/her sex, marital status, pregnancy, breastfeeding, disability, family status or race.



# Dismissal on the Ground of Pregnancy

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## (DCEO 16/2019) District Court's Ruling –

- Loss of income \$306,680
- Loss of year-end bonus \$489,500
- Injury to feelings \$130,000
- An apology letter
- A reference letter
- Legal costs

# For Employers – Lesson to Learn

法庭：「...僱主的解釋過於簡單和薄弱，更是選擇性和不完整.....沒有足夠證據，部份對周女士的指控屬毫無根據和不公平。」

Justifiable

Comprehensive

Evidence

# Standard of Proof

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- **On balance of probabilities**
- More probable than not that the respondent committed the alleged unlawful acts
- The **more serious the likely consequences** for the respondent if the allegation is proven, the **greater the weight of evidence** that is required for the decision maker to be satisfied that the allegation is proven

# Unlawful Discrimination Act

## 2. Indirect Discrimination

- Impose the **same requirement / condition** on everyone
- Some groups are **less able to comply** with the requirement /condition & suffer a **detriment** as a result
  - Men/women, pregnant women, persons with a particular marital status, breastfeeding women
  - Persons with a disability
  - Persons with family status
  - Persons from a particular racial group
- The requirement / condition **cannot be justified**, i.e. not fair & reasonable

# Same Requirement / Condition in the Workplace

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## Example:

- Dress code
- Shift work / Overtime work
- Recruitment and promotion requirements
- Requirements for attendance
- Year end bonus
- Others job-related requirements

# Unlawful Discrimination Act

## 3. Victimization

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To treat a person **less favorably because** the person has:

- brought proceedings against discriminators /harassers
- given evidence or information in connection with proceedings against discriminators/harassers
- done anything under the SDO/DDO/FSDO/RDO
- alleged that discriminators /harassers have committed unlawful discriminatory acts
- Or by reason that the person intends to do any of those things

# Harassment

SDO

- Sexual harassment
- Breastfeeding harassment

DDO

- Disability harassment

RDO

- Racial harassment

# Unlawful Discrimination Act

## 4. Sexual Harassment

### Subjective Test

- X makes an **unwelcome** sexual advance, or an unwelcome request for sexual favors to Y; or
- X engages in other unwelcome conduct of a **sexual nature** in relation to Y

### Objective Test

- A reasonable person, having regard to all the circumstances, would have anticipated that Y would be **offended, humiliated or intimidated**.

Court case: C v Hau (DCEO 10/2021)



**A Territory-wide Representative Survey  
on Sexual Harassment in Hong Kong 2021**

2021 年全港性騷擾調查

**Report  
研究報告**

May 2022  
2022 年 5 月



## Territory-wide Survey on Sexual Harassment in Hong Kong 2021

- 12 May 2022
- 5,027 Hong Kong residents were interviewed by phone

<https://www.eoc.org.hk/en/policy-advocacy-and-research/research-reports/2022-1>

# Prevalence of Workplace Sexual Harassment (Base=3,928)

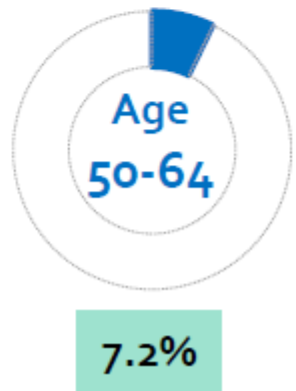
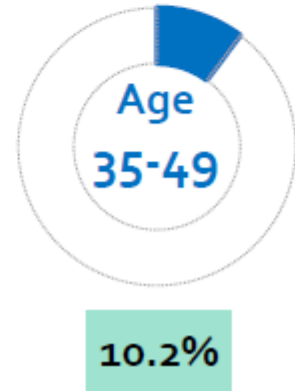
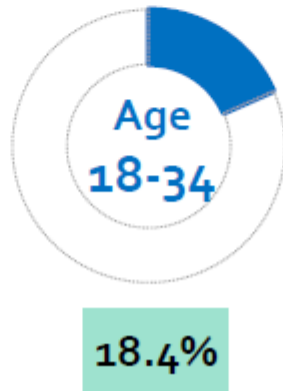
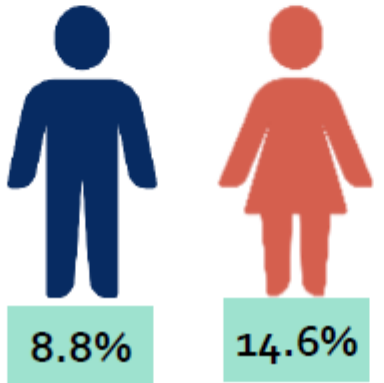


