

CHAPTER 4

**Culture, Sports and Tourism Bureau
Leisure and Cultural Services Department**

**Management of
public swimming pool complexes**

**Audit Commission
Hong Kong
5 November 2025**

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.

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Audit Commission
6th Floor, High Block
Queensway Government Offices
66 Queensway
Hong Kong

Tel : (852) 2867 3423
Fax : (852) 2824 2087
E-mail : enquiry@aud.gov.hk

MANAGEMENT OF PUBLIC SWIMMING POOL COMPLEXES

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MANAGEMENT OF PUBLIC SWIMMING POOL COMPLEXES

Executive Summary

1. According to a territory-wide physical fitness survey in 2023, swimming is one of the most popular sports in Hong Kong. Under the policy direction of the Culture, Sports and Tourism Bureau (CSTB), the Leisure and Cultural Services Department (LCSD) is responsible for providing and managing public swimming pool complexes, organising a wide range of activities in order to promote swimming at all levels throughout the community, promoting awareness of water sports safety in LCSD's venues, and improving the efficiency and cost-effectiveness in the provision of recreation and sports services. As of June 2025, LCSD managed 46 public swimming pool complexes under the Public Health and Municipal Services Ordinance (Cap. 132) and its subsidiary legislation. In 2024-25, the attendance at public swimming pools was 12.6 million, with revenue of \$142.9 million and expenditure of \$1,276.5 million.

2. A public swimming pool complex is open for use by individuals as well as organisations for training, competition and other sports activities. Each complex may include a variety of heated or non-heated pool types such as main pool, secondary pool, training pool, leisure pool and diving pool. LCSD has arranged regular repair and maintenance of swimming pool facilities. To safeguard swimmers, LCSD has employed qualified lifeguards to provide lifesaving services at public swimming pool complexes. LCSD has also launched the progressive swimming scheme to provide more opportunities for individuals of all ages to participate in swimming and enhance their swimming skills through three levels of progressive training courses. As at 30 June 2025, about 2,280 LCSD staff (including 1,690 civil servants and 590 contract staff) were involved in the management of public swimming pool complexes and relevant sports activity programmes. The Audit Commission (Audit) has recently conducted a review to examine LCSD's management of public swimming pool complexes.

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Provision and utilisation of public swimming pool complexes

3. *Attendance target for public swimming pools not met in recent years.* Since 2018, LCSD had set in its Controlling Officer's Reports (CORs) the annual target of 13,500,000 for attendance at public swimming pools. However, the attendance targets were not achieved from 2020 to 2024, with the actual attendance falling short of the target by 7% to 73% in each year. Despite the resumption of normalcy from the coronavirus disease (COVID-19) epidemic since 2023, the attendance targets were not met in 2023 and 2024, and the actual attendance declined by over 10% compared to that in 2018 and 2019 (paras. 2.4 to 2.6).

4. *Need to lay down guidelines for counting and reporting attendance at public swimming pool complexes.* Audit noted that LCSD did not formulate guidelines for counting and reporting the attendance at public swimming pool complexes in its COR. Audit also found that:

- (a) use of public swimming pool complexes by toddlers (i.e. persons aged below 3) was not counted in the reported figures in COR;
- (b) in April 2022, the Hong Kong Swimming Team made use of two public swimming pool complexes for training purpose with a total attendance of 4,383. However, the LCSD staff concerned did not include the athletes concerned in the actual attendance in COR; and
- (c) different practices were adopted by different pool complexes in counting and reporting the number of swimmers (e.g. those who entered a public swimming pool complex through entrances other than the metered entry gates). Of the 401 swimming galas held in 2024, the attendance figures for only 20 (5%) were accurately reported in COR (para. 2.9).

5. *Variations in the number of LCSD's standard swimming pool complexes and population served across 18 districts.* According to the Hong Kong Planning Standards and Guidelines (HKPSG), the standard of provision is one standard swimming pool complex per 287,000 population, and a standard swimming pool complex usually contains swimming pools of 50 metres and/or 25 metres long. Audit found that, for the total 7,523,000 population of Hong Kong in mid-2024 (excluding the marine population), 26.2 standard swimming pool complexes were required according to the standard of provision stipulated in HKPSG, and 42 standard

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swimming pool complexes were provided by LCSD for individual admission. In mid-2024, 7 districts had at least one more standard swimming pool complex than HKPSG requirement and the average population served by each pool complex varied significantly across 18 districts (ranging from 82,100 to 342,600 population served by one standard swimming pool complex in each district) (paras. 2.14, 2.16 and 2.17).

6. ***Significant variations in average daily attendance and unit cost per swimmer among public swimming pool complexes.*** Audit found that, in 2024-25, the average daily attendance and the unit LCSD's cost per swimmer varied significantly among the public swimming pool complexes, as follows:

- (a) the average daily attendance of a public swimming pool complex ranged from 77 to 3,142; and
- (b) while the overall average LCSD's cost per swimmer of all the swimming pool complexes was \$101, the unit LCSD's cost per swimmer of individual pool complexes varied significantly (ranging from \$42 to \$763). In particular, there were 26 swimming pool complexes whose unit LCSD's cost per swimmer was above the overall average of \$101 (para. 2.19).

7. ***Need to regularly obtain relevant information on private swimming pools to assess local needs.*** According to HKPSG, private recreation facilities (e.g. swimming pools) should be taken into account in assessing the local needs of a district if they can meet the relevant countability criteria. According to LCSD, while it was aware of the number and locations of private swimming pools uploaded on the website of the Food and Environmental Hygiene Department (FEHD — responsible for regulating the operators of private swimming pools under the Public Health and Municipal Services Ordinance), LCSD did not maintain detailed information on private swimming pool facilities (e.g. maximum capacity of swimming pools), which might affect LCSD's assessment of local needs (paras. 2.20 and 2.21).

8. ***Need to review provision of swimming pool complexes.*** Audit noted that some public swimming pool complexes recorded relatively low average daily attendance or comparatively high unit LCSD's cost per swimmer (see para. 6), and LCSD had planned a number of swimming pool projects. There is a need for LCSD to review the provision of swimming pool complexes including ascertaining the reasons for lower average daily attendance or higher unit LCSD's cost per swimmer

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at some public swimming pool complexes, and take appropriate measures to address the issues. LCSD also needs to consider all the relevant factors (including the average daily attendance and unit cost per swimmer of public swimming pool complexes and details of private swimming pool facilities) when planning swimming pool projects in future (paras. 2.15, 2.22 and 2.24).

9. ***Need to provide more comprehensive information for Finance Committee (FC)'s consideration of public swimming pool projects.*** Audit analysis of the funding papers submitted to the Legislative Council for the 5 most recently approved new public swimming pool projects as of September 2025 revealed that, while FC had been informed of the population of the respective districts, no specific reference had been made to the relevant HKPSG standards in the FC papers in 3 cases. While CSTB and LCSD indicated that HKPSG standards were only among the many factors for considering the provision of a swimming pool complex, Audit also found that FC had not been informed of the maximum capacity of a new swimming pool complex (paras. 2.25 to 2.27).

Provision of lifesaving services

10. ***Persistent shortage of lifeguards during swimming season.*** The operation of public swimming pool complexes during a year can be broadly categorised into the swimming season (from April to October each year) and the non-swimming season (from November each year to March the following year). According to LCSD, there has been persistent shortage of lifeguards at public swimming pool complexes during the swimming season. LCSD conducted 23 recruitment exercises from January 2018 to January 2025 to recruit lifeguards and the respective recruitment targets were not met in 19 exercises with the recruitment rates (i.e. the percentage of the number of lifeguards recruited over the recruitment target) ranging from 13% to 69% (paras. 1.4 and 3.4).

11. ***Need to take more effective measures to minimise inconvenience to the general public due to temporary closure of public swimming pool facilities arising from the shortage of lifeguards.*** According to LCSD guidelines, in the event of a severe shortage of lifeguards, to avoid full closure of swimming pool facilities, the District Leisure Services Offices concerned should flexibly deploy the lifeguards of swimming pool complexes within the same district or the neighbouring districts if needed. If the shortage of lifeguards is still not alleviated, temporary closure of some pool facilities may be considered. Despite the presence of these guidelines, Audit

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found that the partial closure rate (i.e. the percentage of the total number of days with partial closure of pool facilities over the total number of scheduled opening days) of public swimming pool complexes due to the shortage of lifeguards was 30% in 2022, followed by 36% in 2023 and 41% in 2024, and then 38% in 2025 (up to August) (paras. 3.7 and 3.8).

12. ***Need to promptly address lifesaving services contractor's non-compliance with contract requirements and keep under review implementation of trial scheme for outsourcing lifesaving services.*** In August 2024, LCSD launched a trial scheme to outsource the lifesaving services at six public swimming pool complexes to a contractor, with an estimated value of about \$75.9 million under a two-year contract. According to LCSD, from August 2024 to August 2025, the lifesaving services contractor failed to provide the required manpower on seven occasions. Audit found that LCSD took between 4 and 305 days (averaging 100 days) to deduct payment from the contractor and took between 5 and 311 days (averaging 59 days) to issue 7 Default Notices to the contractor. According to LCSD, it will review the implementation of the trial scheme when the current outsourcing contract expires in July 2026 (paras. 3.13, 3.15 and 3.17).

13. ***Need to enhance monitoring of lifeguard performance and expedite the investigation progress.*** LCSD investigated the attendance to duty of lifeguards in seven public swimming pool complexes and found that 45 lifeguards were suspected to have left their duty posts in 2024 without supervisors' permission. According to LCSD, as at 30 September 2025:

- (a) the disciplinary investigations for 30 lifeguards were completed. LCSD completed disciplinary action against 22 lifeguards, including dismissing 2 contract lifeguards, issuing written warnings to 17 lifeguards (i.e. 14 civil servants and 3 contract staff) and terminating the service of 3 civil service lifeguards on probationary terms. The elapsed time from each respective incident to the corresponding disciplinary action ranged from 211 to 388 days (averaging 314 days). Besides, LCSD was also taking disciplinary procedures against the other 8 lifeguards; and
- (b) the disciplinary investigations of the remaining 15 lifeguards were in progress. As at 30 September 2025, 339 days had elapsed since the date of their suspected unauthorised absences from duty (para. 3.25).

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Management of swimming pool facilities

14. *Need to process block-book applications in accordance with LCSD guidelines.* Certain pool facilities (e.g. main pools and training pools) are available for group bookings during designated opening hours or session breaks for organising training, competition, etc (i.e. designated use of public swimming pools). LCSD processes block-book applications submitted by priority users such as National Sports Associations (NSAs) before those submitted by non-priority users such as private sports organisations. According to LCSD guidelines, applications from affiliated clubs without the proper endorsement of the parent NSAs/sports organisations or submitted after the application deadlines shall be treated as non-priority applications. Audit visited three swimming pool complexes and examined the block-book application records for 15 applicants with hire dates fell within the period from July 2024 to June 2025 (covering three months for each complex) and found that of 65 applications: (a) 7 (11 %) lacked the required information (i.e. names of authorised coaches) and/or supporting documents (i.e. the relevant copies of valid coaches' certificates); and (b) 28 were submitted after the priority application deadlines and/or lacked the endorsement from the parent NSAs, of which 1 (4 %) was approved before the non-priority application deadline (paras. 1.7, 4.2, 4.4 to 4.6).

15. *Room for improvement in handling matters relating to hire requirements.* Audit examined the relevant records for the 15 applicants (see para. 14) and found that there were cases of non-compliances with the terms and conditions of hire for designated use of public swimming pools (hereinafter referred to as terms and conditions of hire) (i.e. delays in payment of hire charges, cancellation of hired lane hours without meeting 14-day notice requirement and/or providing justifiable reasons to LCSD's satisfaction, and non-compliances with capacity limits of the hired facilities). However, for all these cases, there was no documentation indicating that default notices were issued to the hirers concerned, or that the contravention was recorded in the register of breach as required. Besides, while the Safeguarding National Security Ordinance took effect on 23 March 2024, there was no specific clause concerning safeguarding national security in the terms and conditions of hire as of September 2025 (paras. 4.9, 4.10 and 4.12).

