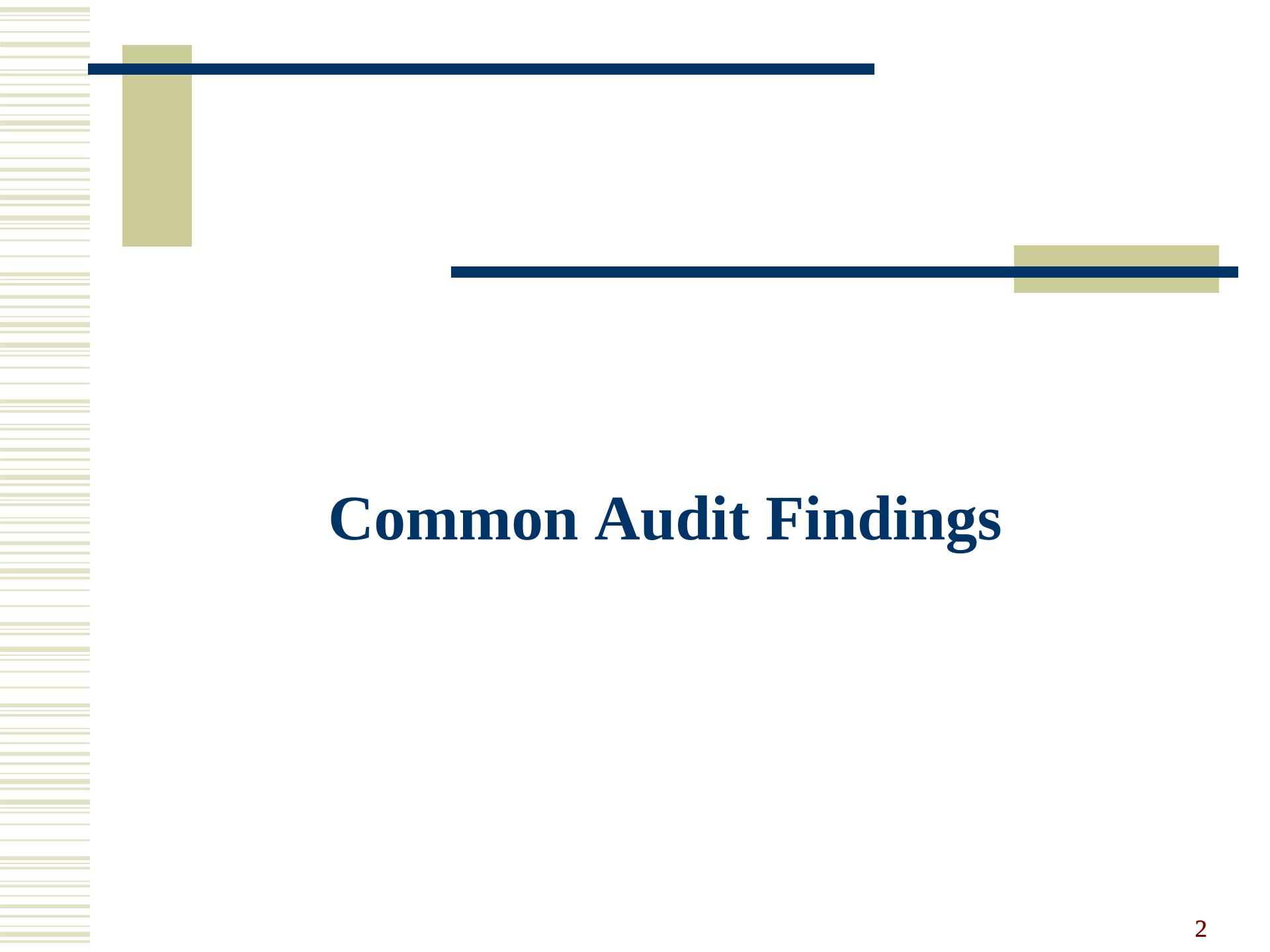


# **Sharing of Audit Experience (DSS Schools)**

**School Audit Section  
Education Bureau  
October 2025**

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# Common Audit Findings

# Common Audit Findings

Common Audit Findings by functional areas:

