

YEAR-END HONG KONG HUMAN RIGHTS REVIEW

2025



AMNESTY
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Table of Contents

Executive Summary	1
Rights to freedom of expression	4
1.1 Legal and policy chang	4
1.1.1 The enactment of Protection of Critical Infrastructure (Computer System) Ordinance	4
1.1.2 Subsidiary legislation under the Safeguarding National Security Ordinance (SNSO)	4
1.1.3 Education Bureau’s updated Curriculum Framework of National Security Education	5
1.2 Criminalization of legitimate expression	5
1.2.1 Striking cases of wrongful criminalization	5
1.2.2 Criminalizing and suppressing accountability-seeking expression after the Tai Po Fire	8
1.2.3 Weaponizing electoral laws to curb expression	9
1.3 Suppression of cultural expression and artistic freedom	10
1.3.1 Film censorship	10
1.3.2 Administrative suppression of publishing and cultural spaces	11
1.3.3 Suppression of performing arts through venue control	11
1.4 Independent media persists amid repression	12
1.5 Recommendations	12
2. Rights to freedom of association and peaceful assembly	13
2.1 Ongoing crackdown of Tiananmen anniversary	13
2.2 Convictions for rioting	13
2.3 More groups disbanded in the territory	14
2.4 Prosecution of overseas-based organizations	16
2.5 Recommendations	16

3. Excessive pre-trial detention, ill-treatment of detainee	17
3.1 Legal and policy change	17
3.1.1 Amendments to Prison Rules	17
3.2 Arbitrary and prolonged detention	18
3.2.1 The cases of Chow Hang-tung and Lee Cheuk-yan	18
3.2.2 The case of Jimmy Lai	19
3.3 Inhumane detention conditions	20
3.4 Recommendations	21
4. Reprisals against human rights defenders	22
4.1 Extra-territorial reprisals targeting human rights defenders in exile	22
4.1.1 Use of arrest warrants and bounties	22
4.1.2 Other punitive measures	25
4.2 Harassment and intimidation against families of dissidents living abroad	25
4.3 Recommendations	27
5. Rights of lesbian, gay, bisexual, transgender and intersex (LGBTI) people	28
5.1 Rejection of Same-sex Partnerships Registration Bill	28
5.2 Continuation of Pride events despite cancellations	29
5.3 Legal developments affecting transgender people and same-sex couples	30
5.4 Recommendations	31
6. Workers' rights	32
6.1 Legal and policy change	32
6.1.1 Enactment of Trade Unions (Amendment) Bill	32
6.1.2 The new "468 Rule" under the Employment Ordinance	32
6.1.3 Modest minimum wage adjustments	33
6.2 Rights at work	33
6.2.1 Migrant workers	33
6.2.2 Occupational health and safety	33
6.2.3 Complaint of forced labour	34
6.2.4 Successful grassroots labour resistance	34
6.3 Recommendations	35

Executive Summary

The human rights situation in Hong Kong in 2025 was marked by the further entrenchment of the national security legal framework and an escalation of transnational repression against activists in exile and their families. Authorities increasingly deployed national security laws beyond traditional political dissent to criminalize legitimate expression, including calls for public accountability of Tai Po fire.

1. Expression Under Siege

Freedom of expression continued to deteriorate through new laws and aggressive enforcement. Subsidiary legislation under the Safeguarding National Security Ordinance (SNSO) created six new offences. The Protection of Critical Infrastructure (Computer Systems) Ordinance granted authorities broad powers to access private data.

At the same time, the authorities have continued to abuse national security laws. In December, Apple Daily founder Jimmy Lai was convicted of national security offences, leaving him facing a possible life imprisonment. An Amnesty International report in June 2025 found that around 85% of prosecutions under national security-related laws between July 2020 and June 2025 involved conduct amounting to legitimate expression under international human rights standards, with no clear evidence of violence or incitement to violence.

Following the Tai Po fire, which killed 168 people, several individuals who called for an independent inquiry were arrested on sedition charges, illustrating how expressions of public concern and calls for accountability are now framed as threats to national security. Suppression of artistic freedom and cultural expression is following an increasingly deteriorating trajectory. Through covert and coercive tactics — including censorship, funding withdrawals, blacklisting, and administrative obstruction — the authorities are enforcing government-sanctioned narratives, gradually eroding the artistic diversity and creative freedom that once underpinned the success of Hong Kong's cultural industry.

2. Association and Assembly Curbed

Freedom of association and peaceful assembly also declined significantly. The dissolution of the city's last two major pro-democracy political parties effectively marked the near-total eradication of organized political opposition. Authorities continued to suppress June 4 commemorations, including arrests for low-key acts of mourning. Prosecutions linked to the 2019 protests continued, including cases against individuals whose roles centered on de-escalation or clearly non-violent participation.

3. Prolonged Detention and Prison Abuses

Serious concerns persisted over prolonged pre-trial detention and prison conditions. Amendments to the Prison Rules empowered the Correctional Services Department to restrict prisoners' access to lawyers and medical professionals on national security grounds, and abolished remand detainees' right to wear personal clothing, undermining the presumption of innocence under Article 14(2) of the ICCPR.

Human rights lawyer Chow Hang-tung and veteran activist Lee Cheuk-yan have remained on remand for more than 1,500 days. Jimmy Lai was held for over five years before conviction, reportedly spending more than 1,800 days in solitary confinement. Amnesty International's report showed that bail was denied in 89% of cases where charges were brought, and that those denied bail were forced to spend an average of 328 days in detention before facing trial.

In addition, 53 civil society organizations wrote jointly to the UN High Commissioner for Human Rights documenting systemic violence, forced "de-radicalization" programmes and denial of medical care in Hong Kong's prisons.

4. Transnational Repression Surge

In 2025, transnational repression intensified. By July, 34 exiled activists had been targeted with national security arrest warrants and bounties. The prosecution of Anna Kwok's father for allegedly "handling the finances of an absconder" marked the first national security case against a family member of an overseas activist, signaling a new phase of reprisals against relatives of exiled dissidents.

Activists abroad also reported harassment through deepfake images and AI-generated videos, reflecting the expanding use of digital tools in cross-border repression.

5. Limited Advances on LGBTI and Workers' Rights

There were narrow but noticeable judicial advances on LGBTI rights, including recognition of transgender individuals' access to gender-appropriate restrooms and parental rights for same-sex couples. However, the legislature's rejection of the Registration of Same-Sex Partnerships Bill in September left comprehensive legal recognition of same-sex relationships unresolved.

Workers' rights came under renewed pressure as amendments to trade union legislation restricted union independence and cross-border cooperation on national security grounds, raising serious concerns under Article 22 of the ICCPR and ILO Conventions 87 and 98.

Key Recommendations

The Hong Kong Special Administrative Region (HKSAR) government should:

- Halt the weaponization of national security laws against legitimate expression, peaceful assembly, and freedom of association, and release all those detained solely for exercising these human rights.
- End censorship and administrative suppression of arts and cultural activities, and ensure that decision-making by cultural authorities and venue operators is transparent and impartial.
- End the practice of prolonged pre-trial detention as a default in national security cases, and ensure that detention conditions fully comply with the Nelson Mandela Rules, guaranteeing humane and dignified treatment of all detainees.
- Stop all acts of transnational repression targeting activists in exile, and cease harassment and retaliation against their family members remaining in Hong Kong.
- Swiftly enact comprehensive marriage equality legislation and repeal national security-based restrictions on trade unions.

1

Rights to freedom of expression

Hong Kong has experienced stark declines in freedom of expression in the past few years. This is in large part under the Beijing-imposed 2020 National Security Law (NSL) and the local-legislated 2024 Safeguarding National Security Ordinance (SNSO). In 2025, the authorities continued to weaponize the NSL and related legal frameworks to criminalize expression in the territory and beyond its borders.