16. *Room for improvement in handling Central Lane Allocation Scheme (CLAS) matters.* To assist major swimming pool facility users (i.e. primary users) such as NSAs and sports organisations in hiring swimming lanes in main pools for long-term sports development and training, LCSD has implemented CLAS since 2005 under the block-book arrangement (para. 4.3). Audit noted the following issues:

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- (a) ***Need to enhance monitoring of allocation of swimming lanes by LCSD.*** According to LCSD guidelines, when allocating swimming lanes to CLAS primary users for the coming year, LCSD will make reference to their actual utilisation, including take-up rates of lane hours allocated by LCSD under CLAS, in the current year. However, in the period from 2018-19 to 2024-25: (i) excluding 2020-21, the take-up rates ranged from 36% to 73% and LCSD continued to allocate lane hours to primary users under CLAS (e.g. 82,241 lane hours in 2024-25) at levels well above the actual lane hours hired (e.g. 37,133 lane hours in 2023-24) in subsequent years; and (ii) the take-up rates varied among primary users (e.g. ranging from 0% to 45% in 2024-25) (paras. 4.13 and 4.14);
- (b) ***Room for improvement in monitoring allocation of swimming lanes by primary users.*** Of the 15 applicants in the selected period (see para. 14), Audit examined the relevant application and cancellation records for 11 applicants allocated lane hours under CLAS and found that the cancellation rates (i.e. the percentage of applied lane hours cancelled) ranged from 0% to 43% (averaging 12%). For the affiliated club with cancellation rate of 43%, the parent NSA allocated 92 lane hours to the affiliated club in the period from July 2024 to June 2025 even though it cancelled 60 of 129 lane hours allocated in the period from July 2023 to June 2024 (para. 4.17); and
- (c) ***Need to conduct a review on CLAS.*** Audit analysed the number of lane hours hired by the CLAS primary users for main pools in the period from 2018-19 to 2024-25 and noted that while those hired under CLAS decreased generally by 56% from 68,438 in 2018-19 to 29,985 in 2024-25, those hired outside CLAS increased generally by 93% from 32,874 in 2018-19 to 63,488 in 2024-25. Besides, Audit noted that the number of CLAS primary users during the period from 2015-16 to 2024-25 was 7 and there was no documentation indicating that an evaluation of CLAS had been conducted (paras. 4.20 and 4.21).
17. ***Need to enhance compliance with procedures for handling group entries on hire dates.*** Audit examined the relevant application and registration records for the 15 applicants (see para. 14) and found that: (a) of the 1,541 sessions attended, the authorised persons or coaches who signed on the registration forms differed from those listed in the corresponding application forms for 388 (25%) sessions. For 109 (7%) sessions that involved session breaks, no signatures from coaches holding

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the valid lifesaving certificates were found on the registration forms; and (b) in 12 (19%) out of 63 cancelled sessions, the hirer had indicated attendances on the registration forms despite prior notifications of cancellation to LCSD. Upon enquiry, LCSD informed Audit in August 2025 that the registration forms were signed by hirer's authorised person by mistake (para. 4.24).

18. ***Scope for enhancing assessment processes for public coaching area (PCA) designation.*** To promote swimming while taking care of public safety, LCSD has started to designate PCAs for coaching activities in different public swimming pool complexes since 2003. In July 2023, LCSD laid down a mechanism for PCA designation in its guidelines (para. 4.30). Audit noted the following issues:

- (a) ***Room for improvement in assessing need for designation of PCAs.*** Audit examined the records of public opinion surveys conducted during the swimming season in 2024 at 35 swimming pool complexes where PCAs had not been designated, and found that the number of questionnaires collected across the 35 complexes varied significantly (ranging from 9 to 2,790). Besides, according to LCSD, to assess whether the criteria (e.g. receiving complaints/suggestions regarding PCA designation from no less than 3 different parties/people in the past 3 years) in the mechanism for PCA designation are met during each swimming season, individual complexes are required to submit monthly returns. Audit examination of the complaint records for two (where PCAs were not designated) of the three swimming pool complexes (see para. 14) over the past 3 years revealed that the required complaint/suggestion thresholds were met for both complexes, which conflicted with the information provided in their monthly returns for the swimming season in 2024 (paras. 4.31 to 4.33); and
- (b) ***Need to lay down criteria to assess on-going need for designation of PCAs.*** Audit noted that, for 9 swimming pool complexes with PCAs designated, no public opinion survey had been conducted. In addition, 7 of these complexes had their PCAs designated between 2003 and 2014. However, there was no documentation indicating that a review of these designations had been conducted since their approval, and no guidelines had been laid down in this regard (para. 4.34).

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19. ***Room for improvement in conducting inspections at public swimming pool complexes and documenting compliance with requirement for raising free residual chlorine to a specified level every night.*** LCSD conducts daily, surprise and holiday inspections at public swimming pool complexes. Audit examined the relevant records for the three swimming pool complexes (see para. 14) and noted that: (a) some inspections were not conducted in accordance with the frequencies stipulated in LCSD guidelines during opening hours in the period from April 2024 to June 2025; and (b) for the daily inspection focusing on cleanliness and sanitation aspects, while there was no documentation indicating that the free residual chlorine level was raised to 3 parts per million (ppm) on any night in August 2024 and June 2025 at one complex (against the requirement for raising to 3 ppm and maintaining for an hour after closing the pools every night to enhance the disinfection effect of the pool water) and no relevant daily inspections were conducted after closing the pools in these two months, the respective swimming pool supervisors reported compliance with the requirement in all relevant cleanliness and sanitation inspection reports (paras. 4.38, 4.39 and 4.41).

20. ***Room for improvement in managing repair and maintenance of facilities.*** Audit noted the following issues:

- (a) ***Need to maintain proper records for monitoring repair work and ensure timely follow-up on long outstanding cases.*** Audit examined the repair records for the three swimming pool complexes (see para. 14) for August 2024 and March/June 2025 and found that: (i) photographs of the defects before and after repairs were not taken as required; (ii) of 217 repair requests for one complex with a repair register maintained, 13 (6%) lacked the required information (i.e. dates of request or completion), and 8 (4%) were long outstanding (i.e. not completed within 1 month after request) (ranging from 35 to 195 days; averaging 94 days), for which no monthly repair reports were submitted as required; and (iii) no repair register was maintained by the other two complexes (paras. 4.45 and 4.46); and
- (b) ***Room for improvement in scheduling annual maintenance work.*** According to LCSD, annual maintenance is generally scheduled in non-swimming season for non-heated pools and in the period from mid-April to June or in September and October for heated pools (to avoid the heated pool operating periods from mid-November to mid-April and peak months for bookings in July and August). Audit examined the annual maintenance schedule of 46 swimming pool complexes for the period from

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November 2024 to October 2025, and noted that the annual maintenance of all/some swimming pools at some complexes was scheduled during: (i) June, which fell within the peak swimming season (i.e. June to August); (ii) heated pool operating periods; and/or (iii) periods when the maintenance schedule of heated and non-heated pools at two complexes overlapped, resulting in full closure of each complex for 51 days (paras. 1.3, 1.4, 4.2 and 4.47).

Other related issues

21. ***Room for improvement in the delivery of swimming courses.*** A swimming course comprises 10 lessons. Each year, LCSD would inform 18 District Councils of the estimated numbers of the recreation and sports activities to be organised and the participants expected to join these activities in the coming financial year (paras. 5.2 and 5.3). Audit analysis of 2,474 swimming courses organised by LCSD in 2024-25 revealed that:

- (a) ***Estimated numbers of swimming courses and participants not achieved in some districts.*** LCSD did not achieve the estimated numbers of swimming courses and participants in 8 districts (para. 5.4);
- (b) ***Need to better align swimming course offerings with public demand.*** There were 110 (4.5%) courses having subscription rates of 50% or less (mainly courses for children and juniors), while 300 (12.1%) courses had subscription rates exceeding 500% (mainly courses for adults and elderly) (paras. 5.7 and 5.8);
- (c) ***Need to take measures to address low attendance rate of some swimming courses.*** There were 2,221 (89.8%) courses having an average attendance rate of 75% or below, including 12 (0.5%) courses recording an average attendance rate of only 25% or below. However, LCSD did not impose any penalty measures on those participants with low attendance (paras. 5.14 and 5.15); and
- (d) ***Need to take measures to address low passing rate of some swimming courses.*** Course-end assessment was conducted for 2,030 courses, with 816 (40.2%) courses having a passing rate of 50% or below, including 7 (0.4%) courses in which no participant passed the course-end assessment.

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Audit also noted that LCSD guidelines did not require the course instructor to notify participants of their failure reasons (paras. 5.16 and 5.17).

22. ***Issues related to fees and charges for public swimming pools.*** The fees payable for individual admission to a public swimming pool complex are specified in the Public Health and Municipal Services (Fees and Charges) (Leisure Facilities) Regulation (Cap. 132CN) and are hereinafter referred to as statutory fees. On the other hand, fee items set for group booking of public swimming pool facilities by LCSD are hereinafter referred to as administrative fees (para. 1.14). Audit noted the following issues:

- (a) ***Need to review fees and submit fee proposals to the Financial Services and the Treasury Bureau (FSTB) annually.*** According to Financial Circular No. 6/2016 on “Fees and Charges” issued by FSTB, fees should generally be reviewed and, where necessary, revised on an annual basis. After conducting the annual fee reviews, bureaux/departments should derive their fee proposals and forward a self-contained submission (including costing statements) to FSTB. Audit noted that the fees and charges for LCSD’s leisure facilities and services (including public swimming pools) were last revised in 2013. According to the 2013 Policy Address and 2013-14 Budget respectively, LCSD was asked to conduct a comprehensive review of its fee levels and charging policy, and plans for revising the fees and charges were to be submitted by 2015. However, LCSD submitted the fee review results and fee proposals to FSTB only in August 2019 (paras. 5.26, 5.29 and 5.35); and

- (b) ***Need to step up efforts in implementing endorsed fee proposals and consult FSTB on setting of target cost recovery rate for statutory fees.*** For the statutory fees, the actual cost recovery rate ranged from 2.3% to 10.3% in 2018-19 to 2024-25. For the administrative fees, the actual cost recovery rate in 2019-20 to 2024-25 (ranging from 3.3% to 12.1%) did not meet the target cost recovery rate of 14% set by FSTB. Audit noted that, although LCSD had submitted a number of fee proposals to FSTB since August 2019, the fees and charges for LCSD’s leisure facilities and services (including public swimming pools) were not revised as of September 2025. Audit also noted that a target cost recovery rate had not been set for the statutory fees as of September 2025 (paras. 5.28, 5.32 and 5.35).

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23. *Need to properly record complaints in complaint registers.* Audit examination of the complaint records for the three swimming pool complexes (see para. 14) and LCSD's Aquatic Venues Section (which handles complaints relating to the overall management of public swimming pool complexes) in 2024-25 found that one complex and the Aquatic Venues Section did not maintain a complaint register as required, despite 117 and 2 complaints were received respectively (para. 5.45).

24. *Need to step up public education efforts on water safety to prevent occurrence of drowning incidents.* For the seven drowning incidents in 2024, most of the victims were aged 60 or above (75 on average). According to LCSD, they were all swimming alone at the time of the incidents, with some known to be good swimmers and others not possessing good swimming skills. Audit noted that LCSD had implemented various measures to promote water safety, including publishing the Swimmer's Handbook to provide the general public with water safety advice for enhancing their safety awareness. However, the occurrence of drowning incidents indicates a need for LCSD to step up public education efforts on water safety to prevent such occurrence as far as possible (para. 5.55).

Audit recommendations

25. **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 Leisure and Cultural Services should:**

Provision and utilisation of public swimming pool complexes

- (a) **formulate a multi-pronged strategy to improve attendance at public swimming pool complexes (e.g. strengthening efforts to promote swimming, and conducting public opinion surveys to better ascertain users' preference, so that the swimming pool services more effectively align with their needs and interests) (para. 2.11(a));**
- (b) **lay down guidelines for counting and reporting the attendance at public swimming pool complexes in COR (including the requirement to count toddlers and athletes using the pool complexes) and take measures to ensure that consistent swimming pool attendance records are maintained (para. 2.11(c));**

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- (c) obtain information on the details of private swimming pool facilities from FEHD regularly in order to assess the local needs for swimming pools according to HKPSG (para. 2.28(a));
- (d) review the provision of swimming pool complexes including ascertaining the reasons for lower average daily attendance or higher unit LCSD's cost per swimmer at some public swimming pool complexes, and take appropriate measures to address the issues (para. 2.28(b));
- (e) consider all relevant factors, including the average daily attendance and unit cost per swimmer of public swimming pool complexes and details of private swimming pool facilities, when planning swimming pool projects in future (para. 2.28(c));
- (f) in collaboration with the Secretary for Culture, Sports and Tourism, when seeking funding approval for future swimming pool projects, provide FC with more comprehensive information such as the relevant HKPSG standards, the compliance status and the maximum capacity of the proposed swimming pool complexes (para. 2.29);

Provision of lifesaving services

- (g) keep in view the supply of lifeguards potentially available to LCSD's swimming facilities, continue to explore different measures to address the shortage of lifeguards during the swimming season and take appropriate follow-up actions (para. 3.18(a));
- (h) take more effective measures to minimise inconvenience to the general public due to the temporary closure of public swimming pool facilities arising from the shortage of lifeguards (para. 3.18(b));
- (i) if a contractor fails to provide the required manpower to LCSD, promptly deduct payment from the contractor and issue Default Notices, and take into account the audit observations and recommendations in this Audit Report when reviewing the trial scheme for outsourcing lifesaving services (para. 3.18(d) and (e));

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- (j) **strengthen measures to prevent future unauthorised absences of lifeguards from their designated duty posts (e.g. use of technology), and expedite the investigations into the outstanding cases (para. 3.31(b));**

