

# Hong Kong

## Country Focus Report

### October 2025



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# A) An Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:

## SIX ENABLING PRINCIPLES

- 1. Respect and Protection of Fundamental Freedoms**
- 2. Supportive Legal and Regulatory Framework**
- 3. Accessible and Sustainable Resources**
- 4. Open and Responsive State**
- 5. Supportive Public Culture and Discourses on Civil Society**
- 6. Access to a Secure Digital Environment**

In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the six principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

## Brief Overview of the Country Context

Hong Kong's civil society landscape has undergone a profound and accelerated transformation, shifting from a relatively open and pluralistic environment to one marked by systemic repression and legal uncertainty. Once regarded as a regional model for civic freedoms under the "one country, two systems" framework, the territory now exemplifies the fragility of institutional safeguards when confronted with expansive state security imperatives.

The enactment of the [National Security Law \(NSL\)](#) in 2020 by Beijing introduced a sweeping legal architecture that redefined permissible civic engagement, criminalising dissent under broadly defined offences such as subversion and collusion with foreign forces. This trajectory intensified with the [Safeguarding National Security Ordinance \(SNSO\)](#) in 2024—commonly referred to as Article 23 legislation—which further entrenched executive powers, including indefinite detention without charge and warrantless surveillance, effectively sidelining judicial oversight.

These legislative shifts have had cascading effects on civil liberties. Freedom of expression, association, and assembly—once protected under the Basic Law—have been systematically undermined. The forced closure of independent media outlets such as [Apple Daily \(2021\)](#) and [Stand News \(2022\)](#), coupled with pervasive self-censorship among remaining journalists, has hollowed out the public sphere. Simultaneously, pro-democracy NGOs, trade unions, and grassroots organisations have faced relentless pressure through legal intimidation, funding restrictions, and administrative obstruction, leading to widespread disbandment.

Institutional checks and balances have also eroded. The Legislative Council (LegCo), following [electoral reforms in 2021](#), now functions as a pro-Beijing body with minimal opposition representation, curtailing policy debate and civic participation. Judicial independence, while formally preserved, has come under scrutiny for its [deference to executive interpretations](#) in national security cases, raising concerns about the rule of law's resilience.

International watchdogs have documented this regression. The 2024 CIVICUS Monitor [classifies Hong Kong's civic space](#) as "closed," citing arbitrary arrests, criminalisation of peaceful activism, and restrictions on public assembly. These developments position Hong Kong as a cautionary tale of how legal instruments can be repurposed to dismantle democratic norms and suppress civil society.

This report offers a baseline assessment of Hong Kong's enabling environment for civil society, structured around six core principles. It seeks to illuminate the constraints faced by civic actors in organising, operating, and engaging in public life, and to contextualise these within broader regional and global trends of authoritarian resurgence.

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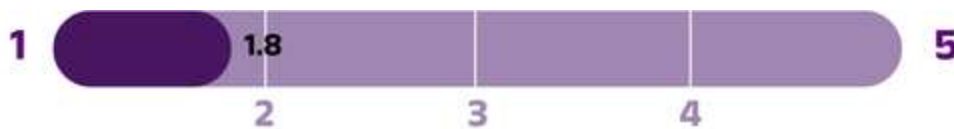


# B) Assessment of the Enabling Environment

## PRINCIPLE SCORE

### 1. Respect and Protection of Fundamental Freedoms

Score: <sup>1</sup>



Despite formal guarantees under Hong Kong's [Basic Law](#) (Articles 27–39), the [Hong Kong Bill of Rights Ordinance](#) (Cap. 383), and applicable [international human rights covenants](#), the territory's civic space has experienced a sharp and sustained decline and is classified by the CIVICUS Monitor as "[closed](#)." Freedoms of expression, association, and assembly—once foundational to Hong Kong's semi-autonomous identity—are now systematically suppressed under an expansive national security regime. Freedom of association has deteriorated markedly, with over 90 NGOs and 175 trade unions disbanding amid escalating legal threats and informal coercion. The dissolution of student unions and opposition parties has further eroded platforms for collective organising and youth participation. Freedom of assembly is effectively criminalised, with protest symbols and gatherings banned under judicial deference to executive security assessments. Expression is tightly controlled through colonial-era sedition laws and the 2024 Safeguarding National Security Ordinance, which broadened prosecutorial powers and removed safeguards against abuse. Journalists and academics face prosecution and pervasive self-censorship, stifling independent reporting and critical inquiry. Cultural expression has also been curtailed, exemplified by the judicial ban on the protest anthem "Glory to Hong Kong." Transnational repression now targets exiled activists and affiliated institutions, extending the threat beyond Hong Kong's borders. International watchdogs have responded by classifying Hong Kong's civic space as "closed," reflecting the collapse of democratic safeguards. These developments reveal a hostile enabling

<sup>1</sup>This is a rebased score derived from the [CIVICUS Monitor rating](#) published in December 2024.

environment in which civil society actors operate under constant risk, with limited space for dissent, participation, or accountability.

## 1.1 | Freedom of Association

The dismantling of civil society in Hong Kong since 2020 reflects a deliberate and sustained campaign to suppress collective organising. Arrests, surveillance, and coercive pressure have not only targeted individuals but have structurally undermined the right to freedom of association. By March 2024, [researchers recorded](#) the disbandment of over 90 NGOs and 175 trade unions, including legacy organisations such as the Civil Human Rights Front, Amnesty International Hong Kong, and the Hong Kong Alliance in Support of Patriotic Democratic Movements of China. These closures signal more than attrition—they represent the systematic removal of institutional pillars that once anchored civic engagement.

The trend has accelerated. In February 2025, Hong Kong Unison, a long-standing advocate for ethnic minorities, [announced its closure](#). While officially framed as mission completion, the timing and context suggest that the operational climate has become [incompatible](#) with rights-based advocacy. The League of Social Democrats (LSD), one of the last opposition parties, [dissolved](#) on 30 June 2025 amid reports of informal warnings that failure to disband before 1 July—a politically sensitive date—would trigger prosecution under the National Security Law. This illustrates the use of pre-emptive intimidation to enforce political conformity.

The [abrupt shutdown](#) of China Labor Bulletin in June 2025, including the deletion of its social media accounts, underscores the shrinking space for labour rights advocacy—even when focused on mainland China. Its closure reflects the extraterritorial reach of repression and the collapse of Hong Kong as a safe harbour for cross-border civil society work.

Student organisations have also been [hollowed out](#). Universities have severed ties with student unions, halting fee collection and restricting campus access. The Hong Kong Federation of Students, central to major social movements since 1958, including the Umbrella Movement in 2014, now [faces existential threats](#) due to the dismantling of its constituent bodies. This points to a broader strategy of depoliticising youth spaces and neutralising student-led mobilisation.

Since July 2023, the state has extended its [coercive reach globally](#), issuing bounties for 34 exiled activists accused of national security violations. The warning that support for these individuals could result in prosecution introduces a chilling form of transnational repression. The case of Dr. Chung Kim-wah, [listed](#) in December 2024, exemplifies this. Following his designation, the Hong Kong Public Opinion Research Institute (HKPORI)—where he previously served—faced investigations and intimidation, leading to the [suspension of its self-funded research](#). This not only undermines academic freedom but signals that institutions are vulnerable to retaliation for past affiliations.

Taken together, these developments reveal a civic environment where freedom of association is no longer protected in practice. The legal and extra-legal measures deployed have created a climate of fear, fragmentation, and pre-emptive compliance. The implications are that civil society actors now operate under constant threat, and the infrastructure for collective action has been largely dismantled. Hong Kong's enabling environment has shifted from constrained to actively hostile, with long-term consequences for democratic resilience and international engagement.

