

STREET CLEANSING SERVICES

Executive Summary

1. Street cleanliness is an integral part of environmental hygiene and public health. It can reduce disease transmission and help curb rodent infestation, as well as create a favourable cityscape to enable citizens to enjoy an improved quality of life. The Food and Environmental Hygiene Department (FEHD) is responsible for providing quality environmental hygiene services and facilities and safeguarding public health. The core duties include monitoring of street cleansing service delivery as well as carrying out enforcement actions against illegal disposal of refuse under the relevant Ordinances.

2. According to FEHD, its street cleansing services mainly include street sweeping services, street washing services, gully cleansing services and poster removal services (including the removal of illegal bills and posters). Street cleansing services are delivered by FEHD's staff (i.e. in-house) as well as by contractors (i.e. outsourced). The outsourcing policy aims at greater cost-effectiveness and flexibility in the delivery of services. As at 30 September 2024, the total workforce was about 13,200 (comprising about 3,000 in-house staff and about 10,200 contractors' staff) and about 82% of the street cleansing services were outsourced. In 2023-24, the expenditure for street cleansing and related services amounted to about \$5.1 billion. FEHD did not maintain a separate breakdown of the expenditure on street cleansing services. The Audit Commission (Audit) has recently conducted a review of the work of FEHD on street cleansing services.

Monitoring of service delivery

3. *Need to enhance checking on daily attendance records submitted by contractors.* As at 30 September 2024, FEHD had 42 street cleansing service contracts (each with a duration of three years) with a total contract value of \$7.62 billion. According to the street cleansing service contracts, contractors are required to provide stipulated minimum numbers and types of contractor personnel and ensure their full attendance, and submit daily attendance records to FEHD for checking. For example, for street sweeping services, each workman is allocated with

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a length of road (hereinafter referred to as a beat) within a work shift and each work shift shall be attended by a workman. Audit visited 3 District Environmental Hygiene Offices (DEHOs) (out of 19 DEHOs) and examined their daily attendance records for outsourced street cleansing services in December 2023 and September 2024. Audit found that the attendance requirement of contractors' staff was not fully met in some days for street sweeping, gully cleansing and poster removal services. For example, in December 2023, in 7 of 9,300, 1 of 7,936 and 3 of 8,401 work shifts for street sweeping services, the attendances of contractors' workmen of the three DEHOs were not indicated in the records. Upon enquiry, FEHD informed Audit in March 2025 that, based on the contractors' attendance books which were provided to FEHD upon request, all the work shifts were actually attended by contractors' workmen and provided with the stipulated minimum number of contractor personnel, but the daily attendance records submitted by the contractors concerned to FEHD were inaccurate and these attendances were not reflected. In this connection, Audit noted that Senior Foremen of FEHD had reviewed the daily attendance records submitted by the contractors concerned (paras. 1.9, 1.14, 2.2, 2.4 to 2.7).

4. *Need to enhance compliances with requirements on conducting self-discipline quality inspections for outsourced street cleansing services.* FEHD guidelines stipulate that Health Inspectors shall assign each inspection team of contractor to conduct at least two self-discipline quality inspections per week and cover two tasks for each inspection to monitor the street cleansing services delivered by their workmen. Audit examined the inspection records of contractors' inspection teams for outsourced street cleansing services of the three DEHOs (see para. 3) for September 2024 and found that for one DEHO (involving 9 inspection teams): (a) 4 inspection teams carried out only one task in each self-discipline quality inspection; and (b) the other 5 inspection teams did not conduct any self-discipline quality inspection in one week and only conducted one self-discipline quality inspection each in another two weeks. In this connection, Audit noted that the Health Inspectors concerned had not assigned tasks/the required number of tasks to the contractors' inspection teams for conducting the self-discipline quality inspections for the period (paras. 2.8 and 2.9).

