

## **CHAPTER 6**

**Labour and Welfare Bureau  
Food and Environmental Hygiene Department  
Leisure and Cultural Services Department  
Architectural Services Department  
Buildings Department**

**Barrier-free facilities at government premises**

**Audit Commission  
Hong Kong  
30 October 2018**

*This audit review was carried out under a set of guidelines tabled in the Provisional Legislative Council by the Chairman of the Public Accounts Committee on 11 February 1998. The guidelines were agreed between the Public Accounts Committee and the Director of Audit and accepted by the Government of the Hong Kong Special Administrative Region.*

Report No. 71 of the Director of Audit contains 10 Chapters which are available on our website at <https://www.aud.gov.hk>

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# **BARRIER-FREE FACILITIES AT GOVERNMENT PREMISES**

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# **BARRIER-FREE FACILITIES AT GOVERNMENT PREMISES**

## **Executive Summary**

1. Under the Disability Discrimination Ordinance (DDO — Cap. 487), which is binding on the Government, it is unlawful to discriminate against persons with disabilities (PWDs) in relation to the provision of means of access to any premises that the public is entitled to enter or use, or by refusing to provide goods, services or facilities or in the manner in which goods, services or facilities are provided, except where the provision of such goods, services or facilities would impose unjustifiable hardship.
2. The Building (Planning) Regulations (B(P)R — Cap. 123F) under the Buildings Ordinance (Cap. 123) prescribe the design requirements to ensure that reasonable barrier-free access and facilities are provided on premises to meet the needs of PWDs. The Buildings Department (BD) is responsible for updating a Design Manual (DM) concerning barrier-free access. The latest version is “Design Manual: Barrier Free Access 2008” (DM 2008) which sets out both the mandatory requirements stipulated under the B(P)R and the recommended design requirements for barrier-free access and facilities. While the B(P)R is not applicable to buildings belonging to the Government, it is the established policy of the Government to comply with the prevailing requirements in the DM, and where practicable, achieve standards beyond the statutory requirements in the provision of barrier-free facilities.
3. Under Article 9 of the United Nations Convention on the Rights of Persons with Disabilities (hereinafter referred to as the Convention) which has entered into force for Hong Kong since 31 August 2008, the Government has the obligation to take appropriate measures to ensure to PWDs access, on an equal basis with others, to the physical environment, transportation, information and communications, and other facilities and services open or provided to the public. The objective is to enable PWDs to live independently and participate fully in all aspects of life.

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4. In line with the provisions of the DDO and the Convention, it is the Government's established policy objective to provide barrier-free facilities for PWDs, thereby facilitating them to live independently and fully integrate into the community. In addition, barrier-free facilities could benefit the elderly.

5. The Labour and Welfare Bureau (LWB) is the policy bureau which formulates policies and programmes on provision of barrier-free facilities to PWDs, and oversees and co-ordinates their implementation by government bureaux and departments (B/Ds). B/Ds are required to ensure that policies and measures under their respective purview comply with the requirements of the Convention and overall government policy objective in providing a barrier-free environment for PWDs.

6. In December 2006, the Equal Opportunities Commission (EOC) commenced a formal investigation to examine the progress made on the realisation of a barrier-free environment for PWDs, in particular on accessibility to publicly accessible premises. The EOC conducted access audits on publicly accessible premises including that owned, managed or maintained by eight government departments. In June 2010, the EOC issued a formal investigation report (EOC Report). The EOC Report had made a number of recommendations including the improvement of accessibility for publicly accessible premises. In June 2010, the LWB convened a Task Force comprising representatives of stakeholders within the Government to co-ordinate follow-up actions on the recommendations of the EOC. Among the follow-up actions, a Retrofitting Programme involving premises/facilities of 13 managing departments had been worked out in December 2010.

7. The Audit Commission (Audit) has recently conducted a review to examine barrier-free facilities at government premises. Apart from examining the efforts of the LWB (being the policy bureau) on the matter, Audit selected the Food and Environmental Hygiene Department (FEHD) and the Leisure and Cultural Services Department (LCSD) (being the two major departments with barrier-free facilities retrofitted under the Retrofitting Programme) to examine their provision and management of barrier-free facilities with a view to identifying any areas for improvement and lessons to be learned.



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### **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

8. *Retrofitting Programme may not cover all government premises with frequent public interface.* To draw up the Retrofitting Programme, in June and July 2010, the LWB (with its representative serving as the Secretary of the Task Force) requested 15 B/Ds (e.g. the FEHD, the LCSD and the Government Property Agency), which were Task Force members to conduct assessments on the need to upgrade barrier-free facilities under their management. In the event, 13 B/Ds identified the need to do so and 3,692 premises/facilities managed by them were included in the Retrofitting Programme. According to the LWB, the Task Force would, apart from the 8 departments identified by the EOC Report, examine the premises under the management of those B/Ds with frequent public interface. Audit noted that, among the 15 B/Ds requested by the LWB to conduct assessments on the need to upgrade barrier-free facilities, 8 were covered by the EOC Report and 7 were not. There was no documentary evidence showing why only these 7 B/Ds were requested to make assessments. As a result, some B/Ds with premises under their management having frequent public interface might not have been requested to make assessment and thus were not included in the Retrofitting Programme. According to the LWB, the tight and pledged timetable for completing the works under the Retrofitting Programme from mid-2012 onwards might be a consideration at that time (paras. 1.14, 2.5 to 2.7 and 2.9 to 2.11).

9. *Longer time than originally planned in collecting feedback from B/Ds on reviews of their accessibility issues.* On 21 September 2016, the LWB issued a memorandum to all B/Ds advising them to review their respective operational practices and procedures to ensure accessibility to services and facilities for users who are PWDs. In the memorandum, the LWB requested B/Ds to complete the review before end of 2016 so that the first annual return could be sent to the LWB before end of 2017. On the same day, the LWB informed all B/Ds that it would get in touch with them on the proforma of the annual return in early 2017 and the exact return date. The LWB issued a finalised proforma to B/Ds in April 2018 and requested them to return the completed proforma on or before 15 April 2019. According to the LWB, two draft proforma were prepared in April and November 2017. It had also held a meeting and organised a seminar with B/Ds to seek their views on the draft proforma in February and March 2018. Audit noted that the LWB took 1.5 years (from September 2016 to April 2018) to prepare the proforma of the annual return and the date for return of the completed proforma was set for April 2019. Comparing with

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the planned return date of end 2017, the LWB had taken a longer time than it originally planned to collect feedback from B/Ds (paras. 2.13 to 2.15).

10. ***Scope for providing more comprehensive information to Legislative Council.*** The Government undertook to provide a quarterly progress report of the Retrofitting Programme to the Legislative Council (LegCo). Audit noted from the progress reports that, for the positions as reported for the period from March 2011 to June 2014, a total of 103 premises/facilities were taken out from the Retrofitting Programme without providing reasons. According to the LWB, the managing department and the works agent of the relevant premises/facilities, of these 103 premises/facilities, the works for: (a) 32 premises/facilities were completed; (b) 55 premises/facilities were cancelled due to various reasons; (c) barrier-free facilities for 13 premises/facilities had been reviewed and considered not necessary; (d) 2 premises were in progress; and (e) 1 premises would be tied in with a works project. The LWB informed Audit that in compiling the large number of returns from departments for submission to LegCo in the form of regular progress reports, the LWB had endeavoured to provide in each progress report the full information as provided by the B/Ds concerned. Audit considers that the LWB needs to remind B/Ds to ensure the completeness of information in their returns in future (paras. 1.17, 2.16, 2.18 and 2.19).

11. ***Need to take actions to timely update the Design Manual.*** In June 2014, the BD set up a Technical Committee on Design Manual with an aim to keep the DM under regular review. Once a consensus to amend certain parts of DM has been reached in the Technical Committee, a draft corrigendum would be prepared. After endorsement by the Technical Committee, the draft corrigendum would be submitted to the responsible BD officer for review. Between December 2015 and June 2018, the Technical Committee was handling proposals relating to 92 items for improving DM 2008. Regarding these 92 items, amendments for 10 items to the DM were considered not necessary by the Technical Committee and 11 items were being discussed by the Technical Committee. For the remaining 71 items, Audit noted that as of June 2018: (a) for 26 items with amendments made in the DM (which did not require legislative amendments), 19 had taken more than six months (counting from the endorsement of the draft corrigendum by the Technical Committee) to amend DM 2008. The long time was due to delay in submitting the draft corrigendum to the responsible BD officer for review after endorsement given by the Technical Committee (ranging from 7 months to 14 months, averaging 10 months); (b) for 17 items, amendments were considered necessary but had not been made in the DM. For 13 of these 17 items, more than three months had elapsed after endorsement by

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the Technical Committee. Up to June 2018, the relevant draft corrigendum had not been submitted to the responsible BD officer after they were endorsed (ranging from 6 to 16 months, averaging 11 months); and (c) 28 items had not yet been discussed by the Technical Committee. Audit considers that the BD needs to take actions to timely update the DM and closely monitor the progress (paras. 2.24 to 2.27).

### **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

12. The LCSD is responsible for providing leisure and cultural facilities and services to the public. The FEHD is responsible for, among others, environmental hygiene services and facilities as well as food safety control. As of June 2018, the LCSD had 1,949 venues (e.g. sports centres, parks and playgrounds, museums and libraries) and the FEHD had 1,741 venues (e.g. public toilets, public markets, cemeteries and crematoria) under their purview (para. 3.2).

13. *Access Co-ordinator and Access Officer Scheme.* The Government has launched an Access Co-ordinator and Access Officer Scheme to enhance the accessibility of government premises, facilities and services. According to the memorandum issued by the LWB, individual B/Ds should appoint an Access Co-ordinator (AC) to co-ordinate accessibility issues within the B/D and serve as the departmental focal point of a government network to facilitate government-wide collaborated efforts in enhancing the accessibility of government premises and facilities. An Access Officer (AO) should be appointed for each venue under the B/Ds' management to serve as the first point of contact on accessibility issues at the venue. As of 30 June 2018, the FEHD and the LCSD had each appointed an AC, and had also appointed 101 and 347 AOs respectively (paras. 3.3 and 3.4).

14. *Maintaining a complete and updated list of barrier-free facilities.* According to the LWB, under the established practice, it is the responsibility of B/Ds to maintain up-to-date lists of barrier-free facilities under their management. Audit noted that the FEHD and the LCSD had not maintained a complete and updated list of barrier-free facilities for all the venues under their management (para. 3.6).

15. *Areas for improvement in conducting access audits.* According to the departmental circulars issued by the FEHD and the LCSD, their AOs should conduct

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regular audit checks and take timely follow-up actions as required to ensure the provision of suitable barrier-free facilities. AOs are required to complete access audit checklists. Audit has found areas for improvement in access audits conducted by the LCSD and the FEHD including: (a) access audits for some venues were not carried out; (b) access audits were not conducted by the designated AOs; and (c) some DM 2008 requirements were not included in their access audit checklists for checking (paras. 3.12, 3.14 and 3.15).

16. ***Deficiencies identified in Audit site visits.*** Audit conducted site visits to 20 FEHD venues and 30 LCSD venues (covering various types of venues across the territory) during May to September 2018 and found deficiencies in 14 (70% of 20) FEHD venues and 26 (87% of 30) LCSD venues including: (a) in the provision of barrier-free facilities, deficiencies (e.g. a notice of “Emergency Call” in both English, Chinese and braille was not provided next to the emergency push button for emergency call bell) were found in 13 FEHD and 25 LCSD venues; (b) in the maintenance of barrier-free facilities, deficiencies (e.g. tactile guide paths were worn out) were found in 4 FEHD and 8 LCSD venues; and (c) in the control of barrier-free facilities, deficiencies (e.g. tactile guide paths were obstructed by goods, carpets, or trolleys) were found in 9 FEHD and 12 LCSD venues (paras. 3.5, 3.20 and 3.21).

17. ***Other administrative issues.*** Audit notes room for improvement in a number of other administrative issues concerning the provision and management of barrier-free facilities under the FEHD and the LCSD including: (a) as of August 2018, for the FEHD, information on accessible toilets was provided on its website. However, accessibility information (e.g. whether and what barrier-free facilities were provided) of other venues under its management (e.g. public markets) was not available. For the LCSD, accessibility information on libraries was not provided on its website. Regarding other venues, while information on accessible toilets was provided, information on other major barrier-free facilities (e.g. accessible lifts and tactile guide paths) was not available on its website for most venues; (b) according to the LWB, B/Ds are required to assess the training needs and organise tailor-made seminars/workshops for AOs and venue-based staff. As of 30 June 2018, 52 out of the 101 AOs of the FEHD and 183 out of 347 AOs of the LCSD had not attended seminars on accessibility issues; and (c) the FEHD and the LCSD did not regularly compile complaint statistics relating to the provision and management of barrier-free facilities (paras. 3.26, 3.27, 3.34, 3.36 and 3.38).

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18. *Way forward.* As the audit findings and recommendations on the FEHD and the LCSD may also be applicable to other B/Ds, there is a need for the LWB to draw attention of other B/Ds to the audit findings and recommendations in this Audit Report with a view to improving the provision and management of barrier-free facilities at premises managed by them (para. 3.42).

### **Management of retrofitting works for barrier-free facilities at government premises**

19. The Architectural Services Department (ArchSD) is the works agent for implementing barrier-free facilities improvement works initiated by managing departments. According to the ArchSD, the retrofitting works for barrier-free facilities at government premises are carried out through: (a) the Retrofitting Programme; and (b) the refurbishment of government buildings (e.g. the Public Toilet Refurbishment Programme). They were funded under two block votes (controlled by the ArchSD) of the Capital Works Reserve Fund. According to the ArchSD, from 2011-12 to 2017-18, the actual expenditure under the Retrofitting Programme was \$1.07 billion, which was funded under the related block vote. The ArchSD had engaged 11 consultants for conducting feasibility studies and awarded 10 design-and-build (D&B) term contracts for carrying out design and construction of barrier-free facilities. The ArchSD is responsible for administering these term contracts (paras. 4.2 to 4.4 and 4.6 to 4.8).

20. *Need to closely monitor the timely submission of documents relating to implementation of works orders by contractors.* The ArchSD had issued 5,139 works orders from 2011 to 2017 for upgrading the barrier-free facilities under the Retrofitting Programme. Audit noted 414 works orders (8% of 5,139) with delay in completion, of which the delay of 30 works orders was particularly long (ranging from 730 days to more than 1,095 days). According to the ArchSD, for these 30 works orders: (a) the delay for 29 works orders was mainly due to the contractors' late submission of documents which were required under the contracts and there was no delay in the provision of barrier-free facilities on site for use by the public. Without such documents, the ArchSD could not certify the works completion under the terms and conditions of these contracts. In view of such delay, the ArchSD had imposed liquidated damages; and (b) for the remaining works order, the delay was due to the time taken to resolve land issue during the design stage. Audit considers that the ArchSD needs to take measures to closely monitor the timely submission of documents relating to implementation of works orders by contractors (paras. 4.9 and 4.10).

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21. *Need to learn from incidents involving slippery tactile guide paths.* Shortly after the completion of the installation of tactile guide path in Lai Chi Kok Park, the LCSD received four complaints about tactile guide path being slippery (two expressly mentioned that the path was slippery after the rain) and posing safety risks to the public. After investigation, the LCSD noted that 14 other venues also had incidents involving slippery tactile guide paths. According to the ArchSD, the materials used in the tactile guide paths in the 15 venues concerned complied with the slip resistance requirements of DM 2008. Upon the LCSD's request, the ArchSD carried out remedial works by applying anti-slip coating to tactile guide paths in 15 venues where 9 accidents (mainly involving visitors who slipped on the ground) had occurred and 23 complaints (concerning slippery floor) were received. According to the ArchSD, the anti-slip coating once applied could improve the friction of the surface and last up to five years. However, the LCSD still found the tactile guide paths of eight venues slippery. For five venues, anti-slip coating had been re-applied within 9 to 13 months after applying the first coating. For the remaining three venues, the tactile floor tiles at inclined or steeper areas had been removed. In this connection, Audit noted that the issue of slip resistance requirements on tactile guide path was being reviewed by the Technical Committee on Design Manual since September 2014. The issue was discussed again at the Technical Committee meeting in April 2018. According to the BD, the review of slip resistance requirements for tactile guide path by the relevant departments was still in progress. Audit considers that: (a) the ArchSD needs to learn from the incidents involving slippery tactile guide paths; and (b) the BD needs to closely liaise with the departments concerned regarding the updating of slip resistance requirements for tactile guide path in DM 2008 (paras. 4.11 to 4.16 and 4.18 to 4.21).

22. *Scope for improving ArchSD's work in project administration for retrofitting works.* In March 2012, in the course of submitting funding application for the retrofitting works, the ArchSD informed the LCSD that the D&B term contractor estimated the cost of retrofitting works of barrier-free facilities in the Victoria Park to be \$10.66 million. Such works would proceed in two phases. Phase I works were targeted to complete by May 2012. Phase II works were targeted to commence in May 2012. Four works orders with a total cost of \$12.8 million were issued between February 2013 and May 2014. Audit noted that the ArchSD had instructed the contractor to commence works before the issuance of works orders and the total cost for the four works orders had exceeded the cost estimates by \$2.14 million. According to the ArchSD: (a) to meet the Government's target firmly set to complete the works by June 2012, the contractor was instructed to commence works first and works orders were subsequently issued to the contractor; (b) in some circumstances under the term contracts, the ArchSD could instruct the contractor to

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proceed works first and issue works order later. The ArchSD was committed to reviewing its operational procedures to clarify the circumstances under which this applied and the related procedures; and (c) the excess in works costs was to cater for additional barrier-free facilities works carried out concurrently with the barrier-free facilities retrofitting works. Audit considers that there is scope for the ArchSD to improve its project administration work (paras. 4.23 to 4.27).