## 1.2 | Freedom of Peaceful Assembly

Freedom of peaceful assembly in Hong Kong has been [systematically constrained](#) through a layered regime of legal, procedural, and informal controls. Authorities have employed a coordinated strategy combining indefinite prosecution of 2019 protestors, [selective enforcement](#), and [targeted pressure](#) on organisers to suppress public gatherings. This approach—marked by its discriminatory application [and pre-emptive policing](#)—has produced a chilling effect that deters participation and undermines the right to assemble. The absence of large-scale demonstrations [for four consecutive years](#) (2021–2024) is not incidental but symptomatic of a civic space rendered inert by fear and legal ambiguity.

The requirement for a “Letter of No Objection” under the [Public Order Ordinance](#) remains a formal barrier, but the real deterrent lies in informal discouragement and opaque decision-making. In 2024, the League of Social Democrats cancelled a planned protest [under pressure](#), illustrating how non-transparent coercion substitutes for outright bans. Even small symbolic actions are met with suppression: in early 2024, activists protesting outside the court during the Jimmy Lai trial were forcibly removed and interrogated. Law enforcement claims of [not rejecting protest](#) applications since 2022 obscure the reality that deterrence now operates through informal channels, making the right to assemble contingent on political acceptability.

The state’s posture is especially aggressive on politically sensitive dates. On 4 June 2025 ([Tiananmen anniversary](#)) and 1 July 2025 ([handover day](#)), authorities pre-emptively closed or occupied Victoria Park, historically a site for peaceful vigils. Activists attempting commemorations [were surveilled or detained](#), signalling a shift from reactive policing to preventive suppression. These actions reflect a broader strategy to erase collective memory and neutralise symbolic resistance.

The legal framework underpinning this repression is increasingly weaponised. A Human Rights Watch [report \(June 2025\)](#) found that 85% of National Security Law convictions involved individuals engaged in peaceful expression or assembly. This statistic reveals the extent to which peaceful protest has been criminalised, blurring the line between security enforcement and rights violations.

The cumulative effect is a civic environment where freedom of assembly exists largely in theory. The procedural requirements, informal pressures, and targeted enforcement have created a landscape of managed silence, where public expression is neither safe nor feasible. For civil society, this means the loss of a vital tool for mobilisation, solidarity, and visibility—further weakening the enabling environment and reinforcing a climate of isolation and self-censorship.

### 1.3 | Freedom of Expression

Freedom of expression in Hong Kong has been undermined through a combination of legal prosecution, institutional censorship, and pervasive self-censorship. The targeting of independent media outlets illustrates a broader strategy to criminalise dissent and reshape public discourse. The [ongoing trial](#) of Apple Daily’s owner and editors for sedition and collusion with foreign forces, and the [2024 imprisonment](#) of Stand News editors under [colonial-era sedition laws](#), mark a historic regression—these are the first such convictions since the 1997 handover, signalling a revival of repressive legal instruments.

The use of colonial-era sedition laws, [widely condemned](#) by UN human rights experts, reflects a deliberate choice to weaponise outdated statutes against contemporary expression. Despite [international recommendations](#) during China’s Universal Periodic Review to repeal both the National Security Law (NSL) and sedition laws, Hong Kong embedded sedition provisions into

the 2024 Safeguarding National Security Ordinance (SNSO). The SNSO not only increased penalties to 10 years' imprisonment but also removed the requirement to prove violence or incitement—broadening the scope for arbitrary enforcement and chilling legitimate speech.

Judicial deference to executive security claims further entrenches this erosion. In March 2024, the Court of Appeal [granted an injunction](#) banning dissemination of the protest anthem “*Glory to Hong Kong*”, effectively criminalising its broadcast and online sharing. Amnesty International [described](#) this as a senseless attack on Hongkongers' freedom of expression, highlighting how national security is being used to suppress symbolic resistance.

Journalists covering politically sensitive topics now operate under implicit constraints. The need to present an officially “balanced view” reflects a normalisation of self-censorship, driven by fear of legal reprisal. This is corroborated by Hong Kong's 140th ranking out of 180 in the 2025 Reporters Without Borders [Press Freedom Index](#), and its “Partly Free” [status](#) by Freedom House—both indicators of a deteriorating media environment. The chilling effect extends beyond journalism. Academics [report](#) avoiding research on politically sensitive subjects such as the 2019 protests, national identity, or China's foreign policy, to protect funding and personal safety. This signals a broader intellectual retreat, where critical inquiry is stifled and academic freedom curtailed.

Taken together, these developments reveal a civic space where freedom of expression is no longer meaningfully protected. The legal architecture now facilitates repression, while informal pressures enforce silence. Without the ability of civil society actors to speak freely, challenge dominant narratives, or engage in public debate, the foundations of democratic accountability and civic participation are being systematically dismantled.

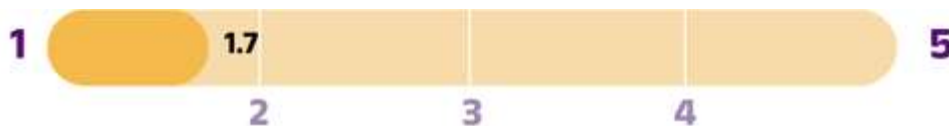
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## PRINCIPLE SCORE

## 2. Supportive Legal and Regulatory Framework

Score:



Hong Kong's legal and regulatory framework for civil society has shifted from permissive to restrictive, undermining the enabling conditions for independent civic action. Registration, once a neutral administrative process, now functions as a political filter, with vague national security criteria used to deny or revoke legal status. Operational constraints have intensified, as CSOs face burdensome licensing, selective enforcement, and venue restrictions that deter public engagement. Administrative oversight is increasingly used to control rather than facilitate, with professional deregistration and tax audits targeting politically active actors. Legal protections against interference are weak or absent, allowing authorities to surveil, dissolve, or penalise CSOs with minimal accountability. Appeals mechanisms lack independence, and redress is inaccessible for most organisations, especially grassroots and marginalised groups. Third-party threats, including harassment of journalists, are met with institutional indifference, further eroding civic resilience. Together, these trends reveal a legal framework that enables repression rather than safeguards civic space, placing CSOs under constant risk.

### 2.1 | Registration

While Hong Kong's legal framework does not explicitly prohibit individuals or marginalised groups from forming civil society organisations (CSOs), registration has become a politically charged process. Authorities increasingly invoke vague concepts like “national security” and “public order” to deny or revoke registrations, creating a climate of legal uncertainty and deterrence—especially for groups critical of the government.

Historically, CSOs operated without formal registration, or registered under the [Societies Ordinance](#) (Cap. 151) or [Companies Ordinance](#) (Cap. 622). Trade unions and professional bodies fall under separate laws. However, since the enactment of the National Security Law (NSL), registration has shifted from optional to coercive for politically sensitive organisations, effectively functioning as a gatekeeping tool.

The Societies Ordinance, administered by the police, grants broad discretionary powers to refuse or cancel registration. The [2022 conviction](#) of five trustees of the 612 Humanitarian Relief Fund, including Cardinal Joseph Zen, for failing to register marked the first such prosecution under this law. The pending appeal, alongside similar [action](#) against the Civil Human Rights Front, underscores the law's selective enforcement.

Appeals under the Ordinance are made to the Chief Executive, whose dual role in governance and national security enforcement compromises procedural independence. No successful appeals have been reported, reinforcing perceptions of a politically insulated process.

While pro-government groups continue to register, those advocating for independence or self-determination are effectively barred. Many CSOs opt out of registration altogether to avoid legal liability, personal targeting, or surveillance. Others register under the Companies Ordinance, but face rejection [for “unlawful purpose”](#) and exposure to compliance risks that heighten vulnerability under national security scrutiny.