5. *Need to conduct monitoring inspections as well as submit and review monitoring inspection reports for outsourced street cleansing services in accordance with stipulated frequencies, timeframes and coverage.* Apart from contractors' self-discipline quality inspections, FEHD conducts monitoring inspections under a multi-tier monitoring mechanism (comprising daily inspections, formal inspections, assigned risk-based surprise inspections, supervisory checks and systematic

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inspections) to monitor outsourced street cleansing services. According to FEHD guidelines, each district is divided into 12 cleansing sectors by making reference to the existing boundary areas of the supervisory staff of district cleansing sections and the distribution/percentage of the outsourced areas and in-house areas. Audit examined the monitoring inspection records of the three DEHOs (see para. 3) for outsourced street cleansing services and noted that:

- (a) some monitoring inspections were not conducted in accordance with the frequencies and coverage stipulated in FEHD guidelines. For example, in the period from 1 to 14 September 2024: (i) for two DEHOs, 5 (2%) of 210 and 21 (12%) of 182 daily inspections did not cover the required beats (against the requirement of covering at least 10% of the cleansing sector each working day); and (ii) for one DEHO, there was no documentation showing that 6 (2%) of 271 beats were covered in daily inspections (against the requirement of covering the whole cleansing sector (i.e. every beat) once every 10 working days); and
- (b) the monitoring inspection reports were not always submitted and reviewed in accordance with the timeframes stipulated in FEHD guidelines in the period from January 2023 to September 2024. The delays ranged from 1 to 10 working days (paras. 1.9, 2.3, 2.10 to 2.12).

6. ***Room for improvement in handling contractors' non-compliances with contract terms.*** Under the street cleansing service contracts, warnings (verbal/written) and/or default notices will be issued to contractors for breach of contract terms. According to FEHD, in tender assessment exercises of street cleansing service contracts, the evaluation will take into account the number of default notices and demerit points (e.g. a demerit point is given to the contractor for each employment-related default notice issued in respect of wages) issued to the contractors submitting the tenders, which has created a deterrent effect (paras. 2.14 and 2.17). Audit noted the following issues:

- (a) ***Need to issue warning letters and default notices in accordance with stipulated timeframe.*** According to FEHD guidelines, all warning letters/default notices should be delivered to contractors as soon as possible and be completed within 7 working days after the discovery of the breaches. Audit examination of the warning letters and default notices issued by FEHD to contractors of 19 DEHOs in the period from January 2019 to September 2024 found that FEHD did not maintain readily available

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information on the delivery dates of warning letters/default notices. The time lags between the identification of non-compliances and issuance of the warning letters/default notices had exceeded 7 working days for 230 (66%) of 351 warning letters and 2,103 (54%) of 3,870 default notices to the contractors (para. 2.15); and

- (b) ***Need to review effect of FEHD's measures regarding past performance of contractors on future tender assessment exercises.*** Audit examination of the latest completed street cleansing service contracts for 19 DEHOs as of September 2024 (involving a total of 38 contracts) noted that the total number of default notices issued was 35 on average (ranging from 2 to 179) for each contract. Among these 38 contracts, Audit examination of 10 contracts with the largest number of default notices issued revealed that each of the 10 contracts was issued 74 (ranging from 45 to 179) default notices on average. Audit also noted that as of September 2024, scores of 7 and 15 (out of 100) technical marks were allocated for contractors' demerit point records and past performance records respectively in the tendering exercises of street cleansing service contracts and there was room for further adjusting the relevant scores (paras. 2.17 to 2.19).

7. ***Room for improvement in delivering in-house street cleansing services.*** Audit examined the records of the three DEHOs (see para. 3) for in-house street cleansing services in December 2023 and September 2024, and noted that:

- (a) for street sweeping services: (i) workmen of two and one DEHOs were absent for some work shifts in December 2023 and September 2024 respectively (e.g. 31 (1%) of 3,100 work shifts for a DEHO in December 2023); and (ii) for two DEHOs, some workmen were assigned to provide street sweeping services in more than one beat within a work shift (e.g. 121 (14%) of 837 work shifts for a DEHO in December 2023). As the duties of each workman concerned would be thinned out, the street sweeping services were not provided at a frequency as planned; and
- (b) for street washing services, street washing vehicles were not deployed as planned or their operation was temporarily suspended in some work shifts (e.g. 33 (53%) of 62 work shifts and 4 (17%) of 24 work shifts in December 2023 respectively) for two DEHOs (para. 2.22).