Management of swimming pool facilities

- (k) **take measures to ensure that block-book applications are processed in accordance with LCSD guidelines (para. 4.28(a));**
- (l) **take measures to ensure hirers' compliance with the terms and conditions of hire and that follow-up actions are taken against their non-compliances in accordance with LCSD guidelines, and incorporate specific clauses concerning safeguarding national security in terms and conditions of hire for designated use of public swimming pools (para. 4.28(b)(i) and (d));**
- (m) **regarding CLAS, take measures to ensure that LCSD staff follows the CLAS allocation procedures stipulated in LCSD guidelines, and conduct a review on CLAS, taking into account the reasons for cancellation and declining user preferences for CLAS as well as the audit observations and recommendations in this Audit Report, and take follow-up actions as appropriate (para. 4.28(e)(i) and (v));**
- (n) **take measures to ensure that LCSD staff follows the procedures for handling group entries stipulated in LCSD guidelines, and review the incorrect signed-in attendance records identified by Audit and take follow-up actions as appropriate (para. 4.28(g));**
- (o) **align the practices in conducting public opinion surveys and take measures to enhance the accuracy of the information reported in the monthly returns for the mechanism for PCA designation by individual swimming pool complexes (para. 4.36(a));**
- (p) **for swimming pool complexes with PCAs designated, lay down the criteria to assess the on-going need for such designations in LCSD guidelines (para. 4.36(c));**

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- (q) **take measures to ensure that inspections at public swimming pool complexes are conducted in accordance with the frequencies stipulated in LCSD guidelines and compliance with the requirement for raising the free residual chlorine in pool water to a specified level every night is documented, and review the design of the daily inspection reports (para. 4.51(a) to (c));**
- (r) **take measures to ensure that proper records for monitoring repair work are maintained and long outstanding cases are timely followed up, and review the annual maintenance schedule (para. 4.51(f) and (g));**

Other related issues

- (s) **take measures to achieve the estimated numbers for swimming courses and participants as far as possible, take into account the subscription patterns for swimming courses, and regularly adjust the course offerings as appropriate to better align with participant needs and demand trends (para. 5.24(a));**
- (t) **take measures to enhance the attendance rate of swimming courses, including ascertaining the reasons for low attendance and taking appropriate measures to address these issues, and considering the imposition of appropriate penalty measures on those participants with low attendance (para. 5.24(d));**
- (u) **take measures to improve the passing rate of swimming courses as far as possible, including notifying participants of their failure reasons (para. 5.24(e));**
- (v) **review the fees and charges for public swimming pools and submit the related fee proposals (including costing statements) to FSTB on an annual basis in accordance with Financial Circular No. 6/2016 (para. 5.40(a));**
- (w) **step up efforts in finalising and implementing the fee proposals endorsed by FSTB and CSTB, and consult FSTB on whether a target cost recovery rate should be set for the statutory fees for individual admission to a public swimming pool complex (para. 5.40(b));**

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- (x) **take measures to ensure that the complaints are properly recorded in the complaint register in accordance with LCSD guidelines (para. 5.48(a)); and**

- (y) **taking into account the review reports on drowning incidents and the audit findings in this Audit Report, step up public education efforts on water safety to prevent occurrence of drowning incidents as far as possible (e.g. providing targeted messages to specific groups highlighting risk factors) (para. 5.57(a)).**

Response from the Government

26. The Director of Leisure and Cultural Services 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 According to a territory-wide physical fitness survey commissioned by the Sports Commission (Note 1) and conducted by a local university in 2023, swimming is one of the most popular sports in Hong Kong. Under the policy direction of the Culture, Sports and Tourism Bureau (CSTB), the Leisure and Cultural Services Department (LCSD) is responsible for providing and managing public swimming pool complexes, organising a wide range of activities in order to promote swimming at all levels throughout the community, promoting awareness of water sports safety in LCSD's venues, and improving the efficiency and cost-effectiveness in the provision of recreation and sports services.

1.3 As of June 2025, LCSD managed 46 public swimming pool complexes under the Public Health and Municipal Services Ordinance (Cap. 132) and its subsidiary legislation, with 9 located on Hong Kong Island, 13 in Kowloon and 24 in the New Territories. Each complex may include a variety of heated or non-heated pool types such as main pool, secondary pool, training pool, leisure pool and diving pool. Of the 46 complexes, 30 were equipped with heated pool(s) (Note 2). In

Note 1: *The Sports Commission, chaired by the Secretary for Culture, Sports and Tourism and comprising three subcommittees, is established to advise the Government on:*

(a) *the policies, strategies and implementation framework for sports development in Hong Kong; and*

(b) *the provision of funding and resources in support of sports development in Hong Kong, taking into account the input from various stakeholders in sport through partnership and collaboration.*

Note 2: *According to LCSD, heated water (normally at 26 to 28 degrees Celsius) is provided at heated pools from 16 November each year to 15 April the following year. During the periods from 16 April to 30 June and 1 to 15 November, if the average temperature forecasted by the Hong Kong Observatory drops to 23 degrees Celsius or below in at least three consecutive days, LCSD will also arrange provision of heated water at such pools.*

Introduction

2024-25, the attendance at public swimming pools was 12.6 million, with revenue of \$142.9 million and expenditure of \$1,276.5 million.

Operation of public swimming pool complexes

1.4 The operation of public swimming pool complexes during a year can be broadly categorised into:

- (a) *Swimming season.* It generally spans from April to October each year, during which demand for swimming is relatively higher. It can be further divided into peak swimming season (June to August) and non-peak swimming season (April, May, September and October). According to LCSD, all public swimming pool complexes should be open for public use during the swimming season, except under special circumstances (e.g. repairs, maintenance or inadequate lifeguards); and
- (b) *Non-swimming season.* It generally spans from November each year to March the following year, during which demand for swimming is relatively lower. According to LCSD, heated pools in public swimming pool complexes should be open for public use during the non-swimming season (except under special circumstances — see (a) above) to promote year-round swimming.

1.5 A public swimming pool complex is open for use by individuals as well as organisations (e.g. schools and National Sports Associations (NSAs — Note 3)) for training, competition and other sports activities. Except for Wan Chai Swimming Pool (reserved for group training only), a public swimming pool complex is open for individual admission in three sessions (i.e. morning session, afternoon session and evening session).

Note 3: *Being the local governing bodies of individual sports, NSAs are responsible for the promotion and development of their respective sports in Hong Kong. They are affiliated to their respective international federations and also members of the Sports Federation & Olympic Committee of Hong Kong, China, and represent Hong Kong in international events of the respective sports.*

Swimming pool facilities

1.6 Swimming pool facilities include main pools, secondary pools, training pools, a multi-purpose pool (Note 4), teaching pools, diving pools, children's pools, toddlers' pools, leisure pools (see Photograph 1), water slides (see Photograph 2), a toddlers' zone, Jacuzzis, a participatory fountain, sun bathing areas, and other ancillary facilities (e.g. spectator stands and changing rooms). The types of facilities provided vary across public swimming pool complexes.

Photograph 1

Leisure pool



Photograph 2

Water slides



Source: LCSD records

1.7 ***Block-book arrangement of public swimming pools.*** Main pools, secondary pools, training pools, a multi-purpose pool, teaching pools and diving pools are available for group bookings during designated opening hours or session breaks. LCSD processes block-book applications according to a pre-set priority (i.e. processing applications submitted by priority users such as NSAs before those submitted by non-priority users such as private sports organisations). According to LCSD, in general not more than four 50-metre lanes in each swimming pool complex may be allocated for block-bookings for training purpose during opening hours. During the two session breaks in a day, all swimming lanes and training pools are open for group bookings. In addition, except for organising swimming competitions/galas, each non-priority user is only allowed to book not more than one lane hour

Note 4: *According to LCSD, a multi-purpose pool is equipped with a movable pool bottom and can be used as a diving pool.*

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(Note 5) at a 25-metre/50-metre pool or one hour at a teaching/training/diving pool in each swimming pool complex for training per day during non-peak hours (i.e. before 6:00 p.m. from Monday to Friday, except public holidays).

1.8 ***Designation of swimming areas.*** According to LCSD, to better manage different mode of swimming activities and for public safety, it implements a Swimming Areas Scheme to designate in public swimming pools four swimming areas in order to cater for the interests of different users. Details of these four swimming areas are as follows:

- (a) ***Public coaching area (PCA).*** It is designated for those who need to receive coaching service. According to LCSD, there is a practical need for beginners to learn swimming and to receive coaching service as a means of promoting the sport but such activities should be carried out in an orderly manner without causing disturbance or nuisance to other swimmers;
- (b) ***Group hiring area.*** It is designated for group booking of swimming lanes for training under the block-book arrangement (see para. 1.7). The area will be released for public use during sessions with no group booking;
- (c) ***Public lap swimming area.*** It is designated for individual swimmers who prefer uninterrupted lap swimming; and
- (d) ***Public swimming area.*** It is designated for individual swimmers who are not using the pool for lap swimming or receiving coaching.

1.9 ***Management and maintenance of facilities.*** According to LCSD, it attaches great importance to the facilities and management of water quality in public swimming pools. The related work includes:

- (a) ***Repair and maintenance of facilities.*** According to LCSD, in response to wear and tear of facilities, defective parts are repaired and replaced in a timely manner. Furthermore, non-heated swimming pool facilities are

Note 5: *According to LCSD, a lane hour means one hour of use of a swimming lane. For example, hiring of two swimming lanes in the same hour shall be counted as two lane hours.*

closed in winter, during which annual maintenance is carried out. Additionally, swimming pool complexes might be temporarily closed for conversion works (e.g. converting an outdoor secondary pool into a heated indoor pool) or redevelopment works as and when necessary. LCSD coordinates with relevant works departments to carry out repair and maintenance as well as conversion and redevelopment works that fall under their purview; and

- (b) ***Management of water quality.*** According to LCSD, water in public swimming pools is continuously circulated, filtered and sterilised throughout opening hours. Making reference to guidelines issued by the World Health Organization, LCSD has drawn up parameters, such as pH value (Note 6) and total bacteria count, for monitoring the water quality. To ensure that the hygiene of pool water is up to standard, water samples are taken and tested regularly and on an ad-hoc basis (e.g. after discovery of vomit). LCSD has also stepped up publicity efforts to remind swimmers to observe personal hygiene (e.g. walking through the shower bath and using the toilet before entering the pool).

LCSD conducts inspections at public swimming pool complexes regularly to ensure proper management of swimming pools, and safety, cleanliness and hygiene of facilities (including pool water quality).

Lifesaving services

1.10 To safeguard swimmers, LCSD has employed qualified lifeguards to provide lifesaving services at public swimming pool complexes. The number of lifeguards deployed depends on the types of pool facilities at each complex. According to LCSD, to cater for the surge in demand for lifeguards during the swimming season (see para. 1.4(a)), it has recruited contract seasonal lifeguards in addition to full-year lifeguards to provide adequate lifesaving services to the public.

1.11 ***Outsourcing of lifesaving services.*** LCSD commenced a trial scheme in August 2024 for outsourcing the lifesaving services at six public swimming pool complexes under a two-year contract. According to LCSD, the greater versatility

Note 6: *The pH is an expression of concentration of hydrogen ions present in water and is used to indicate the degree of alkalinity or acidity of a solution.*

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offered by the outsourced contractor in terms of remuneration packages and working hours should allow for more flexible arrangements for lifeguard recruitment and make greater room for attracting qualified lifeguards serving in private organisations to provide lifesaving services at public swimming pool complexes.

1.12 ***Artificial intelligence (AI) drowning detection system.*** To assist lifeguards in monitoring the real-time condition of swimmers and promptly locating drowning victims, in August 2023, LCSD commenced a trial of an AI drowning detection system (with underwater cameras) developed by a local technology company (hereinafter referred to as “AI System 1” in this Audit Report) at the outdoor secondary pool of Kwun Tong Swimming Pool. In September 2024, LCSD started another trial of an AI drowning detection system (with overhead cameras) developed by an overseas company (hereinafter referred to as “AI System 2” in this Audit Report) at the indoor main pool and training pool of Sun Yat Sen Memorial Park Swimming Pool. Through AI detection technology, the systems analysed the videos and images captured by the cameras. If suspected drowning is detected, the systems would alert lifeguards to carry out a rescue.

Swimming courses organised by LCSD

1.13 LCSD has launched the progressive swimming scheme to provide more opportunities for individuals of all ages to participate in swimming and enhance their swimming skills through three levels of progressive training courses. Each swimming course comprises 10 one-hour lessons, with an assessment conducted during the last two lessons to ascertain whether the participants have achieved the required standard. The public wishing to enrol in the swimming courses should submit their applications in LCSD’s “Smart Public Leisure Activities for You” system (SmartPLAY — Note 7). Upon a ballot exercise after the application deadline, successful applicants should pay course fees and confirm their enrolments through SmartPLAY. In 2024-25, LCSD organised 2,474 swimming courses under the progressive swimming scheme, with a total of 40,807 participants.