23. *Need to ensure that improvement works for barrier-free facilities are completed as soon as practicable.* A total of 90 premises had been taken out from the Retrofitting Programme and transferred to other improvement programmes. As of September 2018, the retrofitting works for barrier-free facilities in 66 premises were completed and 10 premises were cancelled mainly because the premises were demolished or subject to re-development. The retrofitting works for the remaining 14 premises had not been completed. These 14 premises were public toilets under the FEHD's Public Toilet Refurbishment Programme. The works for 7 public toilets were in progress and 7 public toilets were at planning stage. According to the FEHD and the ArchSD, a Public Toilet Refurbishment project involves various stages, including clarification on land status, comprehensive design and seeking approval of design. Audit considers that the FEHD needs to, in collaboration with the ArchSD, take measures to complete the improvement works for barrier-free facilities under its management as soon as practicable (paras. 4.34 to 4.37).

### Audit recommendations

24. **Audit recommendations are made in the respective sections of this Audit Report. Only the key ones are highlighted in this Executive Summary. Audit has recommended that the Government should:**

*Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual*

- (a) **take measures to ensure that all relevant B/Ds are consulted as far as practicable in co-ordinating issues on provision of barrier-free environment in government premises and facilities in future (para. 2.22(a));**
- (b) **with regard to the B/Ds' reviews of accessibility issues, in collecting their feedback in future, make a better assessment of the difficulties**

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involved in setting the time target for collecting their feedback and endeavour to meet the target (para. 2.22(b)(ii));

- (c) in co-ordinating returns from a large number of B/Ds for submission to LegCo in future, remind B/Ds to ensure the completeness of information in their returns (para. 2.22(c));
- (d) take actions to timely update the DM and closely monitor the progress (para. 2.28(a));
- (e) take follow-up actions as soon as practicable on the 28 items (involving proposals for improving DM) that had not been discussed by the Technical Committee on Design Manual (para. 2.28(b));

*Work of FEHD and LCSD in providing and managing barrier-free facilities under their management*

- (f) maintain a complete and updated list of barrier-free facilities at venues managed by the FEHD and the LCSD for monitoring and planning purposes (para. 3.8);
- (g) take follow-up actions on the areas for improvement in conducting access audits as identified by Audit and take measures to enhance access audits of the FEHD and the LCSD (para. 3.17(a) and (b));
- (h) take follow-up actions on the deficiencies in the provision, maintenance and control of barrier-free facilities at venues managed by the FEHD and the LCSD as identified by Audit (para. 3.23(a));
- (i) take measures to strengthen the work of the FEHD and the LCSD in providing, maintaining and controlling barrier-free facilities at venues managed by them (para. 3.23(b));
- (j) take measures to ensure that adequate information about accessibility of venues is promulgated on the websites of the FEHD and the LCSD and/or at venues managed by them (para. 3.39(a));



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- (k) assess the training needs of and organise suitable training for AOs and venue-based staff of the FEHD and the LCSO (para. 3.39(c));
- (l) ensure that complaint statistics relating to the provision and management of barrier-free facilities are regularly compiled and submitted to the senior management (para. 3.39(d));
- (m) draw attention of other B/Ds to the audit findings and recommendations on the FEHD and the LCSO as mentioned in this Audit Report (para. 3.43);

### *Management of retrofitting works for barrier-free facilities at government premises*

- (n) take measures to closely monitor the timely submission of documents relating to implementation of works orders by ArchSD contractors (para. 4.30(a));
- (o) learn from the incidents involving slippery tactile guide paths (particularly those at outdoor venues) and closely liaise with the departments concerned regarding the updating of slip resistance requirements for tactile guide path in DM 2008 (paras. 4.30(b) and 4.31);
- (p) strengthen measures for controlling the issuance of works orders and remind ArchSD staff and consultants to make more accurate cost estimates for works orders as far as practicable (para. 4.30(c)); and
- (q) take measures to complete the improvement works for barrier-free facilities managed by the FEHD as soon as practicable (para. 4.38).

## Response from the Government

25. The Government agrees with the audit recommendations.

## **PART 1: INTRODUCTION**

1.1 This PART describes the background to the audit and outlines the audit objectives and scope.

### **Background**

1.2 The Disability Discrimination Ordinance (DDO — Cap. 487) was enacted in August 1995. Under the DDO, which is binding on the Government, it is unlawful to discriminate against persons with disabilities (PWDs) in relation to the provision of means of access to any premises that the public is entitled to enter or use. In addition, it is also unlawful to discriminate against PWDs by refusing to provide goods, services or facilities, or in the manner in which goods, services or facilities are provided, except where the provision of such goods, services or facilities would impose unjustifiable hardship (Note 1).

1.3 Under Article 9 of the United Nations Convention on the Rights of Persons with Disabilities (hereinafter referred to as the Convention) which has entered into force for Hong Kong since 31 August 2008, the Government has the obligation to take appropriate measures to ensure to PWDs access, on an equal basis with others, to the physical environment, transportation, information and communications, and other facilities and services open or provided to the public. The objective is to enable PWDs to live independently and participate fully in all aspects of life. To ensure Hong Kong's compliance with the Convention, government bureaux and departments (B/Ds) are required to give due regard to the Convention's provisions in formulating policies, implementing programmes and delivering services.

1.4 In line with the provisions of the DDO and the Convention, it is the Government's established policy objective to provide barrier-free facilities for PWDs, thereby facilitating them to live independently and fully integrate into the community.

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**Note 1:** *The DDO stipulates that notwithstanding any provision in any other Ordinance, a public authority which has the power to approve building works, which includes the Director of Lands, the Building Authority, the Housing Authority and the Director of Architectural Services, shall not approve building plans, whether for a new building or for the alterations or additions to an existing building unless the public authority is satisfied that reasonable access will be provided for PWDs.*

## Introduction

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1.5 The Building (Planning) Regulations (B(P)R — Cap. 123F) under the Buildings Ordinance (BO — Cap. 123) prescribe the design requirements to ensure that reasonable barrier-free access and facilities are provided on premises to meet the needs of PWDs. B(P)R applies to new buildings or alterations and additions to existing buildings. The Buildings Department (BD) is responsible for updating a Design Manual (DM) concerning barrier-free access which was first published in 1984. The latest version is “Design Manual: Barrier Free Access 2008” (hereinafter referred to as DM 2008) which sets out both the mandatory requirements stipulated under the B(P)R, as well as a set of recommended design requirements (i.e. best practice options beyond the statutory requirements) for barrier-free access and facilities (Note 2). According to the Labour and Welfare Bureau (LWB), while the B(P)R is not applicable to buildings belonging to the Government and the Hong Kong Housing Authority (HA), it is the established policy of the Government and the HA to comply with the prevailing requirements in the DM, and where practicable, achieve standards beyond the statutory requirements in the provision of barrier-free facilities as follows:

- (a) ***New premises and facilities.*** All new government and HA buildings or alterations and additions to existing government and HA buildings with construction commencing after 1 December 2008 will have to meet the mandatory requirements in DM 2008 and wherever practicable, achieve a standard beyond the statutory requirements; and
- (b) ***Existing government premises and facilities.*** The managing departments concerned should work with the works agents (e.g. the Architectural Services Department — ArchSD) to upgrade the barrier-free facilities to the latest design standards where practicable whenever renovation works are carried out.

1.6 DM 2008 sets out the latest design requirements of providing proper access to and appropriate facilities in a building for PWDs (see Appendix A for examples). Barrier-free facilities at some government premises are shown in Photographs 1 and 2.

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**Note 2:** *The DM was revised in 1997 and 2008 to introduce improved design requirements to address the needs of PWDs in the light of advancement in building technology and the rising expectation of the community.*

**Photograph 1**

**Wheelchair spaces in auditorium**



*Source: Leisure and Cultural Services Department records*

**Photograph 2**

**Handrail with braille and tactile information**



*Source: Leisure and Cultural Services Department records*

## **Introduction**

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### ***Roles and responsibilities***

1.7 The LWB is the policy bureau which formulates policies and programmes on provision of barrier-free facilities to PWDs, and oversees and co-ordinates their implementation by B/Ds. B/Ds are required to ensure accessibility to services and facilities for PWDs at premises under their management in accordance with government policies. The ArchSD is the works agent for implementing barrier-free access improvement works initiated by the managing departments of the government premises/facilities to upgrade or provide barrier-free facilities at existing government premises under its maintenance in accordance with the approved funding applications submitted by the managing departments. Details of their roles and responsibilities are set out in paragraphs 1.8 to 1.10.

### ***Labour and Welfare Bureau***

1.8 The Rehabilitation Division of the LWB (Note 3) is headed by the Commissioner for Rehabilitation (C for R) whose responsibilities include, among others:

- (a) formulating and reviewing the overall development strategy for rehabilitation policies and programmes;
- (b) overseeing and co-ordinating as required cross-bureau issues pertaining to the rights and well-being of PWDs;
- (c) overseeing and enhancing the co-ordination among government B/Ds, public bodies and non-governmental organisations on the implementation of the Convention including monitoring the delivery of rehabilitation services by B/Ds;
- (d) providing policy input in formulating and reviewing policies and programmes on barrier-free environment and overseeing and co-ordinating for their effective implementation by B/Ds;

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**Note 3:** *As of June 2018, the Rehabilitation Division is staffed by 2 directorate officers, 8 non-directorate officers and 14 secretarial/clerical staff.*

- (e) reviewing and monitoring the application of the DDO and Regulation 72 of the B(P)R (see para. 2.25) under the BO;
- (f) providing advice and support for the review of DM 2008 being conducted by the BD; and
- (g) preparing submission to the Legislative Council (LegCo) on rehabilitation policy matters and take necessary follow-up actions.

### *Government bureaux and departments*

1.9 B/Ds are required to ensure that policies and measures under their respective purview comply with the requirements of the Convention and overall government policy objectives in providing a barrier-free environment for PWDs. Their responsibilities include:

- (a) developing procedures and guidelines on barrier-free access to services and facilities;
- (b) ensuring provision of suitable barrier-free facilities within government premises;
- (c) designating an Access Co-ordinator (AC) to co-ordinate accessibility issues within the B/D and serve as the departmental focal point of a government network to facilitate government-wide collaborated efforts in enhancing the accessibility of government premises and facilities, and appointing an Access Officer (AO) for each venue under their management to handle accessibility issues;
- (d) offering assistance to PWDs in access to B/Ds' premises and using the services and facilities therein;
- (e) monitoring the implementation of retrofitting programmes in improving the accessibility of B/Ds' venues; and
- (f) co-ordinating communication with stakeholders to identify improvement areas in premises managed by B/Ds.

## **Introduction**

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### ***Architectural Services Department***

1.10 The ArchSD is responsible for the design and construction of government buildings. It needs to ensure that all newly constructed buildings or major alterations and additions to existing buildings meet the B(P)R under the BO and the DM. The ArchSD is the works agent for implementing barrier-free access improvement works initiated by the managing departments of the government premises/facilities to upgrade or provide barrier-free facilities at existing government premises under its maintenance in accordance with the approved funding applications submitted by the managing departments.

### ***Formal Investigation Report on Accessibility in Publicly Accessible Premises by Equal Opportunities Commission***

1.11 In December 2006, the Equal Opportunities Commission (EOC — Note 4) commenced a formal investigation to examine the progress made on the realisation of a barrier-free environment for PWDs, in particular on accessibility to publicly accessible premises. For the purpose of the investigation, the EOC conducted access audits on 60 publicly accessible premises owned, managed or maintained by the Hong Kong Housing Society, the then Link Management Limited (Note 5), the HA and 8 government departments, namely the Civil Engineering and Development Department (CEDD), the Department of Health, the Food and Environmental Hygiene Department (FEHD), the Government Property Agency (GPA), the Home Affairs Department, the Hongkong Post, the Leisure and Cultural Services Department (LCSD) and the Transport Department (TD). In June 2010, the EOC issued a formal investigation report (EOC Report).

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**Note 4:** *The EOC is a statutory body established in 1996. It is responsible for overseeing the implementation of the Sex Discrimination Ordinance (Cap. 480), the DDO, the Family Status Discrimination Ordinance (Cap. 527) and the Race Discrimination Ordinance (Cap. 602) in Hong Kong.*

**Note 5:** *It was renamed as the Link Asset Management Limited in August 2015.*

1.12 The EOC Report had made a number of recommendations on the improvement of accessibility, connectivity and interface with surrounding environment and user-friendly management practices for publicly accessible premises. In June 2010, the LWB convened a Task Force comprising representatives of stakeholders within the Government (Note 6) to co-ordinate follow-up actions on the recommendations of the EOC.

1.13 In response to the EOC's recommendations, the Task Force agreed to co-ordinate to work out a rolling action plan on upgrading barrier-free facilities in existing government premises/facilities.

1.14 To draw up the Retrofitting Programme, in June and July 2010, the LWB requested members of the Task Force to conduct a preliminary assessment on individual premises/facilities under their management for compliance with the requirements stipulated in DM 2008 on the basis of a checklist prepared by the ArchSD (see para. 2.6), and provide departmental returns on premises/facilities that would be retrofitted having regard to such relevant factors including patronage, extent of accessibility, plan for major renovations and operational circumstances. The members were also required to provide a list of premises/facilities where retrofitting would not be carried out or of low priority with full justifications.

1.15 In December 2010, the LWB informed LegCo that relevant departments had made assessments on premises and facilities under their management which had a frequent public interface on the basis of DM 2008. Having regard to operational requirements, technical feasibility and time required for the retrofitting works, the LWB had worked out a consolidated Retrofitting Programme for these premises and facilities. The details of the Retrofitting Programme are shown in Table 1.

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**Note 6:** *The Convenor of the Task Force is the Deputy Secretary for Labour and Welfare (Welfare). Members are representatives from the 8 departments covered in the EOC Report (see para. 1.11), 10 other B/Ds (the ArchSD, the BD, the Chief Secretary for Administration's Office, the Hong Kong Police Force, the Housing Department, the Highways Department, the Immigration Department, the Judiciary, the Labour Department and the Social Welfare Department) and the C for R. The Task Force held three meetings on 23 June 2010, 23 July 2010 and 10 September 2010.*



## Introduction

**Table 1**  
**Number of government premises/facilities to be retrofitted**  
**(December 2010)**

Managing department	Number of premises/facilities involved			
	Works to be completed by		Works not recommended (Note 2)	Total (d) = (a) + (b) + (c)
	30.6.2012 (a)	30.6.2014 (b)		
1. LCSD	1,185	15	147	1,347
2. TD (Note 1)	806	193	11	1,010
3. FEHD	652	68	15	735
4. Social Welfare Department	165	—	—	165
5. GPA	106	—	2	108
6. Home Affairs Department	93	1	—	94
7. Hongkong Post	79	46	—	125
8. Labour Department	77	—	6	83
9. Hong Kong Police Force	64	—	2	66
10. Department of Health	49	58	2	109
11. Immigration Department	25	—	1	26
12. Judiciary	4	5	3	12
13. CEDD	1	—	—	1
14. Chief Secretary for Administration's Office	—	—	4	4
Total	3,306	386	193	3,885

3,692

Source: LWB's paper to LegCo

Note 1: According to the LegCo paper of December 2010, the TD (the managing department), together with the Highways Department and the CEDD (the works agents), would schedule their programmes of providing barrier-free facilities, e.g. tactile guide paths, dropped kerbs, tactile warning strips for Public Transport Interchanges/Public Light Bus termini, footbridges/subways and roads to enhance accessibility of PWDs. The installation of lift and ramp in footbridges/subways would continue to be handled in a separate retrofitting programme carried out by the Highways Department.

Note 2: According to the LegCo paper of December 2010, these government premises/facilities would not be retrofitted because of imminent plan of decommissioning or disposal (e.g. West Wing, Central Government Offices and Murray Building), insurmountable technical constraints (e.g. the Mount Davis Service Reservoir Sitting-out Area located on a slope with a steep and restricted access road), and buildings with structural constraints for the provision of manoeuvring space in corridors for wheelchairs, etc.

1.16 As shown in Table 1, apart from the TD which is responsible for managing barrier-free facilities at Public Transport Interchanges/Public Light Bus termini, footbridges/subways and roads, the LCSD and the FEHD are the two major managing departments in the Retrofitting Programme.

1.17 At the meeting of LegCo Panel on Welfare Services in December 2010, the Government undertook to provide, starting from April 2011, a quarterly progress report of the Retrofitting Programme for upgrading the barrier-free facilities in existing government and HA (Note 7) premises and facilities to LegCo (Note 8).

1.18 According to the progress report for the position as at June 2014, the LWB reported that all the improvement works under the Retrofitting Programme had been completed (covering 3,435 premises/facilities). As the improvement works had been completed and the enhancement works were the ongoing work of the relevant departments, the LWB did not propose to submit further progress report.

### Audit review

1.19 In 2016, the Audit Commission (Audit) completed a review of “Retrofitting of barrier-free access facilities for grade-separated walkways”, the results of which were included in Chapter 3 of the Director of Audit’s Report No. 66 of April 2016. The audit review focused on the retrofitting of barrier-free access facilities for

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**Note 7:** *The Housing Department, as the executive arm of the HA, provides secretarial and executive support for the HA and its six standing committees. The Housing Department had devised a retrofitting programme to improve the accessibility of the properties (including public rental housing estates, commercial centres and carparks) under its management. Such retrofitting works were not included in Table 1 and their works progress was separately reported in the progress reports to LegCo.*

**Note 8:** *At the meeting in January 2011, the Panel on Welfare Services of LegCo agreed to appoint a subcommittee to monitor, among others, the Government’s follow-up actions on the recommendations in the EOC Report. The Subcommittee on Improving Barrier Free Access and Facilities for Persons with Disabilities commenced work in June 2011. The progress reports were submitted to the Subcommittee until it was dissolved in May 2012 after submission of its report to the Panel. The progress reports for the position from June 2012 onwards were submitted to the Panel.*

## Introduction

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grade-separated walkways (managed by the TD and retrofitting works carried out by the Highways Department (HyD) and the CEDD).