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8. ***Room for improvement in conducting monitoring inspections as well as submitting and reviewing monitoring inspection reports for in-house street cleansing services.*** Audit examined the monitoring inspection records of the three DEHOs (see para. 3) for in-house street cleansing services and noted that:

- (a) some monitoring inspections were not conducted in accordance with the frequencies and coverage stipulated in FEHD guidelines. For example, for Foremen's daily inspection, in the period from 1 to 14 September 2024 (comprising seven rounds), of 10 beats of each of the three DEHOs examined by Audit, the stipulated frequency and coverage (i.e. alternate days to every beat) was not met in most (i.e. five to seven) rounds of inspections for the three DEHOs. Besides, the monitoring inspection reports were not always submitted and reviewed in accordance with the timeframes stipulated in FEHD guidelines in the period from January 2023 to September 2024. The delays ranged from 1 to 17 working days; and
- (b) FEHD guidelines stipulate that Overseers may carry out random and surprise checks on the daily inspection work performed by Foremen under their purview and management of DEHOs should ensure a cycle of the inspection to all services to be taken within a reasonable period of time. However, in the period from January 2023 to December 2024, the numbers of Overseers' daily inspections varied among the three DEHOs, ranging from 152 to 556. Furthermore, 150 daily inspections were not recorded by one DEHO in the E-Management System for In-house Cleansing Services and Pest Control Services (EMS) as required. Besides, no reports were submitted for the 150 daily inspections and 796 reports were reviewed 1 to 519 working days (averaging 43 working days) after the Overseers' daily inspections. However, no timeframe was set in FEHD guidelines in this regard (paras. 2.3, 2.24 to 2.26, 2.28 and 2.29).

9. ***Need to keep under review provision of in-house street cleansing services.*** According to FEHD, the percentage of in-house street cleansing services slightly decreased from 19% as at 31 December 2019 to 18% as at 30 September 2024. In view of variance in such percentages among 19 DEHOs (ranging from 5% to 37% as of September 2024), higher percentage of work shifts in which in-house workmen were absent (see para. 7(a)) as compared to contractors' workmen (see para. 3) and a high vacancy rate of in-house workmen (i.e. a shortage of 283 (13%) workmen as of September 2024), FEHD needs to keep under review the provision of in-house street

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cleansing services and take follow-up actions as appropriate (paras. 2.33, 2.34 and 2.37).

Tackling illegal disposal of refuse

10. *Scope for improvement in monitoring work programs of Dedicated Enforcement Teams (DETs).* FEHD carries out enforcement actions against people committing public cleanliness offences. Under the Fixed Penalty (Public Cleanliness and Obstruction) Ordinance (Cap. 570), FEHD may issue Fixed Penalty Notices (FPNs) for specified public cleanliness offences (e.g. littering in public places). FEHD may also institute prosecution by way of summons against the offenders. Since 2017, FEHD has set up DETs to step up enforcement actions against various public cleanliness offences. DET members perform enforcement duties in plain clothes and are deployed to various littering black spots. According to FEHD, the work programs set out the work covered by DETs. However, FEHD had not specified in its guidelines the information to be included in the work programs. Audit visited three DEHOs to review the work of DETs and noted the following issues:

- (a) *Number of locations included in DETs' work programs varied significantly among DEHOs with similar number of DETs.* Audit examined the work programs for 2024 (up to October) and noted that while the number of DETs under the purview of the three DEHOs was similar (i.e. 5 to 6 DETs as of October 2024), the average number of locations selected for conducting daily inspection by DETs as shown in their work programs varied significantly (i.e. 2, 22 and 58 locations); and
- (b) *Need to enhance documentation of work performed by DETs for monitoring compliance with work programs.* For the three DEHOs, Audit noted that the documentation of the work performed by DETs varied (e.g. the time of inspection was recorded by two DEHOs but not by one DEHO) and there was no documentation showing that the locations inspected were compared against those in the work programs of DETs for monitoring compliance (paras. 1.12 and 3.6).