1.1 Legal and policy change

The authorities expanded their scope of national security with new moves in 2025:

1.1.1 The enactment of Protection of Critical Infrastructure (Computer System) Ordinance

On 19 March 2025, the Hong Kong Legislative Council passed the Protection of Critical Infrastructure (Computer System) Ordinance, a new cybersecurity law that gives the government's expanded powers to access private data and any 'relevant information' deemed suspicious under the notions of security.¹

1.1.2 Subsidiary legislation under the Safeguarding National Security Ordinance (SNSO)

In May, the Hong Kong government enacted subsidiary legislation under the SNSO, introducing six new offenses and declaring six locations of the Chinese national security offices in Hong Kong as "prohibited places" which bar people from approaching or passing over them.²

1. <https://www.legco.gov.hk/yr2025/english/ord/2025ord004-e.pdf>

2. <https://www.info.gov.hk/gia/general/202505/13/P2025051300371.htm>

1.1.3 Education Bureau’s updated Curriculum Framework of National Security Education

Also in May, the Education Bureau updated its policy to integrate “national security” across primary and secondary school curricula, imposing strict oversight on teaching materials and activities, significantly restricting academic freedoms and free expression in schools.³

1.2 Criminalization of legitimate expression

According to an Amnesty International report published in June, as many as 85% of cases prosecuted under national security-related legislation between July 2020 and June 2025 involved only legitimate expression, with no evidence of violence, direct plans for violence or advocacy of violence, falling far short of the high threshold required for criminalization under international human rights standards.⁴ In 2025, those arrested for exercising their right to freedom of expression continued to face prolonged incarceration.

1.2.1 Striking cases of wrongful criminalization

On 15 December, Jimmy Lai Chee-ying, 78-year-old founder of the pro-democracy newspaper Apple Daily, was convicted in a landmark national security trial.⁵ The High Court ruled him guilty of two counts of conspiracy to commit “collusion with foreign forces” under the NSL and one count of conspiracy to commit “sedition” under the Crimes Ordinance. He had pleaded not guilty to all charges.

During the 156 days of his trial, Lai testified for 52 days in his own defence. Lai told the court that Apple Daily’s outspoken stance was part of the essential journalistic work and reflected his commitment to freedom of expression including press freedom. The judges rejected Lai’s defense that his anti-China comments are protected expression, and described him as a “mastermind” of conspiracies designed to destabilize the Chinese government.⁶

3. <https://www.edb.gov.hk/attachment/en/curriculum-development/renewal/CM/EDBC25007E.pdf>

4. <https://www.amnesty.org/en/documents/asa17/9556/2025/en/>

5. On 9 February 2026, Jimmy Lai was sentenced to 20 years in prison.

<https://www.amnesty.org/en/latest/news/2026/02/hong-kong-jimmy-lai-jail-sentence-a-cold-blooded-attack-on-freedom-of-expression/>

6. https://legalref.judiciary.hk/lrs/common/ju/ju_frame.jsp?DIS=175422&currpage=T

Apart from the high-profile case of Jimmy Lai, the authorities continued their relentless crackdown on the legitimate exercise of the right to freedom of expression in 2025 by prosecuting activists and young individuals on national security grounds:

Date of arrest	Name	Charges	Description
21/2/2025	Li Chun-kit	“Sedition” under the SNSO	The 36-year-old bus technician was sentenced to one year in prison on 8 May 2025 after pleading guilty to sedition charges under the SNSO. He was alleged of publishing social media posts that criticized the Hong Kong police, judiciary and the government with derogatory terms and seditious intent.
28/4/2025	Chan Ho-hin	“Inciting subversion of state power” under the NSL	The 22-year-old was alleged of “inciting subversion” for posting publications with a view to fostering hatred and contempt towards China’s fundamental system on social media between June 2024 and April 2025. Chan is being remanded in custody. The case’s trial is adjourned to 17 March 2026.
6/6/2025	Joshua Wong	“Conspiring to collude with foreign forces” under the NSL	Jailed activist Joshua Wong faced a new charge under the NSL of “conspiring to collude with foreign forces” for his advocacy allegedly urging foreign governments to impose sanctions on Hong Kong or China. The case remains before the court, pending judgment.

Date of arrest	Name	Charges	Description
21/7/2025	Leung Kai-lok	“Sedition” under the SNSO and three counts of “criminal damage”	<p>The 18-year-old was accused of leaving seditious messages on the wall of a male toilet in a shopping mall between July 17 and 21, 2025.</p> <p>The police alleged that the messages were deemed to have provoked hatred or contempt against the Hong Kong government, and incited others to commit illegal acts. He is currently on bail. The case’s trial is adjourned to 23 February 2026.</p>
26/8/2025	Bettie Lan Fei	“Sedition” under the SNSO	<p>The 19-year-old was sentenced to one year in prison on 13 November for producing promotional videos for the Hong Kong Parliament, a banned overseas political group deemed “subversive” by authorities, and encouraging people on social media to vote in an unofficial poll organized by the group between March and May 2025.</p>
18/11/2025	Lam Chung-ming	“Knowingly publishing seditious publications” under the SNSO	<p>The 68-year-old retired man was accused of repeatedly posting content with “seditious intent” on Facebook from 26 September 2024 to 18 November 2025, including inciting hatred against the Hong Kong SAR government, the judiciary, and law-enforcement agencies, as well as inciting people not to vote or to cast blank ballots in elections. He is remanded in custody, with the case adjourned to 27 February 2026.⁷</p>

7. In February 2026, Lam Chung-ming was sentenced to eight months in prison over the sedition charge <https://hongkongfp.com/2026/03/02/hong-kong-retiree-jailed-for-8-months-over-seditious-facebook-posts/>

1.2.2 Criminalizing and suppressing accountability-seeking expression after the Tai Po Fire

In late November, shortly after the deadly inferno at the Wang Fuk Court housing complex in Tai Po district that killed 168 people, the Hong Kong authorities arrested at least four individuals under sedition charges connected to public calls for accountability and online petitions regarding the tragedy. Among those arrested was 24-year-old student Miles Kwan, who initiated a petition demanding an independent inquiry, better oversight of construction standards, and government responsibility for the disaster.

Two weeks after the Tai Po fire, a political commentator, known by his pen name Wong On-yin, was also arrested and charged with sedition under SNSO over “seditious” videos posted on YouTube, which the prosecution said were made with the intention to incite hatred against the central Chinese government and the HKSAR government.⁸ Wong was among the convenors of a civil society-led press conference that had been planned to discuss building management problems and bid-rigging in the aftermath of the fatal blaze, but which was ultimately cancelled following notifications from relevant departments.⁹

In addition to the arrests, media coverage of the Tai Po fire was also met with pressure on journalists. On 6 December, Beijing’s national security body in Hong Kong, the Office for Safeguarding National Security, summoned international journalists and warned them against “crossing red lines” following critical reporting on the tragedy, contributing to a chilling effect on press freedom.¹⁰

The arrests related to the Tai Po fire illustrate how, in today’s Hong Kong, even legitimate expressions of public concern can be labelled as “seditious” and subject to criminal punishment. Voices speaking out for transparency and accountability risk hampering, intimidation and prosecution by the authorities.

8. <https://www.scmp.com/news/hong-kong/law-and-crime/article/3335716/hong-kong-commentator-remanded-over-seditious-online-posts-including-about-tai-po-fire>

9. <https://hongkongfp.com/2025/12/02/hong-kong-solicitor-taken-in-by-nat-sec-police-as-civic-press-event-on-deadly-tai-po-blaze-axed/>

10. <https://hongkongfp.com/2025/12/06/dont-say-we-didnt-warn-you-chinas-nat-sec-office-in-hong-kong-summons-international-media/>



1.2.3 Weaponizing electoral laws to curb expression

Freedom of expression is also impacted with respect to electoral laws. In the lead-up to the 7 December 2025 Legislative Council election, the authorities arrested 11 people for breaching Section 27A of the Elections (Corrupt and Illegal Conduct) Ordinance.¹¹ They were alleged to have incited others not to vote or to cast invalid ballots by posting on social media. Under Hong Kong law, it is permitted to not vote, or return an empty or spoiled ballot, but not to incite others to do so.¹²

The legality of Section 27A of the Elections (Corrupt and Illegal Conduct) Ordinance has been challenged under judicial review.¹³ The Court of Final Appeal will scrutinise whether the law unconstitutionally infringes the right to freedom of expression enshrined under the Basic Law and the Bill of Rights. The appeal is scheduled to be heard on 20 May 2026.

Under the International Covenant on Civil and Political Rights (ICCPR) Articles 19 and 25 and as interpreted by the UN Human Rights Committee, peaceful advocacy related to electoral participation, including calls to abstain from voting or to cast invalid ballots, is protected as a form of political expression. Criminalizing such expression constitutes an unreasonable restriction on participation in public affairs and is incompatible with international human rights law and standards.