1.20 In April 2018, Audit commenced a review to examine the barrier-free facilities at government premises (Note 9). Apart from examining the efforts of the LWB (being the policy bureau) on the matter, Audit selected the FEHD and the LCSD (being the two major departments with barrier-free facilities retrofitted — see para. 1.16) to examine their provision and management of barrier-free facilities (Note 10) with a view to identifying any areas for improvement and lessons to be learned. The review focuses on the following areas:

- (a) work of LWB over barrier-free facilities at government premises and BD in updating Design Manual (PART 2);
- (b) work of FEHD and LCSD in providing and managing barrier-free facilities under their management (PART 3); and
- (c) management of retrofitting works for barrier-free facilities at government premises (PART 4).

Audit has found room for improvements and lessons to be learned in the above areas, and has made a number of recommendations to address the issues.

## Acknowledgement

1.21 Audit would like to acknowledge with gratitude the full cooperation of the staff of the LWB, the FEHD, the LCSD, the ArchSD and the BD during the course of the audit review.

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**Note 9:** *The audit review does not cover barrier-free facilities in premises managed by the Housing Department (e.g. public rental housing estates or commercial centres) and premises managed by the Hospital Authority (hospitals and clinics).*

**Note 10:** *While the TD is also a major department with barrier-free facilities retrofitted (see item 2 of Table 1 in para. 1.15), the 2016 audit review on “Retrofitting of barrier-free access facilities for grade-separated walkways” had already covered retrofitting works of ramps, lifts and alternative at-grade crossings in footbridges, elevated walkways and subways.*

## **PART 2: WORK OF LWB OVER BARRIER-FREE FACILITIES AT GOVERNMENT PREMISES AND BD IN UPDATING DESIGN MANUAL**

2.1 This PART examines the LWB's work in overseeing and co-ordinating the implementation of policy on barrier-free facilities at government premises by B/Ds (paras. 2.2 to 2.23) and the BD's work in updating the DM (paras. 2.24 to 2.29).

### **LWB's work in overseeing and co-ordinating the implementation of policy on barrier-free facilities at government premises by B/Ds**

2.2 *Role and responsibilities of the LWB.* The Rehabilitation Division is responsible for policy matter on provision of a barrier-free environment for PWDs, thereby facilitating them to live independently and fully integrate into the community. It is headed by the C for R, whose responsibilities as mentioned in paragraph 1.8 include:

- (a) providing policy input in formulating and reviewing policies and programmes on barrier-free environment and overseeing and co-ordinating for their effective implementation by B/Ds; and
- (b) preparing submission to LegCo on rehabilitation policy matters and taking necessary follow-up actions.

2.3 According to the LWB, since upgrading of his post (Note 11) in September 2014, the C for R has maintained close collaborations with the

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**Note 11:** *The C for R post was created at Administrative Officer Staff Grade C (D2) rank in 1977 and was re-graded to Senior Principal Executive Officer (D2) rank in 2001, having regard to the then executive, resource management and co-ordination duties of the post. Owing to the significant development in rehabilitation policies and services for PWDs since the review of the C for R post in 2001, the post was upgraded to Administrative Officer Staff Grade B (D3) rank with the approval of the Finance Committee of LegCo in July 2014.*

## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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Rehabilitation Advisory Committee (Note 12) and listened to its views on issues including provision of barrier-free environment for PWDs. The C for R has also enhanced co-ordination among relevant B/Ds on cross-bureau policies and measures to ensure that government policies on barrier-free environment can suitably cater for needs of PWDs and help them fully integrate into the community.

2.4 Audit examined the LWB's work in overseeing and co-ordinating the implementation of policy on barrier-free facilities at government premises by B/Ds and noted room for improvement in a number of areas (see paras. 2.5 to 2.21).

### ***Retrofitting Programme may not cover all government premises with frequent public interface***

2.5 To co-ordinate the Government's response and follow-up actions on the recommendations of the EOC, the LWB convened a Task Force in June 2010 comprising representatives from B/Ds (the 8 departments covered in the EOC Report and 10 other B/Ds — see Note 6 to para. 1.12). It was agreed at the Task Force meeting on 23 June 2010 that departments would conduct a preliminary assessment on individual premises/facilities under their management for compliance with the requirements stipulated in DM 2008 and worked out a rolling action plan on upgrading barrier-free facilities in existing government premises/facilities.

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**Note 12:** *The Rehabilitation Advisory Committee is set up to serve as the principal advisory body to the Government on the development and implementation of rehabilitation services and matters pertaining to the well-being of PWDs in Hong Kong. The Committee comprises members from different sectors including the business sector, rehabilitation sector and education sector.*

## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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2.6 On 30 June 2010, the LWB (with its representative serving as the Secretary of the Task Force) issued an email to ten B/Ds (which were Task Force members — Note 13 ) requesting them to conduct preliminary assessments on individual premises/facilities under their management using a checklist prepared by the ArchSD (Note 14) and provide their returns by 16 July 2010.

2.7 On 5 July 2010, the LWB informed the Task Force members that the Chief Executive's Office advised on 4 July 2010 that any shortcomings with government premises should be rectified within a target timeframe before 30 June 2012. At the second Task Force meeting held on 23 July 2010, it was agreed to take forward the upgrading of barrier-free facilities as follows:

- (a) ten B/Ds (see para. 2.6) would review whether refinements of their returns were required and provide revised returns to the LWB by 6 August 2010 on:

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**Note 13:** *The LWB had issued an email to the 13 Task Force members and the HA. According to the LWB, those Task Force members who were responsible for management of premises/facilities were requested to conduct assessments, as follows:*

- (a) *ten departments (the Chief Secretary for Administration's Office, the CEDD, the FEHD, the Department of Health, the GPA, the Home Affairs Department, the HyD, the Hongkong Post, the LCSD and the TD) were requested to conduct assessments; and*
- (b) *for the remaining three departments: (i) the BD was invited to join the Task Force because it was responsible for the DM; (ii) the ArchSD was the works agent for the Retrofitting Programme for government premises. The ArchSD itself did not manage premises which had frequent public interface; and (iii) the Housing Department had its own retrofitting programme (see Note 7 to para. 1.17). The Housing Department was the executive arm of the HA, and hence the email was also issued to the HA.*

**Note 14:** *In the checklist, B/Ds were required to assess whether retrofitting works would be required at individual premises/facilities for providing the following barrier-free facilities: (1) accessible site entry point/entrance; (2) accessible lift; (3) accessible toilet; (4) accessible parking space; (5) accessible service counter; (6) visual fire alarm; (7) adequate accessible sign; (8) tactile guide path; (9) braille and tactile layout plan; (10) assistive listening system; (11) accessible common area; (12) accessible seating space; (13) accessible aisle; (14) visual display board; and (15) accessible pool.*

## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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- (i) premises/facilities that would and would not be retrofitted by 30 June 2012; and
  - (ii) premises/facilities where retrofitting would not be carried out or of low priority; and
- (b) the Task Force would invite 5 more departments (Note 15), which had not been covered in the EOC Report (see Note 6 to para. 1.12) but managed premises/facilities with frequent public interface, to join the Task Force. They would be requested to conduct assessments on their premises/facilities for compliance with the requirements stipulated in DM 2008 and provide departmental returns by 6 August 2010.

2.8 In December 2010, the LWB informed LegCo that, after relevant departments had made assessments on premises and facilities under their management with frequent public interface, a Retrofitting Programme involving 13 departments (Note 16) was formulated as follows:

- (a) 3,306 government premises/facilities would be retrofitted by 30 June 2012; and
- (b) 386 government premises/facilities would be retrofitted by 30 June 2014 having regard to such factors as patronage, extent of improvement works involved, plan for major renovations, operational requirements and technical constraints, etc.

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**Note 15:** *The five departments were the Hong Kong Police Force, the Immigration Department, the Judiciary, the Labour Department and the Social Welfare Department.*

**Note 16:** *Of the 15 B/Ds that were requested to assess their premises/facilities, the Chief Secretary for Administration's Office and the HyD were not included in the Retrofitting Programme. According to the LWB: (a) the Chief Secretary for Administration's Office had reported that, after conducting the assessment, barrier-free facilities retrofitting works were not required; and (b) the HyD conducted a separate retrofitting programme for the provision of barrier-free access (lift or ramp) at public footbridges, subways or elevated walkway structures.*

## Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual

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2.9 Audit noted that:

- (a) the LWB had invited 15 B/Ds (10 + 5 B/Ds — see para. 2.7 (a) and (b)) to conduct assessments on the need to upgrade barrier-free facilities of premises and facilities under their management. In the event, 3,692 (3,306 + 386) premises/facilities managed by 13 departments were included in the Retrofitting Programme (see Table 1 in para. 1.15). The 13 departments were all Task Force members, of which 8 were covered in the EOC Report (see para. 1.11) and 5 were not covered in the Report (see para. 2.7(b)); and
- (b) when compiling 14 quarterly progress reports (Note 17) to LegCo on the Retrofitting Programme during February 2011 to June 2014, the LWB issued emails to all B/Ds inviting them for “input or update on the paper and annexes to the progress reports” (Note 18). However, the emails did not request these B/Ds to make assessments on the need to upgrade their barrier-free facilities. In the event, the number of departments (i.e. 13) included in the Retrofitting Programme had remained unchanged throughout the reporting period.

2.10 In response to Audit’s enquiry as to the reasons for only inviting 15 B/Ds to conduct assessments on the need to upgrade barrier-free facilities of premises and facilities under their management and whether the purpose of the emails as mentioned in paragraph 2.9(b) served as requesting all B/Ds to make such assessments, the LWB informed Audit in August and October 2018 that:

- (a) based on file records and the progress report to LegCo for the position as of March 2011, the Task Force was set up to examine the Government and the HA premises identified in the EOC Report as well as the premises and

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**Note 17:** *In the progress reports, the LWB reported the progress of the Retrofitting Programme and follow-up actions on the EOC Report recommendations (e.g. staff training and appointment of ACs and AOs). In the Annex to the progress reports, a breakdown of the premises/facilities covered under the Retrofitting Programme and their works progress was provided.*

**Note 18:** *Except for the email for the first progress report which stated that client/managing departments were requested to, among others, verify information in the progress report and comment on the presentation of table in the progress report, the other 13 emails had invited B/Ds for “input or update on the paper and annexes to the progress reports”.*



## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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facilities under the management of B/Ds and the HA which had a frequent public interface in order to make prompt response and follow-up actions to the recommendations; and

- (b) based on available file records, it was not able to provide the reason why the emails did not request B/Ds to make assessment on the need to upgrade their barrier-free facilities. However, the tight and pledged timetable for completing the works under the Retrofitting Programme from mid-2012 onwards might be a consideration at that time.

2.11 According to the LWB, the Task Force would, apart from the 8 departments identified by the EOC Report, examine the premises under the management of those B/Ds with frequent public interface (see para. 2.10 (a)). Audit noted that, among the 15 B/Ds requested to make assessments, 8 were covered by the EOC Report and 7 were not covered by the Report. There was no documentary evidence showing why only these 7 B/Ds were requested to make assessments but not other B/Ds which were not covered by the EOC Report. In the event, the Retrofitting Programme had covered premises/facilities managed by 13 B/Ds which identified the need to do so. As a result, there might be B/Ds with premises under their management having frequent public interface not requested to make assessment and were not included in the Retrofitting Programme (Note 19). Audit considers that the LWB needs to take measures to ensure that all relevant B/Ds are consulted as far as practicable in co-ordinating issues on provision of barrier-free environment in government premises and facilities in future.

### ***Longer time than originally planned in collecting feedback from B/Ds on reviews of their accessibility issues***

2.12 One of the recommendations of the EOC Report was that each government department and public body should appoint an “Access Advisor” to provide assistance

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**Note 19:** *They may include: (a) those B/Ds located at joint-user buildings managed by the GPA. According to the GPA, insofar as the management of the common areas/parts of a joint-user building is concerned, it is only responsible for arranging the provision of property management and maintenance services to the common areas/parts, including the barrier-free facilities thereat; and (b) the Agriculture, Fisheries and Conservation Department which manages some venues with frequent public interface such as the Lions Nature Education Centre and the Hong Kong Wetland Park.*

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to PWDs in accessing premises under its ownership and management as well as services and facilities that it provides. In response to this recommendation, in December 2010, the LWB issued a memorandum informing all B/Ds to introduce an Access Co-ordinator and Access Officer Scheme to enhance the accessibility of government premises/facilities and services. The AC, who should be a directorate officer, is tasked to serve as the focal point of the B/D regarding the accessibility issues and co-ordinate and handle accessibility issues and appointment of AOs in respective B/D.

2.13 On 21 September 2016, the LWB issued a memorandum to ACs of all B/Ds advising them to review their respective operational practices and procedures to ensure accessibility to services and facilities for users who are PWDs (hereinafter referred to as LWB Memorandum of September 2016), by taking due consideration of, but not limited to, the following aspects:

- (a) awareness of needs of PWDs;
- (b) adequacy of ACs and AOs;
- (c) communication with AOs and venue-based staff;
- (d) training; and
- (e) review and feedback mechanism.

In the memorandum, the LWB requested ACs to complete the review before end of 2016 so that the first annual return could be sent to the LWB before end of 2017. On the same day, the LWB informed ACs of all B/Ds via an email that it would get in touch with them on the proforma of the annual return in early 2017 and the exact return date.

2.14 According to the LWB, two draft proforma were prepared in April and November 2017. The LWB had held a meeting and organised a seminar with B/Ds to seek their views on the draft proforma in February and March 2018. In April 2018, the LWB issued the finalised proforma to ACs to facilitate compiling the annual return for the period from 1 April 2018 to 31 March 2019 and requested them to return the completed proforma to the LWB on or before 15 April 2019. The proforma

## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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had 16 questions covering 6 aspects (i.e. the 5 aspects as mentioned in paragraph 2.13 and a new one on evacuation plan in case of fire — see Appendix B for some of the questions). According to the LWB, depending on the returns of individual B/Ds, it would suggest the B/Ds concerned to take appropriate follow-up actions to ensure accessibility to services and facilities for PWDs at premises/facilities under their management. In Audit's view, the LWB needs to, upon receipt of B/Ds' returns, remind those B/Ds with their returns showing deficiencies relating to accessibility to services and facilities for PWDs at premises/facilities under their management to take appropriate follow-up actions.

2.15 Audit noted that the LWB took 1.5 years (from September 2016 to April 2018) to prepare the proforma of the annual return and the date for return of the completed proforma was set for April 2019 (see paras. 2.13 and 2.14). Comparing with the planned return date of end 2017, the LWB had taken a longer time than it originally planned to collect feedback from B/Ds. In Audit's view, in collecting feedback from B/Ds on review of their accessibility issues in future, the LWB needs to make a better assessment of the difficulties involved in setting the time target for collecting their feedback and endeavour to meet the target.

### ***Scope for providing more comprehensive information to LegCo***

2.16 In December 2010, the LWB informed LegCo that 3,692 government premises/facilities (see Table 1 in para. 1.15) would be retrofitted under the Retrofitting Programme (Note 20). However, Audit noted from the progress reports to LegCo that, for the positions as reported for the period from March 2011 to June 2014 (covering some 3,400 to 3,600 premises/facilities in each progress report), a total of 103 premises/facilities were taken out from the Retrofitting Programme without providing reasons. Upon enquiry with the LWB, the managing department (in this case, the TD) and the works agent (in this case, the ArchSD) for carrying out the Retrofitting Programme:

- (a) for 53 premises/facilities, the ArchSD (being the works agent) informed Audit in July 2018 that:

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**Note 20:** *According to the LWB, apart from 27 premises/facilities taken out from the Retrofitting Programme (see para. 2.16(c)), the particulars (e.g. names, locations and works progress) of the remaining 3,665 premises/facilities were included in the first progress report (for the position as at March 2011) to LegCo in April 2011.*

## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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- (i) works for 17 premises/facilities had been completed; and
  - (ii) works for 36 premises/facilities had been cancelled due to various reasons (e.g. the venues were affected by Mass Transit Railway development, under decommissioning for redevelopment or had been closed);
- (b) for 23 premises/facilities, the TD (being the managing department) informed Audit in October 2018 that:
- (i) barrier-free facilities for 13 premises/facilities had been reviewed and considered not necessary due to various reasons (e.g. the facilities were at grade with connection footpaths at both ends or the facilities were for cyclists only);
  - (ii) works for 4 premises/facilities had been completed;
  - (iii) works for 3 premises/facilities had been cancelled due to various reasons (e.g. the concerned facility had been closed/demolished);
  - (iv) works for 2 premises were in progress; and
  - (v) works for 1 premises would be upgraded in the remaining phase of a works project; and
- (c) for 27 premises/facilities, the LWB informed Audit in September and October 2018 that according to the records in relevant departments:
- (i) works for 16 premises/facilities had been cancelled due to various reasons (e.g. the venue did not provide service to the public or had been closed); and
  - (ii) works for 11 premises/facilities had been completed.

2.17 In addition, the LWB stated in the progress reports to LegCo that 90 premises/facilities had been grouped under other improvement programmes (e.g. the Public Toilet Refurbishment Programme of the FEHD and the refurbishment

## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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programme of the ArchSD) and their upgrading of the barrier-free facilities would be carried out as part of the relevant renovation works. Audit noted that the works progress of 90 premises/facilities transferred to other programmes was not reported to LegCo (Note 21). According to the LWB, the reason for not reporting was that the works progress of these transferred premises/facilities would depend on the overall progress of the barrier-free facilities and other facilities under these programmes.

2.18 The LWB informed Audit in October 2018 that the Retrofitting Programme covered some 3,500 venues/facilities involving 13 departments. In compiling the large number of returns from departments for submission to LegCo in the form of regular progress reports, the LWB had endeavoured to provide in each progress report the full information as provided by the B/Ds concerned, including the number of premises/facilities under the Retrofitting Programme and their particulars (including their names, locations, works progress, etc.).

2.19 In Audit's view, in co-ordinating returns from a large number of B/Ds for submission to LegCo in future, the LWB needs to remind B/Ds to ensure the completeness of information in their returns in order to provide more comprehensive information to LegCo.

