

PROVISION OF BARRIER-FREE FACILITIES IN PUBLIC RENTAL HOUSING ESTATES

Executive Summary

1. The Hong Kong Housing Authority (HA) is responsible for developing and implementing a public housing programme to meet the housing needs of low-income families that cannot afford private accommodation. One of the missions of HA is to provide an age-friendly and barrier-free estate environment to address the needs of residents of different ages and physical ability. As at 30 June 2023, the Housing Department (HD), as the executive arm of HA, managed 818,468 public rental housing (PRH) flats for 2.1 million residents, which were located in 237 housing estates (comprising 193 PRH estates, 39 Tenants Purchase Scheme (TPS) estates and 5 estates under other subsidised housing schemes, i.e. the Home Ownership Scheme, the Buy or Rent Option (BRO) Scheme and the Green Form Subsidised Home Ownership Scheme). As at 30 June 2023, HD had 4,741 staff in its Estate Management Division (EMD) which was responsible for the management and maintenance of PRH estates.

2. It is the established policy of HA to comply with the prevailing requirements in the “Design Manual: Barrier Free Access” (DM) on the provision of barrier-free access and facilities, wherever practicable. HA implemented improvement programmes in 2001 and 2010 to tally with the launch of DM 1997 and DM 2008 respectively. Since 2008, HA has implemented the Lift Addition Programme (LAP) in existing PRH estates as lifts constitute a major part of barrier-free facilities. In addition, the Highways Department (HyD) also implements projects to retrofit lifts to walkways in estates under TPS and BRO Scheme, and PRH estates with properties divested under HA in the Special Scheme of the Universal Accessibility Programme (UAP). The Universal Accessibility Project Team under the Major Works Project Management Office of HyD is responsible for overseeing the implementation of UAP. The Audit Commission (Audit) has recently conducted a review to examine the provision of barrier-free access and facilities in PRH estates.

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Barrier-free access and facility improvement programmes

3. *Need to enhance the monitoring of submission of results of regular checks on provision and maintenance of barrier-free access and facilities.* HA nominated Access Officers on individual site basis to provide assistance to persons with disabilities (PWDs) in accessing premises and using services and facilities therein, and handling complaints regarding accessibility issues for the venues. According to HD's departmental general circular, Access Officers should conduct regular checks of the facilities available to PWDs on each premises to ensure adequate provision of barrier-free facilities/services, proper maintenance of the facilities, and addition of such facilities. Quarterly Returns would be called from Access Officers. Audit analysed the submission of results of regular checks by Access Officers covering the period from April 2022 to March 2023 and found that for 97 (41%) of the 237 housing estates, not all the required results had been submitted. In particular, no results had been submitted for 25 (11%) estates (paras. 1.9, 2.3 and 2.4).

4. *Audit's site inspections on barrier-free access and facilities.* In addition to the regular checks conducted by the Access Officers, barrier-free access and facilities are subject to daily patrols by the estate staff to ensure their proper functioning as they are considered as part of estate facilities. From June to August 2023, Audit conducted site inspections to 4 PRH estates, focusing on the major improvement works of the improvement programmes implemented in 2001 and 2010. Audit's site inspections found deviations from DM 2008 and HD's technical guide, and defects in all the 4 estates. For example, tactile warning strips were not provided in front of a door, at head and foot of a ramp or at staircases in 3 estates and the audible signal and indication of the stopping floor in lift cars was out of order in 2 estates. None of the deviations and defects identified by Audit had been identified during the regular checks/daily patrols conducted by HD (paras. 2.5 to 2.8).

5. *Room for improvement in provision of multi-sensory maps.* In 2006, HD developed a multi-sensory map with a PWDs group to provide directions by visual, tactile and voice messages for all people, regardless of their age and quality of vision. As at 30 June 2023, multi-sensory maps were installed in 72 (37%) of the 193 PRH estates. From June to August 2023, Audit conducted two site inspections on the conditions of each of the 36 multi-sensory maps in 10 PRH estates and found that 27 (75%) maps (in 8 estates) were defective in both site inspections (paras. 2.9 to 2.11).