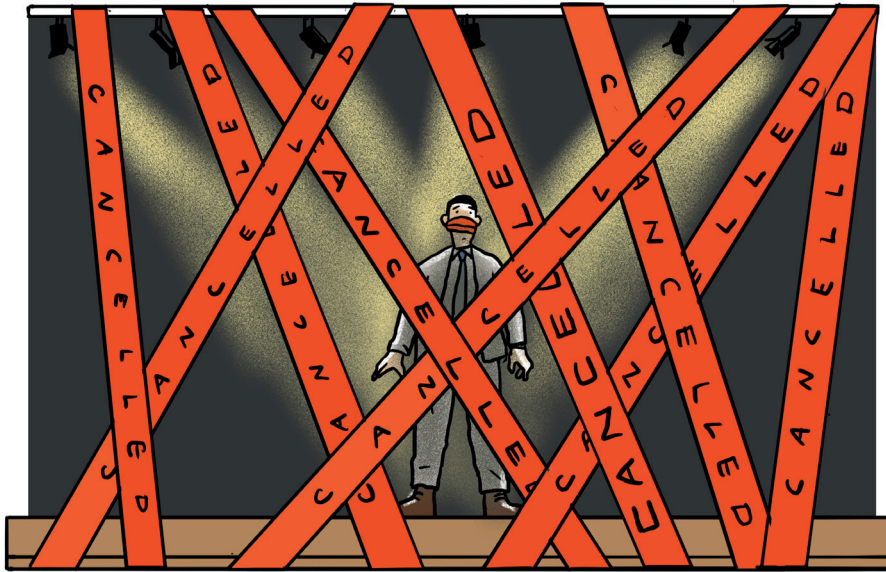
11. https://www.icac.org.hk/en/p/press/index_id_2214.html

12. <https://www.elegislation.gov.hk/hk/cap554!en.pdf>

13. https://orientaldaily.on.cc/content/要聞港聞/odn-20251018-1018_00176_063/煽惑投白票罪成--中大學生會前會長准終極上訴

1.3 Suppression of cultural expression and artistic freedom

Throughout 2025, numerous publicly reported cases revealed a growing pattern of suppression targeting artistic freedom and cultural expression. Covert and coercive tactics, such as censorship, funding withdrawals, blacklisting and administrative obstruction, are used to enforce government-sanctioned narratives, eroding the artistic diversity and freedom that underpinned the hitherto success of the cultural industry of Hong Kong.



1.3.1 Film censorship

In 2025, the Office for Film, Newspaper and Article Administration (OFNAA) barred at least 13 films from public screening, and demanded at least 50 films to make edits due to “national security considerations”.¹⁴ Under the Film Censorship Ordinance, which was amended in October 2021 to include national security clauses, the government has expansive censorship powers to decide whether a film is “prejudicial to national security”.

In December, award-winning film director Kiwi Chow Kwun-wai disclosed to the public that his latest film *Deadline* had been rejected by the OFNAA from screening in Hong Kong, on the grounds that it is “contrary to the interests of national security”, following a 4-month review process.¹⁵ Chow alleges that he has been effectively blacklisted after

14. <https://hongkongfp.com/2025/10/08/hong-kong-bars-13-films-from-screening-on-national-security-grounds-since-2021-censorship-law/>

15. <https://www.inmediahk.net/node/文藝/周冠威新戲《自殺通告》被禁在港公映-電檢處：不利於國家安全>

his production of documentary *Revolution of Our Times*, which chronicles the 2019 pro-democracy protests. He described his name as “blacklisted” and “taboo” in the local film industry and warned of a chilling self-censorship culture imposed under the NSL.¹⁶

1.3.2 Administrative suppression of publishing and cultural spaces

In May, three independent publishers reported that they were banned from taking part in the 2025 Hong Kong Book Fair. The publishers believed their applications were rejected because they previously refused to remove “sensitive” titles requested by the fair organizer, the Trade Development Council.¹⁷

Independent bookshops also faced continuous scrutiny from the government over the circulation of politically sensitive publications. One of them, Book Punch, faced repeated regulatory harassment leading to event cancellations and charges. In November 2025, the bookshop was charged under the Places of Public Entertainment Ordinance for operating an unlicensed place of public entertainment.¹⁸

1.3.3 Suppression of performing arts through venue control

In June, acclaimed playwright Candice Chong Mui-ngam voiced concerns that official rhetoric around “soft resistance” was being used to penalize cultural expression, citing the cancellation of performances and denial of venue access as punitive measures against critical voices in the sector. In October, the re-run of her award-winning play *We Are Gay* was abruptly cancelled by the West Kowloon Cultural District Authority, with the Culture, Sports and Tourism Bureau confirming it had approved the decision, following complaints that the drama “promoted confrontation” and “defamed Hong Kong.” Chong believes that her willingness to engage with politically taboo topics, including *May 35th*, which references the 1989 June 4th Tiananmen crackdown, has made her a target in Hong Kong’s increasingly constrained cultural expression space.¹⁹ More generally, a series of short notice cancellation of cultural or social events was reported, often with the private venue operators citing “force major”.

16. <https://japan-forward.com/facing-the-invisible-tank-blacklisted-filmmaker-in-hong-kong-on-freedom-of-the-soul/>

17. <https://www.scmp.com/news/hong-kong/politics/article/3309833/annual-hong-kong-book-fair-bans-3-exhibitors-without-explanation>

18. <https://thewitnesshk.com/一拳書館辦棟篤笑表演-遭票控無牌公眾娛樂場所罪/>

19. <https://news.mingpao.com/ins港聞/article/20250623/s00001/1750608102647/莊梅岩回應「軟對抗」論-「冤枉幾多無辜的人和作品」-文體旅局-軟對抗一直存在>

1.4 Independent media persists amid repression

Despite severe crackdowns on independent media in Hong Kong—including the closure of Apple Daily and Stand News in 2021, and pervasive administrative and legal pressures on local journalists and foreign correspondents—a resilient ecosystem of independent journalism persists. Local and overseas media outlets continue to report on social justice, political trials and the status of civil liberties. Many operate with reader-supported subscription models or from abroad to maintain editorial safety and independence.

1.5 Recommendations

Amnesty International calls on the HKSAR government to:

- Cease the use of the NSL, the SNSO and other legal provisions to criminalize expression that is protected under international human rights law and standards, including peaceful political speech, journalism, artistic and cultural expression, electoral advocacy and calls for public accountability; and ensure that peaceful criticism of government actions or policies is not treated as a criminal offense;
- Bring all laws and enforcement practices that restrict expression into full conformity with Hong Kong’s binding international human rights obligations, including those under the ICCPR and the International Covenant on Economic, Social and Cultural Rights (ICESCR), as applied through the Basic Law and the Hong Kong Bill of Rights Ordinance;
- Ensure that education policies, including those relating to national security education, are implemented in a manner that respects academic freedom, pluralism and freedom of expression, in line with ICCPR Article 19 and ICESCR Article 13;
- Ensure that the Protection of Critical Infrastructure (Computer System) Ordinance is implemented in strict compliance with ICCPR Articles 17 and 19 by introducing clear limits, judicial authorization, independent oversight and effective remedies to prevent arbitrary surveillance and undue interference with privacy and freedom of expression;
- End censorship, funding withdrawals, blacklisting, venue denials and other administrative measures used to suppress artistic and cultural expression, and ensure transparent, content-neutral decision-making by cultural authorities and venue operators.

2

Rights to freedom of association and peaceful assembly

2.1 Ongoing crackdown of Tiananmen anniversary

The authorities continued to prevent public commemorations of the 1989 Tiananmen crackdown. On 4 June, police deployed heavy patrols and conducted searches around Victoria Park, the traditional site of commemoration for over 30 years. Even low-key acts of commemoration were suppressed. Police arrested two individuals and took at least 10 others to police stations for their attempts to mourn, including for carrying flowers or candles.

2.2 Convictions for rioting

In February, former lawmaker Lam Cheuk-ting and six other defendants were convicted of “rioting” for their alleged involvement in the Yuen Long MTR station incident of 21 July 2019, during the large protests that year. Lam received 37 months’ imprisonment, and the six others were sentenced to jail terms between 25 and 31 months. The “721” incident occurred when groups of men in white shirts, widely believed to be linked to triad organizations, entered the Yuen Long MTR station and indiscriminately attacked commuters and protesters, injuring dozens. Lam Cheuk-ting was filmed urging people to remain calm and avoid confrontation in the station, yet prosecutors alleged that his presence and actions constituted participation in a riot.²⁰

20. <https://www.reuters.com/world/asia-pacific/veteran-hong-kong-democrat-6-others-jailed-rioting-after-2019-mob-attack-2025-02-27/>

In March, social worker Jackie Chen Hung-sau was convicted of rioting after a retrial of her involvement in a different incident during the 2019 protests, in which she sought to de-escalate tensions by urging police to exercise restraint.²¹ Although she was acquitted in 2020, the prosecutors succeeded in having that verdict overturned on appeal. She was found guilty of the rioting charge in the retrial, sentenced to three years and nine months in prison. In June, she was stripped of her social worker licence for five years.

