

August 14, 2026

Mr John Lee Ka-chiu, GBM, SBS, PDSM, PMSM
Chief Executive
Office of the Chief Executive
Hong Kong Special Administrative Region
People's Republic of China
Tamar, Hong Kong

Dear Mr Lee

The Women's Foundation's Response to the Policy Address and Hong Kong's First Five-Year Plan Public Consultations

I am writing as CEO of The Women's Foundation (TWF), a non-profit organisation dedicated to improving the lives of women and girls in Hong Kong, to submit our response to the *Policy Address Public Consultation* and the consultation on *Hong Kong's First Five-Year Plan (2026–2030)*. Given the complementary nature of these two consultations, with one setting out Hong Kong's longer-term strategic direction and the other identifying near-term priorities and implementation measures, we have provided a single consolidated submission.

We welcome the Government's efforts to develop Hong Kong's first Five-Year Plan as a forward-looking and actionable framework, complementing China's *National 15th Five-Year Plan* ("National Plan"). We particularly welcome the National Plan's reaffirmation of gender equality as a fundamental state policy. We believe a gender lens, applied consistently across Hong Kong's Five-Year Plan and Policy Address and aligned with the National Plan, is critical to building a prosperous, resilient and inclusive city.

Gender equality is not a standalone social issue. It is directly connected to Hong Kong's competitiveness, resilience, innovation, health, inclusivity and long-term sustainability. As Hong Kong strengthens its position as an international financial, innovation and talent hub and deepens integration with the Greater Bay Area, it must ensure that women and girls can participate fully, safely and equally in shaping and benefitting from that future.

Our submission encourages the Administration to adopt gender-responsive approach to policy design, implementation and measurement. We see particular scope for a gender lens to strengthen two areas of the Five-Year Plan:

- *People's Livelihood and Social Development*: by addressing barriers to women's workforce participation, wellbeing, financial inclusion, safety and health
- *Innovation, Technology and Industry Development*: through increasing women's participation in STEM talent pipelines and ensuring emerging technologies, including AI are developed inclusively.

Consistent with the National Plan's commitment to strengthening the institutional voice of women and recognising the scale and cross-cutting nature of these issues, we encourage the Administration to establish an inter-bureau taskforce on gender equality. This would help ensure gender considerations are systematically integrated into policy formulation, budgeting, implementation and evaluation, in line with the Administration's results-oriented approach.

We share the Administration's vision for a better Hong Kong and are committed to working constructively with the Administration, business, education and community stakeholders to support both immediate measures and longer-term reforms. We would welcome the opportunity to meet with you or a representative of your Administration to discuss the recommendations in our submission and explore areas for collaboration.

Please contact my colleague Lisa Moore, Research and Advocacy Senior Director, via email at Lisa.Moore@twfhk.org or by phone at +852 9248 8199 for more information or to arrange a meeting.

Sincerely

Signed.

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CC

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Mr Algernon YAU, JP, Secretary for Commerce and Economic Development
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Dr Eliza CHAN, GBS, JP, Chairperson, Women's Commission
Ms Linda LAM, SBS, Chairperson, Equal Opportunities Commission
Dr Donald LI Kwok-tung, SBS, JP, Chairperson, Elderly Commission

RECOMMENDATIONS AT A GLANCE

Section	Topic	Key Ask
1. Workforce Participation & Leadership	Flexible / Part-Time Work	Encourage employer adoption of flexible arrangements for caregivers, with incentives
	Childcare	Expand NGO and home-based childcare subsidies; extend the After School Care Service Scheme to secondary students and later hours
	Parental Leave	Extend maternity leave to 16 weeks, paternity leave to 4 weeks; move toward gender-neutral parental leave long term
	Eldercare	Strengthen support for informal caregivers (majority women)
	Age Discrimination	Enact an age discrimination ordinance
	Board Diversity	30% female board representation; 30% female senior management disclosure
	Motherhood Penalty	Employer education and public campaigns to end hiring bias against mothers
	Gender Pay Gap	Equal pay legislation with employer certification; employer education on pay equity best practices; mandatory pay disclosure for 250+ employee companies; ban salary-history questions
	AI & tech upskilling for women and girls	Expand opportunities for women and girls to develop AI, tech, coding, and digital skills, ensuring they can participate fully in HK's development as a digital assets hub
2. Sexual & Domestic Violence	Sex Discrimination Ordinance	Extend harassment protections to tenants/subtenants; positive duty on employers to prevent harassment
	Domestic Violence	Emergency financial support fund for survivors; criminalise coercive control
	AI-Generated / Deepfake Images	Standalone offence for creation and possession of non-consensual deepfake images