- A. Procurement
- B. Trading Operations
- C. Payments and Collections
- D. Operation of Bank Accounts
- E. Safe Keeping of Assets
- F. Use of Subsidies

# Common Audit Findings

## A. Procurement – main points

- ◆ Procurement – a risk area.
- ◆ Formulate policy – Public accountability, value for money, transparency, open and fair competition.
- ◆ To follow as far as possible EDB's guidelines on procurement procedures for aided schools. (EDBC No. 4/2013) Variations from EDB's guidelines should be approved by the SMC / IMC and documented for information of stakeholders. (Paragraph 7 of EDBC No. 17/2012)
- ◆ Quotation / tender exercises should be conducted in accordance with the schools' policies and procedures.

# Common Audit Findings

## A. Procurement

- ◆ No quotation / tender exercises were conducted for procurement of goods and services e.g. security guard services, broadband internet services, coaching services for school's extra-curricular activities, subscription of newspapers / magazines, lease of photocopying machines, maintenance of lifts, provision of vending machines.
- ◆ No quotation / tender exercises were conducted for renewal of contracts / The contracts contain terms for automatic renewal upon expiry.

# Common Audit Findings

## A. Procurement

- ◆ No prevention of bribery clause was included in the terms of quotations / tenders and in the contract.
- ◆ Staff were not required to declare any conflict of interest.
- ◆ Requirements for security of information were not set.

# Common Audit Findings

## A. Procurement

- ◆ Splitting orders to evade financial limits.
- ◆ Specifying brand / model in quotations / tenders.
- ◆ Suppliers invited were not provided with sufficient and equal knowledge of the quotation / tender requirements.
- ◆ Insufficient number of quotations / tenders were invited.
- ◆ No explanation recorded / prior approval were provided for not inviting the minimum number of suppliers.
- ◆ Contract period over 3 years.

# Common Audit Findings

## A. Procurement

- ◆ Reasons were not provided for not accepting the lowest / lower offers.
- ◆ Quotation / tender documents were not properly prepared and / or not available for inspection e.g. invitation letters to suppliers, original tenders / written quotations, delivery receipts issued by the post office, Tender Summary and Approval Record, Price Comparison Table and Purchase-by-Oral Quotation Form.

# Common Audit Findings

## A. Procurement

- ◆ Tenders / written quotations were not opened at the specified time on the closing date.
- ◆ Orders were placed after the expiry of the written quotation / tender validity period.
- ◆ No segregation of duties, e.g. the Tender Opening & Vetting Committee (TOVC) and the Tender Approving Committee (TAC) were not made up of different staff members.

# Common Audit Findings

## A. Procurement

- ◆ Not initialling, date-stamping and checking all written quotations / tenders (including “no offer” forms).
- ◆ Not circling and initialling against the revised amount / rate in red on both original and duplicate copies of the written quotations / tenders and for alternations / amendments found on written quotation / tender documents.
- ◆ Late written quotations / tenders which the approving authority would not consider were opened and not returned to the suppliers.

# Common Audit Findings

## A. Procurement

- ◆ No supervisory checks for oral quotations.
- ◆ Tender box was not installed as a fixture in a permanent and convenient location in the General Office and / or not under double lock.
- ◆ No spare set of tender box keys was kept by the principal.

# Common Audit Findings

## A. Procurement : Case Study (1)

### Background information

Name of school: Evergreen Primary School

Item purchased: Coaching services for extra-curricular activities in 2025/26 school year

Estimated cost: \$210,000 ~ \$470,000

### Procurement policy of the school

For estimated purchase of \$200,000 and above, school should invite tenders from at least 5 suppliers.

## Tender Summary and Approval Record of Tender No. T003 for coaching services for 2025/26 s.y.

Name of School : Evergreen Primary School

School Tender Reference : T003

Date of Issue : 16 October 2025      Date of Closing : 23 October 2025

Date of Approval : ?