One in Eight  
(11.8%)

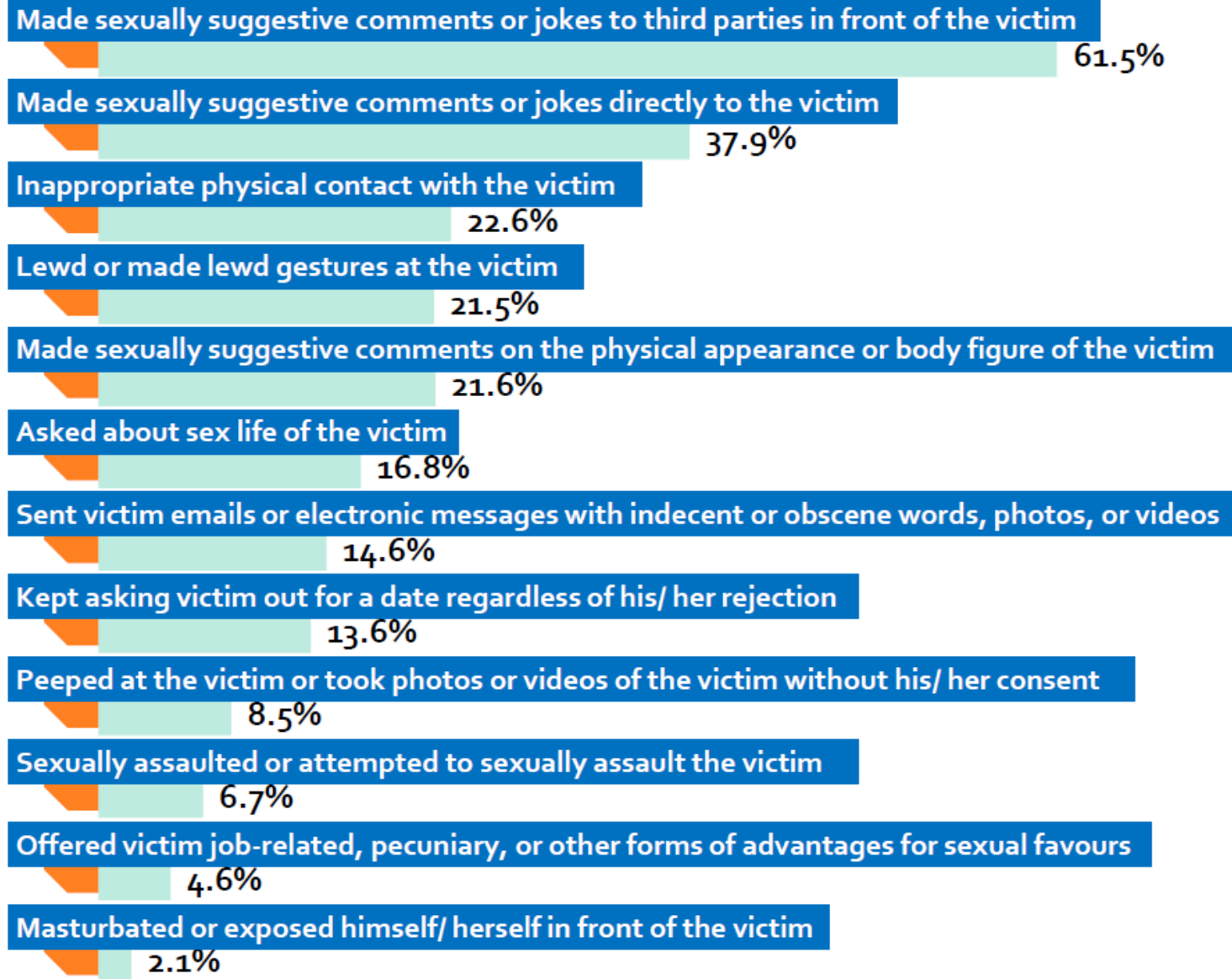


11.8% of the respondents were sexually harassed at work in the past 24 months.

## Disaggregated Prevalence by Sex and Age Groups



## Nature of Workplace Sexual Harassment



# Sexual Harassment – Hostile or Intimidating Environment

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A person, alone or together with other persons, engages in conduct of a sexual nature which creates a **hostile or intimidating environment** for other(s).