3. Women's Health Taboos	Fertility Treatments	Extend egg-freezing use rights to unmarried women; decriminalise overseas fertility treatment travel for unmarried individuals
	Abortion	Comprehensive sex education curriculum
	Menstrual Health & Menopause	Employer education and support; subsidised perimenopause / menopause assessments at designated clinics; pharmacist training on menopause symptoms
4. Poverty & Financial Vulnerability	Retirement / MPF	Gender-disaggregated tracking within the new Targeted Poverty Alleviation Strategy; retirement support for homemakers; subsidise full-time caregivers
5. Protections for Vulnerable Communities	LGBT+ Communities	Standalone discrimination ordinance; review of full participation across policy areas
	Migrant Domestic Workers	Wage and rights protections aligned with ILO standards; culturally accessible support services
	Ethnic Minority Women & Girls	Tailored solutions addressing education, employment and mental health barriers
6. Gender Stereotypes	Education	Mandatory gender-sensitivity curriculum reform; teacher and civil servant training
	Online Safeguards for Minors	Effective age checks (e.g., digital ID or facial age estimation) to restrict access of pornography for young people and children under 18.
	Social Media	Explore platform regulation for minors (e.g. Malaysia-style licensing)
	AI Companions	Code of Practice restricting AI romantic companions for minors
	Private Sector	Unconscious bias training; gender-sensitive media/PR practices
7. Gender-Disaggregated Data	Government Reporting	Convert the Gender Mainstreaming Checklist into mandatory gender-impact reporting in budgets and new policies
	Corporate Reporting	Mandatory workforce gender-data disclosure for 250+ employee companies

1. BOOSTING WOMEN'S WORKFORCE PARTICIPATION AND LEADERSHIP

Boosting women's workforce participation rate would positively address the [current talent shortage](#), but Hong Kong greatly lags behind when it comes to gender equality in the workforce limiting the number of women able and willing to be participants in the formal economy.

Hong Kong's female workforce participation rate is only 47%^[1] below that of regional peers such as Singapore and Australia, where rates exceed 60%. Women also remain underrepresented in leadership: despite recent progress, women hold only [20.4%](#) of board seats on Hang Seng Index listed companies, compared with [Australia at 40%](#) , [Malaysia at 31%](#) and the [UK at 43%](#).

Addressing these gaps requires a comprehensive approach, including stronger childcare and eldercare support, greater access to flexible and part-time work, and measures to tackle workplace bias and discrimination. Supporting women to participate and progress in the workforce would not only strengthen Hong Kong's talent pipeline but also help address its declining birth rate and ageing population.

Flexible / Part Time Work Options

Alongside the *2023 Re-Employment Allowance Pilot Scheme* aimed to encourage those 40+ to go back into the workforce, we were heartened to see the passage of the *Employment (Amendment) Bill 2025* which broadens the scope for which part time and casual workers will be eligible for benefits, an amendment which will greatly benefit women who are over-represented in this type of work.

However, we know there are still significant barriers to women being able to secure part-time employment. From the [Labour & Welfare Bureau-commissioned research in 2023](#) (LWB research) on women currently not working in their 40s and 50s, low income homemakers and ethnic minority women – the majority of who have caregiving responsibilities -- not being able to secure part time or flexible work was a significant reason for not joining the workforce.

Recommendation

- Strongly encourage employers to adopt options that accommodate working parents and caregivers long term and without penalty, and consider incentives to companies that adopt these practices

Childcare

We recognise the Government efforts on the *After School Care Service Scheme*, launched in the 2023, which scaled rapidly, from around 3,000 places in its first year to over 10,500 places in March 2026^[2].

The LWB research found that lack of affordable, accessible childcare is a major barrier preventing economically inactive women from working. This may also help explain why single mothers comprise the majority of CSSA recipients among single parents. In 2024, women headed 76.7% of single-parent households, rising to 78.1% among those with children under 12^[3]. Single mothers'

labour force participation rate increases as their children grow older, from 57.2% when their youngest child is under 12 to 67.5% once their youngest child is 12 or older^[4] — underscoring the importance of childcare in supporting workforce participation.

Recommendations

- Carefully consider some of the recommendations in LWB research including greater subsidies for NGOs that provide childcare services, particularly home-based services as well as greater financial support for parents to encourage their use of these services.
- To better support single parents' caregiving needs, consider extending the *After School Care Service Scheme* to cover junior secondary school-aged children and reviewing whether its operating hours (currently ending at 6–7pm) are sufficient to support parents working standard full-time hours.

Parental Leave

Whilst Hong Kong's maternity leave meets the [minimum international standard at 14 weeks](#) as well as provides 5 days of paternity leave, as a next step, the Government should aim to extend maternity leave to 16 weeks and extend paternity leave to 4 weeks.

Long term, we believe Hong Kong would do well to follow the approach being adopted in other jurisdictions which have embraced the concept of gender-neutral parental leave, allowing parents to choose which of them assumes the greater share of childcare responsibilities, and which covers adoptions and foster placements in addition to natural births. This direction is also consistent with the National Plan, which [commits](#) to "fully implement the parental leave system and encourage employers to implement flexible working arrangements for parents of children under three years of age".

Neighbouring economies have moved apace. In Mainland China, Shenzhen [offers](#) 178 days (approx six months) of maternity leave and 15 days of paternity leave; Beijing [offers](#) 158 days (approx. five months) of maternity leave with 15 days of paternity leave. Elsewhere in Asia, Singapore [adopted](#) a 10-week Shared Parental Leave scheme, combining with the existing 16 weeks of maternity leave and 4 weeks of paternity leave for a total of 30 weeks of government-paid family leave per child. Japan [offers](#) 14 weeks of maternity leave, 4 weeks of paternity leave and up to one year of shared parental childcare leave, with extension under special circumstances.

Recommendation

- *Short term*, extend maternity leave to 16 weeks and extend paternity leave to 4 weeks with a long term plan to implement gender neutral parental leave.

Eldercare

We welcome the 2026-27 Budget's increase of Community Care Service Vouchers and Residential Care Service Vouchers as a positive step to improving people's livelihoods. In addition to the positive measures that have been implemented to provide adequate services and quality of life for the elderly, we would urge the Government to consider strengthened policies and measures to provide support for informal caregivers – the majority of who are women.