11. *Scope for improving situation reports.* According to FEHD guidelines, records on locations with littering activities and actions taken to tackle the problem should be properly recorded in a Situation Report on Handling of Locations with Littering Activities by DET (hereinafter referred to as situation report). The criteria

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for including locations with littering activities (in the past three months) in the situation report include identified top five hotspots under the Complaint Management Information System (CMIS) and frequent littering/illegal dumping activities reported at the locations. For the three DEHOs (see para. 10), Audit examined the situation reports for October 2024 and noted the following issues:

- (a) ***Some hotspots not included in situation reports.*** While 39 locations were identified as the top five hotspots in CMIS reports in the period from July to September 2024 (i.e. with littering activities in the past three months), 32 (82%) locations were not included in the situation reports for monitoring by DETs;
 - (b) ***Need to consider including locations with frequent littering activities detected by Internet Protocol (IP) cameras in situation reports.*** While 49 locations were detected by IP cameras (see para. 13) with illegal disposal of refuse in the period from July to September 2024, 39 (80%) locations were not included in the situation reports. In particular, 8 (21%) of the 39 locations had been reported with illegal disposal of refuse activities for over 500 to 2,141 times (averaging 1,170 times) in the three-month period; and
 - (c) ***Need to review actions needed at locations included in situation reports for a long time.*** Audit noted that 37 locations had been included in the situation reports of the three DEHOs for a long time, ranging from about 1.5 years to about 7.3 years (averaging about 3.6 years) in spite of the fact that 2 to 62 (averaging 6) blitz operations had been organised in the period from July to September 2024 for each location (paras. 3.5 and 3.8).
12. ***Need to review operations of DETs.*** DETs had been set up for more than 7 years and the number of DET members increased by about 34% from 158 in 2020 to 211 in 2024. Audit noted that the penalty levels of FPNs had increased since 22 October 2023, and the average number of FPNs issued by each DET member and the number of black spots of refuse dumping dealt with by DETs decreased generally from 2020 to 2024. On the other hand, the work programs of DETs varied among different DEHOs. As of February 2025, no documentation was available showing that an evaluation on operations of DETs had been conducted (para. 3.12).

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13. ***Need to enhance monitoring of deployment of IP cameras.*** FEHD has installed IP cameras at illegal refuse deposit black spots to curb the illegal deposits of refuse in public places. According to FEHD guidelines, based on the footage captured by IP cameras, districts can analyse the timing and patterns of the illegal acts to formulate more effective enforcement operations and take prosecution action against registered owners of vehicles or relevant offenders. Districts should periodically review the target locations for installation of IP cameras and relocation of the IP cameras to new target locations should be strategically considered. The number of locations installed with IP cameras was 470 as of December 2024. For the deployment of IP cameras by the three DEHOs (see para. 10), Audit noted the following issues:

- (a) ***Need to review locations installed with operating IP cameras but with no or few FPNs or summons issued.*** As of December 2024, 45 locations had been installed with operating IP cameras for more than six months. In the period from 2022 to 2024, for 7 (16%) locations, no FPN or summons was issued (the operating period of the IP cameras ranged from 10 months to about 2.8 years, averaging about 1.8 years); and
- (b) ***Some illegal refuse deposit black spots not installed with operating IP cameras.*** As of October 2024, of the 37 locations included in the situation reports of the three DEHOs for a long time (ranging from about 1.5 years to about 7.3 years), 23 (62%) locations had not been installed with operating IP cameras (paras. 3.13 and 3.14).