# Examples

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In workplace –

- Open discussion of **sexual jokes**
- Display of sexually offensive **posters and calendars**
- At a **meeting**, a group of colleagues hijack discussion and turn it to sexual topics.

# Unlawful Discrimination Act

## 5. Breastfeeding/Disability/Racial Harassment

### Subjective Test

- X harasses Y if X engages in **unwelcome** conduct against Y on the ground that Y is **breastfeeding / Y's disability / Y's race**.

### Objective Test

- A reasonable person, having regard to all the circumstances, would have anticipated that Y would be **offended, humiliated or intimidated**.

# Example

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- Some staff made jokes that they should **call the office breastfeeding room “Cow Milking Room” for all the “cows” at the office.**

# Unlawful Discrimination Act

## 6. Disability / Racial Vilification

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Activity in public inciting

- ❑ hatred towards
- ❑ serious contempt for; or
- ❑ severe ridicule of

persons on the ground of their disabilities or race.



# Unlawful Discrimination Act

## 7. Serious Disability / Racial Vilification

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Activity in public:

- a) Threatening physical harm to the persons on the ground of their disabilities or race, or damages towards premises or property of those persons
- b) Inciting others to commit the act in (a)

 **Criminal offence:**

Fine at level 6 (\$50,001 – 100,000) & imprisonment of up to 2 years



# Legal Liability

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# Applicable Field – Employment

## Employees:

- ⇒ Terms of employment
- ⇒ Pay levels, benefits, promotion, transfer, training
- ⇒ Dismissal, redundancy or other detriment

## Applicants:

- ⇒ Arrangement of offering employment
- ⇒ Terms and conditions of employment
- ⇒ Deliberately not employ

# Applicable Field – Provision of Goods, Facilities and Services (GFS)

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Unlawful to discriminate against a person by refusing or deliberately omitting to :

- ➔ Provide GFS
- ➔ Provide GFS on like terms
- ➔ Provide GFS in like manner

**Paid or Unpaid GFS**

# Applicable Fields

The fields covered relate to our **public life**. Examples:

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- ◆ Employment
- ◆ Provision of goods, facilities and services
- ◆ Access to premises (DDO only)
- ◆ Disposal or management of premises
- ◆ Sporting activities
- ◆ Clubs
- ◆ Education
- ◆ Government activities, etc

# Employee's Liability

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Individuals are **personally liable** for their own unlawful acts under the law.

It is unlawful to:

- ❖ **instruct** someone to discriminate against or harass another person
- ❖ **pressure** someone to discriminate against or harass another person
- ❖ **knowingly aid** someone to discriminate against or harass another person

# Employer's Liability – Vicarious Liability

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- The employer is liable for their employees' unlawful discriminatory acts **in the course of their employment** whether with or without employer's knowledge or approval
- An employer is not liable only if it has taken **reasonably practicable steps** to prevent its employees from performing unlawful discriminatory acts in the course of their employment.

# Reasonably Practicable Steps

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- ☑ Developing and implementing an **equal opportunities policy, anti-harassment policy, etc.**
- ☑ Developing a **complaint resolution procedure**
- ☑ **Appointing person(s)** in the organization to take responsibility for equal opportunities issues
- ☑ **Awareness training for employees** about what is unacceptable and unlawful behaviour in the workplace



# Vicarious Liability - intern(s) or volunteer(s)

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- The person who engaged
  - the intern(s) for the internship; or
  - the volunteer(s) to perform the work
- is liable for the intern's / volunteer's unlawful discriminatory acts whether with or without his/her knowledge or approval
- The person is not liable only if he/she has taken **reasonably practicable steps** to prevent the intern(s) / volunteer(s) from performing unlawful discriminatory acts.

# Part 2

# Equal Opportunity Governance

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# Case 1

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B V KING OF THE KING GROUP LTD. (DCEO 9/2010)

# Responsibilities of Employers (Management)

## Reasonably Practicable Steps

- Policy should be **understood, implemented and observed**
- Complaints handling procedures must be developed and **managers should have been trained** in dealing with discrimination and harassment complaints
- All employees should be **aware of** what constitutes discrimination and harassment
- A **work culture** that is free of discrimination and harassment should be nurtured



## Framework for Corporate Policy on Anti-Sexual Harassment

### 1. Principle: zero tolerance for sexual harassment

The policy should clearly state that everyone has the rights to be respected and be equally treated. It should also point out that sexual harassment is discriminatory and unlawful. Sexual harassment may lead to disciplinary measures of company, and may also entail civil liability and even criminal consequences. Once an act of sexual harassment occurred, any person in the company has a right to lodge a complaint. The determination of company to eliminate and prevent sexual harassment should be clearly conveyed. Sexual harassment will not be tolerated in the company.