Research TWF conducted with HSBC Life and HKU's Sau Po Centre on Ageing [shows](#) the population of eldercare recipients are set to more than double from 5% to 11% by 2060, the cost to society will increase by nearly 6x from HK\$39 billion to HK\$222 billion; the indirect cost of eldercare for employers will increase 4.7 times from HK\$1.8 billion to approximately HK\$8.4 billion; and the overall cost of eldercare to individuals will quadruple from HK\$1.8 billion to HK\$7.2 billion.

Recommendation

- Implement policies and practices to alleviate the financial and human resources burden on companies, and to support employees with eldercare responsibilities

A full list of recommendations for the Government is provided in Appendix A.

Age Discrimination

An Equal Opportunities Commission survey [found](#) that 35% of people aged 50 and above had experienced age discrimination at work in the past five years, most commonly through lower pay, missed promotions or redundancy following restructuring. Among those affected, 40% reported negative impacts on their wellbeing, including psychological stress and reduced job satisfaction.

As lifespans and healthy years increase, many women aged 50 and above face growing concerns about financial security and wellbeing – particularly considering elderly living below the poverty line are disproportionately women. These challenges are compounded by barriers to securing work that matches their skills and experience beyond traditional retirement age. Yet Hong Kong still lacks legal protection against age discrimination, including being overlooked for promotion or pressured into retirement. Given the city's talent needs, employers should be encouraged to create more opportunities for older workers to remain in the workforce.

Recommendation

- Establish an age discrimination ordinance, to prohibit age discrimination in employment, including recruitment, promotion and retirement practices, and provide effective avenues for redress. As a first step, consider conducting a territory-wide study on ageism, building on the EOC research conducted a decade ago, to assess current attitudes, experiences and barriers faced by older people and inform evidence-based policy response.

Board Diversity

It has been well documented that greater gender diversity on boards improves decision making, has a positive impact on corporate culture, and the bottom line, serves as a fundamental aspect of good governance and delivers benefits for the whole society.

A series of reforms from the Hong Kong Exchanges and Clearing, including the 2021 ban on single-gender boards^[5], have contributed to the number of female board directors on HSI-listed companies increasing from 14%^[6] in early 2021 to [20.4%](#) in 2026. However, progress remains slow compared to other financial hubs (for example, UK at 43% and Singapore at 25%) and further action is needed for meaningful change.

Recommendations

- Actively push companies to set target of 30% female board representation, extending the no single-gender rule to 30% with parity as the goal.
- Listed companies should also disclose workforce diversity policies with measurable targets—including 30% female senior management. The Government has shown leadership in this respect with 53% female bureaux heads and should further model best practices, encouraging the private sector to align with these targets.

Motherhood Penalty

There is a concerning level of discrimination against working mothers in this city. Research by the Equal Opportunities Commission (EOC) in 2018 [found](#) that over 50% of surveyed employers said they would not hire women with young children.

Recommendations

- Promote better education among employers to raise awareness around the motherhood penalty and put forward best practice to prevent this type of behaviour
- Actively support public campaigns and bolster the work of the EOC to more effectively tackle this issue
- Conduct an updated study on the motherhood penalty to understand any changes in prevalence, impact and form

Gender Pay Gap

The gender pay gap stands at approximately [22%](#) overall. Granular data on this and the method used to calculate wage disparities is not available. This lack of transparency in organisations' pay scales and the way an organisation defines the pay gap makes it difficult for that organisation to formulate initiatives and policies to rectify this gap, and they face no pressure to correct these imbalances.

Equal pay legislation

Whilst the Discrimination Ordinances provide some channel for lawful redress in the case of unequal pay based on gender discrimination, Hong Kong has no legislation that explicitly provides for equal pay in the workplace. Enacting equal pay legislation would send a signal that the Government prioritises this issue and would encourage employers to take more proactive steps in creating the processes and monitoring that would greatly reduce instances of the gender pay gap.

When drafting the legislation, a point for consideration is shifting the responsibility from employees seeking legal reparation due to gender-based discrimination in pay to the employer -- this can be accomplished through mandating organisations over a certain number of employees get independently certified as paying equally for work of equal value or face paying fines.

Recommendation

Introduce equal pay legislation to ensure men and women receive equal pay for work of equal value, with employer accountability measures to monitor, report and address pay disparities.

Equal pay best practices

Companies may need more education on how to identify and redress any existing gender pay gap – as well as put in place the structures to prevent pay gaps going forward, including the importance of pay equity, tools to support this and best practice that strengthens the transparency and accountability of remuneration practices across the organisation.

Recommendation

The Government can work with the Equal Opportunities Commission to promote practical guidance to employers on identifying, addressing and preventing gender pay gaps and campaigns on its importance.

Gender pay disclosure

The Government should introduce measures for gender pay disclosure by Hong Kong companies of a certain size. This has been modelled in other jurisdictions, such as the UK where any organisation that has 250 or more employees must publish and report specific figures about their gender pay gap and in the European Union, where their [Pay Transparency Directive](#) will require employers with 250 or more staff to report annually and employers with 150–249 staff to report every three years, from June 2027 onwards. Where a report reveals an unexplained pay gap of 5% or more that persists for six months, the employer must conduct a joint pay assessment with worker representatives.