Note 7: *SmartPLAY is an intelligent sports and recreation services booking and information system launched by LCSD in November 2023 to replace the previous Leisure Link Computerised Booking System. The public should register as SmartPLAY users to make enquiries about and book sports and recreation facilities, and enrol in sports and recreation programmes (including swimming courses) through the SmartPLAY mobile app, Internet and self-service stations at LCSD’s leisure venues.*

Fees and charges for public swimming pools

1.14 An individual may enter a public swimming pool complex either by paying a single-entry fee or presenting a valid monthly ticket. The fees payable for individual admission to a public swimming pool complex are specified in the Public Health and Municipal Services (Fees and Charges) (Leisure Facilities) Regulation (Cap. 132CN). A fee item that is specified in a legislation is hereinafter referred to as statutory fee in this Audit Report. On the other hand, a fee item set by LCSD (not specified in any legislation) is hereinafter referred to as administrative fee in this Audit Report (e.g. fees for group booking of public swimming pool facilities and LCSD's swimming course fees).

Responsible sections and offices of LCSD

1.15 The three Leisure Services Divisions under the Leisure Services Branch of LCSD are responsible for the management of public swimming pool complexes in the three geographical areas of Hong Kong Island, Kowloon and the New Territories respectively. Various sections/offices, including the Aquatic Venues Section, the Community Sports Section, 18 District Leisure Services Offices (DLSOs), the Grade Management Section and the Support Section under the Leisure Services Branch, provide support to the swimming pool operation and management. The Finance and Supplies Division of LCSD is responsible for overseeing the financial, costing and accounting matters.

1.16 As at 30 June 2025, about 2,280 LCSD staff (including 1,690 civil servants and 590 contract staff) were involved in the management of public swimming pool complexes and relevant sports activity programmes (Note 8). An extract of the organisation chart of LCSD is at Appendix A.

Note 8: *According to LCSD, about 150 staff were also responsible for duties other than management of public swimming pool complexes and relevant sports activity programmes (e.g. management of other venues in a district or recruitment of other staff in the Leisure Services Branch).*

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Audit review

1.17 In May 2025, the Audit Commission (Audit) commenced a review to examine LCSD's management of public swimming pool complexes. The audit review has focused on the following areas:

- (a) provision and utilisation of public swimming pool complexes (PART 2);
- (b) provision of lifesaving services (PART 3);
- (c) management of swimming pool facilities (PART 4); and
- (d) other related issues (PART 5).

Audit has found room for improvement in the above areas and has made a number of recommendations to address the issues.

Acknowledgement

1.18 Audit would like to acknowledge with gratitude the full cooperation of the staff of LCSD during the course of the audit review.

PART 2: PROVISION AND UTILISATION OF PUBLIC SWIMMING POOL COMPLEXES

2.1 This PART examines issues related to the provision and utilisation of public swimming pool complexes, focusing on the following areas:

- (a) attendance at public swimming pool complexes (paras. 2.2 to 2.12); and
- (b) provision of public swimming pool complexes (paras. 2.13 to 2.31).

Attendance at public swimming pool complexes

2.2 In its Controlling Officer's Report (COR), LCSD has provided the target and actual attendance at public swimming pools in a year. According to LCSD, the attendance figure reported in its COR was the total number of swimmers entering the paid areas of public swimming pool complexes, comprising:

- (a) individuals paying normal or concessionary admission fees; and
- (b) individuals entering a pool complex under a group booking arrangement.

2.3 The attendance figure for public swimming pools reported in LCSD's COR is compiled by the following means:

- (a) generally speaking, for individuals mentioned in paragraph 2.2, the attendance is counted by the number of persons passing through the metered entry gates installed at a public swimming pool complex; and
- (b) for a swimming gala organised by a school or a relevant sports organisation, although the activity falls under a group booking arrangement, swimmers usually enter a public swimming pool complex through entrances other than the metered entry gates owing to the relatively large number of swimmers involved. The number of swimmers is usually provided by the organiser to LCSD staff for inclusion in the attendance records, which are subsequently used to compile the attendance figures in LCSD's COR.

Provision and utilisation of public swimming pool complexes

Attendance target for public swimming pools not met in recent years

2.4 Since 2018, LCSD had set in its CORs the annual target of 13,500,000 for attendance at public swimming pools. The actual attendance compared with the attendance target from 2018 to 2024 is shown in Table 1.

Table 1

**Actual attendance at public swimming pools and
achievement of attendance target
(2018 to 2024)**

Year	Attendance		Over-achievement / (Under-achievement) of target (c) = (a) – (b)	Percentage (d) = (c) ÷ (b) × 100%
	Actual (a)	Target (b)		
2018	14,138,371	13,500,000	638,371	5%
2019	14,056,065		556,065	4%
2020	3,610,091		(9,889,909)	(73%)
2021	9,178,655		(4,321,345)	(32%)
2022	8,328,763		(5,171,237)	(38%)
2023	12,140,948		(1,359,052)	(10%)
2024	12,538,801		(961,199)	(7%)

Source: Audit analysis of LCSD records

2.5 As shown in Table 1, the attendance targets for public swimming pools had not been achieved since 2020. According to LCSD, the shortfall in attendance was mainly due to the temporary closure of public swimming pools for months during the coronavirus disease (COVID-19) epidemic from 2020 to 2022, the society's gradual return to normalcy after the COVID-19 epidemic in 2023, and the deferred opening of a new swimming pool complex and temporary closure of another pool complex due to urgent maintenance in 2024. The gap between the attendance targets and actual attendance had narrowed since 2022, decreasing from 38% in 2022 to 7% in 2024.

Provision and utilisation of public swimming pool complexes

2.6 While noting LCSD's explanations, despite the resumption of normalcy from the COVID-19 epidemic since 2023, the attendance targets were not met in 2023 and 2024, and the actual attendance declined by over 10% compared to that in 2018 and 2019. According to LCSD, it promotes swimming mainly through disseminating publicity materials on its website and at leisure venues, and organising swimming courses. Audit noted that the temporary closure of public swimming pool facilities due to the shortage of lifeguards (see para. 3.8), as well as the fact that some heated pools were closed for annual maintenance during their operating periods (see para. 4.47(b)) might have affected the attendance figures. In Audit's view, LCSD needs to formulate a multi-pronged strategy to improve attendance at public swimming pool complexes (e.g. strengthening efforts to promote swimming, and conducting public opinion surveys (see para. 5.48(c)) to better ascertain users' preference, so that the swimming pool services more effectively align with their needs and interests).

Need to document basis for setting attendance target for public swimming pools

2.7 Audit noted that LCSD increased the attendance target for public swimming pools from 12,100,000 in 2017 to 13,500,000 in 2018, and it had remained unchanged since then. Upon enquiry, LCSD informed Audit in July and October 2025 that, generally speaking, it set the current year's attendance target based on the previous year's actual attendance (e.g. the attendance target was increased in 2018 as the actual attendance in 2017 had exceeded the then attendance target), venue availability and other relevant factors (e.g. maintenance schedules and projected new venues).

2.8 However, Audit examination revealed that LCSD did not document the basis for setting the attendance target for public swimming pools and the expected impacts of the relevant factors on the attendance target during the forecasting process, which was not conducive to subsequent reviews.

Need to lay down guidelines for counting and reporting attendance at public swimming pool complexes

2.9 Audit noted that LCSD did not formulate guidelines for counting and reporting the attendance at public swimming pool complexes in its COR. In this connection, Audit noted the following issues:

Provision and utilisation of public swimming pool complexes

- (a) ***Toddlers' use of public swimming pool complexes not counted.*** Toddlers aged below 3 (accompanied by an adult) did not need to pay admission fee for entering a public swimming pool complex. As such, they were not required to pass through metered entry gates installed at the swimming pool complex and their attendance was therefore not counted in the reported figures in the COR;

- (b) ***Some swimmers' use of public swimming pool complexes not reported.*** Audit compared the usage records of public swimming pool complexes with the actual attendance reported in LCSD's CORs for 2022 to 2024, and found that in April 2022, despite the fact that public swimming pool complexes were temporarily closed due to the COVID-19 epidemic, the Hong Kong Swimming Team made use of two public swimming pool complexes for training purpose with a total attendance of 4,383. However, the LCSD staff concerned did not include the athletes concerned in the actual attendance in COR; and

- (c) ***Different practices of counting and reporting the number of swimmers in swimming galas.*** For swimming galas organised by schools or other relevant sports organisations, some swimmers entered a public swimming pool complex through entrances other than the metered entry gates. Audit noted that different practices were adopted by different pool complexes in counting and reporting the number of such swimmers. For instance, for the 401 swimming galas held in 22 public swimming pool complexes in 2024, Audit observations on the different practices are shown in Table 2.

Provision and utilisation of public swimming pool complexes

Table 2

**Practices of counting and reporting swimmer numbers in swimming galas
(2024)**

Category	No. of swimming galas	No. of swimmers		No. of participants (other than swimmers, e.g. spectators)	
		Counted	Reported in COR	Counted	Reported in COR
(A) Attendance figures accurately reported in COR					
A1	20	11,047	Yes	17,400	No
(B) Attendance figures inaccurately reported in COR					
B1	7	1,754	Yes	2,425	Yes
B2	11	4,475	No	3,830	No
B3	31	Not counted	No	21,200	No
B4	153	Not counted	No	Not counted	No
B5	81	A total of 53,973 swimmers and other participants were counted (without breakdown) and reported in COR.			
B6	98	A total of 62,675 swimmers and other participants were counted (without breakdown) and not reported in COR.			
Total	401				

Legend: Inaccurate reporting of attendance figures in COR

Source: *Audit analysis of LCSD records*

2.10 As mentioned in paragraph 2.2, only swimmers should be included when calculating the attendance figures in COR. However, as shown in Table 2, different practices were adopted by different swimming pool complexes (e.g. counting other participants in swimming galas) and some swimmers were omitted in the calculations. Audit analysis of relevant data for January to June 2025 revealed similar issues. Audit considers that LCSD needs to lay down guidelines to address the identified issues.

Audit recommendations

2.11 **Audit has recommended that the Director of Leisure and Cultural Services should:**

- (a) **formulate a multi-pronged strategy to improve attendance at public swimming pool complexes (e.g. strengthening efforts to promote swimming, and conducting public opinion surveys to better ascertain users' preference, so that the swimming pool services more effectively align with their needs and interests);**
- (b) **take measures to document the basis for setting the attendance target for public swimming pools and the expected impacts of the relevant factors on the attendance target during the forecasting process; and**
- (c) **lay down guidelines for counting and reporting the attendance at public swimming pool complexes in COR (including the requirement to count toddlers and athletes using the pool complexes) and take measures to ensure that consistent swimming pool attendance records are maintained.**

Response from the Government

2.12 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that LCSD will:

- (a) implement a multi-pronged strategy to promote swimming at public swimming pool complexes, including promoting the characteristics of individual public swimming pool complexes to attract swimmers, encouraging more swimmers and schools to use the facilities of public swimming pool complexes in their neighbourhood, taking account of users' service needs and swimming habits;
- (b) take measures to document the basis for setting the attendance target for public swimming pools. Relevant factors will be duly considered, such as previous years' attendance figures, adjustments to the number of available public swimming pool complexes (e.g. opening of new pool complexes

Provision and utilisation of public swimming pool complexes

and/or closure of existing ones for redevelopment), and any observable changes of the preference and habits of swimmers/users; and

- (c) refine the relevant guidelines and develop new registration forms for frontline staff to count, record and report the attendance at public swimming pool complexes in a consistent manner.

Provision of public swimming pool complexes

2.13 According to CSTB and LCSD, when planning new sports facilities (e.g. swimming pool complexes) or improving the existing ones, apart from making reference to the Hong Kong Planning Standards and Guidelines (HKPSG — Note 9), they would also consider various relevant factors, including the current provision of public and private sports facilities across Hong Kong and at the district level, policy objectives of sports development, utilisation of existing facilities, demographic changes, district-specific elements (e.g. characteristics and aspirations of local residents), views of the District Councils (DCs) and relevant stakeholders, site availability and technical feasibility.

2.14 According to HKPSG:

- (a) the standard of provision is one standard swimming pool complex per 287,000 population. The provision level is to be determined on an individual district-by-district basis;
- (b) a standard swimming pool complex usually contains swimming pools of 50 metres and/or 25 metres long; and

Note 9: *According to the Planning Department:*

- (a) *HKPSG is a Government manual of criteria for determining the scale, location and site requirements of various land uses and facilities. Bureaux/ Departments would formulate, review and amend planning standards and guidelines of various land uses and facilities under their purview in accordance with their latest policy considerations and initiatives;*
- (b) *CSTB and LCSD are responsible for formulating and implementing the planning standards and guidelines of swimming pool complexes; and*
- (c) *as planning standards and guidelines could affect the allocation of scarce land and financial resources, HKPSG should be applied with a degree of flexibility.*

Provision and utilisation of public swimming pool complexes

- (c) it is common nowadays that recreation facilities (e.g. swimming pool) are provided in private residential developments. These private recreation facilities should be taken into account in assessing the local needs of a district if they can meet the relevant countability criteria (Note 10).