### ***Need to remind B/Ds to maintain complete and up-to-date lists of barrier-free facilities and to publicise such lists***

2.20 According to the LWB, under the established practice, it is the responsibility of B/Ds to maintain up-to-date lists of barrier-free facilities under their management. According to a memorandum issued by the LWB in December 2010, AOs are required to make available information to PWDs about the accessibility of the venues (e.g. on website and/or displaying suitable notices in the venues).

2.21 Audit's examination of the two selected departments (the FEHD and the LCSD) revealed that they did not maintain complete and updated lists of barrier-free facilities (see para. 3.6) and had not provided adequate information about accessibility

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**Note 21:** *Of the 90 premises/facilities that were transferred to other programmes, details of only 32 premises/facilities (e.g. name and address) were provided in the progress reports.*

## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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of venues on their websites (see para. 3.27 (d) and (e)). Audit considers that the LWB needs to remind B/Ds to maintain complete and up-to-date lists of barrier-free facilities under their management for monitoring and planning purposes, and publicise such lists for public information.

### **Audit recommendations**

**2.22**      **Audit has *recommended* that the Secretary for Labour and Welfare should:**

- (a)      take measures to ensure that all relevant B/Ds are consulted as far as practicable in co-ordinating issues on provision of barrier-free environment in government premises and facilities in future;**
  
- (b)      with regard to the B/Ds' reviews of accessibility issues:**
  - (i)      upon receipt of their returns, remind those B/Ds with their returns showing deficiencies relating to accessibility to services and facilities for PWDs at premises/facilities under their management to take appropriate follow-up actions; and**
  
  - (ii)     in collecting their feedback in future, make a better assessment of the difficulties involved in setting the time target for collecting their feedback and endeavour to meet the target;**
  
- (c)      in co-ordinating returns from a large number of B/Ds for submission to LegCo in future, remind B/Ds to ensure the completeness of information in their returns in order to provide more comprehensive information to LegCo; and**
  
- (d)      remind B/Ds to maintain complete and up-to-date lists of barrier-free facilities under their management for monitoring and planning purposes, and publicise such lists for public information.**

## **Response from the Government**

2.23 The Secretary for Labour and Welfare agrees with the audit recommendations.

## **BD's work in updating the Design Manual**

2.24 In December 2008, the BD promulgated DM 2008 which set out the design requirements of barrier-free access and facilities for PWDs. Taking into account the experience gained in application, advancement in building design and technologies, as well as the changing aspiration of the society, in June 2014, the BD set up a Technical Committee on Design Manual (Note 22) with an aim to keep the DM under regular review. Its terms of reference are to:

- (a) collect views and consider any comments or feedback received from the building industry arising from the use of the DM, relevant advancement in design, technologies and construction methods, and the latest relevant overseas regulatory control and standards; and
- (b) advise and make recommendations to the Director of Buildings from time to time on the appropriate measures to be taken in response to item (a) above.

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**Note 22:** *The Technical Committee is chaired by an Assistant Director of Buildings with representatives from the LWB, the BD, the ArchSD and the Housing Department, the building professional bodies, the academia and the rehabilitation sector.*

**Work of LWB over barrier-free facilities  
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*Need to take actions to timely update the Design Manual*

2.25 According to the BD, the procedures for amending DM which would not involve legislative amendments to Regulation 72 of and the Third Schedule to the B(P)R (Note 23) are as follows:

- (a) once a consensus to amend certain parts of DM has been reached in the Technical Committee, a draft corrigendum would be prepared and circulated for Technical Committee Members' comments. After incorporating their comments, the draft corrigendum would be submitted to the Technical Committee for consideration and endorsement at its meetings;
- (b) after endorsement by the Technical Committee and if no legislative amendment to the B(P)R (Note 24) is required, the Secretary of the Technical Committee (a BD officer) would prepare and submit the recommendation with the draft corrigendum to the responsible Assistant Director of the BD for review before submitting to the Director of Buildings for consideration; and

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**Note 23:** *Regulation 72 of the B(P)R stipulates that, where a building is one to which PWDs have or may reasonably be expected to have access, that building shall be designed to the satisfaction of the Building Authority in such a manner as will facilitate the access to, and use of, that building and its facilities by PWDs. A building shall be deemed to be designed in accordance with the B(P)R if its design complies with the requirements set out in Part 2 of the Third Schedule of the B(P)R (the Schedule setting out the statutory requirements for barrier-free access in private buildings).*

**Note 24:** *If the endorsed proposal requires legislative amendments to the B(P)R, the BD would work together with the Department of Justice to prepare a draft "Drafting Instructions" for the Development Bureau's consideration. The Development Bureau would then issue a "Drafting Instructions" to the Law Drafting Division of the Department of Justice to prepare the amendment legislation which would be subject to negative vetting by LegCo.*



## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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- (c) upon endorsement by the Director of Buildings, the BD would circulate the draft revised Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) to its consultative committees (Note 25 ) for comments. Following the completion of the consultation exercise, the draft revised PNAP would be submitted to the Director of Buildings for formal approval. The approved revised PNAP would be promulgated to Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers whereas this PNAP together with the relevant amended parts of the DM would be uploaded onto the BD's website.

2.26 Audit examination of the LWB and BD records revealed that between December 2015 and June 2018, the Technical Committee was handling proposals relating to 92 items for improving DM 2008 (Note 26). Regarding these 92 items, amendments for 10 items to the DM were considered not necessary by the Technical Committee and 11 items were being discussed by the Technical Committee. As of June 2018, regarding the remaining 71 items:

- (a) amendments for 26 items had been made in the DM (e.g. power operated doors for accessible toilets and the number of accessible car parking spaces). While all the 26 items did not require legislative amendments, for 19 items, it had taken more than six months (counting from the endorsement of the draft corrigendum by the Technical Committee) to amend DM 2008 (see Table 2). Audit noted that the long time was due to delay in submitting the draft corrigendum to the responsible Assistant Director of the BD for review (ranging from 7 months to 14 months, averaging 10 months) after endorsement by the Technical Committee;

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**Note 25:** *The consultative committees are the Building Sub-Committee under the Land and Development Advisory Committee of the Development Bureau and the Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers Committee.*

**Note 26:** *The proposals were made by the Subcommittee on Access under the Rehabilitation Advisory Committee. The Subcommittee comprises members with different kinds of disabilities, members from different sectors including the business sector, rehabilitation sector and education sector, and representatives from relevant government departments. The responsibilities of the Subcommittee include advising on the special needs of PWDs, examining the existing areas of deficiency, and monitoring and reviewing efforts made in improvement in terms of building design, external environment, public transport facilities, and access to information technology and related media.*

**Work of LWB over barrier-free facilities  
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**Table 2**

**Time elapsed from the endorsement of draft corrigendum by  
the Technical Committee to amendment of DM 2008**

Time elapsed (Month)	Number of items with amendments made
≤ 3	1
> 3 to ≤ 6	6
> 6 to ≤ 9	11
> 9 to ≤ 12	4
> 12	4
Total	26

*Source: Audit analysis of BD records*

- (b) amendments for 17 items were considered necessary but had not been made in the DM (e.g. amendments for audible and visible alarm signal for emergency call bells and amendments for hold-open device for fire rated doors). Up to June 2018, for 13 of these 17 items, more than 3 months had elapsed after endorsement by the Technical Committee (see Table 3). Of these 13 items, none required legislative amendments. The relevant draft corrigendum had not been submitted to the responsible Assistant Director of the BD after they were endorsed by the Technical Committee (ranging from 6 to 16 months, averaging 11 months); and

**Work of LWB over barrier-free facilities  
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**Table 3**

**Time elapsed from the endorsement of draft corrigendum  
by the Technical Committee to June 2018  
(June 2018)**

<b>Time elapsed (Month)</b>	<b>Number of items with amendments not yet made</b>
≤ 3	4
> 3 to ≤ 6	4
> 6 to ≤ 9	—
> 9 to ≤ 12	3
> 12 to ≤ 15	4
> 15	2
Total	17

*Source: Audit analysis of BD records*

- (c) 28 items (e.g. enhanced provision of tactile guide path from entrance to elevator and service counter) had not yet been discussed by the Technical Committee. Audit noted that the proposed amendments for these 28 items had been submitted over 2.5 years ago at the Technical Committee meeting held in December 2015. The BD informed Audit in September and October 2018 that according to Technical Committee meetings:
- (i) as a general practice, around 5 new items would be introduced in each meeting but the time required to discuss and reach a decision was much dependent on the complexity, necessary consultation and alignment of views on each item;
  - (ii) those items with legislative amendments required would be discussed after the completion of review on imperative items and prioritised items agreed among members in the Technical Committee meetings; and
  - (iii) the 28 items would be timely introduced and discussed in coming Technical Committee meetings held in around 2 to 3 months intervals accordingly.

## **Work of LWB over barrier-free facilities at government premises and BD in updating Design Manual**

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2.27 In Audit's view, the BD needs to take actions to timely update the DM and closely monitor the progress with a view to enhancing the provision of barrier-free facilities (e.g. setting a time target for submitting the draft corrigendum to the responsible Assistant Director of the BD). The BD also needs to take follow-up actions as soon as practicable on the 28 items (involving proposals for improving DM) that had not been discussed by the Technical Committee as of June 2018.

### **Audit recommendations**

2.28 **Audit has *recommended* that the Director of Buildings should:**

- (a) **take actions to timely update the DM and closely monitor the progress with a view to enhancing the provision of barrier-free facilities; and**
- (b) **take follow-up actions as soon as practicable on the 28 items (involving proposals for improving DM) that had not been discussed by the Technical Committee on Design Manual.**

### **Response from the Government**

2.29 The Director of Buildings agrees with the audit recommendations. He has said that:

- (a) the BD will review and closely monitor the updating of the DM; and
- (b) the latest Technical Committee meeting held in July 2018 has already started the discussion on 3 out of the 28 items and the remaining items will be timely introduced and discussed in the coming scheduled Technical Committee meetings.

### **PART 3: WORK OF FEHD AND LCSD IN PROVIDING AND MANAGING BARRIER-FREE FACILITIES UNDER THEIR MANAGEMENT**

3.1 According to LWB Circular No. 1/2011, it is the responsibility of B/Ds to ensure that policies and measures under their respective purview comply with the requirements of the Convention and overall government policy objectives in providing a barrier-free environment for PWDs. As mentioned in paragraph 1.16, the LCSD and the FEHD were two major departments in the Retrofitting Programme with barrier-free facilities in 1,347 and 735 premises/facilities under their management respectively. Audit selected the two departments to examine their work in providing and managing barrier-free facilities at premises/facilities managed by them with a view to identifying areas for improvement and lessons to be learned. This PART examines the work of the FEHD and the LCSD in this regard.

3.2 ***Roles and responsibilities.*** The roles and responsibilities of the LCSD and the FEHD are as follows:

- (a) ***LCSD.*** The LCSD is responsible for providing leisure and cultural facilities and services to the public including recreation and sports activities, and cultural and entertainment programmes. The LCSD delivers its services through the Leisure Services (LS) Branch (Note 27), Cultural Services (CS) Branch (Note 28), Administration Division, and Finance and Supplies Division. The venues under its purview include recreation and sports venues (e.g. beaches, sports centres, swimming pools, parks and playgrounds), performance venues, museums and libraries. As of 30 June 2018, the number of venues under its purview was 1,949 (see Appendix C for details); and
  
- (b) ***FEHD.*** The FEHD is responsible for environmental hygiene services and facilities as well as food safety control, import control on live food animals,

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**Note 27:** *The LS Branch is responsible for management of leisure facilities including swimming pools, beaches, sports centres, sports grounds, parks and playgrounds.*

**Note 28:** *The CS Branch is responsible for the management of cultural facilities including performance venues, museums and libraries.*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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and management of food incidents. The FEHD delivers its services through the Centre for Food Safety (CFS), the Environmental Hygiene Branch (EHB — Note 29), the Administration and Development Branch and the Private Columbaria Affairs Office (PCAO — Note 30). The venues under the purview of the FEHD include public markets, public toilets, public bathhouses, refuse collection points, cemeteries and crematoria, and animal/livestock/poultry monitoring inspection stations. As of 30 June 2018, the number of venues under its purview was 1,741 (see Appendix D for details).

### ***Access Co-ordinator and Access Officer Scheme***

3.3 The Government has launched an Access Co-ordinator and Access Officer Scheme to enhance the accessibility of government premises, facilities and services (see para. 2.12). According to the memorandum issued by the LWB to all B/Ds in December 2010, individual B/Ds should appoint:

- (a) ***Access Co-ordinator.*** A departmental AC should be appointed to co-ordinate accessibility issues within the B/D and serve as the departmental focal point of a government network to facilitate government-wide collaborated efforts in enhancing the accessibility of government premises and facilities. Individual B/Ds may consider appointing deputy, regional and/or district ACs where necessary to assist the departmental AC in the discharging of his/her duties. The duties of an AC include:
  - (i) co-ordinating and handling accessibility issues and appointment of AOs in respective B/D;
  - (ii) co-ordinating the provision of suitable training and guidance to AOs and venue staff to enhance their awareness on accessibility issues;

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**Note 29:** *The EHB is responsible for overseeing the planning and management of a wide range of venues which are open to the public including wet markets, cooked food markets, hawker bazaars, public toilets, public bathhouses, aqua privies, refuse collection points, cemeteries and crematoria.*

**Note 30:** *The PCAO was set up on 30 June 2017 to handle matters relating to the implementation of the Private Columbaria Ordinance (Cap. 630) and provide executive support to the Private Columbaria Licensing Board.*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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- (iii) co-ordinating the development of policies and guidelines on barrier-free access to services and facilities; and
  - (iv) handling public enquiries/complaints on department-wide accessibility issues; and
- (b) **Access Officer.** An AO should be appointed for each venue under the B/Ds' management to serve as the first point of contact on accessibility issues at the venue. The duties of an AO include:
- (i) conducting regular audit checks and taking timely follow-up actions as required to ensure the provision of suitable barrier-free facilities without undue alterations or obstructions to the barrier-free access;
  - (ii) offering assistance to PWDs in access to the venue and using the services and facilities therein;
  - (iii) making recommendations to the AC on improvements of barrier-free access and assistance rendered to PWDs at the venue;
  - (iv) making available information to PWDs about the accessibility of the venue, e.g. on website and/or displaying suitable notices in the venue;
  - (v) reviewing operational practice and procedure periodically for emergency evacuation of PWDs from the venue under his/her management;
  - (vi) handling public enquiries and complaints regarding accessibility issues for the venue; and
  - (vii) providing suitable guidance to venue staff and raise their awareness on accessibility issues.

3.4 As of 30 June 2018, the FEHD and the LCSD had appointed a Principal Executive Officer and an Assistant Director as their departmental ACs respectively. The two departments had also appointed 101 and 347 AOs respectively.

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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### ***Audit site visits***

3.5 Apart from examining records of the FEHD and the LCSD, Audit also conducted site visits (during May to September 2018) to 20 FEHD and 30 LCSD venues (Note 31) to examine the provision, maintenance and control of barrier-free facilities under their management with a view to identifying room for improvement and lessons to be learned. Audit visited various types of venues across the territory (Note 32) managed by these two departments, including FEHD's public toilets and markets as well as the LCSD's parks and playgrounds, sports centres and libraries (see Appendix E) and found areas for improvement.

### **Maintaining a complete and updated list of barrier-free facilities**

3.6 According to the LWB, under the established practice, it is the responsibility of B/Ds to maintain up-to-date lists of barrier-free facilities under their management (see para. 2.20). In response to Audit's enquiries, the FEHD and the LCSD informed Audit between June and October 2018 that:

- (a) **FEHD.** The Administration and Development Branch, the CFS and the PCAO (Note 33) had maintained lists of barrier-free facilities and the EHB had maintained a list of accessible toilets (such list was published on the FEHD's website); and
- (b) **LCSD.** The Administration Division and Finance and Supplies Division had not maintained a list of barrier-free facilities. The CS Branch and the LS Branch provided Audit with lists of barrier-free facilities in venues

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**Note 31:** *Factors considered by Audit in selecting the venues for visits included patronage, locations, and type and number of facilities.*

**Note 32:** *The districts covered in Audit site visits were Eastern, Southern, Wan Chai, Yau Tsim Mong, Kwun Tong, Wong Tai Sin, North, Sha Tin, Tai Po, Tsuen Wan and Yuen Long.*

**Note 33:** *According to the FEHD, the PCAO had maintained a list of barrier-free facilities for its new office accommodation upon commissioning in September 2018. Prior to this, it was accommodated in temporary on-loan office accommodation for which no such list had been maintained.*



## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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under their purview (Note 34). Audit found that such lists did not include all the venues with barrier-free facilities under the LCSD's management. For the CS Branch, all music centres (a total of five) were not included. For the LS Branch, all District Leisure Services Offices (a total of 18) and 907 recreation and sports venues (Note 35) (out of a total of 1,818) were not included.

3.7 In Audit's view, the FEHD and the LCSD need to maintain a complete and updated list of barrier-free facilities at venues under their management for monitoring and planning purposes.

### **Audit recommendation**

3.8 **Audit has recommended that the Director of Food and Environmental Hygiene and the Director of Leisure and Cultural Services should maintain a complete and updated list of barrier-free facilities at venues managed by the FEHD and the LCSD for monitoring and planning purposes.**

### **Response from the Government**

3.9 The Director of Food and Environmental Hygiene agrees with the audit recommendation. She has said that the FEHD will compile a list of venues with barrier-free facilities under the FEHD's management after reviewing the access audit checklists and conducting the next round of access audits, and ensure that the list is updated on an annual basis.

3.10 The Director of Leisure and Cultural Services agrees with the audit recommendation. She has said that the LCSD will take steps to update lists of barrier-free facilities to include those venues without such lists prepared.