Validity of Tender up to : 23 December 2025

| Supplier's Name | Offer | No Offer | Late Reply | No Reply | Total cost for 2025/26 | Recommendation | Reasons for not accepting lower offers |
|-----------------|-------|----------|------------|----------|------------------------|----------------|----------------------------------------|
| Venus Limited   | ✓     |          |            |          | \$310,000              |                |                                        |
| Mars Ltd.       | ✓     |          |            |          | \$300,000              | ✓              |                                        |
| Jupiter Limited |       |          |            | ✓        | --                     |                |                                        |
| Neptune Company | ✓     |          |            |          | \$270,000              |                | ?                                      |
| Mercury Ltd.    | ✓     |          |            |          | \$205,000              |                | ?                                      |

*Any problems?*

# Common Audit Findings

## A. Procurement : Case Study (1) (cont'd)

- ◆ **Problem (1):** The period between the tender issue and closing date was too short.
- ◆ **Proper Practice:** At least three weeks should be set between the issue and closing of a tender. For urgent requirement, the tender closing period may be shortened to two working weeks after obtaining approval from the principal with the justifications recorded.

# Common Audit Findings

## A. Procurement : Case Study (1) (cont'd)

- ◆ **Problem (2):** The information on the Tender Summary and Approval Record was incomplete.
- ◆ **Proper Practice:** Relevant tender information should be recorded in the Tender Summary and Approval Record.

# Common Audit Findings

## A. Procurement : Case Study (1) (cont'd)

- ◆ **Problem (3):** Reasons were not provided for not accepting the lowest / lower offers.
- ◆ **Proper Practice:** Reasons for rejecting the lower offers should be provided if the lowest offer to specification is not selected.

# Common Audit Findings

## A. Procurement : Case Study (2)

|                            |                                                     |
|----------------------------|-----------------------------------------------------|
| Name of school:            | Ruby Primary School                                 |
| Item purchased:            | Wifi and broadband service                          |
| Contract period:           | 1 September 2025 – 31 August 2028                   |
| Contract term (extracted): | Contract will continue thereafter unless terminated |
| Contract sign date:        | 29 September 2025                                   |

*Any problem?*

# Common Audit Findings

## A. Procurement : Case Study (2) (cont'd)

- ♦ **Problem (1):** Service contract was signed after the contract start date.
- ♦ **Proper Practice:** Service contract should be signed on or before the contract start date.

# Common Audit Findings

## A. Procurement : Case Study (2) (cont'd)

- ♦ **Problem (2):** Service contract contained a contract renewal term.
- ♦ **Proper Practice:** School should specify the service period clearly in the agreement. Moreover, fresh tender / quotation exercises should be conducted instead of automatic renewal of service contract.

# Common Audit Findings

## A. Procurement : Case Study (3)

|                                                   |                                                                    |
|---------------------------------------------------|--------------------------------------------------------------------|
| Name of school:                                   | Indigo College                                                     |
| Service description<br>(in tender specification): | Security service from<br>1 September 2025 to 31 <b>August</b> 2027 |
| Estimated amount:                                 | \$240,000                                                          |
| TOVC :                                            | Mr. Andy Lau, Ms. Sammi Cheng                                      |
| Tender recommendation:                            | Ms. Sammi Cheng                                                    |
| TAC :                                             | Principal (Chairperson),<br>Mr. Andy Lau & other members           |

Contract period signed: 1 September 2025 to 30 **June** 2027

*Any problem?*

# Common Audit Findings

## A. Procurement : Case Study (3) (cont'd)

- ◆ **Problem (1):** No segregation of duties –

Ms. Sammi Cheng opened the tender and recommended the tender.

Mr. Andy Lau was a member of both the TOVC and the TAC.

- ◆ **Proper Practice:** The staff who opened, recommended and approved the tender should be different persons.

# Common Audit Findings

## A. Procurement : Case Study (3) (cont'd)

- ◆ **Problem (2):** Contract period stated in tender specification was different from that stated in the contract signed with the supplier. Acceptance of longer contract period might affect fairness.
- ◆ **Proper Practice:** Contract period stated in tender specification and contract signed with supplier should be consistent.