Recommendations

- Transparency around compensation and ensure benefits for each pay grade are complied with
- Transparent salary differences in comparable positions adjusted for age and years of experience
- Mandated reporting by companies with 250+ employees of gender statistics at management, senior management and Board level
- Companies should be encouraged to hire third parties to undertake and provide certification on pay disparity reviews and to validate the process and findings.

Ban salary disclosure from previous jobs

Related to, and intensifying the gender pay gap, is the fact that women in the workforce are coming into salary negotiations behind their male counterparts. Offers at successive companies are calculated largely based off of what that candidate is currently earning, placing women at a disadvantage.

Recommendations

- Ban employers from both the public and private sectors from asking applicants about salaries from their previous jobs
- Consider mechanisms to make general market salaries available

AI and Tech Upskilling for Women and Girls

Hong Kong is positioning itself as a digital finance hub, and achieving this ambition depends on a diverse workforce equipped to build, regulate, and audit the technologies that underpin its. However, women remain underrepresented in these fields and in Technology and Engineering degrees, with research showing girls are four times less likely to pursue STEM careers than boys. If left unaddressed, Hong Kong risks building its future digital economy with only half of the talent available to it, while women are excluded from many of the high-value opportunities this transformation will create.

Recommendation

The Government can consider increasing investment in programmes that equip women and girls with AI, coding, technology, and related skills as part of Hong Kong's digital finance hub strategy. This should include partnerships with NGOs, education institutions, and other organisations that have demonstrated success in using gender-responsive approaches to engage and support women and girls on these skills..

2. STRENGTHENING PROTECTIONS AGAINST SEXUAL & DOMESTIC VIOLENCE

We welcome the recent public consultation on *Improving the Laws on Sexual Offences in Hong Kong* and the Government's commitment to introducing a bill by the end of 2026. We commend the proposed introduction of a statutory definition of consent, the expansion of rape into a gender-neutral offence, and new protections for children and persons with mental impairment.

We also believe there is scope to strengthen several reforms to better close accountability gaps and support victim-survivors in seeking justice. Our detailed recommendations, previously submitted to the Security Bureau, are included in Appendix B for reference.

We also propose a series of recommendations outside the scope of the Sexual Offences law that would contribute towards a safe, inclusive city for all.

Sex Discrimination Ordinance

2021 updates to the *Sexual Discrimination Ordinance* on outlawing behaviour that directly or indirectly victimises women who are breastfeeding or expressing milk in public spaces or the workplace was welcomed alongside the 2020 passage of the *Discrimination Legislation (Miscellaneous Amendments) Bill 2018*, which contained important protections against sexual harassment for volunteers, consignment workers and interns, and members or prospective members of clubs.

Recommendations

- Provide legal protection from sexual harassment for tenants or sub-tenants harassed by other tenants or subtenants occupying the same premises.
- Consider adding a positive duty for employers to take proactive steps to prevent sexual harassment or sex-based harassment in connection with the workplace^[7], which would

demonstrate the seriousness with which Hong Kong seeks to build inclusive, safe workplaces for all – taking reference from [Australia](#)

Domestic Violence

Women and girls are disproportionately affected by domestic violence. From 2025 Social Welfare Statistics, we know that [61% of child victims of violence are girls](#) and [84% of spouse / cohabitant abuse victims are women](#).

Recommendations

- We recognise the Government's efforts alongside NGOs in providing temporary and longer term housing support, legal and medical aid as well as counselling, but we urge the Government to consider setting up an emergency fund to help women and their dependents temporarily cover living expenses to help women leave their perpetrators (who may be controlling finances for all household members)
- Review whether Hong Kong should consider coercive control as a crime
- Work closely with stakeholders to strengthen protections and ensure adequate support and resources to frontline services organisations working with this vulnerable group

Protections against AI-generated and deepfake sexual images

We were pleased to note the adoption of measures in recent years to criminalise voyeurism, upskirting and non-consensual intimate image sharing as well as the establishment of the Screen & Social Media Advisory Group in 2025.

Following the 2025 incident involving a male university student using AI to generate non-consensual nude photographs of numerous women, we know the Commissioner's office is [discussing](#) an amendment to criminalise the non-consensual creation of deepfake images, and the Law Reform Commission's Cybercrime Sub-committee is [separately reviewing](#) this, which is a welcome development.

Recommendation

- Adopt a standalone offence that addresses both the creation and possession of non-consensual sexually explicit deepfake images of an identifiable person

3. TACKLING WOMEN'S HEALTH TABOOS

Fertility Treatments

Hong Kong's birth rate remains well below replacement level, raising concerns about its rapidly ageing population. We appreciate the introduction of tax deductions for assisted reproductive services and the removal of restrictions on the storage period for gametes and embryos. However, critical gaps remain. Under the Human Reproductive Technology Ordinance, while any woman may freeze her eggs, only married women may use them, excluding single women and those in non-traditional relationships who wish to start a family. In addition, non-married individuals who seek

fertility treatments overseas, where care may be more accessible or affordable, may face criminal liability.

Recommendation

- Review the law to enable all women to have access to, and full use of, fertility treatments regardless of their partnership status, which would give women more flexibility for family planning.

Abortion

Abortion law in Hong Kong holds relative flexibility when compared to other economies, but there are still a few challenges that can be addressed. Among these, deep rooted stigma is a critical issue which can significantly impact mental well-being and prevent access to social support, which studies show can help mitigate negative effects. Access to publicly available abortion services is another hurdle as the wait time can be up to several months. This issue particularly affects underprivileged women and girls who have less access to alternative resources and services.