These two rioting convictions highlighted the authorities' continued prosecution of participants in the 2019 protests even if those roles involved attempts of de-escalation or non-violent participation.



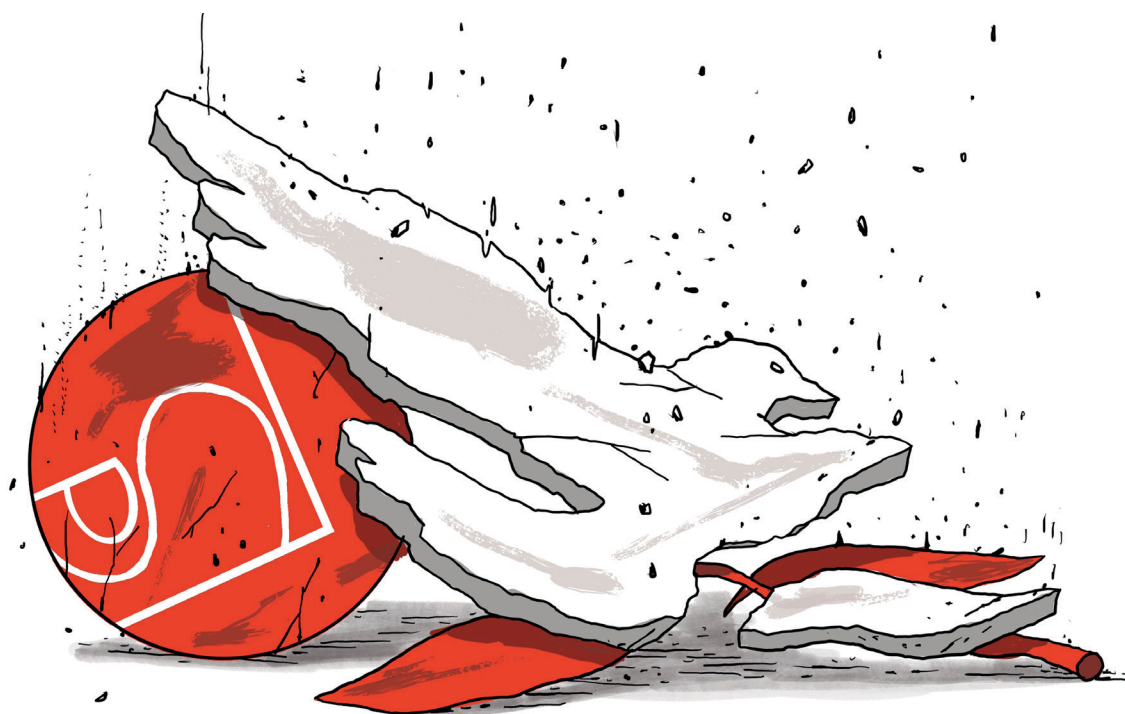
2.3 More groups disbanded in the territory

The city's last two major pro-democracy political parties, the League of Social Democrats and the Democratic Party, officially disbanded in June and December respectively, effectively marking the near-complete eradication of organized political opposition amid relentless government pressure.

21. <https://www.scmp.com/news/hong-kong/politics/article/3305806/hong-kong-court-jails-social-worker-over-3-1/2-years-retrial-over-rioting>

In June, Hong Kong-based China Labour Bulletin (CLB) announced its decision to dissolve, citing difficulties with finances and debt.²² CLB was founded in 1994 by Han Dongfang, a workers leader during the Tiananmen Square protests of 1989, who later fled to Hong Kong in exile. The CLB supported labour movements and persistently reported workers strikes and other labour rights issues in China.

In late December 2025, three student unions at the Chinese University of Hong Kong (CUHK), including the 62-year-old New Asia College Students' Union, suspended their operations.²³ Universities in Hong Kong have increasingly distanced themselves from student organizations following the 2019 protests and the enactment of the NSL.²⁴



22. <https://apnews.com/article/china-labor-bulletin-disbands-5c36e8f2a79f27ff9646b65969a37562>

23. <https://hongkongfp.com/2025/12/29/third-college-student-union-at-chinese-university-of-hong-kong-suspends-operations-in-a-week/>

24. In January 2026, the United College Student Union at the Chinese University of Hong Kong announced their formal disbandment. The other two college student unions, namely the Chung Chi College Student Union and Lee Woo Sing College Student Union, suspended their operations in the same month. By February 2026, only two out of the nine CUHK college unions are still operational.

<https://hongkongfp.com/2026/01/19/two-more-college-student-unions-at-chinese-university-of-hong-kong-cease-operations/>

2.4 Prosecution of overseas-based organizations

Two overseas organizations, the Canada-based self-declared Hong Kong Parliament and the Taiwan-based Hong Kong Democratic Independence Union, were accused of subversion and being threats to national security. In July, police issued arrest warrants and bounties against 15 overseas activists for their involvement in Hong Kong Parliament, cancelled their passports, and imposed financial prohibitions.

Also in July, four people, including a 15-year-old boy, were arrested for “conspiring to subvert state power” under the SNSO due to alleged connections with Hong Kong Democratic Independence Union. In December, the government officially banned both organizations from operating in Hong Kong, criminalising any support or association.²⁵

2.5 Recommendations

Amnesty International calls on the HKSAR government to:

- Bring security laws and policing practices governing public assemblies into compliance with international human rights law and standards, including to ensure that any restrictions are fully based in law and are applied only where strictly necessary and proportionate in line with ICCPR Articles 21 and 22;
- Stop prosecuting individuals only engaged in peaceful assembly, de-escalation efforts, or the exercise of professional duties during protests; and ensure any penalties imposed are commensurate with the gravity of the offence and consistent with international human rights law;
- Refrain from engaging in transnational repression, including the targeting, banning, or stigmatization of civil society organisations and individuals based overseas for their peaceful exercise of rights to freedom of association, as such conduct constitutes violations of Hong Kong’s obligations under the ICCPR, in particular Articles 19, 21, and 22, and undermines the territory’s compliance with international human rights law.

25. <https://www.info.gov.hk/gia/general/202512/02/P2025120200269.htm>

3

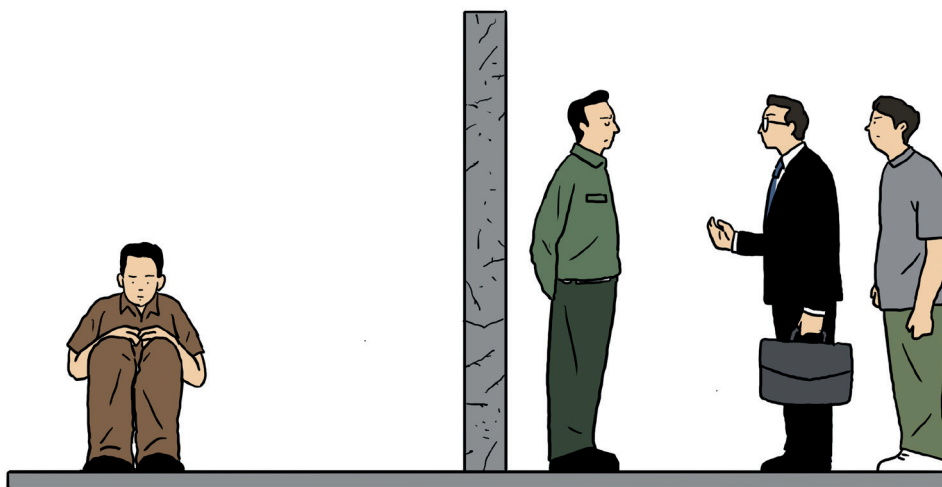
Excessive pre-trial detention and ill-treatment of detainees

3.1 Legal and policy change

3.1.1 Amendments to Prison

In July, the government amended the Prison Rules, granting the Correctional Services Department (CSD) broad powers to restrict prisoners' visits and meetings with lawyers on vague "national security" grounds.²⁶

The amendments empower the CSD to obtain judicial warrants preventing prisoners from receiving visits from certain lawyers, clergy, or medical professionals, thus obstructing access to essential professional supports of choice. Additionally, under the new amendments, pre-trial detainees are no longer permitted to wear their own clothes or order meals from outside. The new rules attempt to blur the distinction between convicted prisoners and those awaiting trial, effectively legitimizing punitive treatment before conviction. It undermines the right to the presumption of innocence for pre-trial detainees, which is one of the guarantees in relation to legal proceedings contained in Article 14(2) of the ICCPR.