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**Note 34:** *According to the LCSD, the Hong Kong Museum of Art is under renovation and the list of barrier-free facilities will be drawn up when the venue is re-opened.*

**Note 35:** *These venues were 6 major parks, 894 parks and playgrounds, 2 other indoor sports facilities and 5 other venues (e.g. nursery).*

## **Access audits**

3.11 *Access audit requirements.* According to the LWB memorandum issued in December 2010, one of the duties of an AO is to conduct regular audit checks and take timely follow-up actions to ensure the provision of suitable barrier-free facilities without undue alterations or obstructions to the barrier-free access (see para. 3.3(b)(i)). According to the LWB, access audit is conducted to ensure adequate provision of barrier-free facilities/services, proper maintenance of the facilities and addition of such facilities.

3.12 The departmental circulars issued by the FEHD and the LCSD on 31 March 2011 stated that their AOs should conduct regular audit checks and take timely follow-up actions as required to ensure the provision of suitable barrier-free facilities. Access audit checklists were provided for their staff when the FEHD issued its Operating Manual for AOs and their assistants in April 2017 (Note 36) and the LCSD promulgated an Administrative Circular on providing a Barrier-free Environment for PWDs in January 2017 (Note 37).

### ***Areas for improvement in conducting access audits***

3.13 Audit has found areas for improvement in access audits conducted by the LCSD (see para. 3.14) and by the FEHD (see para. 3.15).

3.14 *LCSD's access audits.* Audit noted that:

- (a) *Time interval for conducting access audits not specified.* According to the LCSD's Administrative Circular issued in January 2017, AO of each

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**Note 36:** *According to the FEHD, the Operating Manual (including audit checklist) was promulgated in April 2017 for its AOs' further action with effect from 3 April 2017. No access audit had been conducted for FEHD venues before the Manual came into effect (i.e. for the period from 1 April 2011 to 2 April 2017).*

**Note 37:** *According to the LCSD, before the promulgation of the Circular in January 2017, there was no standard checklist form for conducting regular access audits on barrier-free facilities. Checking of barrier-free facilities was conducted during daily/regular inspection of venue facilities by venue staff or other staff in discharging their duties. Any irregularities or damages of facilities would be reported to the works agents for rectification.*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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venue should conduct regular access audits and a checklist has been attached for this purpose. These records should be kept properly for monitoring and review purpose. However, the time interval for conducting the access audit was not specified in the Circular. In this connection, Audit noted that access audits were carried out at a period from 0.5 month to 17 months after promulgation of the Circular;

- (b) ***Access audits for some venues not carried out.*** Based on 406 access audit checklists for the audits completed as of June 2018, Audit found that the CS Branch conducted access audits for 101 (92%) out of 110 venues (Note 38) under its purview while the LS Branch carried out access audits for 810 (44%) out of 1,822 venues (Note 39) under its purview (Note 40);
- (c) ***Access audits not conducted by the designated AOs.*** Of the 406 audit checklists examined by Audit, 28 (7%) access audits were not conducted by their designated AOs of the venues, contrary to the LCSD's requirement (see item (a) above); and
- (d) ***Scope for improvement in compiling access audit checklist.*** Audit examination of completed access audit checklists provided by the CS Branch and the LS Branch revealed that:
  - (i) two districts each used an access audit checklist to cover all venues (e.g. parks and playgrounds, sports centres and sports ground) under their management despite the venues having different types of barrier-free facilities (see Appendix C);

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**Note 38:** *The 110 venues did not include 3 heritage premises. According to the LCSD, these premises were not and would not be installed with barrier-free facilities due to historical status. Access audits were not required to be conducted for these venues.*

**Note 39:** *According to the LCSD, the 1,822 venues did not include 14 venues for which there was no access for the general public (e.g. the whole venue was a planter), and therefore no access audit was required.*

**Note 40:** *According to the LCSD, as barrier-free facilities were among the items covered in regular inspections of venues, some venues had not used a separate checklist for checking of barrier-free facilities, and hence the access audit checklists were not available.*

**Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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- (ii) some DM 2008 requirements were not included in the access audit checklist for checking. They include, for example, the requirement that simple instructions in English, Chinese and braille on how to unfold the folding garb rail should be affixed to the wall of a toilet and, if a floor plan for the use of the public is provided, braille and tactile floor plan showing the main entrance, public toilet and major common facilities shall be provided in a conspicuous place to persons with visual impairment;
- (iii) findings in 13 LCSD's access audit checklists were at variance with those in Audit site visits (examples are shown in Table 4);

**Table 4**

**Examples of variances between findings in the LCSD's access audits and Audit site visits**

Venue	Particulars	LCSD's findings in access audit checklist (Date)	Audit site visits' findings (Date)
Sha Tin Town Hall	Handrails with braille and tactile information were provided at the staircases to auditorium and ramps to the entrance on podium floor and to the box office	Yes (13.2.2018)	Not found (27.6.2018 and 31.7.2018)
Hong Kong Heritage Discovery Centre	Tactile warning strips were provided at the entrances of the bubble lift	Yes (29.3.2018)	Not found (30.7.2018)
Shui Pin Tsuen Playground	An emergency call bell notice in braille was provided in the accessible toilet	Yes (30.7.2018)	Not found (23.8.2018)

*Source: LCSD records and Audit site visits*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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- (iv) the names of preparers of 171 access audit checklists were not provided, making it difficult if not impossible to ascertain the responsible persons; and
- (v) for 170 access audit checklists, the dates of conducting the access audits were not provided.

### 3.15 ***FEHD's access audits.*** Audit noted that:

- (a) ***Delay in conducting access audits.*** According to the Operating Manual/Administrative Circular issued in April 2017 by the FEHD, access audits should be conducted on an annual basis by completing the designated audit checklists by the responsible AOs. All regular access audits should have been completed by March 2018. However, Audit examination of 1,274 completed access audit checklists found that, as of June 2018, 25 access audits (covering 29 venues) were conducted in June 2018, i.e. later than the deadline of March 2018;
- (b) ***Access audits for some venues not carried out.*** Based on 1,274 access audit checklists for the audits completed as of June 2018, Audit found that the FEHD conducted access audits for 1,460 (84%) out of 1,741 venues under its purview (Note 41);
- (c) ***Requirements on access audits not properly followed.*** Audit found that:
  - (i) according to the FEHD's Operating Manual for AOs and their assistants, each AO (assisted by his/her assistant) is responsible for conducting the access audit and the completion of the audit checklist on each venue under his/her management. AOs are required to submit completed checklists to respective Centre/Branch/District ACs for review. However, according to the procedure in the access audit checklist, access audit should be completed by an AO or

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**Note 41:** *According to the FEHD, the discrepancy was mainly due to access audits not conducted for some refuse collection points in remote areas (in villages or being temporary structures, with simply rubbish bins).*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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his/her assistant. The access audit checklists should be checked by the AO if the audit is completed by his/her assistant (Note 42);

- (ii) of the 1,274 access audit checklists examined by Audit, 248 (19%) were not completed nor checked by the designated AO of the venues, contrary to the FEHD's requirement (see para. 3.15(a)); and
  - (iii) according to the FEHD's Operating Manual, AOs are required to submit completed checklists to ACs for review. The CFS and the EHB advised Audit that the findings of access audits were discussed with Centre/Branch ACs and were not documented. Audit considers that the FEHD needs to improve the documentation in this regard; and
- (d) ***Scope for improvement in completing access audit checklist.*** Audit examination of 1,274 access audit checklists found that:
- (i) four access audit checklists covered two venues each (e.g. a checklist covered a public market and a cooked food market, and another checklist covered two offices with different types of barrier-free facilities). To facilitate monitoring, Audit considers that barrier-free facilities in individual venue need to be clearly specified on the checklists;
  - (ii) some DM 2008 requirements were not included in the access audit checklist for checking. They include, for example, that a notice of "Emergency Call" in both English, Chinese and braille should be fitted next to the emergency push button, and braille and tactile fire exit map should be provided directly above the call button of the

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**Note 42:** *According to the FEHD, while specifying in the Operating Manual that the AO (assisted by his/her assistant) was responsible for conducting the access audit and the completion of access audit checklist, flexibility was allowed for the assistant of AO to assist in completing the access audit checklist which would be checked by the AO afterwards. The FEHD would clarify this flexibility in the coming review of the Operating Manual to meet operational needs and at the same time ensure accountability of AOs in completing access audits.*

## Work of FEHD and LCSD in providing and managing barrier-free facilities under their management

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accessible lift in the lobby if a fire exit map for the use of the public is provided (Note 43);

- (iii) findings in 12 FEHD's access audit checklists were at variance with those in Audit site visits (Note 44) (examples are shown in Table 5);

**Table 5**

### Examples of variances between findings in the FEHD's access audits and Audit site visits

Venue	Particulars	FEHD's findings in access audit checklist (Date)	Audit site visits' findings (Date)
Tsung Man Street Refuse Collection Point	Signs, access route, ramp, dropped kerb with adequate visual and tactile warning, door for PWDs enter/leave without undue difficulties, and visual and audible fire alarm system were provided	Yes (16.11.2017)	Not found (16.8.2018)
Pak Shing Street Public Toilet cum bathhouse	Accessible bathrooms and shower compartments were provided	Yes (2.1.2018)	Not found (31.7.2018)
Lockhart Road Market	Dropped kerb with adequate visual and tactile warning was provided in a ramp to accommodate the change in level towards vehicular area	Yes (9.11.2017)	Not found (31.7.2018 and 11.9.2018)

*Source: FEHD records and Audit site visits*

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**Note 43:** *According to the FEHD, it had drawn up the audit checklist based on its knowledge and the available reference materials in hand.*

**Note 44:** *According to the FEHD, its staff had conducted the access audits based on their knowledge and available reference materials in hand.*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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- (iv) in nine access audit checklists, the dates of conducting the access audits were not filled in. In three other access audit checklists (covering 175 venues), the date of conducting the access audit was not clearly specified (it was stated in the checklists that “the audits were carried out on various dates in 2017”) (Note 45); and
- (v) according to the FEHD, public toilets in markets were audited along with the access audits for the markets. However, for four public toilets in the FEHD markets covered in Audit site visits, the access audit checklists for the markets (without checking requirement for toilets) did not mention whether such toilets were covered. Given that the barrier-free facilities requirements for public toilets and markets are different, the FEHD needs to improve the documentation in this regard.

3.16 In Audit’s view, the LCSD and the FEHD need to take follow-up actions on the areas for improvement in conducting access audits as identified by Audit in paragraphs 3.14 and 3.15 respectively. The LCSD and the FEHD also need to take measures to enhance their access audits (e.g. issuing further guidelines or providing more training to their officers — see para. 3.37).

### **Audit recommendations**

3.17 **Audit has *recommended* that the Director of Food and Environmental Hygiene and the Director of Leisure and Cultural Services should:**

- (a) **take follow-up actions on the areas for improvement in conducting access audits as identified by Audit; and**
- (b) **take measures to enhance access audits of the FEHD and the LCSD (e.g. issuing further guidelines or providing more training to their officers).**

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**Note 45:** *According to the FEHD, as the access audit checklist summarised audit information of multiple venues, exact dates were not shown in the summary.*



## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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### **Response from the Government**

3.18 The Director of Food and Environmental Hygiene agrees with the audit recommendations. She has said that the FEHD will:

- (a) ensure carrying out annual access audits in a timely manner;
- (b) review the classification of venues in consultation with the BD and the ArchSD to decide on the scope and categories of venues provided with barrier-free facilities;
- (c) improve the documentation on the submission of completed checklists (e.g. remind staff to put down dates of conducting audits) and discussion on the findings of access audits;
- (d) seek the ArchSD's expert advice and revise the checklist to ensure that all appropriate DM 2008 requirements are included in the respective checklist; and
- (e) review its guidelines and provide more training to its AOs to facilitate staff to conduct access audits according to the relevant guidelines.

3.19 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that the LCSD will take steps to review the arrangements for access audits as well as the content and format of the checklist being used.

**Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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## Deficiencies identified in Audit site visits

3.20 Audit site visits to 20 FEHD venues and 30 LCSD venues found cases of deficiencies in the provision, maintenance and control of barrier-free facilities under their management. Deficiencies were noted in 14 (70% of 20) FEHD venues and 26 (87% of 30) LCSD venues. Audit site visit findings for FEHD and LCSD venues are summarised in Tables 6 and 7 respectively and the details are given in paragraph 3.21.

**Table 6**

**Audit site visit findings for FEHD venues  
(May to September 2018)**

Type of venues (Number of venues visited)	Number of venues with deficiencies identified (Note)		
	Provision of barrier-free facilities	Maintenance of barrier-free facilities	Control of barrier-free facilities
Public toilet (8)	7	2	3
Cemetery and crematorium (1)	—	—	1
Public market (5)	5	2	5
Office (3)	1	—	—
Total	13	4	9

*Source: Audit site visits*

*Note: The deficiencies involved a total of 14 FEHD venues.*

**Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

**Table 7**

**Audit site visit findings for LCSD venues  
(May to September 2018)**

Type of venues (Number of venues visited)	Number of venues with deficiencies identified (Note)		
	Provision of barrier-free facilities	Maintenance of barrier-free facilities	Control of barrier-free facilities
Beach (1)	1	1	—
Heritage and museum (3)	3	—	1
Library (3)	1	1	2
Major park (3)	3	1	1
Office (2)	1	—	—
Other indoor sports facility (1)	1	1	—
Park and playground (7)	5	—	1
Performance venue (2)	2	1	2
Sports centre (4)	4	1	2
Sports ground (1)	1	—	1
Stadium (1)	1	1	1
Swimming pool (2)	2	1	1
Total	25	8	12

*Source: Audit site visits*

*Note: The deficiencies involved a total of 26 LCSD venues.*

3.21 Audit site visits to FEHD and LCSD venues identified deficiencies in the following areas:

- (a) ***Provision of barrier-free facilities.*** Based on DM 2008, deficiencies were found in 13 FEHD and 25 LCSD venues, including the following:

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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- (i) in 16 (4 FEHD and 12 LCSD) venues, simple instructions in English, Chinese and braille on how to unfold the folding grab rail were not affixed to the walls of the toilets;
- (ii) in 16 (4 FEHD and 12 LCSD) venues, tactile guide paths were not provided to entrance or facilities (e.g. accessible lifts and accessible toilets);
- (iii) in 15 (3 FEHD and 12 LCSD) venues, a notice of “Emergency Call” in both English, Chinese and braille was not provided next to the emergency push button for emergency call bell (see Photograph 3 for an example);

**Photograph 3**

**Notice of “Emergency Call” of accessible toilet not provided at the LCSD’s Law Uk Folk Museum Rest Garden**



*Source: Photograph taken by Audit staff on 10 August 2018*

- (iv) in 13 (4 FEHD and 9 LCSD) venues, the International Symbol of Accessibility (Note 46) was not provided at conspicuous location for purpose of identifying location of facilities (e.g. reserved car

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**Note 46:** *The International Symbol of Accessibility shall be the wheelchair figure in white on a blue background and is to be provided at a conspicuous location.*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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- parking facilities for PWDs, information/service counters, accessible toilets and lifts) or the signs did not meet the DM 2008 requirements;
- (v) in 14 (2 FEHD and 12 LCSD) venues, braille and tactile information on directional arrow and floor number was not provided on handrails; and
  - (vi) in 6 (1 FEHD and 5 LCSD) venues, accessible public information/service counters were not provided;
- (b) ***Maintenance of barrier-free facilities.*** Deficiencies were found in 4 FEHD and 8 LCSD venues, including the following:
- (i) in 3 LCSD venues, the plates containing braille and tactile information on handrails were worn out;
  - (ii) in 3 (1 FEHD and 2 LCSD) venues, tactile guide paths were worn out;
  - (iii) in 1 FEHD venue, a folding grab rail in an accessible toilet was missing; and
  - (iv) in 1 LCSD venue, shower heads in two accessible shower rooms were removed; and
- (c) ***Control of barrier-free facilities.*** Deficiencies were found in 9 FEHD and 12 LCSD venues, including the following:
- (i) in 7 (4 FEHD and 3 LCSD) venues, tactile guide paths were obstructed by goods, boxes, carpets, chairs or trolleys (see Photograph 4 for an example);

## Work of FEHD and LCSD in providing and managing barrier-free facilities under their management

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### Photograph 4

#### Tactile guide path obstructed by tables and chairs at the Cooked Food Centre in the FEHD's Tai Po Hui Market



Source: Photograph taken by Audit staff on 31 July 2018

- (ii) in 4 (2 FEHD and 2 LCSD) venues, visitors could not use the handrails due to obstruction;
- (iii) in 2 FEHD venues, handrails on the ramps were obstructed by goods, boxes or trolleys and visitors could not use the handrails;
- (iv) in 1 FEHD venue, ramps were obstructed by goods, boxes and trolleys; and
- (v) in 2 FEHD venues, entrances of accessible toilets were obstructed by a bucket or boxes.

3.22 Audit considers that the FEHD and the LCSD need to take follow-up actions on the deficiencies in the provision, maintenance and control of barrier-free facilities at venues managed by the FEHD and the LCSD as identified by Audit in paragraphs 3.20 and 3.21, and take measures (e.g. providing more training to AOs and venue staff) to strengthen their work in these areas.

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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### **Audit recommendations**

3.23 **Audit has *recommended* that the Director of Food and Environmental Hygiene and the Director of Leisure and Cultural Services should:**

- (a) **take follow-up actions on the deficiencies in the provision, maintenance and control of barrier-free facilities at venues managed by the FEHD and the LCSD as identified by Audit in paragraphs 3.20 and 3.21; and**
- (b) **take measures to strengthen the work of the FEHD and the LCSD in providing, maintaining and controlling barrier-free facilities at venues managed by them.**

### **Response from the Government**

3.24 The Director of Food and Environmental Hygiene agrees with the audit recommendations. She has said that the FEHD will:

- (a) work in collaboration with the ArchSD for repair works or further barrier-free access improvements as appropriate at the venues as identified by Audit, which have indeed been covered under the Retrofitting Programme; and
- (b) remind relevant staff to improve management and monitoring work and to strengthen control and step up necessary enforcement action as necessary.