2.15 The 2022 Policy Address announced the 10-year Development Blueprint for Sports and Recreation Facilities providing diversified facilities by phases. According to LCSD, the first phase of the 10-year Blueprint would cover 16 projects, including planning for a new indoor heated swimming pool complex at Aldrich Bay, and the reprovisioning of Pao Yue Kong Swimming Pool and Sai Kung Swimming Pool. Audit noted that some new public swimming pool complexes were open for public use in recent years (e.g. Tung Cheong Street Swimming Pool in 2022 and Tin Sau Road Swimming Pool in 2024). In 2024, the Government also obtained funding approval to construct a new amenity building in Ma On Shan area, including a new indoor heated swimming pool complex inside the building.

Variations in the number of LCSD's standard swimming pool complexes and population served across 18 districts

2.16 Audit analysis found that, for the total 7,523,000 population of Hong Kong in mid-2024 (excluding the marine population), 26.2 standard swimming pool complexes were required according to the standard of provision stipulated in HKPSG, and 42 standard swimming pool complexes (Note 11) were provided by LCSD for

Note 10: *According to HKPSG, in determining the countability of recreation facilities towards meeting the stipulated standards, reference to the following criteria should be made:*

- (a) the provision should meet the space standard for the facility, taking into account actual site situation;*
- (b) the facility should serve a clearly identifiable residential or worker population;*
- (c) the facility should be accessible to the population it is meant to serve; and*
- (d) the facility should be managed and maintained by a responsible agent, including a Government department or a private body.*

Note 11: *Of the 46 LCSD's swimming pool complexes, 3 did not contain swimming pools complying with the standard stipulated in HKPSG (i.e. with pool length of at least 25 metres) and were therefore excluded from the analysis. Besides, according to LCSD, Wan Chai Swimming Pool was reserved for group training only and was not open for individual admission (see para. 1.5).*

Provision and utilisation of public swimming pool complexes

individual admission. Table 3 shows the number of standard swimming pool complexes in 18 districts and the corresponding population served.

Table 3
Population served by LCSD's standard swimming pool complexes in 18 districts
(Mid-2024)

District	Population (a)	No. of standard swimming pool complex		Average population served by each pool complex (d) = (a) ÷ (c)
		Required under HKPSG (b) = (a) ÷ 287,000	Provided by LCSD for individual admission (c)	
<i>Hong Kong Island</i>				
Central and Western	232,200	0.8	2	116,100
Eastern	519,200	1.8	3	173,067
Southern	262,400	0.9	1	262,400
Wan Chai	164,200	0.6	2	82,100 (Note 1)
<i>Kowloon</i>				
Kowloon City	418,600	1.5	2	209,300
Kwun Tong	668,400	2.3	3	222,800
Sham Shui Po	439,700	1.5	3	146,567
Wong Tai Sin	410,600	1.4	2	205,300
Yau Tsim Mong	304,100	1.1	2	152,050
<i>New Territories</i>				
Islands	197,800	0.7	2	98,900
Kwai Tsing	500,600	1.7	4	125,150
North	342,600	1.2	1	342,600
Sai Kung	501,100	1.7	2	250,550
Sha Tin	703,800	2.4	3	234,600
Tai Po	331,100	1.2	2	165,550
Tsuen Wan	310,000	1.1	2	155,000
Tuen Mun	540,000	1.9	2	270,000
Yuen Long	676,800	2.4	4	169,200
Overall	7,523,000 (Note 2)	26.2	42	179,119

Legend: Districts having at least one more standard swimming pool complex than HKPSG requirement

Source: *Audit analysis of HKPSG, Census and Statistics Department and LCSD records*

Note 1: *If Wan Chai Swimming Pool (reserved for group training only) is included in the analysis, the average population served by the three swimming pool complexes in Wan Chai District would be 54,733.*

Note 2: *The population figures shown exclude marine population and do not add up to total due to rounding.*

Provision and utilisation of public swimming pool complexes

2.17 As shown in Table 3, in mid-2024, 7 districts had at least one more standard swimming pool complex than HKPSG requirement and the average population served by each pool complex varied significantly across 18 districts (ranging from 82,100 to 342,600 population served by one standard swimming pool complex in each district).

Significant variations in average daily attendance and unit cost per swimmer among public swimming pool complexes

2.18 A public swimming pool complex is generally open for individual admission in three sessions and swimmers are required to leave after each session. LCSD has set out the maximum capacity of a swimming pool complex (i.e. the maximum number of swimmers admissible to the pool complex at any one time) based on the pool facilities provided (Note 12) in order to facilitate the provision of sufficient lifesaving services, and the proper operation and management of the pool complex. If the maximum capacity is reached, swimmers will not be admitted to the pool complex until other swimmers in that session have left.

2.19 Audit calculated the average daily attendance (by dividing the actual attendance of a pool complex for a year by the number of corresponding opening days) and the unit LCSD's cost per swimmer. Audit analysis found that, in 2024-25, the average daily attendance and the unit LCSD's cost per swimmer varied significantly among the public swimming pool complexes (see Appendix B for details), as follows:

- (a) the average daily attendance of a public swimming pool complex ranged from 77 (Note 13) to 3,142; and

Note 12: *According to LCSD guidelines, the maximum capacity of a swimming pool is calculated with reference to the pool surface area and the water area occupied by a swimmer, as follows:*

- (a) *1.5 square metres per swimmer for a standard swimming pool;*
- (b) *3 square metres per swimmer for a leisure pool; or*
- (c) *3 square metres per swimmer for a swimming pool complex comprising both standard swimming pool(s) and leisure pool(s).*

Note 13: *According to LCSD, Mui Wo Swimming Pool had the lowest average daily attendance of 77 in 2024-25 because it mainly served local residents due to its remote location compared to other public swimming pool complexes.*

Provision and utilisation of public swimming pool complexes

- (b) while the overall average LCSD's cost per swimmer of all the swimming pool complexes was \$101, the unit LCSD's cost per swimmer of individual pool complexes varied significantly (ranging from \$42 to \$763). In particular, there were 26 swimming pool complexes whose unit LCSD's cost per swimmer was above the overall average of \$101.

Need to regularly obtain relevant information on private swimming pools to assess local needs

2.20 According to HKPSG, private recreation facilities (e.g. swimming pools) should be taken into account in assessing the local needs of a district if they can meet the relevant countability criteria (see Note 10 to para. 2.14(c)). In this connection, Audit noted that since December 2023, LCSD has held regular meetings with the Food and Environmental Hygiene Department (FEHD — Note 14) to exchange information and share experience on the regulation and management of swimming pools in Hong Kong.

2.21 Upon enquiry, LCSD informed Audit in August 2025 that LCSD had discussed swimming pool operation issues with FEHD during the regular meetings and was aware of the number and locations of private swimming pools uploaded on FEHD's website. However, LCSD did not maintain detailed information on private swimming pool facilities (e.g. maximum capacity of swimming pools), which might affect LCSD's assessment of local needs.

Need to review provision of swimming pool complexes

2.22 As mentioned in paragraph 2.16, the number of standard swimming pool complexes provided by LCSD was more than that required under HKPSG. Furthermore, as mentioned in paragraph 2.19, some public swimming pool complexes recorded relatively low average daily attendance or comparatively high unit LCSD's cost per swimmer. In this regard, Audit noted that, for example, while LCSD had planned a new swimming pool complex at Aldrich Bay (in Eastern District), the number of standard swimming pool complexes provided by LCSD in the District

Note 14: *FEHD is responsible for issuing licences to the operators of private swimming pools under the Public Health and Municipal Services Ordinance and ensuring compliance with the licensing conditions. The regulation of private swimming pools is outside the scope of this audit review.*

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already exceeded the requirement set out in HKPSG (see Table 3 in para. 2.16) and the average daily attendance of Chai Wan Swimming Pool (also in Eastern District) was 569 in 2024-25 (see Appendix B).

2.23 Upon enquiry, CSTB and LCSD informed Audit in October 2025 that:

- (a) as a matter of policy, CSTB is committed to promoting the development of sports in Hong Kong through promoting sports in the community, supporting elite sports, promoting Hong Kong as a centre for major international sports events, enhancing professionalism and developing sports as an industry. The Government is committed to providing sporting facilities to meet the demand and aspiration of the public (including demands for swimming pool complexes and heated pools), and providing the necessary infrastructure for promoting swimming in the community, as well as training for athletes to drive sports development;
- (b) in considering the provision of a swimming pool complex in a district, CSTB and LCSD took into account a wide array of factors. Apart from the requirements stipulated in HKPSG, it was equally important to consider district-specific elements, including the aspirations of local residents, suggestions raised by DCs concerned, community views, provision within the district concerned and the neighbouring districts, as well as training of athletes and promotion of territory-wide swimming. To take forward any projects (including swimming pool complexes), LCSD had to go through an established rigorous mechanism, involving planning of the required facilities in the pool complex, district consultation, cost computation, consultation with the relevant Legislative Council (LegCo) panels and funding approval from LegCo Finance Committee (FC), during which the justifications and considerations were thoroughly discussed before the project was supported;
- (c) according to LCSD's observations, the place of residence and the place of work/study were not the same for many members of the general public. It was not uncommon for swimmers to go swimming near their place of work or study. Many DCs had expressed strong demand for swimming pool facilities based on diverse considerations. This reflected that the provision of a swimming pool complex was not based solely on the population threshold stated in HKPSG;

Provision and utilisation of public swimming pool complexes

- (d) taking Kwai Tsing District (see Table 3 of para. 2.16) as an example, in the 1980s, there were two public swimming pool complexes (namely Kwai Shing Swimming Pool and North Kwai Chung Jockey Club Swimming Pool) in the District, and they were both located in Kwai Chung area. Recognising the lack of a public swimming pool complex serving the population in Tsing Yi area, the former Regional Council decided to provide the third public swimming pool complex (i.e. Tsing Yi Swimming Pool) that was commissioned in September 1996. While there were already three public swimming pool complexes in Kwai Tsing District, none of them had an indoor heated pool. To address local demand for indoor swimming facilities and to encourage year-round swimming, an indoor heated swimming pool was included in a project with the support of the Kwai Tsing DC. The then existing provision of three public swimming pool complexes in Kwai Tsing District and the local demand for indoor swimming facilities were set out in the paper on the project as submitted by the Government to the then Panel on Home Affairs of LegCo in February 2013. The project was then discussed at LegCo Public Works Subcommittee (PWSC) in May 2013 and obtained funding approval from FC in June 2013;
- (e) setting the maximum capacity for a swimming pool complex was necessary to safeguard swimmers and deploy suitable resources for pool management, and the maximum capacity might be subject to adjustments depending on the availability of pool facilities. The purpose was not to achieve the daily attendance up to the maximum capacity of the pool complex. Depending on individual swimmers' habits and the district characteristics, it was natural that some swimming pool complexes recorded a higher daily attendance and some with a relatively lower daily attendance. The operation and management of a swimming pool complex were not based on the calculation of unit cost per swimmer; and
- (f) existing provisions, including swimming facilities in private housing developments, within a district and its neighboring districts had been considered in the planning process when prioritising works projects. For instance, the Government proposed constructing Tin Sau Road Swimming Pool despite HKPSG standards being met in Yuen Long District, as the site was located in a local community with six public housing estates and seven schools that lacked swimming pool facilities. The provision of the pool complex effectively served the local community by improving public access and enjoyment. Conversely, in areas with a high density of private housing

Provision and utilisation of public swimming pool complexes

developments (e.g. those in Tseung Kwan O) having their own private swimming pools, the Government had no immediate plan to develop additional swimming pool facilities nearby.

2.24 While noting the explanations of CSTB and LCSD, Audit noted that public resources had been utilised in the construction, operation and management of public swimming pool complexes. Given LCSD's responsibility to improve the efficiency and cost-effectiveness in the provision of recreation and sports services (see para. 1.2), Audit considers that LCSD should review the provision of swimming pool complexes including ascertaining the reasons for lower average daily attendance or higher unit LCSD's cost per swimmer at some public swimming pool complexes, and take appropriate measures to address the issues. LCSD also needs to consider all the relevant factors (including the average daily attendance and unit cost per swimmer of public swimming pool complexes and details of private swimming pool facilities) when planning swimming pool projects in future.

Need to provide more comprehensive information for Finance Committee's consideration of public swimming pool projects

2.25 An analysis of the funding papers submitted to LegCo for the 5 most recently approved new public swimming pool projects as of September 2025 revealed that, while FC had been informed of the population of the respective districts, no specific reference had been made to the relevant HKPSG standards in the FC papers in 3 cases (see Table 4 for details).