Charitable status under Section 88 of [the Inland Revenue Ordinance](#) offers tax benefits and fundraising legitimacy, but advocacy groups are often denied recognition, as “advocacy” is excluded from charitable purposes—structurally disadvantaging rights-based organisations.

Though registration procedures remain [publicly accessible](#) and relatively affordable (e.g. HKD 1,720 for [company registration](#)), the practical burdens and political risks deter many, especially grassroots and marginalised groups lacking legal support. The [2025 amendments](#) to the Trade Unions Ordinance, effective January 2026, deepen this trend by [empowering the Registrar](#) to deregister unions deemed threats to national security, banning foreign funding, and disqualifying individuals with related convictions from leadership roles.

Taken together, these developments reveal a sharp deterioration in the legal environment for CSO registration. While technically possible, registration is no longer a neutral administrative process—it has become a mechanism of political exclusion, determining who may legally operate, under what conditions, and at what cost.

## 2.2 | Operational Environment

Civil society organisations in Hong Kong operate within an increasingly restrictive and politicised environment, where legal ambiguity and discretionary enforcement have transformed routine operations into high-risk activities. While the legal framework does not explicitly require government approval for internal governance, objectives, or activities, in practice, CSOs face growing constraints that undermine their autonomy and operational viability.

Many activities—such as street booths, public performances, and venue use—now require prior approval, subject to opaque and inconsistent licensing procedures. National security compliance clauses are increasingly embedded in venue agreements, including in educational institutions. Even symbolic actions, like delivering letters, are regulated through identification requirements, contributing to a climate of surveillance and intimidation. The [reported difficulties](#) faced by the US Consulate General in securing venues further illustrate the politicisation of access.

Enforcement is selective and politically motivated. The [abrupt cancellation](#) of the 2024 IDAHO Carnival, based on an unsubstantiated [licensing demand](#), highlights how administrative tools are used to suppress events deemed politically sensitive. In contrast, organisers in 2025 preemptively adjusted timing and licensing to avoid scrutiny—revealing how CSOs must self-censor and strategically navigate bureaucratic risk. Meanwhile, groups like the League of

Social Democrats [face prosecution](#) for long-standing civic practices, such as street outreach and [public fundraising](#).

Professional regulation has also become a tool of exclusion. The 2024 amendment to the [Social Workers Registration Ordinance](#) introduced vague disqualification criteria and [expanded government control](#) over licensing. The [deregistration](#) of social worker Jackie Chen in 2025, following a [protest-related conviction](#), exemplifies how professional status can be weaponised to punish activism.

Administrative oversight has intensified through financial scrutiny. The Hong Kong Journalists Association reported [disproportionate tax audits](#) targeting at least eight independent media outlets and 20 journalists or their families, suggesting a pattern of intimidation. These actions undermine press freedom and weaken the role of independent media as a pillar of civil society.

Access to funding is increasingly constrained. While corporate and charity law frameworks remain formally intact, politically active CSOs face heightened risk. Foreign funding is restricted under national security provisions, and the 2025 amendments to the Trade Unions Ordinance—effective January 2026—prohibit foreign donations without approval and bar individuals with security-related convictions from leadership roles. These measures institutionalise financial exclusion and leadership purges.

Together, these developments reveal that CSOs in Hong Kong face escalating administrative, financial, and legal burdens. The operational environment is no longer governed by neutral regulation but by political alignment. The cumulative effect is a chilling atmosphere where civic actors must navigate constant uncertainty, undermining the enabling conditions for independent, rights-based civil society work.

### 2.3 | Protection from Interference

Civil society organisations in Hong Kong operate in a legal environment that offers few meaningful safeguards against arbitrary interference by the state or third parties. While Article 27 of the [Basic Law](#) nominally guarantees freedom of association, this protection has been hollowed out by the National Security Law and the Safeguarding National Security Ordinance, which criminalise broadly defined acts such as subversion and collusion with foreign forces. These laws grant authorities sweeping powers to monitor, investigate, and dissolve CSOs, often without clear procedural safeguards or independent oversight.

The legal framework does not provide explicit protections against arbitrary dissolution. Under the Societies Ordinance, appeals against deregistration are made to the Chief Executive, whose dual role in governance and national security enforcement undermines impartiality. No successful appeals have been reported, and legal redress mechanisms remain weak and inaccessible, especially for grassroots organisations.

National security clauses have been embedded across administrative regimes, including in [restaurants](#), [venue and business](#) licensing. These vague provisions—such as requirements not to “endanger national security”—function as political filters, enabling authorities to penalise organisations based on perceived affiliations. The [2024 raid](#) on Agape Garden, a social enterprise linked to humanitarian work, illustrates this dynamic. Despite [pursuing legal action](#), the case highlights the systemic barriers to accountability, as most CSOs lack the resources to litigate and rarely achieve remedy. As a result, interference is widely perceived as unavoidable, with little hope of remedy.

Third-party interference is also inadequately addressed. The Hong Kong Journalists Association [documented a rise](#) in harassment against journalists, with [limited response](#) from law enforcement or regulatory bodies. In one case, Hong Kong Free Press [filed a complaint](#)

with the Privacy Commissioner, but the investigation stalled due to the inability to identify the perpetrator—revealing a pattern of institutional reluctance to protect civil society actors from external threats.

Under the SNSO, authorities may issue restriction orders, compel disclosures, and deregister organisations - with minimal transparency. These powers are used in tandem with the NSL, creating a dual enforcement regime that facilitates surveillance and control. State inspections and interventions are not regulated to prevent abuse; instead, they serve as tools of intimidation and disruption.

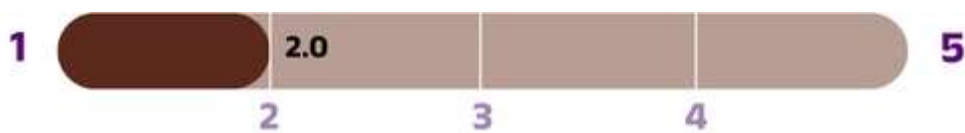
In practice, the law enables rather than prevents interference. CSOs operate under constant threat of dissolution, surveillance, and reputational harm, with no reliable legal mechanisms to challenge politically motivated actions. The cumulative effect is a disabling environment where civil society actors are vulnerable to both state repression and third-party attacks, undermining the integrity and sustainability of civic engagement in Hong Kong.

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## PRINCIPLE SCORE

### 3. Accessible and Sustainable Resources

Score:



Civil society actors in Hong Kong face mounting challenges in securing and sustaining resources amid an increasingly securitised and politicised environment. Access to funding is shaped by ideological filters, with groups working on sensitive issues often excluded from public and private support. Government subventions and venue access are conditioned by national security compliance, deterring rights-based and marginalised organisations. Even when funding is available, restrictive conditions and rigid donor practices limit programmatic flexibility and strategic autonomy. Core funding is rare, and short-term grants dominate, undermining long-term planning, staff retention, and institutional resilience. Donors often fail to adapt to the operational risks CSOs face, leaving gaps in legal, digital, and physical security support. Self-reliance is constrained by reputational risks, banking barriers, and declining public trust in civic engagement. Sectoral inequality is deepening, with rights-based groups facing near-total exclusion from mainstream funding streams. Fragmented funding cycles and compliance burdens force CSOs into survival mode, weakening collaboration and movement-building. These trends reveal a resource environment that is neither accessible nor sustainable—further eroding the enabling conditions for civil society in Hong Kong.