Recommendations

- Revise the sex education curriculum to provide a more holistic education around gender awareness and sex education including understanding consent, contraceptive options, relationships, sexual health, pregnancy and the de-stigmatisation of abortion and post-abortion care. This will complement [the proposed reforms](#) in the sexual offences law which includes a proposal for a definition of consent and also notes sexual autonomy as one of the five guiding principles
- Relevant government bodies should consider examining the accessibility of abortion services as well as consider measures that can reduce the wait time for the actual procedure

Menstrual Health and Menopause

[Up to 85% of women](#) experience menstrual symptoms such as cramps, fatigue and anxiety, with 38% reporting impacts severe enough to disrupt daily life. Menopause can bring symptoms lasting up to 12 years, yet stigma and low awareness leave many women without support. Together with fertility challenges, these reproductive health issues affect [more than a quarter](#) of women during their prime working years.

A 2026 survey [found](#) that 37% of working women in Hong Kong are experiencing menopausal symptoms and 91% believe employers can help support menopause in the workplace. However, only 41% seek professional medical advice or treatment, while 31% cannot correctly identify when perimenopause typically begins, highlighting significant gaps in awareness and support. TWF is partnering with City University of Hong Kong on a longitudinal study of menopause at work and would welcome the opportunity to share future findings with the Government.

Recommendations

- Encourage employers to educate themselves and take steps to support women throughout their reproductive cycle.

- Work with companies to challenge the stigma associated with the menopause and supply resources to help organisations navigate this issue and retain female talent
- Provide subsidised perimenopause or menopause assessments at designated clinics
- Provide training to pharmacists around identifying menopause-related symptoms and suggesting appropriate next steps, [taking reference from Victoria Australia](#)

4. ADDRESSING POVERTY AND FINANCIAL VULNERABILITY AMONG WOMEN

Vulnerable women in low-income families face heightened risks of financial insecurity. Homemakers, many part-time workers and some older people remain outside the MPF system, while women are ten times more likely than men to be economically inactive due to caregiving responsibilities and live an average of five years longer. Combined with lower lifetime earnings and career interruptions, these factors increase women's risk of poverty in old age. Many low-income workers also lack the financial literacy to manage retirement savings effectively, and women are three times more likely to depend on a spouse financially.

Whilst we commend the Government for its newly released report on a [targeted poverty alleviation strategy](#), we do have concerns about its lack of a gender lens. The strategy is built around three specific groups: households in subdivided units, single-parent households, and all-elderly households. Single-parent households — a group nearly 80% headed by women — sit at the centre of this strategy, alongside all-elderly households, among whom women also make up the majority given their longer life expectancy. Yet the report contains no explicit gender-based analysis of either target group.

Recommendations

- Ensure that as this new poverty framework is implemented, it is assessed through a gender lens — including gender-disaggregated outcome tracking for both the single-parent and all-elderly target groups — given how disproportionately these poverty measures affect women.
- Develop measures to recognise the value of unpaid work, improve access to support services and financial planning for vulnerable groups, strengthen retirement support for those without MPF coverage, particularly women, and promote flexible working arrangements and paid care leave.
- Consider subsidising full-time caregivers for their services, drawing on similar structures overseas.
- Consider requiring employers to provide MPF to employees above 65 if they are still able and willing to work whilst waiving the employee contribution

5. STRONGER PROTECTIONS FOR VULNERABLE COMMUNITIES

LGBT+ Communities

We are concerned with the broad lack of official protections for those who identify as sexual minorities, particularly in light of the same sex partnerships bill [voted down](#) in LegCo late last year.

Recommendations

- Consider introducing a standalone anti-discrimination ordinance to protect LGBT+ people from discrimination at work, in education and in public life, while providing access to legal redress.
- Review policies and measures to ensure they support and includes the full and equal participation of the LGBT+ communities in all aspects of Hong Kong society.

Migrant Domestic Workers

About [368,000](#) Migrant Domestic Workers (MDWs) live and work in our city, making up more than 50% of ethnic minorities here. The vast majority are female and are a crucial part of the workforce – a 2019 study calculated that MDWs contributed an estimated [US\\$12.6 billion to our economy per year](#). MDWs face a specific set of challenges, with lower than living wages, a lack of systematic protection of their limited rights, increased vulnerability to exploitation and abuse, and overt discrimination. While there are information and resources available to educate and support MDWs, much of this is not culturally accessible.

Recommendations

- Carefully review policies and ensure the full protection of MDWs from exploitation and work conditions that are aligned with the International Labour Organisation's standards including regular reviews of minimum wage
- Access to information that is culturally accessible and provisions for ways that MDWs can gain access to support they may need for mental health crises and sexual violence
- Proactively remind household employers about their responsibilities towards their employees

Ethnic Minority Women and Girls

Ethnic minority women and girls in Hong Kong remain an educationally disadvantaged group, facing compounding barriers at the intersection of ethnicity, language, and gender. The [2021 Population Census](#) shows that school attendance among ethnic minority girls trails their whole-population female peers from ages 3–5 onwards, and [research notes](#) higher dropout rates, weaker performance, and, in some cases, non-enrolment altogether relative to their Chinese counterparts. Just [62.8%](#) of South Asian children aged 5–14 can write Chinese, against 93.8% territory-wide, with implications for future employment. EM women are also vulnerable to mental health challenges. The Zubin Foundation [note](#) that women account for 80% of EM clients seeking counselling services, underscoring the need for culturally responsive support.