### 2. Objectives and Responsibilities of the Employer & Management

The objectives of anti-sexual harassment policy should be listed out so that all parties in company have a clear understanding of the objectives. The objectives also set a direction for future development of specific measures.

The objectives of anti-sexual harassment policy and the liability of company include but not limited to:

- ensuring all employees, partners and commission agents (including prospective employees and persons who sought for employment / the

# Policy Framework (Sexual Harassment)

1. **Principle**: zero tolerance for sexual harassment
2. **Objectives and Responsibilities** of the Employer & Management
3. **Obligation and Responsibility** of Employer and All Employees
4. **Definition** and examples of Sexual Harassment
5. **Rights of victim** and various actions to be taken
6. **Principles of handling** sexual harassment complaints
7. **Mechanism** for handling sexual harassment complaints
8. **Time bar** for lodging a complaint
9. Disciplinary or Other **Appropriate Actions**
10. Related **resources**

# Internal Complaint Handling Procedures

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1. Principles of handling complaints
2. Mechanism – flow chart to explain (mediation and investigation)
3. Time bar for lodging a complaint
4. Disciplinary or other appropriate actions
5. Rights of victim and various actions to be taken
6. Names and contacts of designated staff responsible for handling complaints

# Internal Complaint Handling Procedures

## Five Key Elements

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- 1) Clear and Accessible Grievance Procedures
  - ✓ clear, step-by-step grievance procedures in plain language
- 2) Contact Officers
- 3) Informal and Formal Procedures
  - ✓ Mediation and investigation
- 4) Decision on Appropriate Action(s)
  - ✓ Disciplinary actions or preventive measures
- 5) Record Keeping: effectively identify problem areas and take proactive action to prevent discriminatory



# Internal Complaint Handling Procedures

## Good Practices

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- Respond to complaints **promptly** and within a set timeframe.
- Take complaints **seriously** by assessing in detail the evidence and ensure complainants are not victimized for coming forward.
- Maintain **confidentiality** by only disclosing details of the complaints to relevant parties on a need-to-know basis.
- Give all relevant parties ample opportunities to explain their version of events and remain **impartial** throughout the investigation.

# Internal Complaint Handling Procedures Good Practices (cont'd)

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- Keep all relevant parties **up to date** on the progress and outcome of investigations.
- Accurately **record and file** details of reported incidents and investigation outcomes.

# Case 2

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# Prevent Family Status Discrimination: Good Practices

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- Adopt **Consistent Selection Criteria (CSC)** in recruitment, promotion, transfer, training, dismissal or redundancy.
- Do not hold stereotypical assumptions on people with family status, e.g. persons with family status are unsuitable for jobs that involve travel.
- Ensure that **shift work** arrangements are free from discrimination.
- Ensure that employees are allowed to have a free choice regarding the taking up of **overtime work**.
- Offer part-time work or job sharing where possible.
- Treat **part-time employees fairly** as regards pay, pension, training and promotion.

# Good management practices – Consistent Selection Criteria

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- Should develop “**consistent selection criteria**” (**CSC**) as one of the first steps in establishing a fair recruitment practice.
- CSC should **relate to the job requirements**, e.g. education, experience, knowledge, skills and etc.
- Should not consider sex, pregnancy, marital status, breastfeeding, disability, family status and race of job applicants.

# Good management practices – Breastfeeding Friendly Employment Policy

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- Developing and implementing “Breastfeeding Friendly Workplace” Policy.
- Promoting the Policy to all staff and remind staff (including breastfeeding moms) to **communicate with the management proactively.**
- Providing training to responsible staff

# “Breastfeeding Friendly Workplace” Policy



## Department of Health

### Measures:

- Time
- Space
- Facilities
- Attitude

<https://www.fhs.gov.hk/english/breastfeeding/workplace.html>

# Breastfeeding: Good practices

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- Developing policies which support breastfeeding
  - ✓ Department of Health has published guidelines relating to breastfeeding in different situations
- Providing appropriate facilities
  - ✓ Babycare or lactation rooms
  - ✓ Existing room that can temporarily be adapted for breastfeeding
- Providing alternative arrangements
  - ✓ Allowing an employee to visit nearby community baby care facilities to express milk