# Common Audit Findings

## B. Trading Operations

- ◆ Prior approval for conducting trading operations (e.g. sale of textbooks / exercise books, tuckshop operation, supply of lunch boxes / school uniforms / school bus service, participation in Feed-in Tariff Scheme) was not sought from REO / SMC / IMC (please refer to paragraph 3 of EDBC No. 18/2025 for details).
- ◆ Prior approval for subsequent changes to the approved trading operations (e.g. change of supplier / contractor, changes to the terms of the agreement) was not sought from REO / SMC / IMC.

# Common Audit Findings

## B. Trading Operations

- ◆ The profit from sale of exercise books, school uniforms, stationery, equipment and other items (other than textbooks) exceeded the profit limit of 15% of the cost price.

# Common Audit Findings

## B. Trading Operations

- ◆ Rates, government rent and other relevant expenses in respect of the tuckshop area were not borne by the tuckshop operator.
- ◆ Subsidies were provided to suppliers / contractors by school fund, e.g. subsidies were provided to school bus operator to establish a new route.
- ◆ User-pay principle was not observed.

# Common Audit Findings

## B. Trading Operations

- ◆ No quotation / tender exercises were conducted. *(Conduct quotation / tender exercises at regular intervals, say at least once every three years, or before renewal of a contract as appropriate.)*
- ◆ No prevention of bribery clause in the terms of quotations and tenders and in the contract with supplier / contractor.

# Common Audit Findings

## C. Payments and Collections

### Payments

- ◆ Payments were not supported by payment vouchers and original invoices.
- ◆ Paid vouchers and invoices were not stamped with the word “PAID” and dated by the paying staff to avoid duplicate payment.

# Common Audit Findings

## C. Payments and Collections

### Payments

- ◆ No segregation of duties e.g. the preparation and authorisation of payment vouchers were conducted by the same person.
- ◆ Cash cheques were issued to suppliers / teachers for procurement of goods and services.
- ◆ Personal credit cards / octopus cards / other electronic payment accounts were used for procurement of goods and services.

# Common Audit Findings

## C. Payments and Collections

### Collections

- ◆ Incomes from school activities were credited to non-government funds but the relevant expenses were charged to government funds.
- ◆ Official receipts were pre-signed and were not issued in sequence.
- ◆ Spoiled / obsolete official receipts were not marked “Cancelled”.

# Common Audit Findings

## C. Payments and Collections

### Collections

- ◆ Daily Collection Summary (DCS) was not prepared.
- ◆ DCS was prepared without essential information such as the date of receipt, serial numbers of official receipts issued, the nature of the income, the amount collected and the date of banking.
- ◆ Cheques received were not recorded in the DCS.
- ◆ Money received was not banked promptly.

# Common Audit Findings

## C. Payments and Collections

### Collections

- ◆ The school incomes (e.g. income from trading operations, donation income, library book fine) were not credited into the bank accounts maintained in the name of the school and / or not included in school audited accounts.
- ◆ For collection of fines, fees and charges exceeding the approved ceilings / not covered in the Annex of EDBC No. 1/2011, approval from EDB was not available for inspection.

# Common Audit Findings

## C. Payments and Collections

### Collections

- ◆ Policy on acceptance of donation was not formulated.
- ◆ SMC / IMC's prior approvals were not obtained for accepting donations.
- ◆ Register of Donations Received by Schools was not prepared.
- ◆ Register of Donations Received by Schools did not include gifts / donations in kind.

# Common Audit Findings

## C. Payment and Collections : Case Study

Name of school: Tangerine Secondary School

Case: Income from sales of school ties and exercise books was credited to non-government funds, while the relevant expenditure was charged to government funds.

*Any problem?*

# Common Audit Findings

## C. Payment and Collections : Case Study (cont'd)

- ♦ **Problem:** Expenditure should not be charged to government funds.
- ♦ **Proper Practice:** The expenditure should be charged to non-government funds.

# Common Audit Findings

## D. Operation of Bank Accounts

- ◆ Bank accounts were not maintained in the name of school.
- ◆ Separate bank accounts were not opened for government and non-government funds.
- ◆ Bank authorised signatories included persons other than registered managers.
- ◆ Private bank accounts were used to keep the money received from students for school activities.