#### 3.1 | Accessibility of Resources

Access to financial and operational resources for civil society actors in Hong Kong has become increasingly constrained, characterised by politicised funding channels, regulatory barriers, and financial surveillance. While resources from government remain technically available, their distribution is now heavily influenced by political alignment and national security considerations, undermining equitable access—especially for organisations working on sensitive issues or with marginalised communities.

Government funding eligibility remains broad in law but, in practice, approval processes favour groups aligned with official narratives. Boards overseeing public grants increasingly exclude CSOs focused on democracy, [LGBTQI+ rights](#), or press freedom. Even non-political initiatives face heightened scrutiny. The drying up of funds for democracy defenders has contributed to



the dissolution of organisations such as the League of Social Democrats and the Democratic Party, revealing how financial exclusion operates as a tool of political attrition.

The Equal Opportunities (Sexual Orientation) [Funding Scheme](#) illustrates this trend. From 2018 to 2023, it supported 18–24 LGBTQ+ groups annually with over HK\$1 million. In 2024–25, the budget was halved, and recipients reduced to 10. Affected groups downsized operations including [laying-off workers](#) and moving to smaller offices, while concerns grew over the political profile of committee members. Similarly, the Social Welfare Department now requires [compliance with national security laws](#) as a condition for subvention, formalising ideological vetting. Environmental grant schemes have also [been restructured](#) to favour pro-government applicants. For instance, a grant scheme was withdrawn mid-cycle in 2023 after [criticism from pro-Beijing media](#); the revised scheme introduced national security clauses and awarded funds primarily to pro-government applicants.

Private fundraising is increasingly difficult. Venue providers for civil society actors [often withdraw](#) under opaque pressure, and banks impose burdensome requirements, such as [high minimum balances](#). Banking challenges compound these issues. CSOs report difficulties opening accounts, facing arbitrary closures, and suspecting that sensitive financial data may be used for surveillance. These barriers disproportionately affect grassroots organisations, which lack the capacity to navigate complex compliance regimes.

The Inland Revenue Department has intensified audits of charitable CSOs, creating a chilling effect on donors who fear reputational or legal consequences. Tax exemptions under Section 88 of the [Inland Revenue Ordinance](#) remain available, but advocacy groups are often denied charitable status, limiting access to tax-deductible donations.

Foreign funding is particularly fraught. The NSL’s prohibition on “collusion with foreign forces” has led to foreign [donor withdrawal](#) and discouraged international partnerships. CSOs avoid foreign grants to mitigate legal risk, resulting in fragmentation and downsizing across sectors. The Bethune House Migrant Women’s Refuge [reported losing](#) long-term funding due to both political pressure and global economic downturns.

Overall, while funding mechanisms remain formally intact, access is increasingly conditional, opaque, and politically filtered. The cumulative effect is a resource-starved civil society, where actors must self-censor, scale down, or dissolve—undermining the sustainability and diversity of civic engagement in Hong Kong.

### 3.2 | Effectiveness of Resources

Restrictive political conditions and evolving donor practices have significantly undermined the effectiveness of resources available to civil society actors in Hong Kong. While funding remains technically accessible, its utility is increasingly constrained by conditionality, misalignment with CSO priorities, and limited responsiveness to the operational realities of a securitised environment.

Local funders increasingly prioritise service delivery and avoid politically sensitive programming. Even non-political projects may lose funding if the organisation has previously been targeted, creating a chilling effect. Core and flexible funding are rare, limiting CSOs’ ability to invest in infrastructure, digital security, staff well-being, or strategic planning—critical needs under repressive conditions. To avoid reputational risk, some CSOs pre-emptively distance themselves from pro-democracy donors, further fragmenting the civic ecosystem.

International donors are more open to supporting rights-based work but often [impose rigid](#) compliance and reporting requirements. These demands are difficult to meet under surveillance and legal uncertainty, diverting resources from programmatic impact. Conversely, some donors adopt trust-based funding with minimal oversight, which, while well-intentioned, can create governance and transparency challenges, especially for smaller organisations.

Donor relationships have become increasingly transactional and short-term. The pressure to demonstrate immediate outcomes discourages investment in long-term movement building, community engagement, and network coordination. Few donors support administrative overheads, legal defence, or risk mitigation—despite their growing relevance in Hong Kong’s securitised context.

Government and quasi-public funding schemes impose ideological conditions through national security clauses, effectively excluding CSOs working on human rights or democracy. Even service-oriented organisations face pressure to sanitise language and avoid politically sensitive topics in programme materials, limiting their ability to respond authentically to community needs.

In this environment, CSOs must divert significant energy toward compliance, risk management, and reputational defence, reducing their capacity to deliver meaningful impact. Donor practices that fail to adapt to these constraints—by offering flexible, long-term, and security-conscious support—risk unintentionally contributing to the weakening of civil society in Hong Kong.

### 3.3 | Sustainability of Resources

Long-term financial sustainability has emerged as a critical vulnerability for civil society organisations in Hong Kong. Most rely on fragmented, short-term, or emergency funding, which lacks the predictability needed for strategic planning, staff retention, and operational continuity. The absence of a diverse and reliable funding pool exposes CSOs to volatility and forces reactive rather than proactive programming.

The political climate shaped by the National Security Law deters both local and foreign funders from sustained engagement. Asset freezes, reputational risks, and [surveillance](#) have made long-term support appear [legally and politically risky](#). International donors—once key to advocacy-oriented CSOs—have scaled back due to compliance burdens or shifting geopolitical priorities. For example, reductions in U.S.-based support, including the [suspension of funding](#) for Voice of America and Radio Free Asia, have left media organisations [vulnerable](#). Ad-funded outlets and merchandising efforts, such as the Hong Kong Journalists Association’s [online auctions](#), offer limited relief and are not viable substitutes for stable funding.

This financial precarity directly affects human resources. Many CSOs [cannot afford](#) full-time staff, leading to part-time or freelance arrangements that erode institutional memory and resilience. Skilled individuals exit the sector for more secure employment, while those who remain face burnout and strategic drift. Volunteer recruitment is also hampered by security concerns and declining public trust, weakening informal support networks and leadership development.

Funding cycles are often misaligned with CSOs’ operational needs. Gaps between grants disrupt programme continuity and delay service delivery. Project-based funding dominates, leaving little room for core support or long-term investment. This undermines CSOs’ ability to build infrastructure, adapt to emerging needs, or engage in strategic planning. Few donors

support overheads, legal defence, or risk mitigation—despite their growing relevance in Hong Kong’s securitised context.

Self-reliance is increasingly difficult. Income-generating activities are constrained by reputational risks and regulatory scrutiny. Donations are declining as individuals fear association with targeted groups. Volunteerism, once a strength of Hong Kong’s civic culture, has weakened under political pressure. While some professionals offer informal support, these efforts are isolated and unsustainable.

Sectoral inequality is deepening. CSOs working on non-political issues—such as disability inclusion or student welfare—retain limited access to corporate or school-based funding. In contrast, rights-based organisations face near-total exclusion and informal blacklisting by business donors. This uneven landscape fragments civil society and isolates high-risk actors.

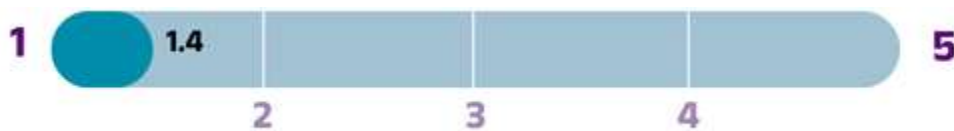
In this context, sustainability depends more on personal commitment than institutional strength. Visibility is often reduced for safety, but this undermines outreach and collaboration. Without structural support, Hong Kong’s civil society risks becoming atomised, reactive, and unable to sustain long-term impact.