3.25 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that the LCSD is taking follow-up actions to address the issues identified in this Audit Report.

### **Other administrative issues**

3.26 Audit notes room for improvement in a number of other administrative issues concerning the provision and management of barrier-free facilities under the FEHD and the LCSD (see paras. 3.27 to 3.38).

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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### ***Scope for improvement in providing accessibility information***

3.27 Audit notes that there is scope for improvement in providing accessibility information:

#### ***Contact information of AOs***

- (a) according to the FEHD and the LCSD, the contact information of their ACs and AOs should be promulgated to the public via their websites. AOs are required to post notices, with their post titles and contact information on entrances/notice boards/conspicuous locations of the venues under their management;
  
- (b) Audit noted that the contact information of AOs had been published on the websites of the FEHD and the LCSD. However, Audit site visits of 50 venues (i.e. 20 FEHD venues and 30 LCSD venues) found that:
  - (i) in 29 venues (13 FEHD venues and 16 LCSD venues) (58% of 50 venues), contact information of AOs was not provided at the venues; and
  - (ii) in five venues (three FEHD venues and two LCSD venues) (10% of 50 venues), contact information of AOs (e.g. telephone number or email address) provided at the venues was different from that published on the websites;

#### ***Accessibility information on websites***

- (c) according to the memorandum issued by the LWB in December 2010, AOs are required to make available information to PWDs about the accessibility of the venues (e.g. on websites and/or displaying suitable notices in the venue). The FEHD and the LCSD had promulgated this requirement vide circulars;
  
- (d) for the FEHD, Audit noted that as of August 2018, information on accessible toilets was provided on its website. However, accessibility information (e.g. whether and what barrier-free facilities were provided)



## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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of other venues under its management (e.g. public markets) was not available; and

- (e) for the LCSD, Audit noted that as of August 2018, accessibility information on libraries was not provided on its website. Regarding other venues (Note 47), while information on accessible toilets was provided, information on other major barrier-free facilities (e.g. ramps, accessible lifts and tactile guide paths) was not available on its website for most venues.

In Audit's view, the FEHD and the LCSD need to take measures to ensure that adequate information about accessibility of venues is promulgated on their websites and/or at their venues to facilitate the PWDs' access to their venues.

### ***Need to keep under review the appointment of AOs for venues***

3.28 Similar to the LWB memorandum issued in December 2010, FEHD and LCSD Circulars also stipulate that an AO should be appointed for each venue under his/her management to handle accessibility issues. The LWB memorandum states that where applicable and appropriate, the same AO may be appointed for a group of venues which are not frequently visited by the public or are of a small scale.

3.29 According to the LWB Memorandum of September 2016, B/Ds need to review the number of AOs to ensure that they are adequate to discharge their duties properly in their review of operational practices and procedures on accessibility of government premises and facilities to PWDs. Under normal circumstances, at least one AO or a venue-based staff should be appointed for each venue under the management of the B/Ds.

3.30 In the annual return proforma issued by the LWB in April 2018 (see para. 2.14), individual B/Ds are required to report the ratios of AO/venue-based staff to facilities/venue. If the ratio is less than 1 (i.e. 1 AO/venue staff to more than

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**Note 47:** *Audit reviewed the LCSD's website for accessibility information of its major venues covering libraries, beaches, sports centres, sports grounds, parks and playgrounds, swimming pools, heritage and museums, and performance venues (including town halls, theatres and civic centres).*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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1 venue), B/Ds are requested to explain the difficulties encountered and briefly describe the special arrangement.

3.31 Audit examined the ratios of AOs to venues managed by the FEHD and the LCSD. As at 30 June 2018, 101 FEHD AOs and 347 LCSD AOs were appointed to manage 1,741 FEHD venues and 1,935 LCSD venues (Note 48) respectively. The ratios of AO to venues of these two departments varied significantly from 1:1 to 1:394 (see Table 8).

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**Note 48:** *According to the LCSD, for 14 venues (e.g. the whole venue was a planter), there was no access for the general public, and therefore no AO was required.*

**Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

**Table 8**

**Ratios of AO to venues of the FEHD and the LCSD  
(30 June 2018)**

Ratio of AO to venues (Note 1)	Number of AOs	
	FEHD	LCSD
1:1	45	203
1:2 to 1:5	27	90
1:6 to 1:10	10	9
1:11 to 1:30	8	25
1:31 to 1:50	2	16
1:51 to 1:70	1	2
1:71 to 1:100	3	1
1:101 to 1:200	4 (Note 2)	1 (Note 3)
1:201 to 1:394	1 (Note 4)	-
Total	101	347

*Source: Audit analysis of FEHD and LCSD records*

*Note 1: According to LWB memorandum, and FEHD and LCSD Circulars, an AO should be appointed for each venue under his/her management to handle accessibility issues (see para. 3.28). In view of this requirement and the number of venue-based staff for each venue was not readily available (see para. 3.29), Audit analysis focused on the ratio of AO to venues.*

*Note 2: The AOs were responsible for managing aqua privies, refuse collection points and public toilets.*

*Note 3: The AO was responsible for managing basketball courts, mini-soccer pitch and parks and playgrounds.*

*Note 4: The AO was responsible for managing aqua privies, refuse collection points and public toilets.*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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3.32 In response to Audit's enquiries, the FEHD and the LCSD advised Audit in October 2018 that:

- (a) **FEHD.** Considering the uniform standard and design, small size and simple structure of certain types of venues (e.g. some public toilets and refuse collection points in the New Territories), a single AO might be able to perform his or her duties in respect of a large number of venues with the assistance of subordinate staff. Depending on operational requirements and changes in organisational structure in the future, the FEHD might review the appointment of AOs; and
- (b) **LCSD.** In some of the venues, four AOs were responsible for more than 50 venues (2+1+1 as shown in Table 8), all of which were leisure and recreational venues. In general, a venue manager would be assigned as the AO of that venue. As some venue managers oversaw a considerable number of small-scale parks and playgrounds with relatively low patronage, they acted as AOs for these venues under their charge, and hence an AO was responsible for many venues. Nonetheless, they should be in an appropriate and capable position to oversee the barrier-free facilities in these venues. The AO to venue ratio of major venues (e.g. sports centre and swimming pool) was generally maintained as 1:1.

3.33 Given that an AO serves as the first point of contact on accessibility issues at the venues and has to discharge various duties (including conducting access audits and taking timely follow-up actions if necessary, making recommendations to an AC on improvements of barrier-free access, providing assistance to PWDs at the venue and handling public enquiries and complaints), Audit considers that the FEHD and the LCSD need to keep under review the appointment of AOs for venues with a view to ensuring that adequate AOs are in place to properly address accessibility issues of venues under their purview.

### ***Need to review training needs and organise suitable training on accessibility issues for officers concerned***

3.34 According to the memorandum issued by the LWB in December 2010, an AC is tasked to co-ordinate the provision of suitable training and guidance to AOs and venue-based staff to enhance their awareness on accessibility issues. In the LWB Memorandum of September 2016, B/Ds are required to assess the training needs and

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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organise tailor-made seminars/workshops for AOs and venue-based staff concerned in collaboration with the Civil Service Training and Development Institute (CSTDI) having regard to the operational needs of individual B/Ds.

3.35 The Training Sections of the FEHD and the LCSD, and the CSTDI organised training courses on accessibility issues, as follows:

- (a) **FEHD.** One or two half-day departmental seminars on accessibility for its AOs and venue staff had been held every year from 2011 to 2017. According to the FEHD, the relevant training for 2018 will be arranged in the latter-half of 2018;
- (b) **LCSD.** A half-day seminar “Access for All” has been held each year since 2011 to provide ACs and AOs with a general knowledge of barrier-free environment and enable them to get familiar with the relevant ordinances; and
- (c) **CSTDI.** Officers of the FEHD and the LCSD are also invited to attend the seminars on accessibility issues organised by the CSTDI.

3.36 In response to Audit’s enquiries regarding the training on accessibility issues received by AOs, the FEHD and the LCSD informed Audit in September and October 2018 that:

- (a) **FEHD.** As of 30 June 2018, 49 out of the 101 AOs attended seminars on accessibility issues held by the FEHD Training Section or the CSTDI (Note 49); and

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**Note 49:** *According to the FEHD, there were alternative sources, such as the LWB website in which materials and information pertaining to “accessibility” are available for reference by all officers. All civil servants can also access Cyber Learning Centre Plus (by the CSTDI), which had information relating to accessibility. Attendance of relevant seminars was but one of the factors relating to the FEHD’s work in the context of “accessibility” training.*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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- (b) **LCSD.** As of 30 June 2018, 164 out of the 347 AOs had received training on accessibility issues (Note 50).

3.37 In Audit's view, the FEHD and the LCSD need to assess the training needs of and organise suitable training for their AOs and venue-based staff with a view to enhancing their awareness of accessibility issues (see para. 3.16).

### ***Need to regularly compile statistics for complaints relating to the provision and management of barrier-free facilities***

3.38 Audit enquired the FEHD and the LCSD about whether they had readily available complaint statistics relating to the provision and management of barrier-free facilities. In response to Audit's enquiry, the FEHD and the LCSD compiled the relevant information and informed Audit that the complaints received (e.g. obstruction in a tactile guide path and an accessible toilet was locked) by the FEHD and the LCSD for the period from June 2016 to May 2018 were 28 and 72 respectively. In Audit's view, the FEHD and the LCSD need to regularly compile and submit such statistics to the senior management with a view to enhancing barrier-free facilities at venues under their management.

## **Audit recommendations**

3.39 **Audit has recommended that the Director of Food and Environmental Hygiene and the Director of Leisure and Cultural Services should:**

- (a) **take measures to ensure that adequate information about accessibility of venues is promulgated on the websites of the FEHD and the LCSD and/or at venues managed by them to facilitate the PWDs' access to these venues;**

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**Note 50:** *According to the LCSD, training on accessibility issues had been provided since 2011 to 520 AOs (including those who were currently in post and those who had been posted out of their role). Under the two-pronged approach, aside from organising relevant seminars and training courses, the LCSD had also provided alternative learning resources. Links to reference materials for ACs and AOs provided by the LWB (including guidelines and videos) were made available at the LCSD training intranet to enable staff to enrich their knowledge on the subject.*

## **Work of FEHD and LCSD in providing and managing barrier-free facilities under their management**

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- (b) keep under review the appointment of AOs for venues with a view to ensuring that adequate AOs are in place to properly address accessibility issues of venues under their purview;**
- (c) assess the training needs of and organise suitable training for AOs and venue-based staff of the FEHD and the LCSD with a view to enhancing their awareness of accessibility issues; and**
- (d) ensure that complaint statistics relating to the provision and management of barrier-free facilities are regularly compiled and submitted to the senior management with a view to enhancing barrier-free facilities at venues managed by the FEHD and the LCSD.**

## **Response from the Government**

3.40 The Director of Food and Environmental Hygiene agrees with the audit recommendations. She has said that the FEHD will:

- (a) remind venue management of the need to provide specific contact information of AOs at venues under its management, and keep such information up-to-date;
- (b) review the appointment of AOs with regard to operational requirements;
- (c) provide suitable training for AOs and venue-based staff; and
- (d) review and improve the availability of management information and statistics on various aspects relating to the provision and management of barrier-free facilities.

3.41 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that the LCSD is taking follow-up actions to address the issues identified in this Audit Report.

## **Way forward**

### ***Need to draw attention of other B/Ds to the audit findings and recommendations on the two selected departments***

3.42 Audit notes that there is room for improvement in various areas on the work of the two selected departments (the FEHD and the LCSD) in providing and managing barrier-free facilities at premises managed by them (see paras. 3.6 to 3.41). As the audit findings and recommendations on the two selected departments may also be applicable to other B/Ds, Audit considers that the LWB needs to draw attention of other B/Ds to the audit findings and recommendations in this Audit Report with a view to improving the provision and management of barrier-free facilities at premises managed by them.

## **Audit recommendation**

3.43 **Audit has recommended that the Secretary for Labour and Welfare should draw attention of other B/Ds to the audit findings and recommendations on the two selected departments as mentioned in this Audit Report with a view to improving the provision and management of barrier-free facilities at premises managed by them.**

## **Response from the Government**

3.44 The Secretary for Labour and Welfare agrees with the audit recommendation.



## **PART 4: MANAGEMENT OF RETROFITTING WORKS FOR BARRIER-FREE FACILITIES AT GOVERNMENT PREMISES**

4.1 This PART examines the work of the ArchSD and managing departments in managing retrofitting works for barrier-free facilities at government premises, focusing on:

- (a) works for barrier-free facilities under Retrofitting Programme (paras. 4.4 to 4.33); and
- (b) works for barrier-free facilities under other improvement programmes (paras. 4.34 to 4.40).

4.2 The ArchSD is the works agent for implementing barrier-free access improvement works initiated by the managing departments of government premises and facilities to upgrade or provide barrier-free facilities at existing government premises under its maintenance in accordance with the approved funding applications submitted by managing departments (see para. 1.10).

4.3 According to the ArchSD, the retrofitting works for barrier-free facilities at government premises are carried out through two channels:

- (a) the Retrofitting Programme which was dedicated for such works and was funded by a block vote (Head 703 (Buildings), Subhead 3101GX controlled by the ArchSD — Note 51) of the Capital Works Reserve Fund (CWRF — Note 52); and

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**Note 51:** *Minor building works (including alterations, additions, improvement works and fitting-out works) are funded under this block vote (Head 703, Subhead 3101GX). The Director of Architectural Services is authorised to approve expenditure for individual items not exceeding \$20 million.*

**Note 52:** *The CWRF was set up in April 1982 for financing the Public Works Programme and the acquisition of land.*

## Management of retrofitting works for barrier-free facilities at government premises

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- (b) the refurbishment of government buildings which was funded under another block vote (Head 703 (Buildings), Subhead 3004GX controlled by the ArchSD) of the CWRF (Note 53). For example, the Public Toilet Refurbishment Programme (see para. 4.34) was funded by this block vote.

### Works for barrier-free facilities under Retrofitting Programme

4.4 As mentioned in paragraph 1.15, the Retrofitting Programme covered 3,692 premises/facilities which were identified by managing departments. According to the ArchSD, from 2011-12 to 2017-18, the actual expenditure under the Retrofitting Programme for about 2,700 premises/facilities under its maintenance (Note 54) was \$1.07 billion (see Table 9), which was funded under a block vote (Head 703, Subhead 3101GX) (see para. 4.3(a)) of the CWRF.

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**Note 53:** *Refurbishment works (including renewing or replacing building elements and facilities to enhance health and hygiene, public safety and security, and upgrading building standards and planned maintenance works) are funded under this block vote (Head 703, Subhead 3004GX). The Director of Architectural Services is authorised to approve expenditure for individual items not exceeding \$30 million.*

**Note 54:** *Of the 3,692 premises/facilities covered under the Retrofitting Programme, about 2,700 premises/facilities were maintained by the ArchSD. The remaining 992 premises/facilities were managed by the TD and the works agents were the HyD and the CEDD. According to the LWB, the expenditure for such works was \$28 million.*

**Management of retrofitting works  
for barrier-free facilities at government premises**

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**Table 9**

**Expenditure under the Retrofitting Programme  
(2011-12 to 2017-18)**

<b>Year</b>	<b>Expenditure (Note) (\$ million)</b>
2011-12	73.87
2012-13	306.86
2013-14	299.77
2014-15	234.45
2015-16	119.93
2016-17	23.46
2017-18	14.37
Total	1,072.71

*Source: ArchSD records*

*Note: The works under the Retrofitting Programme had been completed in 2014-15 and hence the expenditure decreased substantially thereafter. According to the ArchSD, the expenditures incurred after 2014-15 were mainly related to payments made to contractors after the final value of the works orders had been agreed, the relevant documents required from contractors under the contracts had been received and the completion had been certified by the ArchSD.*

4.5 According to the Retrofitting Programme, retrofitting works for 3,306 and 386 premises/facilities were targeted to be completed by 30 June 2012 and 30 June 2014 respectively (see para. 1.15). According to the LWB's progress report to LegCo for the position as at June 2012, there were delays (ranging from 1 month to 12 months) in completing works for 20 (0.6% of 3,306) premises/facilities (Note 55) that were originally targeted for completion by 30 June 2012 (Note 56). According

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**Note 55:** *Audit noted that the LWB only provided a breakdown of 19 premises/facilities in the progress report.*

**Note 56:** *According to the progress report, the delays were mainly due to the need to tie in with fitting-out works programme of the premises and meeting the needs of the managing departments and the users.*

## Management of retrofitting works for barrier-free facilities at government premises

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to the LWB's progress report of September 2014 to LegCo, all items under the Retrofitting Programme had been completed by June 2014.

### *ArchSD's works arrangements for Retrofitting Programme*

4.6 After managing departments identified the required barrier-free facilities in venues under their management, the ArchSD would engage consultants for conducting feasibility studies. Venues were grouped in batches for employment of consultants, with fixed lump sum fees, through selective tender (Note 57). According to the consultancy agreement, the consultant is required to, among other things:

- (a) conduct assessment on elementary aspects in accordance with all the relevant items in Regulation 72 of B(P)R and Third Schedule to the B(P)R and prepare the Compliance Checking Report;
- (b) prepare a barrier-free access upgrading feasibility study report which included works implementation programme and preliminary cost estimates for the proposed upgrading works with regard to site constraints; and
- (c) upon confirmation by the ArchSD, revise the feasibility study report which should include feedback from managing departments and responses to these feedback. The details of the revised barrier-free access upgrading feasibility study reports should be essential and sufficient for preparation of funding applications.

According to the ArchSD, for about 2,700 premises/facilities under the Retrofitting Programme, 11 consultants had been engaged for conducting feasibility studies and more than 1,000 feasibility study reports had been prepared.

