



SUPPORTING  
AN ENABLING ENVIRONMENT  
FOR CIVIL SOCIETY

# Enabling Environment Snapshot

Hong Kong

June 2025

## Context

Since 2020, Hong Kong has undergone a sharp transformation in its political and legal environment. The enactment of the [National Security Law \(NSL\)](#) in June 2020 by China's National People's Congress marked a turning point, criminalising acts of secession, subversion, terrorism, and collusion with foreign forces. According to the Hong Kong Government, a total of [332 people had been arrested](#) for national security offences up to June 2025 since the national security law was enacted on 30 June 2020. Most of them are civil society actors, reflecting the [collapse of civil society and a dramatic shrinking](#) of political space. In 2021, the government [overhauled the electoral system](#) to ensure only “patriots” could hold elective office, effectively eliminating opposition. The World Bank's Rule of Law Index shows a [significant drop](#) in rule of law and accountability since 2020. Governance is now dominated by national security imperatives, and dissent is heavily criminalised. The environment for civil society remains extremely hostile, with further legal tightening under the [Safeguarding National Security Ordinance](#) (SNSO) passed in March 2024.

## 1. Respect and protection of fundamental freedoms

Hong Kong's [Basic Law](#) (Articles 27-39), the [Hong Kong Bill of Rights Ordinance \(Cap. 383\)](#) (BORO), and [applicable international covenants](#) guarantee freedoms of expression, association, and assembly. However, these rights have been severely undermined by the NSL and the SNSO, which criminalise vague offences like “subversion” and “collusion” and impose heavy penalties.

Since 2020, authorities have dismantled civil society through arrests, surveillance, and coercion. Researchers in March 2024 [documented](#) that over 90 NGOs and 175 unions have disbanded, including major and long-standing organisations such as the Civil Human Rights Front, Amnesty International Hong Kong, and Hong Kong Alliance in Support of Patriotic Democratic Movements of China. In February 2025, the NGO [Hong Kong Unison](#), which had served ethnic minorities for 24 years, announced its disbandment. While the official reason cited was the completion of its mission, former staff members criticised the decision, suggesting that the increasingly [repressive environment](#) played a role in the closure. [Universities have cut ties with student unions](#) citing legal risks—stopping fee collection and campus access. Most of the student unions are now inactive.

Independent media outlets are severely affected. The owner and editors of [Apple Daily](#) are [on trial for alleged sedition and collusion with foreign forces](#). Editors of Stand News were [jailed for sedition](#) in 2024, marking the [first time journalists have been imprisoned](#) under colonial-era sedition laws since Hong Kong's handover in 1997.

Other than suppression by directly arresting and prosecuting leaders of civil society, there are other forms of harassment, such as stigmatisation in state-controlled media, intrusive requests for information from authorities—demands that may expose individuals or organisations to criminal liability or reputational harm, and tax audits. There is also a pattern of [harassing activists' relatives](#).

The legal profession has come under pressure, especially [lawyers associated with the 612 Humanitarian Relief Fund](#), which supported 2019 protestors. In 2022, the National Security Police filed misconduct complaints against several solicitors and barristers with the [Law Society of Hong Kong and the Hong Kong Bar Association](#). This has had a chilling effect,

discouraging legal professionals from taking politically sensitive cases and undermining NGOs' access to legal representation.

Freedom of assembly came under [intensified pressure](#) through a coordinated system of legal and preventive controls. Authorities have combined [indefinite prosecution of 2019 protestors](#), [selective law enforcement](#) and [pressure](#) against leaders and organisers to target attempts at public assembly, as well as [pre-emptive policing](#) to deter participation in public gatherings. This multifaceted approach – marked by its discriminatory application and chilling effect – has sharply reduced the space for public expression and raises serious concerns under international human rights standards. [There have been no large-scale demonstrations in Hong Kong for four consecutive years](#) (2021-2024). While law enforcement officials assert that they have [not rejected any protest applications](#) since 2022, this claim obscures how deterrence functions through informal channels rather than explicit prohibitions.

## 2. Supportive legal framework for the work of civil society actors

Hong Kong's legal framework governing civil society has undergone significant changes, shifting from a rights-based approach to one emphasising control and national security. While the [Basic Law](#) and the [Hong Kong Bill of Rights Ordinance \(Cap. 383\)](#) provide for fundamental freedoms, recent legislation and amendments have introduced stringent regulations affecting the creation, registration, operation, and financing of civil society organisations (CSOs), non-governmental organisations (NGOs), faith-based organisations (FBOs), social movements, and trade unions.

[Societies Ordinance \(Cap. 151\)](#) requires societies to register with the Societies Officer. Under the National Security Law (NSL), authorities have leveraged this ordinance to deregister organisations deemed a threat to national security. For instance, the [Civil Human Rights Front](#) was disbanded in August 2021 following police investigations citing national security concerns. In addition, the Registry of Trade Unions has used the [Trade Unions Ordinance \(Cap. 332\)](#) to increase scrutiny on unions, demanding detailed financial disclosures and information on activities. The [Hong Kong Professional Teachers' Union](#), once the largest teachers' union, dissolved in August 2021 after facing intense political pressure and accusations of inciting anti-government sentiments. Civil society organisations registered as companies are regulated by the [Companies Ordinance \(Cap. 622\)](#) which has been used to demand extensive financial and operational information from CSOs. Complying with these requests may expose individuals or organisations to legal risks, including retrospective to the implementation of the NSL, or reputational harm; non-compliance can lead to deregistration or legal action.