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6. *Room for improvement in processing applications for adaptation works.*

HA provides free adaptation works in PRH flats upon applications from elderly or disabled tenants. EMD has promulgated an instruction “Adaptation Works in Flats Occupied by Disabled and Elderly Persons” setting out the processing of such applications by estate staff. Audit examination found that:

- (a) in 15 applications for adaptation works in 5 estates from 1 January 2022 to 30 June 2023, long time had been taken from receiving applications to issuing works orders (76 days on average, ranging from 26 to 140 days). In particular, estate staff took more than 50 days before asking the District Maintenance Offices to process the applications in 2 cases; and
- (b) in 4 complaint cases received from 1 January 2020 to 30 June 2023 about adaptation works not being processed/being declined:
 - (i) in 3 cases, the tenants requested estate staff to conduct adaptation works to their flats without referrals or recommendations from professionals. In 1 of the 3 cases, while acknowledging the request, the estate staff did not inform the tenant that referral or recommendation from professionals was required and the request had not been proceeded. HA had not promulgated detailed application procedures and the required supporting documents (i.e. referrals or recommendations from professionals) for adaptation works; and
 - (ii) in the remaining case, despite that recommendation from an occupational therapist had been submitted, the estate staff declined the tenant’s request for conducting non-standard adaptation works without referring the case to their supervisor nor informing the tenant the refusal reason(s), at variance with EMD’s instruction (paras. 2.15 and 2.16).

7. *Need to step up efforts to obtain consent for the installation of Visual Fire Alarm (VFA) systems.*

In October 2019, with consent from the Fire Services Department and the positive outcome of a trial run in a domestic flat, HA endorsed the installation of VFA systems to PRH flats with hearing-impaired tenants free of charge, subject to their requests. As of 30 June 2023, there were 1,558 PRH flats with hearing-impaired tenants, of which 94 (6%) flats were located in the 42 estates under TPS, BRO Scheme and Home Ownership Scheme, where written consent from

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the respective Incorporated Owners for the connection of VFA to their communal fire service systems is required. Audit noted that up to 30 June 2023, written consent was not yet obtained from 20 (48%) estates, of which 18 estates were with hearing-impaired tenants (involving 42 PRH flats) (paras. 2.20 and 2.21).

8. ***Room for improvement in the appointment and training of Access Officers.*** As at 30 June 2023, 229 estate staff were appointed as Access Officers to cover estates with PRH flats. Some Access Officers are responsible for more than 1 estate. Audit examination revealed that of the 237 housing estates, 6 estates had not appointed Access Officers for a long period of time since the implementation of the Access Co-ordinator and Access Officer Scheme in April 2011 (e.g. no Access Officer had been appointed as at 30 June 2023 in 1 estate). Moreover, HD arranges training for Access Officers every year but it has not stipulated requirements for them to attend training. Audit analysed the attendance of the training sessions conducted from 1 January 2018 to 31 July 2023 and found that of the 229 Access Officers, 105 (46%) did not attend any training (paras. 2.24 and 2.25).

Lift Addition Programme

9. In 2008, HA implemented a centralised LAP with a holistic and consistent approach on evaluation, prioritisation, shortlisting, execution and monitoring of lift addition projects. Two stages of programme, namely LAP Stage 1 and LAP Stage 2, were implemented in 2008 and 2013 respectively. From 2015-16 onwards, LAP was changed from a multi-year rolling programme to an annual on-going programme and two annual exercises (i.e. LAP 2015-16 and LAP 2016-17) had been conducted. According to HD, after LAP 2016-17, as the anticipated number of future lift addition proposals would be very small, annual exercises were no longer conducted (paras. 3.2 to 3.7).

10. ***Need to keep in view implementation of lift addition proposals.*** According to HD, the Regional Management Offices (RMOs) consider lift addition proposals and the proposals are submitted to the Maintenance Planning and Review Committee (MPRC) for its consideration. As at 31 March 2023, there were 24 proposals in the list of potential future lift addition projects submitted to MPRC which had not been shortlisted for implementation. Among the 24 proposals, the agreement from the co-owners were still pending in 7 proposals while the needs for lift installation were being monitored by respective RMOs in 6 proposals. According to HD,

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circumstances (such as change of co-ownership) might change which render these proposals feasible to be implemented. Audit considers that HD should continue to keep in view the need and feasibility of implementing the potential lift addition proposals (paras. 3.8 and 3.9).