14. ***Scope for improving environmental hygiene of problematic spots.*** Audit conducted three site visits to 10 locations with environmental hygiene problems (hereinafter referred to as problematic spots) under the purview of the three DEHOs (see para. 10) in the period from December 2024 to February 2025, and noted the following issues:

- (a) ***Environmental hygiene problems found in some problematic spots and their adjacent areas.*** For 2 (20%) problematic spots, Audit found environmental hygiene problems at the locations during the three site visits. For other 2 (20%) problematic spots, while environmental hygiene problems were not always found at the spots, the problems were found in areas adjacent to the problematic spots during the three site visits; and

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- (b) ***Scope for enhancing actions against obstruction to cleansing operations.*** For any article obstructing or likely obstructing any cleansing operations, FEHD may serve the owner of such article or attach to such article a notice requiring removal within four hours after the notice is served or attached. For the 4 locations with environmental hygiene problems (see (a) above), Audit noted that no notice for removal of obstruction was attached to the articles in all three site visits. According to FEHD, the styrofoam boxes or carton boxes accumulated at the 4 locations were not waste, but were recyclable or reusable, and it would step up street cleansing services at locations with active recycling activities and carefully balance the need to facilitate recycling activities and upkeep environmental hygiene in public places in consultation with relevant departments (paras. 3.17 to 3.21).

Other related issues

15. ***Need to enhance reporting mechanism of performance measures on street cleansing services.*** FEHD has set performance measures in its Controlling Officer's Report (COR) and on its website. According to FEHD, DEHOs shall submit returns for the performance measures through the Environmental Hygiene Statistical Information System (EHSIS) and all the performance measures were met in 2019 to 2023. Audit examined the returns submitted by DEHOs and found that:

- (a) ***Street sweeping services.*** Regarding the reporting of the performance measure in COR (i.e. "completion of first round street sweeping services on main roads before 9:00 a.m. to ensure removal of over-night street litter"), some information in 47 (4%) of 1,140 returns was not available in the period from 2019 to 2023. Based on the information reported in 19 DEHOs' returns, the achievement of 100% of the performance measure could not be ascertained; and
- (b) ***Street washing services.*** Regarding the reporting of the performance measure "to wash streets on a need basis, at least once a week in busy areas, and at least 2 times weekly in problematic areas/black spots" on FEHD's website, the returns only required the reporting of achievement of washing streets at least once a week (i.e. the achievement of washing streets "on a need basis" and "at least 2 times weekly" was not required to be reported). Based on the information reported in 19 DEHOs' returns in the period from 2019 to 2023, the achievement of 100% of the performance measure could not be ascertained. Audit further examined the records of

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the three DEHOs (see para. 3) and noted that the number of streets to be washed at least once a week stated in the returns submitted by one DEHO was different from those in the list of busy areas maintained by the DEHO concerned (paras. 4.2 to 4.4 and 4.7).

16. ***Need to enhance management information for monitoring street cleansing services.*** Audit noted non-compliances with contracts by outsourced contractors and inadequacies in FEHD's monitoring of street cleansing services (e.g. compliance with staff attendance requirement for street cleansing services and compliance with the work programs of DETs). In this connection, some management information (e.g. highlights or summaries) was not readily available or regularly compiled to facilitate the monitoring of performance of all DEHOs (paras. 4.11 and 4.12).

17. ***Need to explore the use of technologies in monitoring service delivery.*** Audit noted that: (a) DEHOs relied heavily on paper-based documents submitted by contractors to monitor the delivery of street cleansing services. The work programmes and reports of in-house street cleansing services were also kept in paper forms. The manual vetting procedures involved were resource intensive, time consuming and prone to errors; and (b) apart from daily inspections, records of other monitoring inspections under the multi-tier monitoring mechanism (see para. 5) were in paper forms (para. 4.19).