In July 2024, the [Social Workers Registration Ordinance \(Cap. 505\)](#) was [amended](#) to allow the Social Workers Registration Board to permanently deregister individuals convicted of national security offences. The board's composition was also altered to include [more government-appointed members](#), reducing the influence of elected representatives. In March 2025, social worker [Jackie Chen](#) was convicted of rioting related to the 2019 protests. Under the new amendments, she faces permanent deregistration, highlighting the law's impact on professionals involved in civil movements.

The [Legal Practitioners \(Amendment\) Ordinance 2023](#) requires foreign lawyers to obtain approval from the Chief Executive before participating in national security cases. The amendment was [prompted](#) by the case of British barrister Timothy Owen, who was initially granted permission to represent media tycoon Jimmy Lai in his NSL trial. Following

government objections, the National People's Congress Standing Committee issued an [interpretation](#) allowing the Chief Executive to bar foreign lawyers from such cases.

The NSL's vague prohibitions on "collusion with foreign forces" (Articles 29-30) have led to heightened scrutiny of foreign funding, deterring international donors and leaving organisations financially vulnerable. Authorities have [proposed legal requirements](#) that unions and NGOs must obtain approval from the Registrar of Trade Unions for foreign donations, further limiting access to external resources.

These legal developments have created a challenging environment for civil society in Hong Kong, with increased regulatory burdens, restrictions on funding, and limitations on professional practices, all under the broad justification of safeguarding national security.

### 3. Accessible and sustainable resources

Funding for civil society has become increasingly inaccessible. The NSL's vague prohibitions on "collusion with foreign forces" (Articles 29-30) have led to heightened scrutiny of foreign funding, deterring international donors and leaving organizations financially vulnerable. Authorities have [proposed legal requirements](#) that unions and NGOs must obtain approval from the Registrar of Trade Unions for foreign donations, further limiting access to external resources.

The Hong Kong government's official statements have indicated that foreign funding is increasingly viewed as a national security threat. In a [press release](#) dated 19 March 2025, the government emphasised the risks posed by external forces using improper means to interfere in Hong Kong's affairs.

Local fundraising is also obstructed. Fundraising events organised by groups such as the [Hong Kong Journalists Association](#) and the [Democratic Party](#) have been cancelled by various venue providers under unclear circumstances. Venues frequently withdraw at the last minute, likely due to government pressure. Banking restrictions and asset freezes have crippled civil society actors. The closure of *Apple Daily* was preceded by the Secretary for Security [ordering](#) a freeze of HK\$18 million in corporate assets under [the Implementation Rules](#) for Article 43 of the Law of the People's Republic of China on Safeguarding National Security in the Hong Kong Special Administrative Region. Other than the NSL, law enforcement has other tools to freeze or confiscate assets, such as the [Organized and Serious Crimes Ordinance \(Cap. 455\)](#). The [612 Humanitarian Relief Fund](#), established to provide financial assistance to protesters, ceased operations in October 2021 after its trustees were arrested and its bank accounts frozen under the NSL.

Economic downturns and emigration have further weakened civil society's financial base. Many private donors have left Hong Kong, and government subsidies increasingly come with national security compliance clauses, limiting funding to pro-government organisations. For example, the Social Welfare Department, which provides significant funding to organisations in Hong Kong, states in its [policy](#) that 'NGOs operating subvented services must comply with the laws and regulations related to safeguarding national security. If an NGO participates in any activities that violate the law of safeguarding national security, the Social Welfare Department may consider terminating the "Funding and Service Agreement" with the concerned NGO.' Civil society groups therefore struggle to sustain operations, leading to widespread downsizing or dissolution.

### 4. State openness and responsiveness

The Hong Kong government has significantly reduced meaningful engagement with civil society, particularly those critical of state policies. Public consultations have become performative, often excluding dissenting voices. For instance, the 2024 consultation on Article 23 legislation—an issue that triggered mass protests in 2003 and forced the government to withdraw the bill at the time—was [conducted with little transparency or inclusion of critical views](#). This starkly contrasts with the widespread public debate seen two decades earlier. In a [press statement](#) following the consultation, the Government dismissed all opposition as foreign interference, stating: “All those raising opposing comments were external forces, as the legislation will increase their cost of and difficulty in endangering our national security.”

Other consultations show similar disregard for civil society. The 2021 consultation on the UN Convention on the Rights of the Child [barred in-person NGO participation](#)—a sharp break from previous practice.

Professional organisations such as the Hong Kong Journalists Association (HKJA) have been sidelined. HKJA was [excluded from consultations](#) over the 2024 national security legislation, with the Secretary for Security claiming it was “not representative.” This exclusion fits a wider trend: in 2021, the Consumer Council, a statutory body, abruptly [suspended its co-organised journalism awards](#) with HKJA, reportedly after pressure from pro-Beijing media.