11. ***Need to expedite implementation of shortlisted projects.*** Seven lift addition proposals shortlisted in the annual exercises (5 in LAP 2015-16 and 2 in LAP 2016-17) had not been implemented as of September 2023. Of the 7 proposals, 1 proposal was not recommended for implementation as the vertical distance between the platforms of different levels was small. Audit examination revealed that, while RMOs had sought agreement on the project details and cost sharing on the lift addition proposals with the co-owners, of the remaining 6 proposals in divested estates: (a) agreement from the co-owners could not be obtained in 4 proposals; and (b) for the remaining 2 proposals, the preliminary feasibility studies were completed in January 2016 and February 2018 respectively and the detailed feasibility studies were still in progress as of June 2023 (para. 3.10).

12. ***Domestic blocks not provided with lifts.*** As of June 2023, there were 30 blocks located in three PRH estates (i.e. Cheung Kwai Estate in Cheung Chau, Lung Tin Estate in Tai O and Model Housing Estate in North Point) not provided with lifts. According to HD, its study in 2006 revealed that it was technically not feasible to provide lifts in the lower blocks of 5 to 6 storeys in Model Housing Estate. For Lung Tin Estate and Cheung Kwai Estate, lift services were not provided because the domestic blocks were all of 3 to 4 storeys. Despite this, HD would continue making use of the current transfer arrangements in order to cater for the needs of the elderly and disabled persons concerned. As at 30 June 2023, about 30% of tenants in the three estates were elderly. According to the 2022 Policy Address, the Government would provide better public space, facilities and estate environment for public housing residents. In Audit's view, there is a need to explore measures to further enhance the living environment of the elderly residing in the domestic blocks not provided with lift services in the three PRH estates (paras. 3.11 to 3.13, 3.15 and 3.16).

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Retrofitting lifts at walkways relating to housing estates under Universal Accessibility Programme

13. In August 2012, the Government promulgated a new policy on universal accessibility and would consider installing lifts for walkways even when standard ramps had already been installed. Since then, the Government has progressively launched various phases of UAP with expanded scope to cover more walkways. In the 2019 Policy Address, the Government announced that the ambit of UAP would be further expanded to retrofit lifts to walkways in estates under the Special Scheme (see para. 2). According to HyD, as at 31 August 2023, 191 lift retrofitting items had been completed under various phases of UAP and there were 33 items under the Special Scheme (paras. 1.13 to 1.16).

14. *Need to enhance consultation with District Councils.* From 2020 to 2021, HyD conducted consultation with the relevant District Councils on implementation of the Special Scheme. Audit examination revealed that of the 39 walkways selected as priority or replacement items for implementation under the Special Scheme, 8 were not included in the lists of walkways provided to the relevant District Councils during the first stage of consultation. In 4 (50%) of the 8 excluded items, they were considered to be of low priority according to HyD's preliminary assessment taking into account various factors (e.g. presence of nearby existing at-grade pedestrian crossing, existing lifts in adjacent shopping malls, pedestrian flow, etc.). For the remaining 4 (50%) items, they were not included in the information provided by HD (paras. 4.6 and 4.7).

15. *Need to take measures to minimise extension of time required for handling underground utilities.* Audit examination found that there were extensions of time for completing the construction works of two lifts, which were mainly caused by the long time taken in handling underground utilities, as follows:

- (a) *Lift A.* According to the works contract which commenced on 22 May 2015, the lift retrofitting works for Lift A were scheduled for completion within 730 days with completion date on 20 May 2017. However, the actual completion date of the retrofitting works was 8 May 2020. According to HyD, an overall extension of time of 1,084 days was granted for completing the works of this lift, including 715 days for handling underground utilities; and