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**Note 57:** *According to the ArchSD, the tenderers were selected from Building Surveying category of the Architectural and Associated Consultants Selection Board. The Board approves the selection and appointment of architectural and associated consultants for government projects (other than those selected and appointed by departmental consultants selection committees), which is chaired by the Director of Architectural Services and comprises members from the ArchSD, the Housing Department and the Development Bureau.*

## **Management of retrofitting works for barrier-free facilities at government premises**

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4.7 The ArchSD awarded five design-and-build (D&B) term contracts for minor building works (see para. 4.3(a)) in different geographical areas. For the Retrofitting Programme, in October 2011, the ArchSD awarded five other D&B term contracts (Note 58) dedicated solely for carrying out barrier-free access upgrading works by selective tender. Contractors under these 10 D&B term contracts were responsible for design and construction of barrier-free facilities in accordance with DM 2008 in premises/facilities under their purview.

4.8 The ArchSD is responsible for administering term contracts. The work includes issuing works orders, inspecting works quality and certifying completion of works. The ArchSD officer is required to confirm with the contractor the completion date and certify the completion of a works order in accordance with requirements of the contract as soon as the works are completed.

### ***Need to closely monitor the timely submission of documents relating to implementation of works orders by contractors***

4.9 According to the ArchSD, 5,139 works orders had been issued from 2011 to 2017 for upgrading the barrier-free facilities in about 2,500 premises/facilities under the Retrofitting Programme (Note 59). Audit compared the expected dates and the actual dates of completion of the works orders and noted 414 works orders (8% of 5,139) with delay in completion of works orders (see Table 10).

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**Note 58:** *The five term contracts were for four years from October 2011 to October 2015. The works scope included site survey, feasibility study, detailed design and construction of barrier-free facilities in government venues.*

**Note 59:** *According to the ArchSD, some venues had been subsequently removed from the Retrofitting Programme as mentioned in the LWB's progress reports and the number of premises/facilities with barrier-free facilities works completed under the Retrofitting Programme was about 2,500.*

**Management of retrofitting works  
for barrier-free facilities at government premises**

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**Table 10**

**Delay in completion of works orders  
(June 2018)**

Works order delay (Time elapsed between expected date and actual date of completion of works order)	No. of works orders (%)
< 90 days	169 (41%)
≥ 90 days to < 180 days	112 (27%)
≥ 180 days to < 365 days	65 (16%)
≥ 365 days to < 730 days	38 (9%)
≥ 730 days to < 1,095 days	19 (4%)
≥ 1,095 days	11 (3%)
Total	414 (100%)

*Source: Audit analysis of ArchSD records*

4.10 Audit enquired the ArchSD about the reasons for the delay of the 30 works orders with the longest delay (i.e. 730 days or more). In September and October 2018, the ArchSD informed Audit that the delay for 29 works orders was mainly due to the contractors' late submission of documents which were required under the contracts (Note 60) and there was no delay in the provision of the barrier-free facilities on site for use by the public. Without such documents, the ArchSD could not certify the works completion under the terms and conditions of these contracts. In view of such delay, the ArchSD had imposed liquidated damages. For the remaining works order, the delay was due to the time taken to resolve land issue during the design stage. Audit considers that the ArchSD needs to take measures to closely monitor the timely submission of documents relating to implementation of works orders by contractors.

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**Note 60:** *According to the D&B term contracts, the contractors shall serve notice to the ArchSD when the works detailed in a works order have been substantially completed and have passed commissioning tests. The contractors are also required to submit documents such as certificates of guarantee and warranty, test certificates on materials, etc.*

## **Management of retrofitting works for barrier-free facilities at government premises**

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### ***Need to learn from incidents involving slippery tactile guide paths***

4.11 The Lai Chi Kok Park was one of the premises under the Retrofitting Programme. Since May 2012, the ArchSD had carried out barrier-free facilities retrofitting works for the Park by phases. The works included provision of ramp, replacement of railing and the installation of tactile guide path. Shortly after the completion of the installation of tactile guide path in June 2012, the LCSD received four complaints about tactile guide path being slippery (two expressly mentioned that the path was slippery after the rain) and posing safety risks to the public. The LCSD immediately investigated whether complaints had been received in other venues installed with the same type of ceramic tactile guide path. The LCSD noted that 14 other venues also had incidents involving slippery tactile guide paths.

4.12 According to the ArchSD, the materials used in the tactile guide paths in the 15 venues concerned complied with the slip resistance requirements of DM 2008. The laboratory tests carried out by accredited laboratory found that the static coefficient of friction of the tactile guide path floor tiles (representing the floor slip resistance properties) complied with slip resistance requirements of the DM 2008. In response to the complaints received, the ArchSD had arranged a test application of anti-slip coating in the Lai Chi Kok Park for the tactile floor tiles to further improve the slip resistance of the tactile floor tiles to a level exceeding the standard required under DM 2008. On 5 July 2012, the ArchSD applied an anti-slip coating as a trial enhancing scheme to address the incidents involving slippery tactile guide path in the Lai Chi Kok Park. However, the LCSD expressed concern about the durability and effectiveness of such measures when the path was heavily used or under wet weather condition and the frequency of re-application of coating. In response, the ArchSD informed the LCSD that based on the product information, the anti-slip coating once applied could improve the friction of the surface (Note 61) and last up to 5 years.

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**Note 61:** *According to the ArchSD, the anti-slip coating once applied could improve the friction of the surface to a level exceeding the standard required under DM 2008.*

## Management of retrofitting works for barrier-free facilities at government premises

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4.13 In August 2012, the ArchSD completed the trial scheme in the Lai Chi Kok Park (see Photograph 5). In view of the satisfactory and effective result, the LCSD requested the ArchSD to apply the same anti-slip coating for venues with incidents involving slippery tactile guide paths. From August 2012 to February 2013, the ArchSD carried out similar remedial works by applying the anti-slip coating to tactile guide paths in 15 venues (Note 62) where 9 accidents (mainly involving visitors who slipped on the ground) had occurred and 23 complaints (concerning slippery floor) were received during May to September 2012 (see Appendix F).

### Photograph 5

#### Application of anti-slip coating for tactile floor tiles in Lai Chi Kok Park



*Source: LCSD records*

4.14 In September 2012, after the anti-slip coating was applied to the tactile guide path in the Victoria Park, the LCSD noted that the effect was not satisfactory, especially at inclined area. In October 2012, the ArchSD conducted a site visit and

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**Note 62:** *According to the ArchSD, the retrofitting works for these 15 venues were carried out by the same contractor and the cost was borne by the ArchSD. The cost of application of anti-slip coating was about \$690,000.*



## **Management of retrofitting works for barrier-free facilities at government premises**

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agreed to partially replace the ceramic tactile guide path at the inclined area near the North Pavilion of the Victoria Park. In June 2013, the relevant works were completed.

4.15 In November 2012, two more accidents occurred (two visitors slipped on the ground) in the Tsing Yi Park. According to the ArchSD, with the LCSD's agreement, a portion of tactile floor tiles was removed in view of the gradient of the site and public safety, and to meet the LCSD's further enhancement requirement. In February 2013, the removal works and resurfacing works were completed. According to the ArchSD, the contractor would bear the cost of installation and removal as well as the resurfacing cost.

4.16 In April 2013, the media raised enquiries including the costs and reasons for removing the tactile floor tiles in Tsing Yi Park. The LCSD then decided to gather feedback from venue staff on the effectiveness of the anti-slip enhancement works mentioned in paragraph 4.13. Other than the Victoria Park and Tsing Yi Park, the LCSD still found the tactile guide paths of six venues slippery. The LCSD sought assistance from the ArchSD and further remedial works were carried out for these six venues (see Table 11).

**Management of retrofitting works  
for barrier-free facilities at government premises**

**Table 11**

**Further remedial works carried out in venues  
where anti-slip coating was applied**

Venues	Completion date of applying the anti-slip coating	Remedial works	Completion date of further remedial works
1. Chai Wan Park	September 2012	} Re-application of anti-slip coating (Note 1)	October 2013
2. Cloud View Road Service Reservoir Playground	September 2012		October 2013
3. King's Road Playground	December 2012		October 2013
4. Choi Sai Woo Park	January 2013		October 2013
5. Quarry Bay Park	February 2013		November 2013
6. Lion Rock Park	September 2012	Re-designing of tactile guide path routing to avoid steeper areas and removal of the installed tactile floor tiles in such areas in September 2013, and installation of a new tactile guide path (Note 2)	November 2013

*Source: Audit analysis of LCSD records*

*Note 1: According to the ArchSD, the relevant cost was borne by the contractor.*

*Note 2: According to the ArchSD, the cost of the relevant works was borne by it.*

## **Management of retrofitting works for barrier-free facilities at government premises**

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4.17 According to the ArchSD, based on the laboratory test report, the friction of the tactile guide path floor tiles used in the 15 venues mentioned in paragraph 4.13 was in compliance with DM 2008 requirements. However, a number of accidents had occurred and complaints were received relating to slippery tactile guide paths of these venues. In response to Audit's enquiry, in October 2018, the ArchSD informed Audit that the slip resistance mentioned in an Appendix of DM 2008 was related to the static coefficient of friction of the materials which would be affected by the presence of contaminants, water, floor finishes and other factors not under the control of the designer or builder and not subject to design and construction guidelines. In each reported incident involving slippery tactile guide paths, the ArchSD took effort to further improve the slip resistance of the tactile floor tiles to a level exceeding the required standard.

4.18 Audit noted that after the application of the anti-slip coating, the incidents involving slippery tactile guide paths at some venues still remained unresolved (see paras. 4.14 to 4.16). The effect for three venues (the Victoria Park, the Tsing Yi Park and the Lion Rock Park), especially at inclined areas, was still not satisfactory and the tactile floor tiles had been removed. While the ArchSD considered that the anti-slip coating could last for 5 years (see para. 4.12), anti-slip coating was re-applied for five venues within 9 to 13 months after applying the first coating (see items 1 to 5 in Table 11). According to the ArchSD, the re-application of the anti-slip coating was made on request from the LCSD and the result was satisfactory after re-application of the anti-slip coating.

4.19 In Audit's view, the ArchSD needs to learn from the incidents involving slippery tactile guide paths (particularly those at outdoor venues) and take measures to prevent the recurrence of similar incidents in future with a view to enhancing safety of users.

4.20 In this connection, Audit noted that the issue of slip resistance requirements on tactile guide path was being reviewed by the Technical Committee on Design Manual (see para. 2.24), as follows:

- (a) at the Technical Committee meeting in September 2014, a Technical Committee member suggested, among others, that the slip resistance requirements of tactile guide path in DM 2008 should be reviewed. At the Technical Committee meeting in April 2015, the Secretary informed the

## **Management of retrofitting works for barrier-free facilities at government premises**

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members that information on slip resistance of an access route was under the best practice section of DM 2008 with details contained in an Appendix. The method of measuring slip resistance was used with reference to some international standards;

- (b) at the Technical Committee meeting in September 2015, the Chairman said that:
  - (i) further research and careful consideration were required before considering the need to put these requirements as mandatory provisions because the slip resistance of tactile guide path would be affected by many factors (e.g. weather, usage and maintenance) which were outside the control of a designer;
  - (ii) even though the design requirements were under the best practice section (instead of mandatory requirements), most building designers had been making reference to such requirements; and
  - (iii) the BD would closely liaise with concerned government departments on the updating of the slip resistance requirements and report back to the Technical Committee; and
- (c) the issue was discussed at the Technical Committee meeting in April 2018. According to the BD, the review of slip resistance requirements for tactile guide path by the relevant departments was still in progress. The issue would be brought up for further discussion after the completion of the review.

4.21 In Audit's view, the BD needs to closely liaise with the departments concerned regarding the updating of slip resistance requirements for tactile guide path in DM 2008 and timely report the progress to the Technical Committee on Design Manual.

## **Management of retrofitting works for barrier-free facilities at government premises**

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### ***Scope for improving ArchSD's work in project administration for retrofitting works***

4.22 Audit noted scope for improving ArchSD's work in project administration for retrofitting works and the Victoria Park was a case in point (see paras. 4.23 to 4.27).

4.23 In March 2012, in the course of submitting funding application under the block vote (Head 703, Subhead 3101GX) for the retrofitting works at the Victoria Park by the LCSD, the ArchSD informed the LCSD that the D&B term contractor estimated the cost of the works for retrofitting of barrier-free facilities in the Park to be \$10.66 million.

4.24 In March 2012, noting the target completion date of May 2012, the D&B term contractor sought confirmation from the LCSD to proceed with the barrier-free facilities upgrading works in two phases. Phase I works included the installation of tactile guide path which was targeted to complete by May 2012. Phase II works were improvement works (including installation of handrails, channel covers and provision of accessible urinals and mirrors) which were targeted to commence in May 2012.

4.25 Four works orders with a total cost of \$12.8 million were issued to the contractor between February 2013 and May 2014, as follows:

- (a) one works order of \$1.5 million was issued in February 2013 funded under Subhead 3004GX (see para. 4.3(b)) to cover a portion of barrier-free facilities for Phase I works; and
- (b) for Phases I and II works, another two works orders with a total cost of \$10.6 million were issued in September 2013 and May 2014 funded under Subhead 3101GX (see para. 4.3(a)) and a fourth works order of \$0.7 million was issued in February 2014 funded under Subhead 3004GX.

Up to June 2018, the expenditures under Subhead 3101GX and Subhead 3004GX were \$9.6 million and \$2.1 million respectively (i.e. totalling \$11.7 million).

## Management of retrofitting works for barrier-free facilities at government premises

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4.26 Audit noted that:

- (a) the ArchSD had instructed the contractor to commence works before the issuance of works orders in or after 2013 and the works were completed in June 2012. The ArchSD advised Audit in October 2018 that:
  - (i) the apparent delay of issuing works orders to contractor was due to the fact that while funding had been approved under block vote (Subhead 3101GX) for barrier-free facilities works, the funding allocated to the works for the Victoria Park was not yet available till 2013;
  - (ii) to meet the Government's target firmly set to complete the works by June 2012, the contractor was instructed to commence works first and works orders were subsequently issued to the contractor in 2013;
  - (iii) in some circumstances under the term contracts, the ArchSD could instruct the contractor to proceed works first and subsequently issue a works order to the contractor; and
  - (iv) the ArchSD already had control mechanism on the issuance of works orders. To tighten control on the use of covering works orders, the ArchSD was committed to reviewing its operational procedures to clarify the circumstances under which this applied and the related procedures, and reminding its project staff accordingly; and
- (b) the estimated cost of all the retrofitting works was \$10.66 million. However, the total cost for the four works orders issued for the retrofitting works was \$12.8 million (i.e. exceeding the cost estimates by \$2.14 million). According to the ArchSD, the excess was to cater for additional barrier-free facilities works carried out concurrently with the barrier-free facilities retrofitting works. Such additional barrier-free facilities works were agreed with the LCSD to suit site conditions and to avoid future disturbance to the public and the LCSD.

## **Management of retrofitting works for barrier-free facilities at government premises**

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4.27 In Audit's view, the ArchSD needs to strengthen measures for controlling the issuance of works orders and remind its staff and consultants to make more accurate cost estimates for works orders as far as practicable.

### ***Need to provide assistance and technical advice to managing departments for barrier-free facilities improvement works initiated by them***

4.28 Audit site visits found that 30 premises/facilities under the Retrofitting Programme (11 managed by the FEHD and 19 managed by the LCSD) did not fully comply with DM 2008 requirements. In response to Audit's enquiries of whether the 3,435 premises/facilities covered under the Retrofitting Programme fully complied with DM 2008 requirements, the feedback of the ArchSD and the FEHD was as follows:

- (a) the ArchSD informed Audit in September and October 2018 that:
  - (i) works carried out by it under the Retrofitting Programme were implemented with reference to the requirements of DM 2008 and complied with the requirements as far as practicable to meet requests from managing departments under the Retrofitting Programme;
  - (ii) the barrier-free facilities improvement works carried out were selected by the managing departments of the premises with reference to DM 2008 to suit the mode of operation of the premises. As the existing premises were in operation, the items of barrier-free facilities improvement works that could be carried out were restricted by a number of factors such as structural constraints, building layout and disposition, land availability, operational concerns, etc. Full compliance with DM 2008 may not be achievable in many cases. Completed barrier-free facilities improvement works were also subject to wear and tear; and
  - (iii) nevertheless, if the managing departments after review so request, the ArchSD would follow up as necessary to bring the barrier-free facilities up to the requirements of the DM as far as practicable; and

## **Management of retrofitting works for barrier-free facilities at government premises**

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- (b) the FEHD informed Audit in October 2018 that for those venues under the Retrofitting Programme or subsequent refurbishment programmes, design and building works were entrusted to the ArchSD which would comply with the prevailing barrier-free access requirements in the DM published by the BD as far as possible to suit the operational requirement of the managing department. Given that DM 2008 has been revised several times after completion of the works, the FEHD would work in close collaboration with the ArchSD to ascertain if it is technically feasible to include barrier-free facilities in future retrofitting or refurbishment works.

4.29 In Audit's view, for barrier-free facilities improvement works initiated by managing departments, the ArchSD needs to provide assistance and technical advice to the managing departments concerned (e.g. the FEHD) with a view to bringing the barrier-free facilities up to the DM 2008 requirements as far as practicable.

### **Audit recommendations**

4.30 **Audit has recommended that the Director of Architectural Services should:**

- (a) **take measures to closely monitor the timely submission of documents relating to implementation of works orders by ArchSD contractors;**
- (b) **learn from the incidents involving slippery tactile guide paths (particularly those at outdoor venues) and take measures to prevent the recurrence of similar incidents in future with a view to enhancing safety of users;**
- (c) **strengthen measures for controlling the issuance of works orders and remind ArchSD staff and consultants to make more accurate cost estimates for works orders as far as practicable; and**
- (d) **for barrier-free facilities improvement works initiated by managing departments, provide assistance and technical advice to the managing departments concerned (e.g. the FEHD) with a view to bringing the barrier-free facilities up to the DM 2008 requirements as far as practicable.**



## **Management of retrofitting works for barrier-free facilities at government premises**

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4.31 Audit has *recommended* that the Director of Buildings should closely liaise with the departments concerned regarding the updating of slip resistance requirements for tactile guide path in DM 2008 and timely report the progress to the Technical Committee on Design Manual.