The government has also shown hostility toward international oversight. During UN treaty body reviews, government officials [repeatedly evaded questions](#) on whether civil society engagement with the UN could be criminalised under national security laws. This refusal to affirm the legality of such engagement creates a chilling effect and undermines open cooperation with international human rights mechanisms.

## 5. Political Culture and Public Discourses on Civil Society

Hong Kong’s political culture has grown increasingly intolerant of dissent. Civil society groups—especially those advocating for democracy or rights protections—are portrayed by officials and pro-Beijing media as destabilising forces aligned with “foreign interference.”

Independent media has been dismantled, leaving pro-government outlets to dominate public discourse. Protests and political opposition are [framed as past “chaos”](#) that the NSL has resolved. The Hong Kong Journalists Association has been vilified, and political cartoons and books critical of the government have [been removed](#) from public circulation.

The government has launched a “rebuttal team” that has publicly countered criticism [over 200 times](#) since the NSL took effect, often labelling concerns as disinformation or “soft resistance.” Even traditionally pro-government outlets like [Sing Tao Daily have been targeted](#) for publishing opposing views on tobacco control policies. In another notable case, the [Ming Pao newspaper](#) was reprimanded by the Secretary for Security in January 2024 after it published an editorial calling for transparency and accountability—accused of being “irresponsible” and misleading the public. Such actions reinforce a political culture in which critical voices, even when moderate and reasoned, are delegitimised and framed as threats to state authority.

High-profile trials, such as the [conviction](#) of 45 pro-democracy politicians in 2024, have reinforced the narrative that dissent is criminal. Self-censorship is [pervasive](#), with ordinary citizens avoiding political discussion online or in public. The space for independent thought has narrowed considerably, and civil society voices are either silenced or forced into exile.

## 6. Access to a Secure Digital environment

Hong Kong's digital environment has grown increasingly hostile due to heightened surveillance, shrinking online freedoms, and growing self-censorship. The NSL, [the Implementation Rules](#) and the SNSO have enabled broad powers to police online expression. Between March 2024 and May 2025, at least six people were prosecuted under sedition provisions for social media posts critical of authorities. Even [symbolic](#) or low-engagement speech—such as [calling a protester a “martyr”](#)—has resulted in imprisonment. In one case, a veteran [teacher lost her pension](#) over private Facebook comments before the court overturned the penalty.

Authorities continue to target digital platforms. Under the Implementation Rules, police may compel internet providers to delete content or provide user data without court oversight. In October 2024, the liberal-leaning [media outlet Flow was blocked](#) in Hong Kong, later [forced to suspend operations](#). Public trust in global platforms has eroded, especially after [testimony in 2025](#) revealed Meta allegedly routed viral posts in Hong Kong for political review.

Information available on the internet reduces. For example, the Ombudsman [removed historical reports](#) from its website, restricting access to physical copies only and prohibiting duplication. This limits public scrutiny and access to administrative accountability.

The Hong Kong Government aimed to install a total of around [2,000 sets of CCTV cameras](#) by the end of next year, followed by 2,000 to 2,500 each year after that, bringing the total to more than [54,500 cameras](#) citywide. The Police Chief said that the first 2,000 sets of cameras would be installed by the end of 2024. These cameras are increasingly integrated with facial recognition technology and artificial intelligence (AI) capabilities.

As civic space contracts offline, civil society actors have increasingly turned to digital platforms for outreach, mobilisation, and cultural expression. In 2024, after the government cancelled a fully booked venue, the Hong Kong Journalists Association (HKJA) hosted its [fundraising concert online](#); in 2025, HKJA again moved [online for fundraising events](#) after its gala venue was repeatedly cancelled. Other organisations have similarly migrated events to Zoom, YouTube, or private forums, reflecting both resilience and adaptation.

However, this shift is constrained by fear of surveillance, content takedown, and low public confidence in the safety of digital platforms. Digital literacy within civil society has improved modestly in recent years, but knowledge of encryption tools and data security remains uneven. Many smaller or grassroots CSOs lack the resources to protect their communications, leaving them vulnerable to intrusion or monitoring.

## Challenges and Opportunities

The continued prosecution of activists, such as the impending verdict in [Jimmy Lai's trial](#) and the [commencement of the Hong Kong Alliance in Support of Patriotic Democratic Movements of China trial](#), may escalate repression. Funding restrictions and new legal amendments will make organising even more difficult, further isolating independent organisations.

International advocacy remains a pressure point, limiting the government's ability to enact extreme measures. Diaspora groups provide external platforms for Hong Kong issues. Non-political NGOs may find limited space to operate, and the government's global reputation concerns might encourage slight de-escalations in crackdowns. The Legislative Council elections in December 2025, albeit non-representative, may also open up space for public discussion on policies. However, any opportunities remain fragile amid ongoing repression.

*This publication was funded/co-funded by the European Union. Its contents are the sole responsibility of the author and do not necessarily reflect the views of the European Union.*



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