# Breastfeeding: Good practices (cont'd)

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- Flexible work arrangements
  - ✓ Changes to daily start and end times of work
  - ✓ Working from home (WFH) some of the time
- Changings in working conditions
  - ✓ Reducing work from full time to part time temporarily
  - ✓ Changes from doing night to day shifts

# Workplace Dress Code

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- Where practicable, consult employees before introducing a dress code or changing existing one. **Communicate** the dress code to all employees clearly.
- Ensure that the dress code requirements are **job-related, reasonable** and can be objectively justified.
- Ensure that the dress code is applied **fairly and consistently to all staff members**, and is not applied more strictly to a particular group of employees than the other (e.g. male VS female).

# Workplace Dress Code (cont'd)

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- Apply the dress code **flexibly to accommodate the special needs, e.g. disability,** of employees.
- Review the dress code periodically to take into account changing social conventions.



# Recruitment

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# Before Interview

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- Should not **request photos / videos** at the application stage.
- Avoid questions about health conditions, marital status and family responsibility in application forms.

# Complaint Case – Family Status

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- Mona was a mother with a **four month-old baby**. She applied for a manager post at a production house.
- When she attended a **job interview**, a senior manager Ms Wong asked Mona if she had any children.
- Mona did not get the job. She felt that **this was due to her childcare responsibility (family status)**, and lodged a complaint with the EOC.
- The case was eventually settled at the EOC, with monetary compensation given to Mona by the company.

# For Employers – Lesson to Learn

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- Staff who are responsible for recruitment and interviews should be trained properly.
- CSC records should be retained.
- Avoid decisions made by **one person** only.



# Conducting Interviews – Interview Questions

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Basic principles:

- Should not be affected by stereotypes.
- Should be relevant to the requirements of the job.



# Medical Examination

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## Principles:

- Regularly review
- Avoid **only asking job applicants with disability** to undergo medical examinations without justification.
- Should not arrange the medical examinations **too early**.
- Should not ask **unnecessary** health information.
- Should **seek advice from professionals** if needed

# Other HR Functions

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- Promotion, training, posting, performance appraisal and termination
- Should use “consistent selection criteria” (CSC) and review CSC regularly
- Maintain clear policies on promotion, retention, training and development, and communicate the policies to all employees clearly.



# Sick Leave and Absence

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# Rights and Responsibilities

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- **Employers are entitled to monitor** sick leave absence to minimize disruption to work and to manage absence.
- **Employees should share responsibility** for positive management of sickness absence.

# Maximum Length of Sick Leave?

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- Under the DDO, there is no empirical rule on the length of sick leave.
- Exception under the DDO...

# Exception of the DDO: Unable to Perform the Inherent Requirements of the Job

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A person is unable to perform

- **Inherent Requirements** of the job due to his/her disability
- **OR**
- Requires **Accommodation** to perform the Inherent Requirements and providing such accommodation to the job applicant / employee would impose **Unjustifiable Hardship** on employer

# Unjustifiable Hardship

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All relevant circumstances considered including:

- ⊕ Reasonableness of any accommodation
- ⊕ Benefit / detriment to all persons concerned
- ⊕ Effect of the disability concerned
- ⊕ Financial implication

# Good Practices: Sick Leave Management

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- Clear **written EO policy** to staff at all levels
- **Monitor** sick leave /absence trend
  - Particular unit / department / centre
  - Particular supervisor
- Early intervention
- Maintain contacts with absent staff
- **Documentation**





# Job Allocation

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# Case – Direct Pregnancy and Family Status Discrimination

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- Janice was employed by an insurance company as insurance sales.
- After she had informed her employer of her pregnancy, she was **posted to a clerical position**. The company said it was only a temporary arrangement. Her income, however, was reduced as she no longer earned commission.
- When Janice returned to work from maternity leave. She was told that she was not suitable for sales work because she might need to take leave to **look after her baby**, and **not able to cope with the physically demanding sales duties**.
- Janice lodged a complaint with the EOC. The case was settled through early conciliation. The company provided a written apology and monetary compensation to Janice.

# Avoid stereotypes

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- Management should allocate work duties fairly and objectively among employees, taking into account the job nature, individual competencies, skills and experience of employees.
- Should avoid stereotypical assumptions that employees with certain characteristics are inherently better at performing certain job duties.