Recommendation

- Adopt an intersectional, gender-responsive framework for ethnic minority policy

6. CHALLENGING GENDER STEREOTYPES

The Government will be well aware that gender stereotypes are highly prevalent in Hong Kong society from gendered expectations surrounding appearance to career choices and leadership

behaviours. From our work and numerous studies, we know that gender stereotypes are exacerbated for both men and women after prolonged exposure. It also contributes body image and self-esteem issues for women and girls, violence against women and the ambition gender gap, particularly within STEM subjects. Without deliberate intervention, AI can exacerbate some of these stereotypes.

Education

More public education around gender stereotypes is needed as well as education curricula reform.

Recommendations

- Standardise school practices such as:
 - Teacher training on gender equality and gender sensitivity
 - Replacing materials that omit women or tokenise their experiences
 - Teaching students about the negative impacts of gender stereotypes
 - Reviewing curricula for gender stereotypical language or examples
 - Ensuring all school libraries feature books with gender diverse content and authors, and that materials do not contain gender stereotypes
- Update and expand the sex education curriculum to be in line with international best practices that are age appropriate, evidence based and addresses the drivers of gender-based violence.
- Embed a gender-sensitive lens across the roll-out of AI and digital literacy education in Hong Kong schools
- Lead by example by providing comprehensive gender sensitivity training for all civil servants. This should cover gender-inclusive communications, gender-disaggregated data collection and analysis, and gender-responsive policymaking that reflects the diverse needs of the population.

Strengthening Online Safeguards for Children & Young People

Research shows that exposure to pornography during adolescence is [associated](#) with greater acceptance of sexual and dating violence, particularly among boys, where the impact on attitudes and behaviour appears to be stronger. Girls are also [more likely](#) to experience the harmful consequences, including pressure or coercion to share intimate images.

Whilst Hong Kong law already makes it an offence to publish or distribute pornographic material — in print or online — to anyone under 18 via the *Control of Obscene and Indecent Articles Ordinance*, it does not require websites or platforms to actually check a user's age before letting them in.

Recommendation

We recommend Hong Kong to put in place effective age checks on any pornography sites or platforms. These checks should use reliable age-assurance methods, such as digital ID or facial age estimation, to help prevent children and young people from accessing pornography taking

reference from the [UK's Online Safety Act 2023](#), which also imposes significant penalties or seek site-blocking orders where platforms fail to comply.

Social Media

Research shows a positive and significant link between social media use and body dissatisfaction among both boys and girls (with a higher prevalence among girls), as well as lower self-esteem and poorer mental well-being^[8].

Recommendation

- Consider exploring options to address harmful impacts of social media on minors, looking to other economies in the region like Malaysia, which require social media platforms [sign annual licences](#) which have stipulations in place to protect minors.

AI Companions

In other economies we're starting to see the adverse impact of AI romantic companions on real world relationships – research has [analysed](#) how custom-built AI companions can exacerbate existing gender biases and stereotypes. For minors, this has concerning implications for their future relationships – in the UK, for instance, it has been [reported](#) one in five teenage boys aged 12-16 has had - or knows a peer who has had - AI romantic companions and the majority preferred their interactions with the AI to interactions in real life.

To address this growing issue, Mainland China [adopted](#) *Interim Measures for the Management of AI Human-Like Interaction Services* in April 2026 (effective July 2026) which ban AI companions offering virtual romantic partners, spouses, or family members to anyone under 18, alongside a series of [other protections](#), which led to ByteDance, Alibaba, and Tencent [voluntarily disabling](#) companion-persona features nationwide.

Recommendation

As Hong Kong's AI governance currently rests on a [voluntary framework](#) that does not yet address this issue, we would welcome the Government's consideration of developing a Code of Practice around AI companion/romantic chatbots, that could include:

- Restrictions on virtual intimate-relationship AI services for under-18 users
- Age verification measures and a default "minor mode"
- Clear protocols for guardian notification in self-harm situations
- Safeguards against design features that may foster emotional dependency in minors

We believe this can complement the work already underway through the Screen and Social Media Advisory Group and the Department of Justice's ongoing AI-legislation review.

Private Sector

Gender stereotypes still hold women back at work including negatively affecting performance reviews, salary negotiations, overseas opportunities (particularly in high-risk locations), networking and appointments to boards.

Recommendations

- Encourage companies to adopt a wide range of practices that actively debunk gender stereotypes, including regular unconscious bias training, and in particular, encourage private sector media, PR and advertising agencies to adopt gender sensitive policies and practices.
- Role model gender sensitive collaborations between their PR firms and traditional media / social media.

7. IMPROVING THE AVAILABILITY & USE OF GENDER-DISAGGREGATED DATA

While the *Gender Mainstreaming Checklist* implemented in 2002 requires all Government departments and bureaus to maintain gender disaggregated data; in practice, it is not always comprehensive, consistent or accessible to the general public. This reduces the ability of government, businesses, and civil society from being able to fully understand city-wide gaps in gender equality.

Collecting gender-disaggregated data consistently across government departments, supported by clear goals, regular tracking and transparent reporting, would enable more effective policies for women and girls and highlight gaps in support. This could identify where targeted interventions are needed, such as in subsidy uptake among parents, single parents and informal caregivers, or access to mental health services.