Provision and utilisation of public swimming pool complexes

Table 4

**LCSD's five most recent new public swimming pool projects submitted to FC
(September 2025)**

Swimming pool complex	Date of FC meeting	FC informed of HKPSG standards	Other justifications provided
(a) New indoor heated pools in Ma On Shan area	12 Jul 2024	No	<ul style="list-style-type: none"> - Rising attendance at other swimming pool complexes in Sha Tin District - Promotion of year-round swimming - Safe environment in inclement weather - Different water depths for various users - Heated pools in Sha Tin District far away from Ma On Shan
(b) Tin Sau Road	29 Jun 2018	Yes	<ul style="list-style-type: none"> - Rising attendance at other swimming pool complexes in Yuen Long District - Promotion of year-round swimming - Demand for additional venue for swimming competitions - Sited at a convenient location
(c) Tung Cheong Street	17 Jun 2016	No	<ul style="list-style-type: none"> - Tai Po District was the only district in New Territories without heated pools
(d) Tsing Yi Southwest	7 Jun 2013	No	<ul style="list-style-type: none"> - Promotion of year-round swimming - No heated pool in Kwai Tsing District
(e) Tuen Mun North West	13 Feb 2009	Yes	<ul style="list-style-type: none"> - Rising attendance at other swimming pool complexes in Tuen Mun District - Promotion of year-round swimming - No indoor heated pools in the district

Source: FC papers

2.26 For the three cases where HKPSG standards were not mentioned in the funding papers, CSTB and LCSD indicated in October 2025 that HKPSG standards were only among the many factors for considering the provision of a swimming pool complex:

- (a) for the new swimming pool project in Ma On Shan area, three indoor heated swimming pools were proposed to be provided. The Government submitted information to LegCo Panel on Home Affairs, Culture and Sports in

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February 2024 that there were three swimming pool complexes (i.e. Ma On Shan Swimming Pool, Sha Tin Jockey Club Swimming Pool and Hin Tin Swimming Pool) in Sha Tin District. Heated pool facilities were only provided in the latter two pool complexes whereas the Ma On Shan Swimming Pool had no heated pool facility. Residents in Ma On Shan area had to travel to Sha Tin Town Centre or Tai Wai during the winter season for using the heated swimming pool facilities. The overall attendance of Sha Tin Jockey Club Swimming Pool and Hin Tin Swimming Pool during the winter season had been on an increasing trend in the past decade. The provision of additional indoor heated swimming pool facilities under this project would help promote year-round swimming in the community and provide the local residents in Ma On Shan area with a safe and comfortable swimming environment during inclement weather in summer months, thereby meeting their strong demand. In addition, the proposed heated swimming pools would be of different water depths in order to accommodate citizens of different ages and swimming proficiency, especially the elderly and children. The project had gained the support of the Sha Tin DC, and was then discussed at PWSC in June 2024 and obtained funding approval from FC in July 2024;

- (b) for the Tung Cheong Street Swimming Pool, the Government submitted information to the then Panel on Home Affairs of LegCo in February 2016 that Tai Po District was the only district in the New Territories not yet provided with any public heated swimming pool facilities. The nearest public heated swimming facilities available were in North District and Sha Tin District. The Tai Po DC had strongly requested for the provision of an indoor heated swimming pool to enable local residents to enjoy year-round swimming. The project was then discussed at PWSC in April 2016 and obtained funding approval from FC in June 2016;
- (c) for the Tsing Yi Southwest Swimming Pool, the Government submitted information to the then Panel on Home Affairs of LegCo in February 2013 that swimming was one of the most popular sports in Hong Kong. Total attendance at public swimming pools was over 10.4 million in 2012. There was an increasing demand for year-round swimming facilities, such as indoor heated swimming pools. There were already three swimming pool complexes in Kwai Tsing District but none of them had an indoor heated pool. To address local demand for indoor swimming facilities and to encourage year-round swimming, an indoor heated swimming pool with six lanes was included in the project. The project had gained the support

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of the Kwai Tsing DC, and was then discussed at PWSC in May 2013 and obtained funding approval from FC in June 2013; and

- (d) as shown in Table 4, provision of at least one heated swimming pool in each district would further the sports policy by enabling the general public to participate in year-round swimming.

2.27 While noting the explanations of CSTB and LCSD, Audit also found that FC had not been informed of the maximum capacity and expected attendance of a new swimming pool complex. Upon enquiry, LCSD informed Audit in October 2025 that, as the expected attendance of a new swimming facility would be subject to a wide range of factors (such as swimmers' habits in the area), it would be difficult to accurately estimate the expected attendance when seeking funding approval. In Audit's view, CSTB and LCSD need to provide FC with more comprehensive information for reference.

Audit recommendations

2.28 **Audit has *recommended* that the Director of Leisure and Cultural Services should:**

- (a) **obtain information on the details of private swimming pool facilities from FEHD regularly in order to assess the local needs for swimming pools according to HKPSG;**
- (b) **review the provision of swimming pool complexes including ascertaining the reasons for lower average daily attendance or higher unit LCSD's cost per swimmer at some public swimming pool complexes, and take appropriate measures to address the issues; and**
- (c) **consider all relevant factors, including the average daily attendance and unit cost per swimmer of public swimming pool complexes and details of private swimming pool facilities, when planning swimming pool projects in future.**

2.29 **Audit has *recommended* that the Secretary for Culture, Sports and Tourism and the Director of Leisure and Cultural Services should, when seeking**

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funding approval for future swimming pool projects, provide FC with more comprehensive information such as the relevant HKPSG standards, the compliance status and the maximum capacity of the proposed swimming pool complexes.

Response from the Government

2.30 The Director of Leisure and Cultural Services generally agrees with the audit recommendations in paragraph 2.28. She has said that:

- (a) the Government remains as the major provider of public sports and recreation facilities, including a diverse range of swimming facilities. HKPSG serves as one of the factors to be considered in the provision of standard swimming pool complexes. While LCSD is not unaware of the availability of private swimming facilities, they are not open for public use. Having said that, LCSD will liaise with FEHD to obtain the details of private swimming pools (particularly whether they are regarded as standard swimming pool complexes under HKPSG) in the course of assessing the local needs for new swimming facilities;
- (b) LCSD will ascertain the reasons for the lower average daily attendance of individual swimming pool complexes and take measures to promote higher usage; and
- (c) the Government has taken into account a wide array of factors in planning the provision of a swimming pool complex in a district. When planning swimming pool projects in future, LCSD will continue to consider all relevant factors, including HKPSG standards, policy of sports development, views of DCs and stakeholders, utilisation of existing facilities, costs and availability of private swimming pool facilities. LCSD will take into account the audit recommendations and continue to make reference to HKPSG standards.

2.31 The Secretary for Culture, Sports and Tourism and the Director of Leisure and Cultural Services generally agree with the audit recommendation in paragraph 2.29. They have said that, as always, the Government stands ready to provide necessary information to FC based on the individual circumstances of swimming pool projects to facilitate its deliberation of funding proposals in future.

PART 3: PROVISION OF LIFESAVING SERVICES

3.1 This PART examines issues related to LCSD’s provision of lifesaving services at public swimming pool complexes, focusing on the following areas:

- (a) management of lifesaving services (paras. 3.2 to 3.19);
- (b) measures to safeguard swimmers (paras. 3.20 to 3.32); and
- (c) provision of lifesaving training programmes (paras. 3.33 to 3.37).

Management of lifesaving services

Background

3.2 Lifesaving services at public swimming pool complexes are provided by LCSD mainly through the engagement of the following categories of lifeguards:

- (a) ***Lifeguards on long-term employment.*** They include civil service Artisan (Beach/Swimming Pool) and ex-council contract lifeguards (Note 15) recruited by LCSD to provide lifesaving services throughout a year (i.e. covering both the swimming season and non-swimming season);
- (b) ***Non-civil service contract (NCSC) full-year lifeguards.*** LCSD has engaged NCSC full-year lifeguards since 2023 with a view to stabilising the manpower supply of lifeguards. They are recruited by LCSD on two-year contracts to provide lifesaving services throughout the contract period;

Note 15: *Ex-council contract staff were employees of the former Urban Council and Regional Council (dissolved on 31 December 1999) and LCSD subsequently appointed them on non-civil service terms. Non-civil service contract staff are engaged on fixed-term contracts, either full-time or part-time, to meet short-term service needs. Post-retirement service contract staff are retired civil servants employed on contract terms to undertake ad hoc, time-limited or seasonal tasks that require specific civil service expertise/experience. These contract staff are not counted towards the civil service establishment or strength.*

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- (c) **Seasonal lifeguards.** They are recruited by LCSD to provide lifesaving services during a swimming season to address the high swimming demand. They include NCSC full-time/part-time lifeguards and post-retirement service contract (PRSC) full-time lifeguards; and
- (d) **Lifeguards provided by LCSD's contractor.** They are lifeguards provided by LCSD's contractor at six public swimming pool complexes where the lifesaving services are outsourced (see para. 3.13).

3.3 All lifeguards engaged by LCSD should meet the relevant entry requirements (e.g. holding a valid Pool Lifeguard Award from the Hong Kong China Life Saving Society and passing the trade test and selection interview). The duties of lifeguards include ensuring the safety of swimmers at swimming pools, rescuing swimmers in distress, maintaining order and assisting in cleansing work. As at 31 March 2025, LCSD engaged 1,120 lifeguards (Note 16) to provide lifesaving services at public swimming pool complexes.

Persistent shortage of lifeguards during swimming season

3.4 There is public concern over the temporary closure of public swimming pools due to a shortage of lifeguards. According to LCSD, there has been persistent shortage of lifeguards at public swimming pool complexes during the swimming season (Note 17). LCSD conducted 23 recruitment exercises from January 2018 to January 2025 to recruit lifeguards, as follows:

Note 16: *The 1,120 lifeguards comprised 785 lifeguards on long-term employment, 127 NCSC full-year lifeguards, 23 NCSC full-time seasonal lifeguards, 8 PRSC full-time seasonal lifeguards, 121 NCSC part-time seasonal lifeguards and 56 lifeguards provided by LCSD's contractor. According to LCSD, it would assess the lifeguard requirement and manpower gap for public swimming pool complexes before the start of the swimming season each year to estimate the number of contract lifeguards to be engaged for the swimming season.*

Note 17: *According to LCSD, as at 31 July 2025, 1,963 lifeguards were required to provide lifesaving services at LCSD's swimming pool complexes and beaches. With the strength of 1,568 lifeguards, there was a shortage of 395 lifeguards. The actual number of lifeguards working at each of the public swimming pool complexes varies from day to day because DLSOs would flexibly deploy lifeguards to various aquatic venues in the districts concerned. As such, LCSD did not maintain separate breakdown of the shortage figures for swimming pool complexes and beaches.*

Provision of lifesaving services

- (a) of the 8 exercises for recruiting civil service Artisan (Beach/Swimming Pool), the respective recruitment targets were not met in the most recent 4 (conducted between September 2022 and October 2024), with recruitment rates (Note 18) ranging from 13% in February 2024 to 56% in September 2022;
 - (b) in the 7 exercises for recruiting NCSC seasonal lifeguards (Note 19), the respective recruitment targets were not met in all the exercises, with recruitment rate showing a decreasing trend from 69% in November 2018 to 22% in December 2024; and
 - (c) in the 8 exercises for recruiting PRSC seasonal lifeguards, the respective recruitment targets were not met in all the exercises, with recruitment rate showing a decreasing trend from 38% in January 2018 to 13% in January 2025.
- 3.5 Upon enquiry, LCSD informed Audit in July and October 2025 that:
- (a) the recruitment of lifeguards by LCSD had become increasingly difficult in recent years due to the increasing number of private swimming pools and higher market demand for lifeguards;
 - (b) the turnover of seasonal lifeguards was higher than that of civil service lifeguards due to their short-term job nature. The difficulties in recruiting seasonal lifeguards, coupled with the switch to other careers by some lifeguards due to the COVID-19 epidemic, meant that the supply of lifeguards was under constant pressure and exacerbated the manpower shortage of lifeguards;

Note 18: *The recruitment rate of a recruitment exercise is calculated by:*

$$\frac{\text{Number of lifeguards recruited}}{\text{Recruitment target (i.e. number of vacant positions to be filled)}} \times 100\%$$

Note 19: *According to LCSD, the 3 recruitment exercises conducted in December of 2022, 2023 and 2024 were joint recruitment exercises for both NCSC seasonal lifeguards and NCSC full-year lifeguards (see para. 3.2(b)), in which the respective recruitment targets for the latter were met in all the 3 exercises.*

Provision of lifesaving services

- (c) LCSD had put in place various measures to increase and stabilise the manpower supply of lifeguards, including improving the remuneration package of contract lifeguards, enhancing the flexibility of recruitment procedures and exploring the recruitment of more eligible persons to join lifesaving services through various lifeguard training schemes; and
- (d) despite the tight lifeguard manpower situation, LCSD had endeavoured to open as many public swimming facilities as permitted by available manpower resources.

3.6 In view of the recruitment challenges, LCSD needs to keep in view the supply of lifeguards potentially available to LCSD's swimming facilities, continue to explore different measures to address the shortage of lifeguards during the swimming season and take appropriate follow-up actions.

Temporary closure of public swimming pool facilities due to the shortage of lifeguards

3.7 According to LCSD guidelines:

- (a) in the event of a severe shortage of lifeguards, to avoid full closure of swimming pool facilities, DLSOs concerned should flexibly deploy the lifeguards of swimming pool complexes within the same district or the neighbouring districts if needed; and
- (b) if the shortage of lifeguards is still not alleviated, temporary closure of some pool facilities may be considered. In doing so, the pool management staff should take into account the actual circumstances (e.g. attendance at pool facilities) and exercise flexibility in considering partial closure of pool facilities and the order of priority. The general public should be informed of the closure of pool facilities (e.g. posting notices at the swimming pool entrance and on LCSD's website).