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- (b) ***Lift B.*** According to the works contract which commenced on 22 May 2015, the lift retrofitting works for Lift B were scheduled for completion within 912 days with completion date on 18 November 2017. However, the actual completion date of the retrofitting works was 16 October 2019. According to HyD, an overall extension of time of 697 days would be granted for completing the works of this lift, including 418 days for handling underground utilities (para. 4.19).
16. ***Need to make continued efforts in expediting the completion of outstanding lift retrofitting works.*** Audit examination found that while the relevant works contract commenced in October 2019, as at 31 August 2023, the construction of three lifts had not yet been completed. Audit analysed their original completion dates stipulated in the works contract and their completion dates forecasted by HyD, and noted that there would be delays in completing the works, ranging from 406 to 620 days. According to HyD, this was mainly attributable to the slow progress of the works contractor and site idling. In view of the continued unsatisfactory performance of the works contractor in meeting the progress of lift retrofitting works stipulated in the works contract, HyD had taken various follow-up actions (e.g. in June 2023, HyD issued an Adverse Report to the works contractor, and conducted an interview with the senior management of the works contractor). Audit notes the follow-up actions taken by HyD and considers that HyD needs to make continued efforts in expediting the completion of outstanding lift retrofitting works (paras. 4.22 and 4.24).
17. ***Need to conduct review on applying Modular Integrated Construction (MiC) and Early Contractor Involvement in works contracts under UAP.*** According to HyD, the overall construction period of typical lift retrofitting works can take around 3.5 years. In order to expedite the construction of lifts under UAP, HyD has been piloting two new initiatives since late 2021, namely MiC and Early Contractor Involvement. With a view to evaluating the suitability and effectiveness of applying MiC and Early Contractor Involvement in its future works contracts under UAP, HyD should conduct a review after gaining more experience on applying the two new initiatives (paras. 4.27 and 4.32).

Audit recommendations

18. **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 Director of Housing should:**

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- (a) **take measures to enhance the monitoring of the submission of the results of regular checks conducted by Access Officers (para. 2.13(a));**
- (b) **enhance the regular checks/daily patrols on barrier-free access and facilities, and take actions to rectify the defects and deviations from DM 2008/technical guide of barrier-free access and facilities identified by Audit as far as practicable (para. 2.13(b));**
- (c) **remind HD staff to regularly check the conditions of multi-sensory maps in PRH estates and upkeep the maps in good working conditions (para. 2.13(c));**
- (d) **explore measures to enhance the durability of the multi-sensory maps and reduce the occurrence of defects as far as practicable (para. 2.13(d));**
- (e) **review the application process for adaptation works with a view to shortening the processing time as far as practicable (para. 2.22(a));**
- (f) **enhance the promulgation of application procedures for adaptation works and remind estate staff to follow the instruction “Adaptation Works in Flats Occupied by Disabled and Elderly Persons” when handling applications for adaptation works (para. 2.22(b));**
- (g) **step up efforts in obtaining consent for the installation of VFA systems from Incorporated Owners of the estates under TPS, BRO Scheme and Home Ownership Scheme (para. 2.22(d));**
- (h) **take measures to monitor the appointment of Access Officers for all housing estates (para. 2.27(a));**
- (i) **take measures to enhance the training attendance by Access Officers (e.g. by stipulating requirements on their attendance of training) (para. 2.27(b));**

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Lift Addition Programme

- (j) continue to keep in view the need and feasibility of implementing the potential lift addition proposals (para. 3.17(a));
 - (k) closely monitor the progress of the detailed feasibility studies with a view to further expediting the implementation of the two lift addition proposals mentioned in paragraph 3.10(c) (para. 3.17(b)); and
 - (l) explore measures to further enhance the living environment of the elderly residing in the domestic blocks not provided with lift services in the three PRH estates (i.e. Cheung Kwai Estate, Lung Tin Estate and Model Housing Estate) (para. 3.17(c)).
19. Audit has also *recommended* that the Director of Highways should:

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- (a) consider providing more comprehensive information in conducting consultation with the District Councils in future (para. 4.15(b));
- (b) in implementing lift retrofitting works, continue to take measures to minimise the extension of time required for handling underground utilities as far as practicable (para. 4.25(a));
- (c) make continued efforts in expediting the completion of outstanding lift retrofitting works (para. 4.25(b)); and
- (d) conduct a review, after gaining more experience on applying MiC and Early Contractor Involvement, with a view to evaluating the suitability and effectiveness of applying the two new initiatives in HyD's future works contracts under UAP (para. 4.33).

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Response from the Government

20. The Director of Housing and the Director of Highways agree with the audit recommendations.