# Common Audit Findings

## D. Operation of Bank Accounts

- ◆ Payments processed through internet banking (including MPF payments) were approved by a registered manager / school staff alone.
- ◆ Users' access control / transaction limits in internet banking could be modified in the system by a registered manager / school staff alone.
- ◆ User accounts in the name of registered manager were used by school staff.

# Common Audit Findings

## D. Operation of Bank Accounts

- ◆ Spoiled cheques were not marked off as “Cancelled” and attached to the cheque stub to prevent from re-use.
- ◆ Cheque book register was not prepared / updated.
- ◆ Unused cheque books were not kept under lock by the school supervisor or the principal.

# Common Audit Findings

## D. Operation of Bank Accounts

- ◆ Inward mails from banks were not handled by the school supervisor / school head personally.
- ◆ Cash books and bank reconciliation statements prepared monthly by school clerk were not reviewed / initialled by the school head.
- ◆ Cheques had been unpresented for over six months.
- ◆ Bank deposits were not spread among several licensed banks.

# Common Audit Findings

## D. Operation of Bank Accounts : Case Study (1)

Name of school: Violet Primary School

Case: Mr. Jacky Cheung was a registered manager and was included as an authorised signatory for school's bank accounts. He resigned on 1 September 2025 but he remained as a bank account authorised signatory after resignation.

*Any problem?*

# Common Audit Findings

## D. Operation of Bank Accounts : Case Study (1) (cont'd)

- ♦ **Problem:** Bank authorised signatories included persons other than registered managers.
- ♦ **Proper Practice:** Bank mandate should be reviewed and updated promptly whenever there is a change of registered manager.

# Common Audit Findings

## D. Operation of Bank Accounts : Case Study (2)

Name of school: Ivory Secondary School

Case: The school used internet banking for processing salary payments. The monthly salary payments were approved in the system by Mr. Aaron Kwok (a registered manager) alone. The access control and transaction limits of the users could also be modified directly in the system by Mr. Aaron Kwok alone.

*Any problem?*

# Common Audit Findings

## D. Operation of Bank Accounts : Case Study (2) (cont'd)

- ♦ **Problem:** Bank account was not operated by jointly authorised signatories.
- ♦ **Proper Practice:** The procedures for approving payments through internet banking as well as personnel authorising modification of access control and transaction limits should remain the same as the arrangements for cheque payments, i.e. should be jointly approved by any two of the registered managers.

# Common Audit Findings

## D. Operation of Bank Accounts : Case Study (3)

Name of school: Amber Primary School

Case: A teacher collected entrance fees totalling \$2,800 from students for a museum visit, deposited the sum into his / her personal bank account and then paid it to the museum.

*Any problem?*

# Common Audit Findings

## D. Operation of Bank Accounts : Case Study (3) (cont'd)

- ◆ **Problem:** Income should not be deposited into personal bank account.
- ◆ **Proper Practice:** Income should be promptly deposited into school's bank account.

# Common Audit Findings

## E. Safe Keeping of Assets

- ◆ Fixed Assets Register was not prepared / kept properly and up-to-date.
- ◆ Physical checking of assets was not conducted.
- ◆ Surprise cash count was not conducted.
- ◆ Record of surprise cash count was not kept.
- ◆ There was no register for other valuables (e.g. stamps and book coupons).