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# PRINCIPLE SCORE

## 4. Open and Responsive State

Score:



The following sections examine the deteriorating conditions for transparency, participation, and accountability in Hong Kong, revealing a civic environment increasingly defined by opacity, exclusion, and institutional retreat. While formal mechanisms for access to information, public consultation, and government oversight remain nominally in place, they have been hollowed out by legal ambiguity, political vetting, and securitisation. Civil society organisations, once active contributors to governance, now face systemic barriers that limit their ability to access information, engage in policymaking, or hold authorities accountable. These sections unpack how the erosion of legal safeguards, the manipulation of participatory processes, and the weakening of oversight mechanisms have collectively undermined the enabling environment for civil society, transforming it from a space of engagement into one of managed compliance and constrained dissent.

### 4.1. | Transparency

Hong Kong's transparency framework is very fragile, with limited legal guarantees and growing opacity in government practices. While some access to information persists for non-sensitive matters, the absence of a statutory right to information and the dominance of national security justifications to restrict transparency have severely undermined civil society's ability to monitor governance and participate meaningfully in public affairs.

The current system is governed by the [Code on Access to Information](#), introduced in 1995 as a non-binding administrative guideline. It allows individuals to request information from government departments, but lacks legal enforceability, excludes private entities performing public functions, and provides no statutory appeal mechanism. Requests can be denied on vague grounds such as "national security" or "public interest," with no obligation to justify refusals or publish decisions. There are no sanctions for non-compliance, and redress mechanisms are weak.

Public institutions are not legally required to proactively publish draft laws, policies, budgets, or audit reports in accessible formats. Subsidiary legislation under the Safeguarding National

Security Ordinance, such as the May 2025 regulation empowering the Office for Safeguarding National Security, was published only on [the day it took effect](#), denying the public any opportunity for prior scrutiny. This undermines legislative transparency and civic oversight.

The Legislative Council (LegCo), once a conduit for civil society engagement, has become less transparent following political vetting and the exclusion of opposition voices. CSOs report diminished access to legislative briefings and policy consultations, further isolating them from decision-making processes.

The lack of an [Archives Law](#) compounds the problem. Government records are managed under an administrative regime with no legal obligation to preserve or disclose historical or decision-making documents. Archivists and reform advocates have long criticised this gap, warning that it erodes institutional memory and public accountability. A case in point is the missing report to the Committee against Torture that was made in February 2025 from the Hong Kong government [website](#).

Institutional responsiveness has also declined. The Office of the Ombudsman, once a key oversight body, has become less accessible and less willing to investigate politically sensitive complaints. In 2025, over 230 archived investigation reports were [removed from its website](#), and full investigations dropped to a five-year low. Mediation is now favoured over inquiry, reducing the depth and visibility of oversight.

While procedures for filing information requests exist, they are inconsistently applied and lack safeguards against unjustified denial. Vulnerable groups face barriers in navigating the system, and there are no clear waivers or protections to ensure equitable access.

Overall, Hong Kong's transparency regime is deteriorating, particularly in areas intersecting with rights protection, public spending, and civic participation. The absence of binding legal protections, coupled with selective disclosure and institutional retreat, has created an information vacuum that weakens civil society's ability to hold power to account and engage in informed advocacy.

## 4.2 | Participation

Civil society participation in policymaking in Hong Kong has become constrained, symbolic, and discriminatory. While formal mechanisms for engagement—such as Legislative Council deputations, public consultations, and advisory appointments—still exist, they have been hollowed out by political vetting, procedural opacity, and the securitisation of dissent. The cumulative effect is a civic environment where participation is neither inclusive nor influential, and where independent voices are treated as liabilities rather than partners in governance.

Consultations are now largely limited to written submissions, with few opportunities for dialogue or deliberation. In 2025, [key regulations](#) under the Safeguarding National Security Ordinance were enacted without any public consultation prior to gazettal. Where in-person consultations occurred, they were by invitation-only, brief, and procedurally restrictive. Civil society actors were not given adequate time to prepare input, and critical feedback was [publicly dismissed](#) as politically motivated or “anti-China.” This pattern reflects a shift from participatory governance to controlled messaging, where consultation serves more as a formality than a genuine avenue for influence. For example, in July 2024, Charles Mok, a respected digital policy expert, was denounced by the Secretary for Security after [criticising the proposed Critical Infrastructure Bill](#). The government claimed his views were [inciting hatred towards the government](#) – an intimidation tactic that deters other professionals from participating in public discourse.



Discrimination in participation is increasingly institutionalised. CSOs perceived as critical of the government—particularly those working on human rights, democracy, or press freedom—are excluded from consultations, while organisations aligned with official narratives are selectively invited. During the 2024–2025 same-sex partnership discussions, no formal public consultation was held, and some LGBTQ+ groups reported self-censorship due to fear of retaliation. The chilling effect of the National Security Law and sedition provisions has made even constructive criticism legally risky. Although the law nominally protects “constructive criticism,” no defendant has successfully invoked this defence in court, reinforcing the perception that dissent carries criminal liability.

Appointment processes for public bodies have also become less transparent and inclusive. In May 2025, the Equal Opportunities Commission (EOC) board was [reconstituted](#) with members drawn almost exclusively from pro-government circles. No formal consultation was held, and long-standing civil society organisations were excluded from the nomination process. This undermines the legitimacy of public institutions and signals a retreat from pluralistic governance.

International participation channels have similarly narrowed. The Hong Kong Government [delayed its report](#) to the UN Committee Against Torture, obstructing timely scrutiny of rights violations. Civil society engagement with UN mechanisms is increasingly risky, as government officials [refuse to clarify](#) whether such engagement could be criminalised under national security laws. This ambiguity, coupled with rhetoric equating criticism with “soft resistance,” deters CSOs from participating in global accountability processes.

Where participation opportunities do exist, they are often inaccessible or ineffective. Online formats dominate, but lack transparency about how input is used. Timelines are short, and feedback mechanisms are absent. CSOs report that their submissions are rarely acknowledged, let alone incorporated into policy. The erosion of LegCo’s pluralism has further diminished civil society’s access to legislative briefings and policy dialogue.

Overall, civil society in Hong Kong is no longer treated as a stakeholder in governance but as a risk to be managed. Participation is tightly controlled, selectively granted, and procedurally hollow. These trends reveal a deliberate effort to marginalise independent civic actors and consolidate decision-making within politically vetted circles. Without meaningful participation, civil society loses its capacity to shape policy, represent constituencies, and hold power to account.

### 4.3 | Accountability

Government accountability to civil society actors in Hong Kong has deteriorated significantly, with formal mechanisms either weakened or rendered symbolic. While civil society organisations continue to engage in consultations and submit recommendations, there is no systematic process for tracking how their input is received, evaluated, or incorporated into decision-making. The absence of feedback loops, public documentation, and follow-up mechanisms has fostered widespread disillusionment and disengagement among civic actors.

Consultation exercises increasingly lack transparency. As noted in Section 4.2, critical input is routinely dismissed or vilified, reinforcing the perception that engagement is procedural rather than substantive. Government officials rarely provide explanations for disregarding CSO feedback, and there are no formal avenues for CSOs to challenge or appeal such decisions. This undermines the principle of participatory governance and signals a shift toward unilateral policymaking.

The Legislative Council's Complaints Division remains operational, but its effectiveness has diminished. The government is not legally obligated to respond substantively to complaints, and the Legislature no longer functions as a conduit between civil society and the executive. There are no reporting requirements compelling public bodies to disclose how civil society input influences policy outcomes, leaving CSOs in the dark about the impact of their engagement.