26. <https://www.legco.gov.hk/yr2025/english/panels/se/papers/se20250707cb2-1352-1-e.pdf>

3.2 Arbitrary and prolonged detention

3.2.1. The cases of Chow Hang-tung and Lee Cheuk-yan

In October, the trial of the case against the Hong Kong Alliance in Support of Patriotic Democratic Movements of China (Hong Kong Alliance) and its former chairpersons and vice-chairpersons, Lee Cheuk-yan, Ho Chun-yan and Chow Hang-tung, for “inciting subversion of state power” under the NSL was further postponed to 22 January 2026 after repeated delays. No reason was provided for the re-postponement. Their trial was originally set to commence on 11 November 2025.²⁷

The two co-defendants, Chow Hang-tung and Lee Cheuk-yan, have been unjustly and arbitrarily detained for over 1,500 days, literally more than 4 years, simply for exercising their rights to freedom of expression, association and peaceful assembly. Chow and Lee were designated as prisoners of conscience by Amnesty International in 2024 and 2025 respectively.^{28 29} In 2023, the UN Working Group of Arbitrary Detention issued an opinion stating that Chow’s arrest and subsequent detention³⁰

Under international human rights law and standards, as well as the principle of presumption of innocence, pre-trial detention should be an exceptional measure rather than the norm. The government also has a responsibility to ensure that those in custody are brought to trial within a reasonable time. However, all bail applications of Chow and Lee were rejected under the pretext of upholding “national security”, fundamentally depriving them of their right to a fair trial, including the presumption of innocence, and right to liberty and security of person.

During Chow’s pretrial detention, she faced repeated punitive solitary confinement. The latest reported instance occurred in October, after she made an online speech commenting on her nomination for the 2025 Nobel Peace Prize.³¹ Despite prolonged incarceration and punitive treatment, Chow has continued to speak out with resolve and moral courage,

27. <https://amnestyhk.org/en-us/hk-alliance-trial-date-postponed-again-hong-kong-governments-use-of-prolonged-pre-trial-detention-violates-the-right-to-a-fair-trial/>

28. <https://www.amnesty.org/en/latest/news/2024/10/china-hong-kong-amnesty-international-recognizes-three-activists-as-prisoners-of-conscience/>

29. <https://www.amnesty.org/en/latest/news/2026/01/hong-kong-trial-of-tiananmen-activists-a-cynical-attempt-to-erase-historical-memory/>

30. <https://www.ohchr.org/sites/default/files/documents/issues/detention-wg/opinions/session96/A-HRC-WGAD-2023-30-AEV.pdf>

31. www.rfi.fr/tw/中國/20251015-支聯會案開審在即-鄒幸彤疑因發表失落和平獎感言再被單獨囚禁

demonstrating unbowed resilience in defending truth and human rights.

On 10 December, nearly 30 international human rights groups and trade unions issued a joint statement to call for the immediate release of Chow and Lee, and urged the Hong Kong government to drop all national security charges against them.³²



3.2.2. The case of Jimmy Lai

Apple Daily's founder Jimmy Lai had been continuously detained for more than five years on national security charges before his conviction in December 2025, during which he reportedly spent over 1,800 days in solitary confinement.³³ The case of Lai regarding ill-treatment has been brought to the attention of the UN Special Rapporteur on torture, and other cruel, inhuman or degrading treatment or punishment.³⁴ Lai suffers from diabetes, hypertension and heart palpitations, but was denied access to independent healthcare. In August, some sessions of his trial were delayed due to ill-health.³⁵

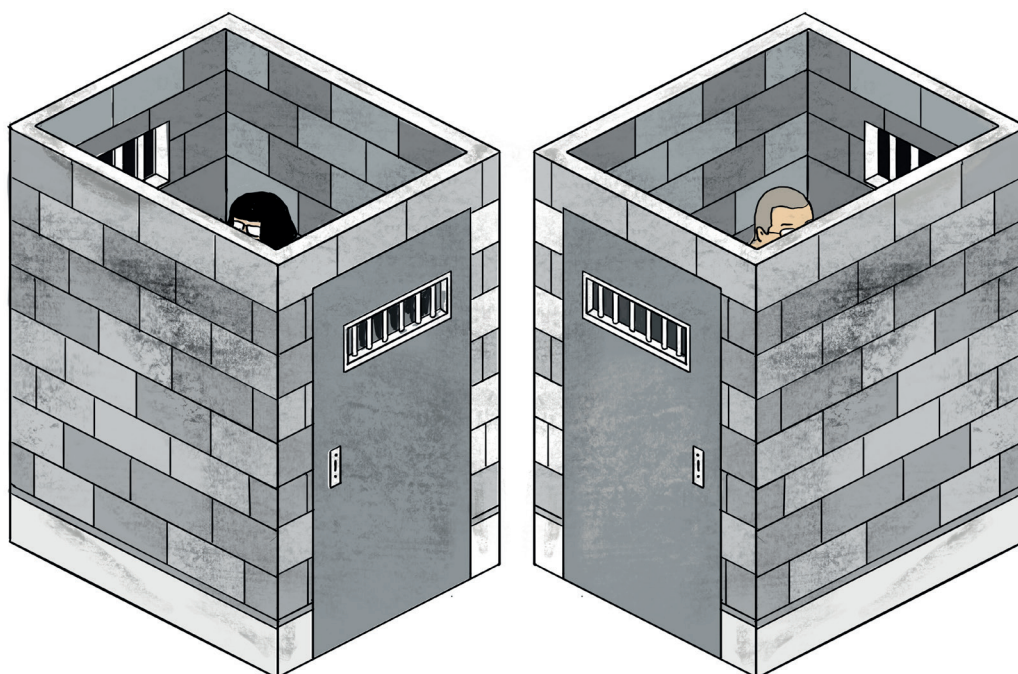
32. <https://amnestyhk.org/en-us/joint-ngo-world-human-rights-day-statement-hong-kong-should-immediately-release-chow-hang-tung-and-lee-cheuk-yan/>

33. <https://rsf.org/en/1800-days-behind-bars-democracies-cannot-let-jimmy-lai-die-prison>

34. <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=28734>

35. <https://hongkongfp.com/2025/08/15/jimmy-lai-trial-closing-arguments-further-postponed-due-medical-issue-with-media-moguls-heart/>

In September, his legal team filed urgent appeals to UN experts, warning that the ill treatment in prison, especially amid prolonged isolation, was posing a serious risk to his life. In December, his family reported significant weight loss, increasing frailty, and noticeable deterioration in Lai's nails and teeth, stating that his life was in peril.³⁶



3.2.3. Prolonged Detention in National Security Cases

In June, Amnesty International published an analysis of 255 individuals targeted under national security legislation in Hong Kong since 30 June 2020 also showed that bail was denied in 89% of cases where charges were brought, and that those denied bail were forced to spend an average 328 days in detention before facing trial.³⁷

3.3 Inhumane detention conditions

In December, Amnesty International published a report of interviews with nine former prisoners, both adults and juvenile detainees at the time, which revealed inhumane and degrading conditions in Hong Kong custodial facilities. These included physical violence, prolonged solitary confinement, poor sanitary conditions and dangerously high summer temperatures during their incarceration across 11 facilities across Hong Kong.³⁸

36. <https://www.washingtonpost.com/opinions/2025/12/09/jimmy-lai-hong-kong-democracy-china-arrest/>

37. <https://www.amnesty.org/en/latest/news/2025/06/hong-kong-national-security-law-analysis-shows-vast-majority-unjustly-arrested/>

38. <https://www.amnesty.org/en/latest/news/2025/12/hong-kong-prisons-rife-with-violence/>

In September, the Committee for Freedom in Hong Kong Foundation also published a comprehensive report documenting harrowing violations including systemic physical, sexual and psychological abuse, medical neglect, communication censorship and forced “deradicalization” programs inside Hong Kong prisons.³⁹ Later the month, 53 civil society organizations wrote to the UN High Commissioner for Human Rights to urgently call for action on the reported abuses.⁴⁰

3.4 Recommendations

Amnesty International calls on the HKSAR government to:

- End the routine use of default and prolonged pre-trial detention in national security related cases, and ensure that deprivation of liberty prior to conviction remains strictly exceptional, in accordance with ICCPR Article 9(3), which provides that pre-trial detention shall not be the general rule;
- Stop employing arbitrary, punitive and lengthy detention as a tool of repression against dissidents, as such practices violate its binding obligations under the ICCPR, amount to systematic violations of the right to liberty, security and fair trial, erode judicial safeguards, and represent a grave departure from the international human rights commitments that continue to apply to Hong Kong;
- Guarantee that all detainees, including those deprived of their liberty under NSL charges, are treated with humanity and respect for their dignity; and ensure that all detention conditions, including access to adequate medical care, hygiene, nutrition, and protection from violence, fully comply with international standards, including the UN Standard Minimum Rules for the Treatment of Prisoners (Nelson Mandela Rules).⁴¹