# Performance Appraisal

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# Complaint Case – Disability

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- Kenneth complained his supervisor had written **discriminatory remarks** in his appraisal report -
- “Kenneth was suffering from impaired health” and “he was temperamentally unstable occasionally”
- Kenneth claimed that his disability had **never affected his performance** and it would jeopardise his career development and **promotion prospects**.
- The parties agreed to **resolve their dispute** with deleting the remarks.

# Performance Appraisal

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- Factual and accurate **indication of** an employee's disability or period of **absence** at work in performance appraisal reports due to disability is **not in itself unlawful**.
- However, if employee's disability or sick leave record **is used against the person's interest in the appraisal** and the employer could not provide legitimate justification, it could **amount to disability discrimination**.

# Factors should be taken into account

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1. Objectives and tasks should be agreed with employees at the beginning of appraisal period.
2. Where there are changes, proper records should be kept with reasons.
3. Assessment system should be clear about what is being measured.
4. Consistency should be maintained.

# Factors should be taken into account (cont'd)

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5. All comments should be supported by facts.
6. In case of poor or marginal performance, employers should act early to allow the employee to improve.
7. Records should be objectively documented on a regular basis, including discussion with staff and agreed action.



# Case 3

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# Provision of Social Services

## Types of Barriers

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# 1. Physical Barrier

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## Design and construction of facilities

- Neglect the needs of PWDs

### Examples

- Lack of ramp, escalator, tactile path
- Staircase in front of entrance
- Service desk is too high
- Website – not accessible for visually impairment persons

# Exception of the DDO

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## Access to premises

- Premises are so designed or constructed as to be inaccessible to a person with a disability; and
- Any alteration to the premises to provide such access would impose **unjustifiable hardship** on the person who provide that access.

## 2. Operational Barrier

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Policy, procedure, etc.

- Not from the perspectives of PWDs

### Examples

- Policy
- Blockage of pathway
- Lack of maintenance

# Case – Disability Discrimination

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- Mr. Wong, with **visual impairment**, went to a bank to **open an investment account** with his family member.
- The bank staff **rejected Wong's application** because Wong could not read and understand the service terms written in the bank document.
- The dispute was settled at the EOC by **early conciliation**.
- The bank confirmed that they would not decline customers with disability under their service policy. They would provide more training to frontline staff.

## 3. Attitudinal Barrier

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### Attitude

- Stereotyping
- Misunderstanding

### Examples

- Not understand the needs and design standard for PWDs
- Insufficient awareness
- Passive: complaint-based

# Universal Design

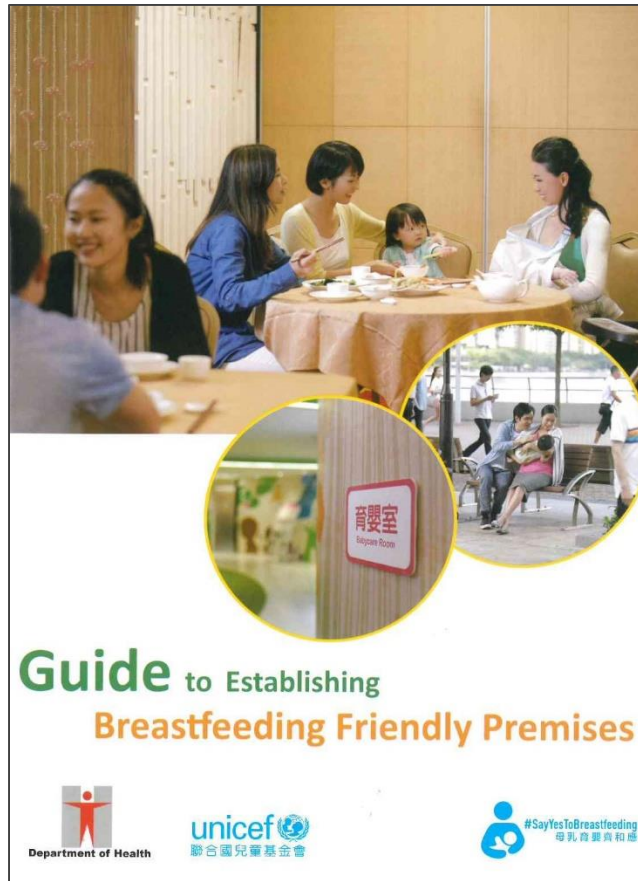
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## Principals