Judicial review, once a key accountability mechanism, [has been weakened](#) under the National Security Law. Article 44 empowers the Chief Executive to designate judges for national security cases, raising concerns about judicial independence and due process. The [conviction of 14 pro-democracy figures](#) in May 2024 for “conspiracy to subvert state power” exemplifies the erosion of impartiality and the chilling effect on political expression. [Reforms](#) to the legal aid system and [intimidation](#) of lawyers involved in sensitive cases have further narrowed access to justice, making it harder for CSOs to use the courts to demand accountability.

In less politically sensitive areas—such as gender-based violence or sexual harassment—some CSOs report incremental progress. However, these gains are often the result of long-term advocacy and do not reflect current openness to civil society input. Across governance, democracy, and human rights domains, CSOs consistently report a lack of follow-up, transparency, or evidence that their views have shaped policy.

There are no institutionalised spaces for CSOs to monitor how their input is used or to hold the government accountable for its commitments. Participation in implementation and oversight is systematically obstructed. Where engagement persists, it is largely symbolic, unsupported by feedback mechanisms, and detached from actual influence over policy outcomes.

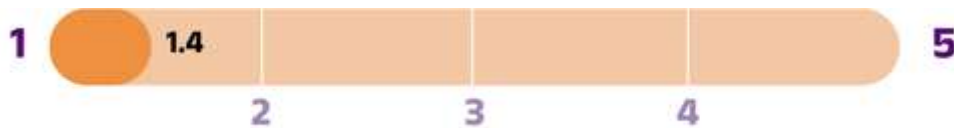
In sum, the accountability framework in Hong Kong has become increasingly opaque and exclusionary. Civil society actors are denied meaningful opportunities to track, challenge, or influence government decisions. This erosion of accountability not only weakens civic trust but also undermines the enabling environment for civil society, reducing its capacity to serve as a check on power or a voice for public interest.

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## PRINCIPLE SCORE

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

Score:



The following sections explore how the civic environment in Hong Kong has been reshaped by a deliberate erosion of public discourse, civic perception, and structural inclusion. Once a space for pluralistic debate and active engagement, public dialogue has become increasingly securitised, with civil society actors framed as threats rather than contributors. Government rhetoric, media narratives, and legal instruments now converge to delegitimise dissent and stigmatise civic participation. This has not only narrowed the space for constructive dialogue but also reshaped public perceptions, fostering fear, disengagement, and self-censorship. At the same time, systemic inequalities—legal, social, and political—have deepened, further marginalising vulnerable groups and excluding them from meaningful participation. Together, these dynamics reveal a civic order that prioritises control over collaboration, undermining the foundations of inclusive governance and democratic accountability.

#### 5.1 | Public Discourse and Constructive Dialogue on Civil Society

Public discourse in Hong Kong has become increasingly hostile toward civil society actors, with government narratives framing them not as partners in governance but as threats to national security, [issuing bounties](#) on their heads. Since 2024, officials have intensified rhetoric accusing NGOs, human rights defenders, and professional associations of engaging in “[soft resistance](#)” or colluding with “foreign forces.” These delegitimising frames—embedded in official statements, [press briefings](#), and [legal proceedings](#)—systematically marginalise civil society and erode public trust in its role.

The government’s “rebuttal team,” established under the National Security Law, has issued [over 200 public responses](#) to criticism, including from UN bodies, often dismissing dissenting views as misinformation or hostile propaganda. This strategy not only discredits civil society input but also signals to the public that engagement with critical actors is unpatriotic or disloyal.

Cultural and artistic expression has also been targeted. Political cartoons, children's books, and school materials [have been censored](#) for alleged national security violations. Artists and performers associated with pro-democracy movements [face venue cancellations](#) and police interference. In May 2024, activist-singer Denise Ho moved her concert online after being denied a venue—only for police to [disrupt the livestream](#), citing noise complaints. Cantopop singer Pong Nan, known for supporting the 2019 protests, had his concert [cancelled](#) due to a venue cancellation by the city's art hub and relocated to Taipei. These incidents reflect a broader effort to suppress cultural dissent and silence symbolic resistance.

Media coverage [reinforces](#) this narrative. With independent outlets shuttered or silenced, pro-Beijing and state-aligned media dominate the landscape, amplifying government portrayals of CSOs as [disruptive or disloyal](#). While a few independent platforms persist, journalists face mounting pressure to self-censor. The [editorial reprimand of Ming Pao](#) in January 2024 for calling for transparency in national security governance exemplifies the risks of even moderate critique. The Hong Kong Journalists Association has been [repeatedly vilified](#), further isolating media actors from civil society.

Constructive dialogue is rare. Government officials seldom engage with civil society evidence or proposals, and public discourse lacks respect, inclusivity, and openness to evidence-based solutions. CSOs working in advocacy are routinely excluded or misrepresented, while service-oriented organisations receive cautious acknowledgment. Even in policy debates, civil society perspectives are sidelined, and loyalty to the state is prioritised over pluralism.

The culture of public dialogue—across government, media, and social platforms—has shifted from deliberation to control. Civil society actors operate in a climate of fear, where visibility invites reprisal and engagement risks criminalisation. This erosion of constructive dialogue undermines the enabling environment for civil society, silencing diverse voices and weakening democratic accountability.

## 5.2 | Perception of Civil Society and Civic Engagement

While some citizens still recognise the positive contributions of civil society actors, particularly in welfare, gender equality, and anti-discrimination, there is growing reluctance to express support openly. Fear of retaliation, professional consequences, or surveillance has made it increasingly difficult for the public to engage with civil society openly. Many organisations report that former supporters now avoid donations, petitions, or even subscribing to mailing lists. Public narratives portraying NGOs and activists as [“soft resistance”](#) or foreign agents further discourage citizens from identifying with civil society initiatives.

There is a widespread belief that civic engagement cannot influence political decision-making. This perception is especially pronounced in electoral contexts. The 2023 District Council election saw a [historic low voter turnout](#) of 27.5%, compared to 71.2% in 2019, reflecting public disillusionment following the introduction of stringent candidate vetting under the “patriots-only” policy. Many citizens now view political participation as futile or risky, with meaningful contestation no longer possible under the current political system. As a result, while civic involvement persists in community-level initiatives—especially those unrelated to formal politics—it is often informal, discreet, and fragmented.

Civic education has also been severely weakened. Since 2021, [national security education](#) has been mandatory in schools, and classroom discussion of political issues is heavily restricted. Educators have reported [self-censorship](#) and a reluctance to engage students in critical discussions about democracy, rights, or governance. This shift deprives students of the foundational knowledge and skills necessary for meaningful political participation. Outside

of formal education, some non-governmental actors continue to offer limited non-formal civic education, but these efforts lack scale and visibility.

Nonetheless, signs of quiet resilience remain. Some youth and community members continue to engage in volunteering or norm-shifting advocacy—especially on issues like environmental protection and workplace equity—though such participation is cautious and rarely visible. These efforts reflect a continued belief in civil contribution, even under shrinking political space.

### 5.3 | Civic Equality and Inclusion

Despite Hong Kong's historical positioning as a semi-autonomous region with a robust legal system, recent developments reveal a systematic erosion of civic equality and inclusion. The legal, social, and economic frameworks increasingly fail to guarantee equal rights and opportunities for all, particularly for marginalised and dissenting groups. Hong Kong's anti-discrimination legal framework remains narrowly defined, omitting critical protections for political opinion, sexual orientation, and gender identity. This legal gap contravenes international human rights obligations under instruments such as the ICCPR and ICESCR, to which Hong Kong is bound. The absence of legal safeguards for political expression has enabled the criminal justice system to be used as a tool of political suppression. Reports of [punitive detention conditions](#), denial of bail, and arbitrary [legal restrictions](#) for political detainees illustrate a justice system that is increasingly weaponised against dissent.