39. <https://thecfhk.org/wp-content/uploads/2025/09/CFHK-Foundation-Hong-Kongs-Prison-Conditions-Report.pdf>

40. <https://cpj.org/wp-content/uploads/2025/10/Urgent-Call-for-Action-from-53-Rights-Groups-on-Systemic-Abuses-and-Political-Control-in-Hong-Kongs-Prisons.docx-1.pdf>

41. https://www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-E-ebook.pdf

4

Reprisals against human rights defenders

The United Nations, including Special Procedures mandate holders and the Office of the Secretary-General, has repeatedly raised alarm over reprisals against Hong Kong human rights defenders for their legitimate activism and engagement with the UN.⁴² These reprisals, including arrest warrants, bounties, prosecutions, asset freezes and intimidation of activists and their families, have been condemned in UN reports as serious violations of international human rights that chill civil society and the exercise of freedom of expression.⁴³

4.1 Extra-territorial reprisals targeting human rights defenders in exile

4.1.1 Use of arrest warrants and bounties

The NSL claims an extraordinary extra-territorial reach, which has fuelled the Hong Kong authorities' reprisal efforts to target dissenting voices far beyond Hong Kong's borders. So far, the total number of Hong Kong human rights defenders in exile overseas subjected to NSL arrest warrants and bounties has reached 34, dispersed among four batches from mid-2023 to the latest move in July 2025.

42. <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=28893>

43. <https://www.ohchr.org/sites/default/files/2025-10/a-hrc-60-62-aev-en.pdf>

List of people under NSL arrest warrants with bounties by 31 December 2025:

	Name	Alleged Offence(s)	Warrant & Bounty Announced
1	Ted Hui Chi-fung	Inciting secession; inciting subversion; collusion	3/7/2023
2	Anna Kwok Fung-yee	Collusion	3/7/2023
3	Elmer Yuen Gong-yi	Collusion; subversion	3/7/2023
4	Dennis Kwok Wing-hang	Collusion	3/7/2023
5	Kevin Yam Kin-fung	Collusion	3/7/2023
6	Nathan Law Kwun-chung	Inciting secession; collusion	3/7/2023
7	Christopher Mung Siu-tat	Inciting secession	3/7/2023
8	Finn Lau Cho-dick	Collusion	3/7/2023
9	Frances Hui Wing-ting	Collusion	14/12/2023
10	Joey Siu Lam	Collusion	14/12/2023
11	Simon Cheng Man-kit	Inciting secession; collusion	14/12/2023
12	Johnny Fok Ka-chi	Inciting secession; inciting subversion;	14/12/2023
13	Tony Choi Ming-da	Inciting secession; inciting subversion;	14/12/2023
14	Joseph Tay	Inciting secession; collusion	24/12/2024
15	Chung Kim-wah	Inciting secession; collusion	24/12/2024
16	Carmen Lau Ka-men	Inciting secession; collusion	24/12/2024
17	Tony Chung Hon-lam	Inciting secession; collusion	24/12/2024
18	Chloe Cheung Hei-ching	Inciting secession; collusion	24/12/2024
19	Victor Ho Leung-mau	Subversion	24/12/2024
20	Chan Lai-chun	Subversion	25/7/2025
21	Tsang Wai-fan	Subversion	25/7/2025
22	Chin Po-fun	Subversion	25/7/2025
23	Paul Ha Hoi-chun	Subversion	25/7/2025
24	Hau Chung-yu	Subversion	25/7/2025
25	Ho Wing-yau	Subversion	25/7/2025
26	Keung Ka-wai	Subversion	25/7/2025
27	Tony Lam	Subversion	25/7/2025
28	Agnes Ng	Subversion	25/7/2025
29	Wong Chun-wah	Subversion	25/7/2025
30	Wong Sau-wo	Subversion	25/7/2025
31	Feng Chongyi	Subversion	25/7/2025
32	Sasha Gong	Subversion	25/7/2025
33	Ng Man-yan	Subversion	25/7/2025
34	Zhang Xinyan	Subversion	25/7/2025

The government seeks to punish and silence the legitimate speech and advocacy of human rights defenders, political dissidents and activists in exile by using broad and vague NSL charges with large bounties against them, which range from HK\$200,000 (US\$25,500) to HK\$1 million (US\$128,000). Such reprisals form part of a pattern of transnational repression, which encompasses extra-territorial threats, harassment, smearing, intimidation of family members at home, and misuse of legal or administrative tools across borders. These practices infringe upon the rights to freedom of expression (Article 19 ICCPR), peaceful association (Article 22), political participation (Article 25), and privacy, family and correspondence (Article 17) under the ICCPR. Given ongoing concerns about the fairness of national security proceedings, the promise of bounties further implicates due process guarantees under Article 14 of ICCPR.

In its 60th session (September–October 2025), the UN Human Rights Council’s annual report on reprisals publicly highlighted overseas activists Anna Kwok Fung-yee and Carmen Lau Ka-men, who faced reprisals for their past and ongoing UN cooperation—including during China’s fourth Universal Periodic Review cycle covering Hong Kong.⁴⁴



44. <https://www.ohchr.org/sites/default/files/2025-10/a-hrc-60-62-aev-en.pdf>

4.1.2 Other punitive measures

In February, the Hong Kong authorities confiscated HK\$800,000 (US\$102,270) from ex-lawmaker Ted Hui Chi-fung, an Australian resident, and his family for having allegedly violated the NSL.

In July, lawyer-activist Kevin Yam Kin-fung was barred from practising as a solicitor in Hong Kong and was financially penalised following a ruling by a disciplinary committee of the Law Society of Hong Kong. In October, two UN human rights experts condemned the disbarment, calling it a reprisal against lawyers who speak out on rule-of-law issues in Hong Kong.⁴⁵

In August, the Secretary of Security announced additional punitive measures targeting 16 of those under NSL arrest warrants, including passport cancellation, freezing of assets and revocation of their professional qualifications.⁴⁶

In November, Chloe Cheung Hei-ching, a young activist in exile, won the 2025 Magnitsky Award for Outstanding Young Human Rights Activist, a prize handed out by the private Global Magnitsky Justice Campaign.⁴⁷ She is one of the wanted activists placed HK\$1 million (US\$128,000) bounty by the Hong Kong authorities due to her continued advocacy for Hong Kong's democracy and human rights. After the issuance of the arrest warrant, Cheung faced physical intimidation and online harassment for her activism abroad.

4.2 Harassment and intimidation against families of dissidents living abroad

While long routine in Mainland China, the harassment and intimidation against families of Hong Kong dissidents living abroad is a relatively new tactic in the territory. More cases of transnational repression and reprisals have emerged since 2025, including arrests of family members for alleged national security violations tied to dissidents' legitimate advocacy abroad.

45. <https://www.ohchr.org/en/press-releases/2025/10/un-experts-condemn-reprisals-against-hong-kong-lawyer-kevin-yam>

46. https://www.news.gov.hk/eng/2025/08/20250804/20250804_113735_697.html

47. The Magnitsky Human Rights Prize is run by the Global Magnitsky Justice Campaign, founded by financier and activist William Browder following the 2009 prison death of his lawyer Sergei Magnitsky, to promote sanctions against human rights abusers.
<https://www.magnitskyawards.com/about/the-global-magnitsky-justice-campaign/>

In January, family members of Chung Kim-wah, the former Deputy Executive Director of the Public Opinion Research Institute of Hong Kong now living in the United Kingdom were taken away by the Hong Kong police for interrogation. Chung's former colleagues in Hong Kong also faced police questioning in the same month. Chung was placed under arrest warrant and bounty by the authorities under NSL charges of inciting secession and colluding with foreign forces in December 2024.

In February and March, neighbours of Carmen Lau's residence in the United Kingdom received leaflets containing a public appeal issued by Hong Kong Police concerning her. In February, Lau's family members in Hong Kong were taken by the police for questioning. In March, she was targeted through the wide dissemination of a video apparently generated by artificial intelligence on social media platforms. The video mimicked her and included false statements that reportedly discredited her. In December, her neighbours received letters containing sexually explicit deepfake images of her. She said these acts of intimidation left her terrified, and she believes they were orchestrated by state actors.⁴⁸

In March, step-father of activist in exile Tony Chung Hon-lam was taken in by Hong Kong national security police to "assist in the investigation" of Chung's suspected national security offences.