# Common Audit Findings

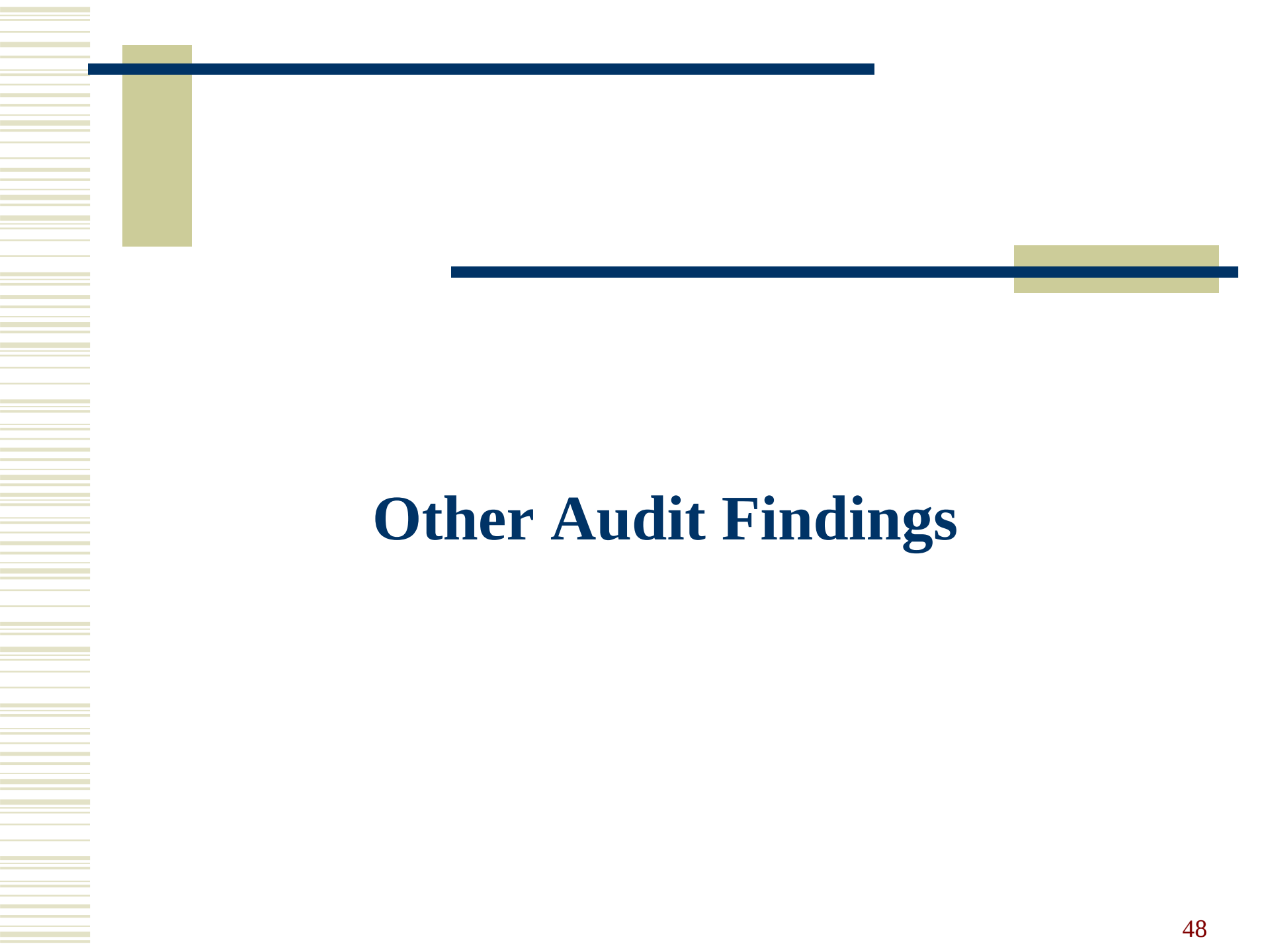
## E. Safe Keeping of Assets

- ◆ Write-off of assets (e.g. fixed assets and library books) was performed without the approval of the school head.
- ◆ The report on the write-off was not submitted to the SMC / IMC for information.

# Common Audit Findings

## F. Use of Subsidies

- ◆ Expenditure items not included in the List of Approved Items of Expenditure for the Direct Subsidy Scheme Government Subsidy were charged to the government funds account. (*Annex 2 of EDBC No. 17/2012*)



# Other Audit Findings

## Other Audit Findings

- 1) Surplus funds were invested in speculative securities instead of HK\$ bonds or certificate of deposits #.

*# (rating not lower than Moody's A3 or S&P A-)*

- 2) Policies on hire of school accommodation and fund-raising activities were not formulated.
- 3) Financial statements for fund-raising activities conducted were not available for inspection.
- 4) Register of hire of school premises was not submitted to IMC / SMC regularly for information.
- 5) Large-scale capital works were not put up to IMC / SMC for discussion and approval.



**THANK YOU**

**End**