The 2023 [Court of Final Appeal ruling](#) mandating an “alternative framework” for same-sex couples by October 2025 was a potential inflection point. However, the government's 2025 [legislative response](#)—crafted without public consultation and offering only minimal rights to overseas-registered unions—signals a performative rather than substantive commitment to equality. The exclusion of domestic same-sex partnerships from legal recognition underscores the state's reluctance to institutionalise inclusion. In addition, the LegCo legislators resolved to receive [submissions only in writing](#). By excluding oral testimonies and public hearings, legislators effectively curtailed opportunities for meaningful dialogue, deliberation, and scrutiny. Written submissions, while a legitimate form of input, often lack the immediacy, visibility, and interactive potential of in-person or live consultations. This format disproportionately disadvantages marginalised communities—such as LGBTQ+ individuals—who may lack the institutional support, legal literacy, or resources to craft formal submissions that meet legislative standards. It also limits the ability of civil society organisations to mobilise collective voices, present lived experiences, and respond dynamically to legislative developments.

Marginalised communities—including ethnic minorities, [LGBTQ+ individuals](#), asylum seekers, and migrant workers—face entrenched structural barriers. These range from discriminatory hiring practices and limited access to public services, to social stigmatisation and political invisibility. The lack of comprehensive anti-discrimination laws exacerbates these challenges, leaving these groups without legal recourse. Migrant domestic workers, for instance, are legally bound to live with their employers, a condition that has been linked to widespread abuse and exploitation. Asylum seekers are denied the right to work, pushing them into poverty and informal economies. These systemic constraints not only marginalise individuals economically but also curtail their ability to engage in civic life.

Social tolerance for diversity has deteriorated in tandem with the shrinking civic space. While pockets of civil society continue to advocate for inclusion, their efforts are increasingly fragmented and under-resourced. The chilling effect of the National Security Law has led many advocacy organisations to either shut down or pivot to non-political service delivery models.



This depoliticisation of civil society has hollowed out platforms for collective action and representation, particularly for vulnerable populations.

The narrowing of political representation through vetting mechanisms in the Legislative Council and District Councils has institutionalised exclusion. These mechanisms disproportionately disqualify candidates from pro-democracy, ethnic minority, and LGBTQ+ communities, effectively disenfranchising entire segments of the population. The result is a political landscape that lacks pluralism and fails to reflect the diversity of Hong Kong's society.

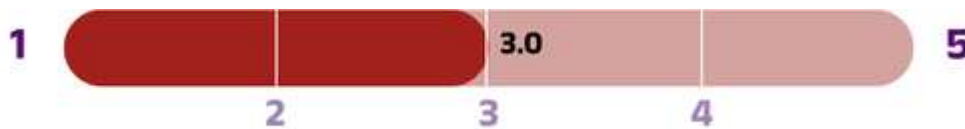
The cumulative effect of legal exclusion, social intolerance, and political disenfranchisement is a severely constrained enabling environment for civil society. The erosion of legal protections and civic freedoms has not only marginalised vulnerable groups but also delegitimised participatory governance. Civil society actors, once vibrant and influential, now operate under the constant threat of legal reprisal, leading to self-censorship and organisational attrition. Without structural reforms to restore legal protections, ensure equitable representation, and foster social cohesion, Hong Kong risks entrenching a civic order that is exclusionary, hierarchical, and resistant to democratic accountability.

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## PRINCIPLE SCORE

### 6. Access to a Secure Digital Environment

Score:



The following sections examine the evolving landscape of digital rights, security, and accessibility in Hong Kong, revealing a complex interplay between infrastructural openness and strategic control. While Hong Kong maintains high levels of internet connectivity and avoids overt shutdowns, this surface-level accessibility conceals a deeper erosion of digital freedoms. Civil society actors face increasing surveillance, opaque content takedown practices, and legal threats that stifle online expression and advocacy. At the same time, targeted cyber threats and the expansion of state surveillance technologies have fostered a climate of fear and self-censorship, undermining digital security and privacy. Despite widespread internet access, many civil society organisations lack the resources and capacity to navigate these risks, leaving them digitally exposed and institutionally unsupported. Together, these dynamics illustrate how digital infrastructure, in the absence of robust protections and accountability, can become a tool of control rather than empowerment—further constraining the civic space in an increasingly digitised society.

#### 6.1 | Digital Rights and Freedoms

There are no systemic internet shutdowns or platform-wide censorship in Hong Kong, and major services such as Google, Facebook, X (formerly Twitter), Telegram, and YouTube remain accessible. However, the absence of full-scale shutdowns masks a more insidious form of digital repression. Rather than blunt disruptions, the state increasingly relies on targeted digital interventions that strategically undermine civil society operations.

Civil society groups have reported a rise in online surveillance and takedown demands, including for content hosted on overseas platforms. Under the [Implementation Rules](#), police can compel internet providers to delete content or surrender user data without judicial oversight, enabling opaque and unchecked enforcement. The [October 2024 blocking](#) of liberal media outlet Flow, followed by [its forced closure](#), illustrates the chilling effect of such powers. Similar pressure on [China Labor Bulletin](#) and a [food delivery worker group](#) underscores how

digital suppression is often enforced offline—via arrests, workplace retaliation, or legal intimidation—rather than through overt platform censorship, making it harder to detect and resist.

Between July 2024 and July 2025, at least six individuals were prosecuted under sedition laws for online speech, including [low-engagement posts](#) and symbolic expressions like [calling a protester a “martyr.”](#) These cases reveal a pattern of disproportionate punishment aimed at deterring dissent. In one instance, a teacher [lost her pension](#) over private Facebook comments, a penalty [later overturned](#) but still under appeal—highlighting the state’s persistence in policing digital expression.

While platforms like Meta, Google, and Telegram remain operational, their perceived neutrality is eroding. [Testimony in early 2025](#) suggested Meta subjected viral Hong Kong content to political review, raising concerns about tacit alignment with government censorship goals. Although there is no conclusive evidence of systematic content suppression by these platforms, the lack of transparency and accountability mechanisms leaves civil society vulnerable to both state and corporate overreach.

The convergence of legal ambiguity, selective enforcement, and opaque platform practices has created a digital environment where surveillance and censorship are pervasive yet difficult to contest, severely constraining the operational space for civil society actors and eroding the foundations of digital freedom.

## 6.2 | Digital Security and Privacy

While large-scale digital attacks on CSOs in Hong Kong remain infrequent, the persistence of targeted cyber threats—particularly against politically sensitive sectors—signals a shift toward more covert and selective forms of digital repression. The 2019 [state-sponsored cyberattack](#) on Amnesty International Hong Kong marked a watershed moment, setting a precedent for future incursions. Since then, suspected state-linked hacking incidents have continued, targeting organisations focused on labour rights and legal advocacy. Though not daily, the strategic nature of these attacks has a disproportionate impact, fostering a climate of fear that compels CSOs to adopt self-censorship and heightened digital caution, thereby undermining their operational capacity and internal communications.

This pervasive sense of vulnerability is compounded by a widespread belief among civil society actors that their online communications are subject to surveillance, even in the absence of overt interference. This perception is not unfounded; it is rooted in past surveillance cases, the demonstrable ability of authorities to trace online activity, and the looming threat of prosecution under national security and sedition laws. Ironically, the state’s own cybersecurity lapses—evidenced by [repeated data leaks](#) from government departments—have further eroded public confidence in its commitment to safeguarding digital privacy, revealing a double standard in the application of digital protections.