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|-------------------|--|
| <b>1. 等效使用</b>    | <b>Equitable use</b>                       |
| <b>2. 方便靈活</b>    | <b>Flexibility in use</b>                  |
| <b>3. 簡單易用</b>    | <b>Simple and Intuitive use</b>            |
| <b>4. 資訊簡明</b>    | <b>Perceptible information</b>             |
| <b>5. 容差納誤</b>    | <b>Tolerance for errors</b>                |
| <b>6. 省力易用</b>    | <b>Low physical effort</b>                 |
| <b>7. 可用面積和空間</b> | <b>Size and space for approach and use</b> |



# Good Practice for Service Providers



## Breastfeeding Friendly Premises:

- Restaurants
- Shopping malls
- Shops
- Hotels
- Public transportation

<https://www.fhs.gov.hk/english/breastfeeding/30037.html>

# Good Practice for Service Providers

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- **Publicizing** breastfeeding friendly policy and facilities to service users –
  - **Announcing** it at organization's website or social media
  - **Posting a welcome signage** at eye catching areas at the entrance and within the premises

# Good Practice for Service Providers

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- Developing and implementing “Breastfeeding Friendly Premises” **Policy**.
- Providing **breastfeeding facilities** at premises for service users.
- Arranging **training** to frontline staff –
  - Attitude
  - Facilities
  - How to handle difficult clients/customers