In April, the father and brother of Anna Kwok were arrested by the national security police. The father was later charged under the SNSO for "directly or indirectly" dealing with the finances of an absconder. This is the first national security prosecution against a family member of an exiled activist. The case is widely seen as targeted retaliation for Kwok's critical speech and activism abroad.⁴⁹

Also in April, Hong Kong police took away overseas activist Frances Hui Wing-ting's parents for questioning. This was the second time that her mother was taken in for police questioning. Hui is among 19 people wanted by the Hong Kong government on suspicion of committing national security offences and placed HK\$1 million bounty in 2023.

48. <https://hongkongfp.com/2025/12/12/hong-kong-activist-terrified-as-sexually-explicit-deepfake-images-sent-to-uk-neighbours/>

49. In February 2026, Anna Kwok's 69-year-old father, Kwok Yin-sang, was sentenced to jail for eight months for attempting to deal with funds linked to an "absconder" under the SNSO. He was found guilty of trying to withdraw roughly US\$11,000 from his daughter's insurance policy.

4.3 Recommendations

Amnesty International calls on the HKSAR government to:

- Desist from transnational repressive actions, direct or indirect, that intimidate, harass, or coerce human rights defenders and political dissidents in exile in retaliation for their legitimate activism abroad, including cooperation with the UN;
- Stop using vague or overly broad interpretations of offences such as “subversion,” “secession,” or “collusion with foreign forces” including when applied to peaceful and legitimate human rights advocacy abroad;
- Stop harassing the family members in Hong Kong of overseas activists, and ensure they are protected from reprisals, in accordance with their right under Article 17 of the ICCPR to be free from arbitrary or unlawful interference with their privacy and family life.

5

Rights of lesbian, gay, bisexual, transgender and intersex (LGBTI) people

In 2025, general legal recognition of same-sex marriage or partnerships remained absent, and Hong Kong continued to lack comprehensive anti-discrimination legislation covering sexual orientation, gender identity, gender expression or intersex status. While recent judicial decisions have yielded incremental advances for same-sex couples and transgender individuals, these developments constitute rather piecemeal and limited progress, falling short of ensuring full recognition and protection of LGBTI people's rights.

But even so, LGBTI groups in Hong Kong still demonstrated enduring resilience and organizational strength. Community networks and activists continued to mobilize, engage the public, and advocate for equality, despite administrative hurdles and scrutiny of civic expression.

5.1 Rejection of Same-sex Partnerships Registration Bill

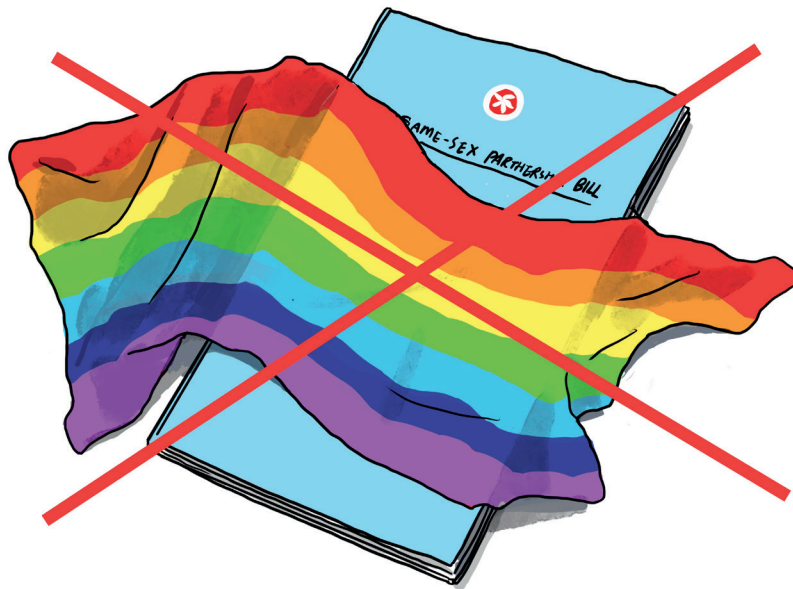
Following a 2023 ruling by the Court of Final Appeal⁵⁰, which required the government to establish a framework for legal recognition of same-sex partnerships by October 2025, the government proposed a Registration of Same-sex Partnerships Bill in July⁵¹, suggesting to confer narrow rights solely on same-sex couples who already had a marriage or civil union registered outside of Hong Kong.⁵² The government subsequently offered no clarity on how it intends to fulfil the Court's ruling.

50. https://legalref.judiciary.hk/lrs/common/search/search_result_detail_frame.jsp?DIS=154774&QS=%2B%7C%-28FACV%2C14%2F2022%29&TP=JU&ILAN=en

51. <https://www.legco.gov.hk/yr2025/english/bills/b202507111.pdf>

52. <https://www.amnesty.org/en/latest/news/2025/09/rejection-of-hong-kong-same-sex-partnerships-bill-blow-for-lgbti-rights/>

Before and during the Bill's consultation period, community actors self-organized a wide range of collective actions, including petition drives and coordinated submission-writing efforts, to amplify their voices and promote equality.⁵³ In total, 2,081 supportive submissions were made during the one-week submission period,⁵⁴ underscoring both the sustained civic engagement of LGBTI communities.



5.2 Continuation of Pride events despite cancellations

Hong Kong's LGBTI community continued to demonstrate vibrancy and resilience through Pride activities. But there were setbacks. One example was the cancellation of the outdoor Pink Dot HK carnival in October. Organizers were denied a venue by the West Kowloon Cultural District Authority.⁵⁵ Organizers adapted by holding an online concert on 2 November, featuring local celebrities and artists to celebrate Pride and support the community.

Hong Kong Pride 2025 was originally scheduled to include an indoor "Rainbow Market" event on 23 November and an outdoor "Rainbow Festival" on 29 November. However, the outdoor "Rainbow Festival" was cancelled due to venue-related issues one day after

53. <https://hongkongfp.com/2025/08/03/explainer-hong-kong-same-sex-partners-bill-lgbtq-activists-reactions-lawmakers-debates-and-whats-next/>

54. https://www.legco.gov.hk/yr2025/chinese/bc/bc57/papers/bc57cb2-1626-1-c.pdf?fbclid=IwZXh0bgNhZW0C-MTAAAYnJpZBExVGo0eDBtbUhkWnNIQnNjanNydGMGYXBwX2lkEDiyMjAzOTE3ODgyMDA4OTIAAR6j66JHihvrk4eb-PB-IY6qIt4GQgom2mWF_8ApHuZL7hJ7gQTP5v7Mg4MxjbQ_aem_9QO8UvJSoN9aCchbGTbOYg

55. <https://www.scmp.com/news/hong-kong/society/article/3320312/hong-kongs-largest-annual-lgbtq-carnival-cancelled-after-host-venue-backs-out>

its announcement.⁵⁶ The “Rainbow Market” nevertheless proceeded as planned under the theme “No Frame for Love,” with booths, talks and LGBTI-inclusive businesses and organizations participating to foster visibility and community engagement.⁵⁷ In addition to these marquee events, grassroots initiatives including Pride Month exhibitions and storytelling activities in June drew crowds and offered spaces for dialogue and celebration of LGBTI identities.

5.3 Legal developments affecting transgender people and same-sex couples

In July, the High Court ruled in favour of transgender people’s rights by striking down provisions that criminalized transgender people for using public restrooms which aligned with their gender identity.⁵⁸ The court found the provisions violated the principles of privacy, equality and non-discrimination as indicated in Articles 14, 22 and 25 under the Hong Kong Bill of Rights, as they disproportionately intruded on transgender people’s rights without valid justification. The court suspended the effect of its ruling for 12 months, giving the government time to respond by July 2026.

In September, another landmark case ruled in favour of a lesbian couple’s parental recognition. The High Court affirmed that a same-sex female couple, one providing the egg and the other carrying the pregnancy, must both be legally recognised as parents of their child, born through reciprocal in vitro fertilization. The court ruled that the government’s refusal to register the genetic mother as a legal parent was unconstitutional, because it violated the child’s rights to family and equality under the Hong Kong Bill of Rights Ordinance.⁵⁹

While these court victories marked incremental progress for same-sex couples and transgender persons, they underscored the inadequacy of relying on litigation-driven, case-by-case improvements. Ensuring equality requires the government to adopt comprehensive, legislative and policy reforms that proactively secure the rights of LGBTI people, rather than leaving fundamental protections to be advanced only through isolated court rulings, in cases brought by affected individual members of the public.