Although Hong Kong’s [Personal Data \(Privacy\) Ordinance](#) ostensibly provides a legal framework for data protection, its limitations are starkly exposed in politically sensitive contexts. The law explicitly exempts national security authorities, and the Office of the Privacy Commissioner lacks the mandate to investigate violations involving law enforcement or intelligence agencies. This legal asymmetry leaves civil society actors with virtually no viable redress mechanisms, reinforcing a sense of futility and fear of retaliation that deters formal complaints and weakens trust in institutional accountability.

The [government's plan to install](#) 2,000 new surveillance cameras by the end of 2025—many equipped with facial recognition and AI capabilities—alongside the [deployment of police drones](#) in urban areas, further entrenches a surveillance infrastructure that blurs the line between public safety and political control. These technologies, while ostensibly justified on security grounds, deepen the perception of omnipresent monitoring and contribute to a psychological environment of self-regulation and withdrawal from public discourse.

Taken together, these developments reveal a digital security landscape where the frequency of overt attacks is less significant than their strategic targeting and psychological impact. The absence of robust legal protections, the opacity of enforcement practices, and the expansion of surveillance technologies collectively erode the digital autonomy of civil society. In this context, the enabling environment for civic actors is not only constrained by actual violations but also by the pervasive anticipation of intrusion, creating a digital ecosystem governed by fear, opacity, and asymmetrical power.

### 6.3 | Digital Accessibility

Internet access in Hong Kong remains [broadly available](#), fast, and affordable. The city consistently ranks among the world's most connected, with near-universal internet penetration (96.0%) and widespread broadband coverage according to [DataPortal](#). There were no geographic or demographic shutdowns, and civil society actors are generally able to access and share content online without technical limitations. Access to the internet is widely viewed as a basic necessity, including among grassroots organisations and marginalised communities. However, this infrastructure-level access obscures deeper disparities in digital agency, where the ability to participate securely and meaningfully in civic discourse is increasingly shaped by knowledge gaps, resource constraints, and systemic neglect of digital capacity-building.

Basic ICT literacy is widespread among the general population and civil society workers, but digital resilience and security awareness are underdeveloped. Many CSOs, especially smaller or resource-strapped ones, lack the knowledge and capacity to protect their digital assets or respond to online threats. This vulnerability has, in some cases, resulted in leaks, breaches, or reputational damage due to poor security practices. The absence of sustained digital training opportunities and the unaffordability of professional cybersecurity support leave many organisations exposed to risks that are not technical in origin but structural—rooted in unequal access to digital literacy and institutional support mechanisms.

The capacity gap is compounded by the weakening of institutional intermediaries that once supported digital inclusion. There is no coordinated public or civil society infrastructure to support adaptation to new technologies. Many CSOs lack even baseline understanding of how to apply AI or protect against AI-enabled threats, and there is no emergency response system to support organisations during digital crises such as data leaks or cyberattacks. This vacuum not only limits the ability of civil society to respond to emerging threats but also marginalises them from shaping the norms and standards of digital governance, deepening their exclusion from the evolving civic space.

As digital governance evolves, Hong Kong's civil society faces a widening gap between infrastructure access and digital empowerment, risking exclusion from key developments that will shape future civic space. The illusion of universal access masks a stratified digital environment where technical connectivity coexists with strategic disempowerment, and where the absence of shutdowns does not equate to the presence of digital freedom or inclusion.

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# C) Recommendations

The following recommendations are intended to support the restoration and protection of a rights-respecting enabling environment for civil society in Hong Kong. Addressing the legal, operational, financial, and digital constraints identified in this report requires a coordinated, multi-stakeholder response. Such efforts are essential to safeguarding civic space, upholding fundamental freedoms, and ensuring that civil society can continue to play its vital role in promoting accountability, inclusion, and democratic resilience.

## To the Government of the Hong Kong Special Administrative Region

1. Immediately repeal the National Security Law and the Safeguarding National Security Ordinance; meanwhile, suspend the application of these laws and release all individuals detained or imprisoned solely for peacefully exercising their rights to freedom of expression, assembly, and association.
2. Constitutional and Mainland Affairs Bureau should prioritise the enactment of a statutory Access to Information Law that guarantees the public's right to information. This legislation should include clear timelines for disclosure, an independent appeals mechanism, and narrowly defined exemptions. All legislative and regulatory instruments, including subsidiary legislation, should be published in advance to allow for meaningful public consultation.
3. Legislative Council (LegCo) is encouraged to restore inclusive and transparent participatory mechanisms by reintroducing oral hearings, extending consultation periods, and eliminating political vetting from public engagement processes. It is essential to ensure that all stakeholders, including rights-based and critical CSOs, are afforded equal opportunities to contribute to policymaking without fear of reprisal.
4. Office of the Privacy Commissioner for Personal Data should be empowered with an expanded mandate and operational independence to investigate and address digital privacy violations, including those involving law enforcement and national security agencies. Legislative reforms should introduce robust safeguards against unlawful surveillance and misuse of personal data.
5. Companies Registry and Inland Revenue Department should undertake reforms to the registration and charitable status frameworks to eliminate political discrimination. This includes removing ideological vetting from registration processes and ensuring that advocacy-oriented CSOs can access legal recognition and associated benefits without undue restriction.

6. Labour and Welfare Bureau should repeal the 2025 amendments to the Trade Unions Ordinance that restrict foreign funding and disqualify individuals based on politically motivated convictions. Measures should be taken to restore protections for union autonomy and uphold the right to freedom of association in accordance with international labour standards.

### To Donors and the International Community

1. Bilateral and Multilateral Donors are encouraged to increase the provision of long-term, flexible funding to CSOs in Hong Kong, particularly those engaged in human rights, democracy, and inclusion. Funding should prioritise core operational costs, legal defence, digital security, and staff well-being to enhance organisational resilience in a high-risk environment.
2. European Union and Diplomatic Missions should intensify diplomatic engagement with HKSAR authorities to advocate for the protection of civic space. Civic freedoms and the treatment of CSOs should be consistently raised in bilateral dialogues, trade negotiations, and multilateral forums.
3. International Philanthropic Foundations should streamline compliance and reporting requirements to reduce administrative burdens on CSOs operating under surveillance and legal uncertainty. Foundations are further encouraged to establish emergency funding mechanisms and provide targeted support for digital and physical security infrastructure, and the mental well-being of civil society staff.
4. UN Human Rights Mechanisms should continue to monitor and publicly report on restrictions to civic space in Hong Kong. Engagement with local CSOs should be strengthened to ensure accurate documentation of violations and to support their participation in international human rights processes.

### To Civil Society Organisations

1. CSOs are encouraged to continue to build and strengthen networks and coalitions that foster mutual support across sectors. The development of shared security protocols and resource-sharing mechanisms can help mitigate risk and enhance sector-wide sustainability, laying the groundwork for broader collaboration when conditions permit.
2. Capacity-Building Organisations are encouraged to invest in initiatives that enhance digital security, legal literacy, and strategic communications. Establishing peer-to-peer learning platforms will facilitate the exchange of best practices and support resilience in navigating the evolving regulatory landscape.
3. Grassroots and Marginalised Groups should explore adaptive models of organising, including informal networks, mutual aid structures, and community-based initiatives that maintain impact while reducing visibility. Efforts should also be made to document and archive civic contributions to preserve institutional memory and counter disinformation.

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## D) Research Process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the [CIVICUS Monitor](#). However, for Principles 2–6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. The discussions are supported by secondary sources, such as [V-Dem](#), the [Bertelsmann Stiftung Governance Index](#), the [RTI Rating from the Centre for Law and Democracy](#), and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.



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# EU SEE

SUPPORTING  
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**EU SEE**

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