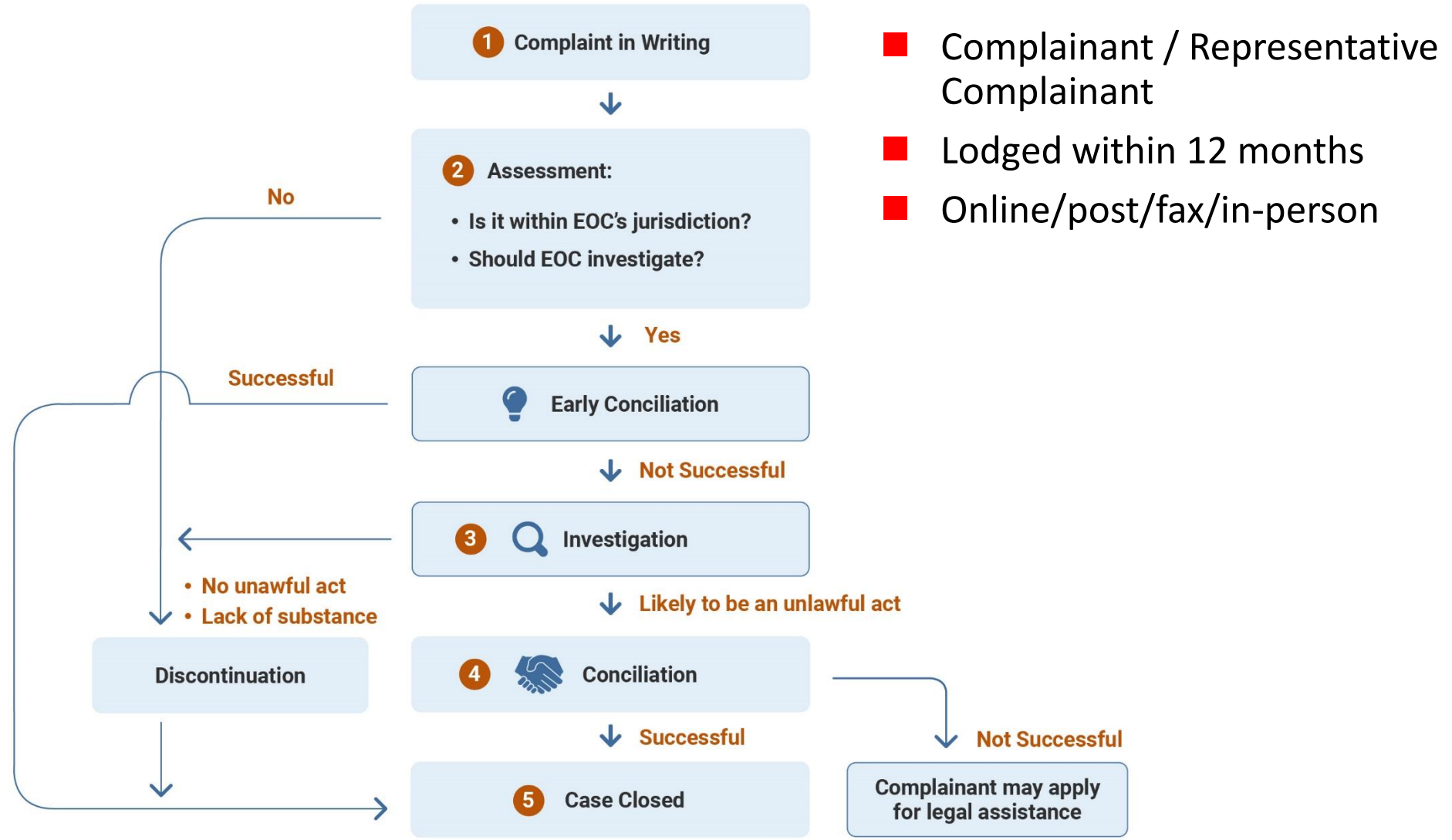
# Conclusion

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# Roles of Employers

- ☑ Developing and implementing an equal opportunities policy, anti-harassment policy, etc.
- ☑ Developing a complaint resolution procedure
- ☑ Appointing person(s) in the organization to take responsibility for equal opportunities issues
- ☑ Awareness training for employees (frontline → supervisors and senior managers)

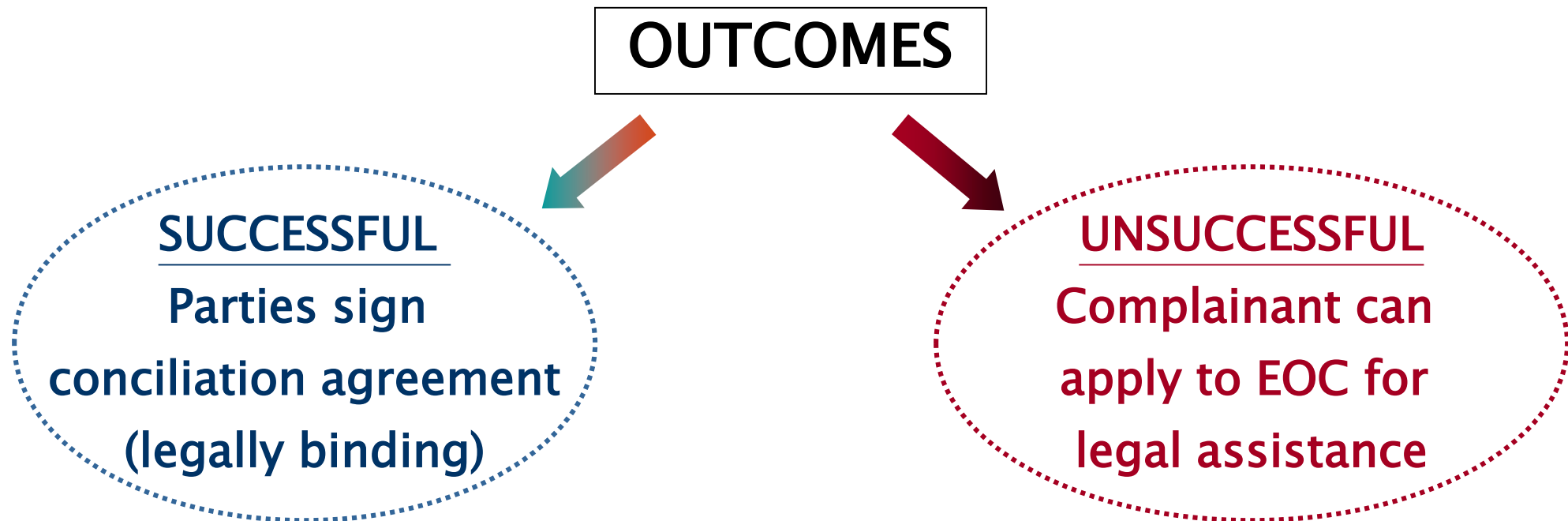
# EOC's Complaint Handling Procedures



- Complainant / Representative Complainant
- Lodged within 12 months
- Online/post/fax/in-person

# Conciliation

- Voluntary participation of both parties
- Confidential
- Role of the EOC – impartial conciliator



# Time Bar

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- EOC – 12 months
- Court – 24 months



# Equal Opportunities Commission

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 : **2511-8211**

Address : 16/F, 41 Heung Yip Road  
Wong Chuk Hang, HK

Email : [eoc@eoc.org.hk](mailto:eoc@eoc.org.hk)

Website : [www.eoc.org.hk](http://www.eoc.org.hk)

Anti-SH hotline: **2106-2222**

Anti-SH resource platform: [www.eoc.org.hk/compass](http://www.eoc.org.hk/compass)



## **DISCLAIMER**

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