56. <https://www.facebook.com/share/p/1AD6DU21Vu/>

57. <https://thebeat.asia/hong-kong/the-list/events/hong-kong-pride-parade-official-party-no-frame-for-love>

58. https://legalref.judiciary.hk/lrs/common/ju/ju_frame.jsp?DIS=170689&currpage=T

59. https://legalref.judiciary.hk/lrs/common/ju/ju_frame.jsp?DIS=172268&currpage=T

5.4 Recommendations

Amnesty International calls on the HKSAR government to:

- Move beyond reactive, piecemeal adjustments and take proactive steps to establish a comprehensive and coherent legal framework - including comprehensive anti-discrimination legislation - that fully safeguards the equality and rights of LGBTI individuals in all aspects of daily life. The framework should be in full conformity with the HKSAR's obligations under applicable international human rights law, including Articles 2 and 26 of the ICCPR, and Articles 2 and 3 of the ICESCR, as well as the guarantees enshrined in the Basic Law and the Hong Kong Bills of Rights Ordinance;
- Enact without delay comprehensive marriage equality legislation that ensures same-sex couples have identical rights to opposite-sex couples in all aspects, including eligibility for public housing, access to spousal benefits for civil servants and in taxation, parental rights, inheritance rights and all other areas of civil and especially family law;
- Ensure all laws criminalizing transgender people for using public facilities that align with their gender identity are repealed, and explicitly outlaw discrimination based on gender identity in law and practice;
- Ensure safe, equal and non-discriminatory access to toilet and sanitation facilities for transgender and gender-diverse people, including, where appropriate, through inclusive facility policies that respect gender identity and protect against discrimination, harassment and exclusion;
- End arbitrary venue denials based on event content or identity unless specific legal prohibitions apply, ensuring LGBTI and other civil society events receive equal access to all government-funded venues.

6

Workers' rights

In 2025, the workers' rights situation in Hong Kong was marked by numerous issues concerning job insecurity, wage pressure on low-income workers, occupational health and safety concerns, restrictions on union activities and complaints over lack of protection against forced labour. Nonetheless, an episode of success by cleaning workers defending their labour rights shows that even when unions and civil society groups face mounting pressure, small community-based unions continue to find ways to organize and sustain workplace resistance through collective solidarity.

6.1 Legal and policy change

6.1.1 Enactment of Trade Unions (Amendment) Bill

In June, the Legislative Council passed the Trade Unions (Amendment) Bill, which banned anyone convicted of national security offences from serving in trade unions. The amendment expanded the government's power to reject union registrations based on national security grounds and required unions to seek approval before receiving foreign funding.⁶⁰

6.1.2 The new "468 Rule" under the Employment Ordinance

In June, the Legislative Council passed an amendment to the Employment Ordinance, which includes key changes to the definition of a "continuous contract" to better cover part-time and casual workers with statutory benefits.⁶¹ The new Four-Week Calculation (the "468 Rule") defines an employee as having a continuous contract if they work 68 hours or more within any four consecutive weeks, regardless of how those hours are distributed weekly. Statutory employment benefits such as days off, paid holidays, severance payment, maternity and paternity leave will extend to part-time or casual workers who meet the new threshold. The amendments take effect from 18 January 2026.

60. <https://www.legco.gov.hk/yr2025/english/bc/bc56/papers/bc20250417-e.pdf>

61. <https://www.legco.gov.hk/yr2025/english/ord/2025ord027-e.pdf>

6.1.3 Modest minimum wage adjustments

In 2025, the government raised its statutory minimum wage from HK\$40 (US\$5.13) to HK\$42.1 (US\$5.4) per hour – a modest HK\$2.1 or 5.25% increase effective May 1, following the Minimum Wage Commission’s recommendation approved on February 18.⁶² In September, the government also increased the minimum allowable wage for migrant domestic workers by 2.2% to HK\$5,100 (US\$654) per month, effective for contracts signed on or after September 30, 2025; food allowances unchanged at HK\$1,236 (US\$158).⁶³

6.2 Rights at work

6.2.1 Migrant workers

The Enhanced Supplementary Labour Scheme (ESLS) has enabled an increase in migrant workers coming into Hong Kong particularly in the catering and construction sectors. In the first half of 2025, over 17,000 work permits were granted. However, by September, the Labour Department had also investigated 321 complaints of firms unlawfully firing local workers in violation of ESLS rules.⁶⁴

6.2.2 Occupational health and safety

According to the Hong Kong Association for the Rights of Industrial Accident Victims, by the end of 2025, there were a total of 120 work-related fatalities across all industries throughout the year (including self-employed individuals and employees). It was a sharp increase from the 78 recorded in the previous year, representing a 54% rise. The construction sector was the deadliest, with 51 fatalities including sudden death cases and fatal accidents.⁶⁵

Despite statutory maximum fines having been raised to up to HK\$3 million (summary offences) or even HK\$10 million (indictable offences) under amended occupational safety laws in 2023, overall sentencing outcomes continue to fall far below the legal ceilings. The biggest fine recorded in 2025 was HK\$160,000 (US\$20,400), less than 2% of the HK\$10 million maximum. The case involved a fatal industrial accident that occurred in 2022. The court made a review decision on increasing the fines from HK\$120,000 to HK\$160,000 in December 2025.⁶⁶

62. <https://www.labour.gov.hk/eng/news/mwo.htm>

63. <https://www.info.gov.hk/gia/general/202509/29/P2025092900318.htm>

64. <https://www.info.gov.hk/gia/general/202510/15/P2025101500252.htm>

65. https://www.ariav.org.hk/files/pressRelease/Review_2025.pdf

66. <https://www.info.gov.hk/gia/general/202512/08/P2025120800773.htm>

6.2.3 Complaint of forced labour

In June 2025, the Court of Final Appeal (CFA) dismissed a judicial review filed by a migrant domestic worker, who argued that the absence of a dedicated forced labour law in Hong Kong had led the police to fail to investigate effectively her complaint of forced labour. The CFA held that the enactment of bespoke legislation criminalizing forced labour was not necessary to provide practical and effective protection of this abuse of the rights of foreign domestic workers.⁶⁷

The ILO Forced Labour Convention 29 emphasizes proactive, specialized, and victim-centred mechanisms for identifying, preventing, and remedying forced labour, which Hong Kong currently lacks. Although the CFA held that existing criminal and employment laws can, in principle, address forced labour, it was also important to assess whether the implementing mechanisms operate effectively in practice for migrant domestic workers, who face structural vulnerabilities such as mandatory live-in arrangements, restricted job mobility, and limited access to remedies.

6.2.4 Successful grassroots labour resistance

On 1 August 2025, cleaning workers at Hong Kong Baptist University staged a sit-in protest after the university switched to a new cleaning contractor that froze wages, imposed a probation period, and cut labour benefits such as statutory holidays.⁶⁸ The cleaners, many of them older women workers, mobilized collectively and secured support from young labour activists, student organizers and community unions. Their collective action forced the new contractor to concede, winning cleaners a monthly cash allowance of between HK\$300 (US\$38) and HK\$500 (US\$64) .



67. https://legalref.judiciary.hk/lrs/common/ju/ju_frame.jsp?DIS=169532&currpage=T

68. <http://hk.news.yahoo.com/浸大外判清潔工抗爭記錄-年輕力量與清潔姨姨的工運-230132236.html>

6.3 Recommendations

Amnesty International calls on the HKSAR government to:

- Repeal or substantially amend the recent trade union restrictions that unduly interfere with freedom of association, foreign cooperation, and union registration, in breach of ICCPR Article 22 and ILO Conventions 87 and 98;
- Review the Enhanced Supplementary Labour Scheme (ESLS) and related labour migration programmes to ensure compliance with the principles of just and favourable conditions of work for all workers;
- Guarantee protection of labour rights for all workers without discrimination, including the rights to freedom of association, access to remedies and a living wage, in line with ILO laws and standards on decent work;
- Ensure meaningful deterrence is put in place to minimize the occurrence of industrial accidents. Violations of occupational health and safety duties should be liable to appropriate penalties, including fines commensurate with the offender's financial capacity and imprisonment for indictable offences causing death or serious harm, in order to deter non-compliance;
- Review and strengthen existing laws to address gaps in the prevention of forced labour and exploitation, ensuring compliance with relevant ILO laws and standards on forced labour, debt bondage, coercion and the abuse of vulnerability. Such a review should prioritize robust safeguards, clear legal definitions and effective enforcement mechanisms capable of protecting migrant domestic workers.