### **Response from the Government**

4.32 The Director of Architectural Services agrees with the audit recommendations in paragraph 4.30. She has said that the ArchSD will:

- (a) implement measures to closely monitor the timely submission of documents related to implementation of works orders by ArchSD contractors in accordance with the contractual requirements;
- (b) learn from the incidents involving slippery tactile guide paths especially at outdoor venues and explore other suitable materials for tactile guide paths to prevent the recurrence of similar incidents in future with a view to enhancing safety of users;
- (c) review the operational procedures in issuing works orders to contractors and will strengthen the measures on the issuance of works orders to contractors. Besides, the project officers will be reminded to make more accurate estimates for works orders according to the prevailing information available; and
- (d) for those barrier-free facilities improvement works initiated by managing departments, continue to provide assistance and technical advice to the managing departments concerned (e.g. the FEHD) with a view to bringing the barrier-free facilities up to the prevailing requirements of DM 2008 as far as practicable.

4.33 The Director of Buildings agrees with the audit recommendation in paragraph 4.31.

## **Works for barrier-free facilities under other improvement programmes**

4.34 As mentioned in paragraph 2.17, 90 premises had been taken out from the Retrofitting Programme and transferred to other improvement programmes, including the Public Toilet Refurbishment Programme (Note 63) of the FEHD and the refurbishment programme of the ArchSD.

### ***Need to ensure that improvement works for barrier-free facilities are completed as soon as practicable***

4.35 Of the 90 premises transferred to other programmes, according to the ArchSD, the FEHD and the LCSD, as of September 2018, the retrofitting works for barrier-free facilities in 66 premises were completed and in 10 premises were cancelled mainly because the premises were demolished or subject to re-development. The retrofitting works for the remaining 14 premises had not been completed. These 14 premises were public toilets under the FEHD's Public Toilet Refurbishment Programme, of which works for 7 public toilets were still in progress and the related works for 7 public toilets were at planning stage.

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**Note 63:** *Since 2000, the FEHD has implemented a Public Toilet Refurbishment Programme to give a new look to public toilets with enhancement in design and facilities. Priority is given to toilets that are aged or with high daily usage or at tourist spots.*

## **Management of retrofitting works for barrier-free facilities at government premises**

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4.36 According to the FEHD, a Public Toilet Refurbishment project involves various stages (Note 64). Approval from the Working Group on Upgrading of Public Toilets (Working Group — Note 65) will be sought on the pre-vetted design proposals of projects under the Public Toilet Refurbishment Programme. Upon final approval from the Working Group, the FEHD will conduct local consultation with the District Council and obtain tentative work schedule from the ArchSD. According to the ArchSD, the improvement works of the public toilets involves clarification on land status, comprehensive design and seeking approval of design from the Working Group before commencement.

4.37 In Audit's view, the FEHD needs to, in collaboration with the ArchSD, take measures to complete the improvement works for barrier-free facilities under its management (e.g. Public Toilet Refurbishment Programme) as soon as practicable.

### **Audit recommendation**

4.38 **Audit has recommended that the Director of Food and Environmental Hygiene should, in collaboration with the Director of Architectural Services, take measures to complete the improvement works for barrier-free facilities managed by the FEHD (e.g. the Public Toilet Refurbishment Programme) as soon as practicable.**

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**Note 64:** *According to the FEHD, in general, the process of a project (covering one toilet) under the Public Toilet Refurbishment Programme involves: (a) internal deliberation and funding approval; (b) detailed design, approval of works, land allocation, public consultation and pre-construction preparation, e.g. tendering; and (c) construction and commissioning.*

**Note 65:** *The Working Group on Upgrading of Public Toilets is chaired by a Deputy Director of the FEHD, with members from the FEHD and the ArchSD. It holds frequent discussions on how to optimise the FEHD's public toilets to ensure that the design of public toilet facilities could blend well with the surrounding environment and keep up with the times, with a view to making the public toilet facilities hygienic, clean, safe and decent. The Working Group will decide on the exterior design, installations and equipment, as well as materials having regard to the actual circumstances of individual toilets.*

## **Response from the Government**

4.39 The Director of Food and Environmental Hygiene generally agrees with the audit recommendation. She has said that:

- (a) the Public Toilet Refurbishment Programme is an ongoing programme to improve the facilities based on the latest building and design standards. While the FEHD is keenly aware of the lack of barrier-free facilities in some public toilets, it makes much better sense to consider improvements of such premises in a holistic manner in order to avoid piecemeal improvement and abortive or short-lived works. Given a running stock of over 700 public toilets across the territory built over a long stretch of time according to the standards of the day, priorities of refurbishment projects must be set to make the most of the resources available to benefit the community in the most optimal way. In doing so, the FEHD is adamant to address the barrier-free access problem in good time as a critical part of the whole refurbishment programme; and
  
- (b) the FEHD will continue to work in close collaboration with the ArchSD to spearhead the Public Toilet Refurbishment Programme which will not only provide barrier-free facilities for PWDs but also significantly improve the public toilet facilities in general for the overall benefit of the public.

4.40 The Director of Architectural Services agrees with the audit recommendation. She has said that the ArchSD will provide assistance and technical advice to the FEHD to complete the improvement works for barrier-free facilities under its management (e.g. Public Toilet Refurbishment Programme) as soon as practicable.

### Examples of DM 2008 requirements

Facility	Obligatory design requirement
1. Auditorium and related facilities	A minimum of 4 wheelchair spaces shall be provided at spectator level (see Photograph 1 in para. 1.6) in the auditorium with not more than 800 fixed seats (2 wheelchair spaces for every 400 fixed seats and any part thereof for auditorium with more than 800 fixed seats).
2. Handrails	Braille and tactile information on directional arrow and floor number shall be provided on handrail (see Photograph 2 in para. 1.6) on every floor at a designated location to facilitate persons with visual impairment. Where a directional sign exists on handrails, braille and tactile information shall also be provided.
3. Carparks	Adequate number of accessible car park spaces (e.g. 6 accessible car parking spaces for a car park with more than 450 parking space) shall be provided with proper access, proper designation and directional signage in the carparks.
4. Access route	Tactile guide paths shall be provided from a prominent point or points on the lot boundary, which is accessible to a public street or pedestrian way, directly to at least one entrance which is commonly used by the public and to an accessible lift. For specified category of building (e.g. museum and public library), tactile guide path shall also be installed from the main entrance to lift zone, the nearest accessible toilet, public information/service counter, braille and tactile floor plan and staircase.
5. Ramp	A ramp shall not be less than 1,050 millimetres (mm) in width.  A clear space of not less than 1,500 mm x 1,500 mm shall be provided at the head and foot of every ramp (i.e. door swing and alike shall not be allowed to swing onto the landing).
6. Toilets and water closet cubicles	Where toilet is provided on a floor, at least one shall be designed as an accessible unisex sanitary facility for use by persons of both sexes and access to which does not necessitate traversing an area reserved for one sex only. It shall be designed for general use and includes adequate circulation space for wheelchair users.
7. Lift	Every floor of a building shall be accessible by at least one passenger lift which shall fully comply with all the obligatory design requirements and have direct access to main lobby.  A lift shall have minimum internal car dimensions of 1,200 mm x 1,100 mm wide, with a minimum clear entrance width of 850 mm, and shall have handrails extending to within 150 mm of the corners at the rear and sides of the car. The top of the gripping surface of the handrails shall be at a height of 850 mm to 950 mm, with a space of 30 mm to 50 mm between the handrails and wall.

Source: *BD records*

**Examples of questions in the annual return  
on accessibility of government premises and facilities to PWDs**

<b>Awareness of needs of PWDs</b>
<ul style="list-style-type: none"><li>● Has B/D received any major concern(s) raised by the public or PWDs about the accessibility of B/D's facilities and services? If so, please set out key area(s) of concern and any measures taken to address these concerns.</li><li>● Has a mechanism been put in place to conduct regular reviews on the accessibility needs of PWDs to B/D's facilities and services? If so, please briefly describe the mechanism. If not, please explain the difficulties encountered and provide future plan/follow-up actions.</li><li>● Has a mechanism been put in place to ensure the proper maintenance and functioning of the barrier-free facilities? If so, please briefly describe the mechanism. If not, please explain the difficulties encountered and provide future plan/follow-up actions.</li></ul>
<b>Appointment of ACs and AOs</b>
<ul style="list-style-type: none"><li>● What is the average ratio of AO/venue-based staff to facilities/venue? If the ratio is less than one, please explain the difficulties encountered and briefly describe the special arrangement.</li><li>● Are updated contact information of ACs and AOs maintained and uploaded on the official website of your B/D? If not, please provide future plan/follow-up actions.</li></ul>
<b>Communication with AOs and venue-based staff</b>
<ul style="list-style-type: none"><li>● Has your B/D drawn up an operating manual and/or internal guidelines/instructions for AOs and other venue-based staff? If not, please provide future plan/follow-up actions.</li><li>● Are sharing/exchange sessions among ACs, AOs and venue-based staff conducted regularly to gauge the views and feedback of AOs and venue-based staff on implementing operating manual and/or internal guidelines/instructions? If not, please provide future plan/follow-up actions.</li></ul>

<b>Training</b>
<ul style="list-style-type: none"> <li>● Has your B/D offered training on accessibility for ACs, AOs and venue-based staff? If so, what is the number of attendees in 2018-19? If not, please provide future plan/follow-up actions.</li> </ul>
<b>Evacuation plan in case of fire</b>
<ul style="list-style-type: none"> <li>● Is an evacuation plan (such as floor plans showing escape routes) available to PWDs in case of fire? If not, please provide future plan/follow-up actions.</li> <li>● Has your B/D offered any staff training on evacuation of PWDs in case of fire? If not, please provide future plan/follow-up actions.</li> </ul>
<b>Review and feedback</b>
<ul style="list-style-type: none"> <li>● Is the operating manual and/or internal guidelines/instructions reviewed and updated having regard to outcomes of regular review on accessibility needs of PWDs, feedback and suggestions from AOs and suggestions/complaints received from PWDs? If not, please provide future plan/follow-up actions.</li> <li>● Is your B/D planning new facilities/venues or making major alterations and additions works to existing facilities/venues in the coming year? If so, please provide brief descriptions of the major facilities/venues and advise if there is plan to consult PWD groups.</li> </ul>

*Source: LWB records*

**Examples of barrier-free facilities  
provided in venues managed by the LCSD  
(30 June 2018)**

<b>Type of venues</b>	<b>Number of venues</b>	<b>Example of barrier-free facilities provided</b>
Library	70	<ul style="list-style-type: none"> <li>• Accessible entrance</li> <li>• Accessible toilet</li> <li>• Accessible lift</li> <li>• Accessible service counter</li> <li>• Visual fire alarm</li> <li>• Tactile guide path</li> <li>• Braille tactile layout map</li> <li>• Assistive listening system</li> <li>• Ramp</li> </ul>
Heritage (Note) and museum	22	
Performance venue (including civic centre, cultural centre, indoor stadium, theatre, and town hall)	16	
Sports centre	99	<ul style="list-style-type: none"> <li>• Accessible entrance</li> <li>• Accessible lift</li> <li>• Accessible toilet</li> <li>• Accessible service counter</li> <li>• Visual fire alarm</li> <li>• Tactile guide path</li> <li>• Braille tactile layout map</li> <li>• Accessible seating space</li> <li>• Accessible carpark</li> </ul>
Swimming pool	44	
Sports ground	25	
Stadium	2	
Other indoor sports facility	10	
Beach	41	
Major park	26	<ul style="list-style-type: none"> <li>• Accessible entrance</li> <li>• Accessible toilet</li> <li>• Tactile guide path</li> <li>• Braille tactile layout map</li> <li>• Accessible carpark</li> </ul>
Park and playground	1,555	
Office	18	
Music centre	5	<ul style="list-style-type: none"> <li>• Accessible entrance</li> <li>• Accessible toilet</li> <li>• Tactile guide path</li> </ul>
Others	16	
<b>Total</b>	<b>1,949</b>	

*Source: LCSD records*

*Note: According to the LCSD, there are three heritage premises which are not and will not be installed with barrier-free facilities due to their historical status.*



**Examples of barrier-free facilities  
provided in venues managed by the FEHD  
(30 June 2018)**

Type of venues	Number of venues	Example of barrier-free facilities provided
<i>Toilet and bathhouse</i>		
Aqua privy	46	<ul style="list-style-type: none"> <li>• Emergency call bell in accessible toilet</li> <li>• Grab rail</li> <li>• Small wash basin</li> </ul>
Public bathhouse	1	
Public toilet	767	
Public toilet cum bathhouse	25	
<i>Others</i>		
Animal/ livestock/ poultry monitoring inspection station	3	<ul style="list-style-type: none"> <li>• Accessible carpark</li> <li>• Access route</li> <li>• Assistive listening system</li> <li>• Audible and visible fire alarm system</li> <li>• Door and doorway for wheelchair user</li> <li>• Dropped kerb</li> <li>• Handrail</li> <li>• International Symbol of Accessibility</li> <li>• Accessible lift</li> <li>• Ramp</li> <li>• Tactile guide path</li> </ul>
Cemetery and crematorium	8	
Cooked food market	25	
Exhibition centre	1	
Hawker bazaar	10	
Public market	73	
Market cum hawker bazaar	1	
Office	77	
Refuse collection point	704	
Total	1,741	

*Source: FEHD records*

**Audit site visits to FEHD and LCSD venues  
(May to September 2018)**

**(A) FEHD venues visited by Audit**

<b>Type of venues</b>	<b>Hong Kong</b>	<b>Kowloon</b>	<b>New Territories</b>	<b>Total</b>
Public toilet	3	3	2	8
Cemetery and crematorium	—	1	—	1
Public market	2	1	2	5
Office (Note 1)	1	1	1	3
Public toilet cum bathhouse	—	—	1	1
Refuse collection point	1	—	1	2
Total	7	6	7	20

**Appendix E**  
(Cont'd)  
(para. 3.5 refers)

**(B) LCSD venues visited by Audit**

Type of venues	Hong Kong	Kowloon	New Territories	Total
Beach	1	—	—	1
Heritage and museum	1	2	—	3
Library	1	1	1	3
Major park	1	1	1	3
Office (Note 2)	—	1	1	2
Other indoor sports facility	1	—	—	1
Park and playground	1	—	6	7
Performance venue	—	1	1	2
Sports centre	1	2	1	4
Sports ground	—	—	1	1
Stadium	1	—	—	1
Swimming pool	—	1	1	2
Total	8	9	13	30

*Source: Audit site visits*

*Note 1: These are Licensing Office and District Environmental Hygiene Offices which provide licensing services and public services (including enquiries) on a district basis.*

*Note 2: These are District Leisure Services Offices where the public can book facilities, enroll in recreational programmes, and make enquiries regarding facilities and sports programmes.*

**Application of anti-slip coating to tactile guide paths in LCSD venues  
(August 2012 to February 2013)**

Venue	No. of accidents occurred (Note 1)	No. of complaints received (Note 1)	Date reported to ArchSD for taking remedial action	Completion date of application of anti-slip coating (Note 2)
1. Lai Chi Kok Park	1	4	18.7.2012	23.8.2012
2. Tung Chau Street Park	—	2	18.7.2012	27.8.2012
3. Fa Hui Park	—	1	18.7.2012	20.9.2012
4. Victoria Park	—	1	18.7.2012	13.9.2012
5. Chai Wan Park (Note 3)	—	1	18.7.2012	15.9.2012
6. Cloud View Road Service Reservoir Playground	—	1	18.7.2012	10.9.2012
7. King's Road Playground	—	1	18.7.2012	31.12.2012
8. Choi Sai Woo Park	—	1	18.7.2012	8.1.2013
9. Quarry Bay Park	1	1	20.8.2012	18.2.2013
10. Kwok Shui Road Park	—	1	18.7.2012	8.9.2012
11. Shing Mun Valley Park	5	5	18.7.2012	8.9.2012
12. Tsing Yi Park	2	3	18.7.2012	4.8.2012
13. Lion Rock Park	—	—	2.5.2012	19.9.2012
14. Kowloon Park	—	1	13.9.2012	1.2.2013
15. Tuen Mun Recreation and Sports Centre	—	—	23.8.2012	15.10.2012
Total	9	23		

Source: Audit analysis of LCSD records

Note 1: The accidents mainly involved visitors who slipped on the ground and the relevant complaints were received during May to September 2012.

Note 2: According to the ArchSD, the retrofitting works for these 15 venues were carried out by the same contractor and the costs were borne by the ArchSD. The cost of application of anti-slip coating was about \$690,000.

Note 3: Apart from the Chai Wan Park, all other venues were under the Retrofitting Programme.

■ Further remedial works (e.g. re-application of anti-slip coating, and dismantling and re-routing of tactile guide paths) were carried out in these venues.

## Acronyms and abbreviations

AC	Access Co-ordinator
AO	Access Officer
ArchSD	Architectural Services Department
Audit	Audit Commission
BD	Buildings Department
BO	Buildings Ordinance
B/D	Bureau/department
B(P)R	Building (Planning) Regulations
CEDD	Civil Engineering and Development Department
C for R	Commissioner for Rehabilitation
CFS	Centre for Food Safety
CS	Cultural Services
CSTDI	Civil Service Training and Development Institute
CWRF	Capital Works Reserve Fund
DDO	Disability Discrimination Ordinance
DM	Design Manual
D&B	Design-and-build
EHB	Environmental Hygiene Branch
EOC	Equal Opportunities Commission
FEHD	Food and Environmental Hygiene Department
GPA	Government Property Agency
HA	Hong Kong Housing Authority
HyD	Highways Department
LCSD	Leisure and Cultural Services Department
LegCo	Legislative Council
LS	Leisure Services
LWB	Labour and Welfare Bureau
mm	Millimetre
PCAO	Private Columbaria Affairs Office
PNAP	Practice Notes for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers
PWD	Person with disabilities
TD	Transport Department