3.8 Despite the presence of the guidelines (see para. 3.7), the persistent shortage of lifeguards has led to temporary closure of swimming pool facilities in recent years, thereby causing inconvenience to swimmers and not conducive to implementing the Government's policy to promote sports in the community. Audit

analysis found that the partial closure rate (Note 20) of public swimming pool complexes due to the shortage of lifeguards was 30% in 2022, followed by 36% in 2023 and 41% in 2024, and then 38% in 2025 (up to August). According to LCSD, there was no full closure of public swimming pool complexes due to the shortage of lifeguards from 2022 to 2025. However, Audit considers that the occurrence of temporary closure of public swimming pool facilities due to the shortage of lifeguards is less than satisfactory. In this regard, apart from implementing the related LCSD guidelines, LCSD needs to take more effective measures to minimise inconvenience to the general public.

***Need to enhance efforts in deploying
Winter Works Programme Lifeguards during non-swimming season***

3.9 While the demand for lifeguards is high during the swimming season, it declines during the non-swimming season as public swimming pool complexes without heated pools and most beaches are closed. According to LCSD, the Winter Works Programme (WWP — normally from 1 November each year to 15 March the following year) has been implemented to ensure that lifeguards from its closed facilities are gainfully redeployed for other duties during the non-swimming season, and these lifeguards are referred to as “WWP Lifeguards”. According to WWP guidelines:

- (a) LCSD would arrange WWP Lifeguards to provide lifesaving services at other LCSD’s aquatic venues (e.g. swimming pool complexes and gazetted beaches) still open for public use, take vacation leave and undertake lifesaving training programmes and drills;
- (b) the lifeguards concerned are grouped under seven clusters based on geographical locations of LCSD’s aquatic venues to facilitate effective manpower planning and allocation. WWP Lifeguards may also be redeployed to provide support to other clusters when necessary; and
- (c) proper records should be maintained under WWP (e.g. rescue cases and accidents handled, duties assigned by supervisors, leave taken and time-off

Note 20: *The partial closure rate is calculated as:*

$$\frac{\text{Total number of days with partial closure of pool facilities}}{\text{Total number of scheduled opening days of the swimming pool complex}} \times 100\%$$

Provision of lifesaving services

taken to compensate for the overtime work performed). LCSD's Grade Management Section and Aquatic Venues Section should regularly collect the relevant work records for review purpose.

3.10 Table 5 shows the number of WWP Lifeguards in LCSD during the non-swimming season in 2024-25.

Table 5

**WWP Lifeguards in LCSD during non-swimming season
(November 2024 to March 2025)**

Cluster	Region/District	No. of WWP Lifeguards				
		Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025
1	Hong Kong Island	(61)	43	31	30	(24)
	Islands	14	30	30	30	14
2	Sham Shui Po, Yau Tsim Mong, Kwai Tsing, Tsuen Wan	43	43	43	43	63
3	Kowloon City, Kwun Tong, Wong Tai Sin	15	19	19	19	19
4	Tuen Mun, Yuen Long	27	27	27	27	27
5	North	8	8	8	8	8
6	Sha Tin, Tai Po	62	62	62	62	62
7	Sai Kung	34	34	34	34	34
Total		142	266	254	253	203

Source: LCSD records

Remark: The figure in bracket refers to the shortage of lifeguards.

3.11 As shown in Table 5, there was a shortage of 61 and 24 lifeguards on Hong Kong Island (in Cluster 1) in November 2024 and March 2025 respectively. According to LCSD, since many WWP Lifeguards of Islands District resided on outlying islands other than Lantau Island, there may be difficulty in redeploying them

to address the shortage of lifeguards in other aquatic venues in Cluster 1, taking account of the commute hassle that may be caused to them. However, Audit noted that LCSD engaged seasonal contract lifeguards to address the above lifeguard shortage in Cluster 1 instead of redeploying WWP Lifeguards from other clusters. There were no records to explain why WWP Lifeguards in other clusters were not redeployed to Cluster 1.

3.12 Moreover, Audit noted that documentation of the work done by WWP Lifeguards was not complete and did not fully comply with WWP guidelines (see para. 3.9(c)).

Need to keep under review implementation of trial scheme for outsourcing lifesaving services

3.13 In August 2024, LCSD launched a trial scheme to outsource the lifesaving services at six public swimming pool complexes (Note 21) to a contractor, with an estimated value of about \$75.9 million under a two-year contract. Under the contract provisions:

- (a) the contractor is required to provide the stipulated number and types of manpower including head lifeguards, lifeguards and first aiders. Otherwise, LCSD would accordingly deduct liquidated damages (e.g. \$165 per hour for absence of a lifeguard) from the payment due to the contractor; and
- (b) LCSD may also issue a Default Notice to the contractor if it fails to observe the requirement in (a) above. For each Default Notice issued, LCSD would deduct liquidated damages (e.g. \$4,528 for the first and second default notice issued in a month) from the payment due to the contractor. The Default Notices issued may be taken into consideration in future tender assessments.

Note 21: *According to LCSD, the six swimming pool complexes (Island East, Lam Tin, Ping Shan Tin Shui Wai, Tai Kok Tsui, Tsing Yi Southwest and Tung Cheong Street Swimming Pools) were selected as trial sites because they were on smaller manpower scales.*

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3.14 LCSD has issued guidelines for managing instances of non-compliance by service contractors in relation to manpower requirements, as follows:

- (a) for lateness or absence of manpower for a period shorter than a shift of work, a Deduction for Shortage/Absence of Worker Letter (SAW Letter) should be issued in the first instance to effect the deduction of payment from the contractor;
- (b) for repeated lateness within a short period and where the lateness is serious, on the top of the SAW Letter, an Advisory Letter should be issued to request the contractor to rectify the situation by a specified date. If the contractor fails to take action, a Default Notice should be issued to the contractor;
- (c) for a very serious case (e.g. a default leading to unavailability of services or repeated breaches across different venues under the same contract), a Default Notice may be issued to the contractor without first issuing an Advisory Letter. A Default Notice should be issued in a prompt manner, as prolonged or unnecessary delays may imply the Government's acceptance/tolerance and may also be open to disputes when belated sanctions are imposed; and
- (d) the issuance of SAW Letters, Advisory Letters and Default Notices should be recorded in the contractor's monthly performance appraisal reports.

3.15 ***Need to promptly address lifesaving services contractor's non-compliance with contract requirements.*** According to LCSD, from August 2024 to August 2025, the lifesaving services contractor failed to provide the required manpower on seven occasions (Note 22). As a result, up to August 2025, LCSD had issued 7 SAW Letters, 3 Advisory Letters and 7 Default Notices in total, and deducted a

Note 22: *The seven occasions included head lifeguard's/lifeguards' absence from duty during the preparation period for opening a swimming pool complex (e.g. in the early morning before the scheduled opening time or during a session break), or head lifeguard's/lifeguards' absence from the supervision post/patrol duty at a swimming pool (the pool safety still covered by lifeguards on duty at other posts in the vicinity). According to LCSD, the seven occasions did not affect swimmers' safety or lead to temporary closure of any pool facility at the swimming pool complex concerned.*

total of \$33,395.9 from the payment due to the contractor. Audit examination found that:

- (a) ***Delay in deducting payment.*** LCSD took between 4 and 305 days (averaging 100 days) to issue the 7 SAW Letters for deduction of the payment from the contractor, thereby not complying with the requirement that SAW Letter should be issued in the first instance to effect the deduction of payment. In particular, LCSD issued 3 of the 7 SAW Letters in July 2025 (addressing the contractor's non-compliance in September 2024, November 2024 and March 2025) only after an enquiry from Audit in the same month;
- (b) ***Delay in issuing Default Notices.*** LCSD took between 5 and 311 days (averaging 59 days) to issue the 7 Default Notices to the contractor, thereby not complying with the requirement that Default Notice should be promptly issued to the contractor (see para. 3.14(c)); and
- (c) ***Issuance of SAW Letters, Advisory Letters and Default Notice not recorded in contractor's performance appraisal reports.*** For 3 SAW Letters (all issued in July 2025), 2 Advisory Letters (issued in October 2024 and April 2025) and 1 Default Notice (issued in August 2025), LCSD did not record them in the corresponding contractor's monthly performance appraisal reports, thereby not complying with the relevant LCSD guidelines (see para. 3.14(d)).

3.16 Upon enquiry, LCSD informed Audit in October 2025 that:

- (a) for the occasions taking 305 days to deduct payment from the contractor and 311 days to issue a Default Notice to the contractor (see para. 3.15(a) and (b)), they were related to a lifeguard's absence from duty for 12 minutes during a session break at a swimming pool complex when it was reserved for block-booking users on 7 September 2024. The absence did not adversely affect the lifesaving services provided at the pool complex. As this was the first instance of such non-compliance since the award of the outsourcing contract, the pool management staff considered at that time that a gradual approach was appropriate and only issued an Advisory Letter to the contractor on 8 October 2024;

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- (b) following Audit's enquiry in June 2025, LCSD's Aquatic Venues Section considered that a stringent approach should be adopted in such cases. Subsequently, the pool management staff issued a SAW Letter on 9 July 2025 (305 days after the incident date) and a Default Notice on 15 August 2025 (311 days after the issue date of Advisory Letter) to the contractor; and
- (c) clarification and reminder had been issued to the relevant staff to prevent recurrence of similar issues in future.

While noting LCSD's explanations, Audit considers that there is room for improvement in handling contractor's non-compliance with contract requirements.

3.17 According to LCSD, it will review the implementation of the trial scheme when the current outsourcing contract expires in July 2026. In Audit's view, LCSD needs to take into account the audit observations and recommendations in this Audit Report in the review.

Audit recommendations

3.18 **Audit has *recommended* that the Director of Leisure and Cultural Services should:**

- (a) **keep in view the supply of lifeguards potentially available to LCSD's swimming facilities, continue to explore different measures (e.g. reviewing lifeguard staffing mix and the extent of outsourcing services as appropriate) to address the shortage of lifeguards during the swimming season and take appropriate follow-up actions;**
- (b) **take more effective measures to minimise inconvenience to the general public due to the temporary closure of public swimming pool facilities arising from the shortage of lifeguards;**
- (c) **enhance efforts in deploying WWP Lifeguards during a non-swimming season, document the reasons why WWP Lifeguards are not redeployed to address the lifeguard shortage in other aquatic venues, and maintain proper work and review records for WWP;**

- (d) **if a contractor fails to provide the required manpower to LCSD, promptly deduct payment from the contractor and issue Default Notices, and ensure that issuance of SAW Letters, Advisory Letters and Default Notices is properly recorded in the contractor's performance appraisal reports; and**
- (e) **take into account the audit observations and recommendations in this Audit Report when reviewing the trial scheme for outsourcing lifesaving services.**

Response from the Government

3.19 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that:

- (a) LCSD has been attaching great importance to addressing the shortage of lifeguards with the aim to provide quality public swimming facilities for public enjoyment. Specifically, LCSD has been endeavouring to stabilise and augment the manpower supply of lifeguards on various fronts (e.g. by employing contract lifeguards on different terms of appointment with enhanced remuneration packages, publicising and conducting more recruitment exercises around the whole year, and providing various lifeguard training schemes);
- (b) in view of the competition from the private market for lifeguard manpower, LCSD will continue to pay close attention to the pay trend in the private sector with a view to maintaining the attractiveness of LCSD's remuneration for contract lifeguards. Efforts will continue to be made to provide suitable lifesaving training programmes (e.g. the Combined Seasonal Lifeguard Training Scheme and collaboration with different organisations to offer training programmes) for candidates interested in joining the lifesaving services;
- (c) LCSD will step up publicity for recruitment exercises, and continue to proactively liaise with youth services organisations and schools to deepen the understanding of lifesaving services and encourage young people to join the services;

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- (d) LCSD will continue to flexibly deploy lifeguards and other resources to maintain services at aquatic venues as far as the available resources permit. Specifically, LCSD will arrange sufficient lifeguards to be on duty at aquatic venues that are open and deploy additional manpower when necessary (e.g. arranging off-duty lifeguards to report for duty, and arranging lifeguards to undertake overtime work where practicable);
- (e) LCSD is taking measures to ensure that the necessary documentation relating to WWP is prepared; and
- (f) LCSD has reminded the swimming pool staff to strictly monitor the performance of the contractor and take necessary follow-up actions to ensure compliance with the contract terms. Reminders will be circulated regularly to the swimming pool staff on the need to deduct payment promptly and issue Default Notices for contract breaches. Pool management staff will be required to submit monthly summary reports of any breaches to the DLSOs concerned for review, and to record information on Advisory Letters and Default Notices issued in the contractor's performance appraisals. LCSD will also examine how the operational guidelines should be beefed up for compliance by swimming pool staff.

Measures to safeguard swimmers

Need to ensure compliance with lifeguard drill requirements

3.20 According to LCSD guidelines:

- (a) to ensure that lifeguards are physically fit for safeguarding swimmers, all lifeguards are required to participate in drills on rescue procedures regularly under the supervision of pool management staff. These drills should be conducted once every two weeks during June to August and once every week during other months; and
- (b) each drill should cover eight components (e.g. swimming tests, first aid skills and emergency procedures).