18. ***Need to conduct more employment-related inspections.*** According to FEHD, public cleansing service contracts rely heavily on the deployment of non-skilled workers and the Central Investigation Team was set up under its Quality Assurance Section in September 2005 with a view to tightening the control on its contractors (e.g. conducting employment-related inspections to obtain timely feedback from contractors' employees through completing questionnaires). According to FEHD guidelines, employment-related inspections are conducted on a daily basis, subject to manpower deployment. Audit examination of 61 street cleansing service contracts commenced and completed in the period from January 2019 to December 2024 for 19 DEHOs noted that only 41 employment-related inspections (involving 36 street cleansing service contracts) were conducted, i.e. at a frequency far lower than "on a daily basis" stated in FEHD guidelines (paras. 4.24, 4.27 and 4.28).

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Audit recommendations

19. 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 Food and Environmental Hygiene should:

Monitoring of service delivery

- (a) enhance checking on daily attendance records submitted by contractors and take follow-up actions against the contractors for submitting inaccurate records (para. 2.20(a));
- (b) take measures to enhance compliances with the requirements on conducting self-discipline quality inspections for outsourced street cleansing services and document the reasons for non-compliances (para. 2.20(b));
- (c) strengthen measures to monitor the compliance with the frequencies and coverage stipulated in FEHD guidelines for monitoring inspections, and the submission and review requirements on the monitoring inspection reports stipulated in FEHD guidelines for street cleansing services (paras. 2.20(c) and 2.38(c));
- (d) take measures to improve the timeliness in issuing warning letters and default notices to contractors, and review FEHD guidelines on the timeframe for issuing warning letters and default notices to contractors (para. 2.20(d) and (e));
- (e) review the effect of FEHD's measures regarding the past performance of contractors on future tender assessment exercises and take follow-up actions as appropriate (para. 2.20(f));
- (f) strengthen measures to monitor the compliance with the planned frequencies for in-house street sweeping services and approved work programmes for in-house street washing services (para. 2.38(a) and (b));

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- (g) regarding Overseers' daily inspections for in-house street cleansing services, regularly review the frequency, take measures to enhance the maintenance of records in EMS and consider setting a timeframe for reviewing the reports (para. 2.38(d) to (f));
- (h) keep under review the provision of in-house street cleansing services, taking into account the staff recruitment situation, and take follow-up actions as appropriate (para. 2.38(g));

Tackling illegal disposal of refuse

- (i) specify the information to be included in work programs of DETs in FEHD guidelines (para. 3.23(a));
- (j) enhance documentation of the work performed by DETs for monitoring compliance with the work programs (para. 3.23(b));
- (k) review the inspections and enforcement actions needed for locations with frequent littering activities and long outstanding cases in situation reports, and properly record the locations in situation reports for monitoring by DETs (para. 3.23(d));
- (l) conduct a review on the operations of DETs and take follow-up actions as appropriate (para. 3.23(e));
- (m) take measures to require DEHOs to periodically review the deployment of IP cameras in accordance with FEHD guidelines (para. 3.23(f));
- (n) review the current measures of improving street cleanliness of locations with persistent hygiene problems in public places (para. 3.23(g));
- (o) for cases involving obstruction to street cleansing operations and relating to broader street management issues, keep under review the street cleanliness of the locations and take appropriate follow-up actions (para. 3.23(h));

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Other related issues

- (p) **enhance EHSIS to monitor the completeness of information in the returns for performance measures (para. 4.9(a));**
- (q) **enhance the reporting mechanism of the performance measures on street cleansing services (para. 4.9(b));**
- (r) **regarding the performance measure on street washing services, review the design of the return to facilitate the reporting of achievement and take measures to check the consistencies between the number of streets in the returns and those in the lists of busy areas maintained by individual DEHOs (para. 4.9(d) and (e));**
- (s) **regularly compile management information for monitoring delivery of street cleansing services for all DEHOs and the enforcement figures against public cleanliness offences (para. 4.13);**
- (t) **explore the use of technologies in monitoring street cleansing services (para. 4.21(b)); and**
- (u) **conduct more employment-related inspections as far as practicable with a view to obtaining timely feedback from contractors' employees (para. 4.29(b)).**

Response from the Government

20. The Director of Food and Environmental Hygiene agrees with the audit recommendations.