Recommendations

- Convert the existing *Gender Mainstreaming Checklist* into a mandatory gender-impact statement for new budget and policy measures, taking inspiration from [Canada](#) — which would give gender-disaggregated data a concrete mechanism through which it drives policy and spending decisions.
- Compulsory reporting from any company with 250 or more employees (or a similar number of employees that fits the Hong Kong context) to publicly disclose their workforce's gender related statistics at all levels of the organisation. This would contribute towards accelerating gender parity progress on many fronts including the gender gap in pay and low numbers of women in managerial and leadership positions, among others.

APPENDIX A – ELDERCARE RECOMMENDATIONS

Developing an Independent Public Policy Strategy

Hong Kong needs a comprehensive and independent public policy strategy for supporting caregivers. It should be based on a robust needs assessment, in consultation with all stakeholders, and eventually be integrated with the Government's eldercare policies.

Capacity Building

Hong Kong can integrate caregiver support in its quality standards for all home care services and professional caregivers. It can build greater capacity for carer support service units, including providing regular training, learning opportunities and support for family and other caregivers including volunteers and domestic helpers; and share best practices on caregiver support innovations and services.

Subsidies

The Government can consider subsidies for entrepreneurs or business owners looking to establish / expand their eldercare service provisions; create best practice guidelines for the industry; and explore policies and incentivisation schemes to drive growth in this industry.

Tax Incentives

The Government should offer tax incentives for eldercare / caregiving friendly initiatives and employers.

Strengthen Services for Frail Older Adults

The Government can consider a centralised and comprehensive solution to subsidised home or respite care Role Model Best Practice Among Government employers, implement best practice and evidence-based models, offer Flexible Working Arrangements, and provide extended care leave and compassionate care leave.

Protect Caregivers

Legislation should consider recognising the needs of caregivers regarding access to information, income, employment, and training as well as respect and emotional support. For working caregivers, legislation should consider incorporating a comprehensive strategy that is able to cover care and income security needs, including Flexible Working Arrangements, social assistance, allowance or wage, tax relief, and ensure explicit protection (including income and MPF) for caregivers.

Societal Income Insurance Mechanism

Implement a societal income insurance mechanism that protects the income of caregivers who need to take a partial /complete break from work to provide caregiving. The Government, working closely

with the private sector and insurance industry, may explore the possibility of a public-private scheme or set of insurance products that would enable companies and/or individuals to have the option of income protection in the event the employee needs to move to part-time hours or stop work due to caregiving responsibilities. This would ensure that individuals continue their MPF contributions, thus helping to alleviate financial pressure.

APPENDIX B – RECOMMENDATIONS TO STRENGTHEN MEASURES AGAINST SEXUAL VIOLENCE

Measures to strengthen the proposed reforms under the consultation “Improving the Laws on Sexual Offences in Hong Kong”

- **Making “steps taken to ascertain consent” a mandatory precondition**, taking reference from two jurisdictions – [Canada](#) and [New South Wales, Australia](#) – who have adopted legislation where active / reasonable steps to obtain consent are a precondition for the defence of the accused
- **Add a ‘no resistance does not equal consent’ provision** so that an individual accused cannot point to a victim's non-resistance as circumstantial support for a ‘reasonable’ but mistaken belief, even where an active-steps requirement is otherwise met.
- **Introduce a dedicated offence of persistent sexual abuse of a child**, with consideration given to: targeting patterns of repeated abuse, not just individual incidents; allow conviction based on an overall pattern, without requiring agreement on every specific incident; enable prosecutors to focus on the general timeframe of abuse, not exact dates or details of each act; apply to past conduct that was already illegal at the time; and carry penalties that reflect the severity of ongoing, repeated abuse.
- **Introduce a standalone offence on abuse of a position of trust involving 16- and 17-year-olds**, under which an adult who intentionally engages in sexual conduct with a 16- or 17-year-old commits an offence where the adult is in a defined position of trust in relation to that young person.
- **Strengthened court procedure protections for child witnesses which include**
 - Defined time limits for cross-examination of a child witness, a requirement that questions intended for a child witness be reviewed and approved by the court in advance, and clear guidance on the language permitted in cross-examining a child witness
 - The establishment of a trauma-informed "one-stop-shop" model for child sexual abuse cases to reduce the number of separate interviews and proceedings a child victim must undergo
 - The establishment of a Sentencing Council to issue official sentencing guidelines binding on Hong Kong courts, which would provide offence-specific guidelines tied to gradations of harm and culpability would improve consistency and proportionality while preserving judicial discretion to weigh mitigating factors.
- **Introduce a close-in-age defence** for mutually accepted peer sexual interactions involving young persons above 14, applicable across the relevant offences rather than confined to one provision, and unavailable wherever there is coercion, deception, abuse of trust, or a significant power differential.
- **Remove age-differentiated sentencing in child-specific offences**, recommending that the maximum penalty for these two offences be unified at 10 years' imprisonment for any victim under 16, removing the 13/16 sentencing split alongside the adoption of a statutory close-in-age consideration — applicable where the defendant and victim are close in age (e.g. both aged 13–15).

- **Replacing the term 'rape' with a term such as "sexual penetration without consent"** that carries no gender connotation while retaining the existing maximum penalty of life imprisonment for the offence.
- **Strengthening victim support and court procedures including**
 - Formalising the existing 'one-stop' model into a statutory multidisciplinary centre to reduce the number of separate interviews and proceedings victims must undergo;
 - Make "standard special measures" statutory for victim-survivors to reduce the distress over uncertainty of being granted these measures
 - Apre-recorded testimony option for adult complainants whose ability to give evidence in person would be significantly impaired by the trauma of appearing in court
 - Giving adult sexual offence complainants an explicit right to waive their own anonymity and self-identify, subject to safeguards

Sex Discrimination Ordinance

Amend the SDO to provide legal protection from sexual harassment for tenants or sub-tenants harassed by other tenants or subtenants occupying the same premises.

Mandatory Sexual Harassment Policy & Training

Introduce legislation mandating that both public and private sector organisations have a written sexual harassment prevention policy and that all employers provide sexual harassment training for their staff.

Non-Disclosure Agreements

Introduce legislation making any contractual clause in a Non-disclosure Agreement which prevents disclosure of future acts of discrimination, harassment, retaliation or victimisation void.

Changes to Listing Rules

Introduce sexual harassment indicators for HKEX-listed entities to report against, including:

- Specific mention of sexual harassment in guidance on company codes of conduct
- Information about measures taken to address sexual harassment (including initiatives to provide information, education and training on sexual harassment in the workplace), as part of its requirements that listed entities have and disclose a diversity policy and set measurable objectives to achieve gender diversity
- Disclosure of the number of incidents/complaints of sexual harassment by gender and associated action taken

SUPPORT SERVICES

Hong Kong Police

A broad range of reforms in the Hong Kong Police Force to enhance protections for sexual crime victims as well as strict preventative measures to protect against any further allegations of sexual violence against the HKPF:

- Special Unit: Add a special unit to the Hong Kong Police Force to handle sexual assault cases that has special training and operates to a code of practice
- Revision of the Police General Orders: To include enhanced requirements on gender sensitivity and prevention of sexual harassment and sexual offences
- Gender sensitivity and sexual harassment training: As a priority, all officers should be provided with gender sensitivity and sexual harassment training
- Code of Practice: Introduction of a Code of Practice for the Investigation of Sexual Crimes with the aim of:
 - Minimising trauma and increasing the confidence of sexual crime victims and the public in the management of sexual crimes
 - Providing a coordinated approach to the handling of sexual crime cases by Hong Kong Police, forensic medical services and other victim support services
 - Achieving best practice through consistent, clear and accountable response to, and investigation of, sexual offences

EDUCATION & AWARENESS RAISING

Online Sexual Harassment & Cyberbullying

Work with social media and technology companies to develop enhanced protections and solutions to curb sexist behaviour, abuse, harassment, and hateful comments (including rape threats, body shaming, doctored photos and release of private intimate videos) particularly for women as they are impacted far worse by online harassers and targeted more frequently than their male counterparts.

Media Guidelines

Work with the regulatory and industry bodies to promote responsible, victim-centred and gender sensitive reporting of sexual violence, and provide training to use international best practice when reporting on sexual violence through a Code of Practice for example.

Research

Conduct a territory-wide survey that provides comprehensive publicly available data on sexual harassment and sexual assault, with a view to update this data annually. Education Curricula Update and expand the Hong Kong sexual education curricula to be in line with international best practices that are age appropriate, evidence-based and addresses the drivers of gender based violence.

Public Campaigns

Collaborate with NGOs and other relevant organisations to promote public campaigns to encourage more positive conversations to support victims collectively and bystanders to help to overturn the cultural taboo and social stigma placed on victims.

REFERENCES

- ^[1] The 47% female workforce participation is taken from the latest Census and Statistics Department figure, excluding Migrant Domestic Workers: [C&SD : Quarterly Report on General Household Survey](#). Whilst TWF recognises the great contributions of this population, we want to reflect the seriousness of the low workforce participation rate among the local population
- ^[2] [Commission on Poverty - Report on Impact of Targeted Poverty Alleviation Strategy in Hong Kong](#)
- ^[3] Ibid
- ^[4] Commission on Poverty (2026). *Report on Impact of Targeted Poverty Alleviation Strategy in Hong Kong*
https://www.commissiononpoverty.gov.hk/pdf/Report_on_Impact_of_Targeted_Poverty_Alleviation_Strategy_in_Hong_Kong.pdf (pg 52)
- ^[5] Announced December 2021 and effective from 2022 with companies given until December 2024 to comply
- ^[6] The Women's Foundation (December 2021). "30% Club Hong Kong and The Women's Foundation Welcome the End of Single Gender Boards on the Hong Kong Stock Exchange."
- ^[7] Adapted from the Australia Sexual Harassment National Inquiry Report 2020
- ^[8] Examples: 1. Merino M, et al. Body Perceptions and Psychological Well-Being: A Review of the Impact of Social Media and Physical Measurements on Self-Esteem and Mental Health with a Focus on Body Image Satisfaction and Its Relationship with Cultural and Gender Factors. *Healthcare (Basel)*. 2024 Jul 12;12(14):1396. doi: 10.3390/healthcare12141396. 2. Scully M, Swords L, Nixon E. Social comparisons on social media: online appearance-related activity and body dissatisfaction in adolescent girls. *Ir J Psychol Med*. 2023 Mar;40(1):31-42. doi: 10.1017/ipm.2020.93