3.21 Audit visited three public swimming pool complexes (Note 23) to review the compliance with the lifeguard drill requirements. The records for lifeguard drills from June to August 2024 and from March to May 2025 were examined. Audit found that:

- (a) the required drill frequencies (see para. 3.20(a)) were not fully complied with, as follows:
 - (i) for Kennedy Town Swimming Pool, the required drill frequencies were not met in three months with a non-compliance rate (Note 24) of 3% in each month;
 - (ii) for Kowloon Park Swimming Pool, the required drill frequencies were not met in six months, with non-compliance rates ranging from 13% to 34%; and
 - (iii) for Tseung Kwan O Swimming Pool, the required drill frequencies were not met in two months with a non-compliance rate of 3% and 7%;
- (b) the lifeguard drills conducted at Kowloon Park Swimming Pool did not cover all the 8 components required by LCSD guidelines (see para. 3.20(b)), with 2 components covered in the drills conducted between June and August 2024, and 4 components covered in the drills conducted between March and May 2025; and
- (c) while senior lifeguards of Kennedy Town Swimming Pool underwent a lifeguard drill that covered the eight components, senior lifeguards of Kowloon Park Swimming Pool and Tseung Kwan O Swimming Pool did not. In this connection, Audit noted that one of the duties of senior

Note 23: *The three swimming pool complexes were Kennedy Town Swimming Pool (on Hong Kong Island), Kowloon Park Swimming Pool (in Kowloon) and Tseung Kwan O Swimming Pool (in the New Territories). They were selected for review due to the largest number of lifeguards required in the respective Leisure Services Division during the swimming season in 2025.*

Note 24: *The non-compliance rate in a month is calculated as:*

$$\frac{\text{Number of lifeguards not complying with the required drill frequency}}{\text{Total number of lifeguards working at a swimming pool complex}} \times 100\%$$

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lifeguards was to direct and perform lifesaving operations and first aid services, and LCSD guidelines (see para. 3.20(a)) did not specify whether senior lifeguards should also undergo a lifeguard drill that covered the eight drill components.

3.22 Upon enquiry, LCSD informed Audit in October 2025 that:

- (a) the non-compliance with the drill frequencies at Kennedy Town Swimming Pool and Tseung Kwan O Swimming Pool (see para. 3.21(a)(i) and (iii)) was primarily due to approved leave of lifeguards lasting for over one week;
- (b) the drills at Kowloon Park Swimming Pool (see para. 3.21(b)) were arranged during a session break and all swimming lanes might be fully booked by organisations. As a result, water training drills could not be arranged while land-based training drills were conducted; and
- (c) senior lifeguards of Kowloon Park Swimming Pool and Tseung Kwan O Swimming Pool (see para. 3.21(c)) were present in the drills and responsible for instructing and monitoring other lifeguards.

3.23 In Audit's view, LCSD needs to take measures to ensure compliance with the required lifeguard drill frequencies and complete coverage of all drill components, and review whether senior lifeguards should also undergo regular training that covers the eight components of a lifeguard drill.

Need to enhance monitoring of lifeguard performance and expedite the investigation progress

3.24 According to LCSD:

- (a) given the tight manpower situation, it has attached great importance to the efficient deployment of lifeguards and their attendance to duties with a view to upholding services for the general public, and a mechanism is in place to monitor lifeguards' attendance to duty and follow up any conduct and disciplinary cases; and

- (b) lifeguards (as civil servants or government employees) involved in any misconduct are subject to the Government's established disciplinary mechanism and procedures. LCSD strictly follows the mechanism and procedures.

3.25 LCSD investigated the attendance to duty of lifeguards in seven public swimming pool complexes and found that 45 lifeguards were suspected to have left their duty posts in 2024 (see paras. 5.53 and 5.54(b)) without supervisors' permission. According to LCSD, as at 30 September 2025, the follow-up progress was as follows:

- (a) the disciplinary investigations for 30 lifeguards were completed after reviewing the relevant records and evidence. Following the investigations:
 - (i) LCSD completed disciplinary action against 22 lifeguards (Note 25), including dismissing 2 contract lifeguards, issuing written warnings to 17 lifeguards (i.e. 14 civil servants and 3 contract staff) and terminating the service of 3 civil service lifeguards on probationary terms (who resigned before completion of the termination procedures). Audit noted that the elapsed time from each respective incident to the corresponding disciplinary action ranged from 211 to 388 days (averaging 314 days). According to LCSD, the long time taken was due to the need to obtain advice from the relevant parties within the Government and duly consider other relevant factors surrounding the cases, with the aim to ensure procedural fairness; and
 - (ii) LCSD was taking disciplinary procedures against the other 8 lifeguards; and
- (b) the disciplinary investigations of the remaining 15 lifeguards were in progress. As at 30 September 2025, 339 days had elapsed since the date of their suspected unauthorised absences from duty. According to LCSD, as a relatively higher number of lifeguards was involved, it was necessary to examine the circumstances pertaining to individual lifeguards.

Note 25: *During the course of this audit review, LCSD provided Audit with the related incident review reports and copies of the dismissal letters and written warnings issued. However, it did not provide Audit with documentation supporting the decisions regarding disciplinary action against the lifeguards involved.*

Provision of lifesaving services

Therefore, considerable time was taken to verify pool management staff's initial findings and evidence. LCSD planned to complete the investigations by end of November 2025.

Need to leverage insights from trial results to consider further use of AI technology in lifesaving services

3.26 After assessment of technical viability (e.g. impacts on and compatibility with swimming pool facilities) and consultation with the relevant works departments, LCSD has initiated trials of AI drowning detection system at two public swimming pool complexes, as follows:

- (a) in August 2023, LCSD commenced a trial of AI System 1 (see para. 1.12) at the outdoor secondary pool of Kwun Tong Swimming Pool. The system was initially developed with \$881,000 granted to a local technology company (which developed AI System 1) by the Innovation and Technology Fund (Note 26). In early 2024, LCSD procured additional sets of devices and upgraded the existing equipment at a cost of \$676,000 (Note 27). LCSD estimated that the annual maintenance cost of AI System 1 was about \$130,000; and
- (b) in January 2024, LCSD procured AI System 2 (see para. 1.12) at a cost of \$7.9 million with one-year technical support at \$1.1 million. In September 2024, LCSD started a trial of AI System 2 at the indoor main

Note 26: *The Innovation and Technology Fund is established under the Public Finance Ordinance (Cap. 2) to finance projects that contribute to innovation and technology upgrading in the manufacturing and service industries, as well as those that contribute to the upgrading and development of the manufacturing and service industries.*

Note 27: *According to LCSD, compatibility between the upgrading services and AI System 1 was very important. The local technology company, which developed AI System 1, had demonstrated its ability to provide seamless integration and compatibility while upgrading similar systems. In addition, the company possessed a proven track record of successfully implementing AI System 1. To ensure a smooth transition and optimal performance of the upgraded system, LCSD decided to invite a single quotation from the company for the procurement of the additional sets of devices and the related upgrading services to ensure public safety. The Chief Leisure Services Manager concerned approved the invitation and acceptance of the single quotation under the delegated authority set out in the Stores and Procurement Regulations.*

pool and training pool of Sun Yat Sen Memorial Park Swimming Pool. LCSD estimated that the annual maintenance cost of AI System 2 was about \$1.1 million, and the system equipment and devices would require a comprehensive inspection every three years at a cost of about \$0.5 million to ensure its stability and safety.

3.27 *Delay in issuing contract award notice for procurement of AI System 2.* According to the Stores and Procurement Regulations (SPRs), for procurement of stores and services contracts exceeding the specified quotation limit (i.e. \$1.36 million since 2024):

- (a) after awarding a contract, departments should publish a notice of contract award in their home pages on the Internet. In cases where publishing a notice of contract award would be contrary to the interest of national security or public interest of the Hong Kong Special Administrative Region (HKSAR) of the People's Republic of China, departments may, after obtaining legal advice from the Department of Justice and policy support of the relevant policy bureaux, seek the approval of the Permanent Secretary for Financial Services and the Treasury (Treasury) for not publishing the contract award notice; and
- (b) departments should send to the Government Logistics Department (GLD) a list of all the contracts awarded by them in a particular month at least two weeks before the end of the following month for publication on the Internet.

3.28 In January 2024, LCSD awarded a contract to a contractor (through direct engagement — Note 28) for the supply, installation and technical support of AI System 2 at a total cost of \$9 million. However, as of August 2025, LCSD had not published a contract award notice on its website, nor had it sent the relevant

Note 28: *According to LCSD, AI System 2 is a patented and mature technology deployed in over 330 swimming pools worldwide. It is exclusively operated by a single supplier and no other potential supplier offering a comparable system has been identified in the current market. In order to promptly enhance water safety at public swimming pool complexes, LCSD decided to directly engage the sole supplier of the system in Hong Kong. The Director of Leisure and Cultural Services had approved the direct engagement of the contractor under the delegated authority set out in SPRs.*

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information of this contract to GLD for publication on the Internet, thereby not complying with the related requirements under SPRs. There were also no records showing that the approval for not publishing the contract award notice had been obtained from the Permanent Secretary for Financial Services and the Treasury (Treasury).

3.29 Upon enquiry, LCSD informed Audit in October 2025 that it had sent the relevant contract information to GLD in September 2025 for publication of the contract award notice on the Internet. Audit considers that there is scope for improvement in this regard.

3.30 *Need to consider further use of AI technology in lifesaving services.* LCSD has put AI System 1 and AI System 2 on trial since August 2023 and September 2024 respectively (see para. 3.26). Upon enquiry, LCSD informed Audit in October 2025 that it took time for the two AI Systems to collect more data during the 2025 swimming season as well as to learn and make necessary adjustments. In Audit's view, LCSD needs to leverage insights from trial results of the two AI Systems, including conducting cost analysis and performance evaluation, to consider whether the use of AI technology in lifesaving services should be extended to other public swimming pool complexes.

Audit recommendations

3.31 **Audit has recommended that the Director of Leisure and Cultural Services should:**

- (a) **take measures to ensure compliance with the required lifeguard drill frequencies and complete coverage of all drill components (e.g. compiling relevant management information to enhance monitoring), and review whether senior lifeguards should also undergo regular training that covers the eight components of a lifeguard drill;**
- (b) **strengthen measures to prevent future unauthorised absences of lifeguards from their designated duty posts (e.g. use of technology), and expedite the investigations into the outstanding cases;**

- (c) **take measures to ensure that, after awarding a contract that exceeds the specified quotation limit under SPRs, a contract award notice is published on LCSD's website and the relevant contract information is sent to GLD in accordance with the timeframe stipulated in SPRs; and**
- (d) **leverage insights from trial results of the two AI Systems, including conducting cost analysis and performance evaluation, to consider whether the use of AI technology in lifesaving services should be extended to other public swimming pool complexes.**

Response from the Government

3.32 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that LCSD is taking improvement measures along the directions of the recommendations.

Provision of lifesaving training programmes

3.33 The Hong Kong China Life Saving Society is the sole organisation in Hong Kong awarding lifesaving credentials. It has set the standards and conducted examinations for different lifesaving qualifications, including:

- (a) ***Qualifications for lifeguards working at aquatic venues.*** These include the relevant qualifications (e.g. Pool Lifeguard Award and Beach Lifeguard Award) required for lifeguards working at various aquatic venues. These qualifications are also required to meet the entry requirements for an LCSD lifeguard (see para. 3.3); and
- (b) ***Basic lifesaving qualifications.*** These include the Bronze Medallion for persons interested in the lifesaving career, but such qualifications do not meet the entry requirements for an LCSD lifeguard. Holding of a Bronze Medallion is a pre-requisite for obtaining higher lifesaving qualifications (e.g. Pool Lifeguard Award and Beach Lifeguard Award).

Provision of lifesaving services

Scope for improvement in the provision of lifesaving training programmes

3.34 To increase the manpower supply of lifeguards and promote the lifesaving career, LCSD has organised lifesaving training programmes for the general public, including:

- (a) ***Combined Seasonal Lifeguard Training Scheme (CSLGTS)***. LCSD has employed trainees and provided them with full-time training to obtain qualifications on pool and/or beach lifesaving in a “hire-and-train” mode, enabling them to become qualified lifeguards. Qualified trainees under the scheme would be directly appointed as NCSC full-time seasonal lifeguards (Note 29) working at various aquatic venues during a swimming season;
- (b) ***Integrated Certificates Course on Life Saving (ICCLS)***. LCSD has organised this course for the general public to obtain qualifications on pool and/or beach lifesaving under the “through-train” mode that enable them to become qualified lifeguards. The course (Note 30) has enabled participants to obtain the relevant qualifications required for becoming a lifeguard in one go; and
- (c) ***Life Saving Training Course on Bronze Medallion (BM)***. LCSD has organised this course (Note 31) for the general public to obtain the Bronze Medallion.

Audit analysis of the three lifesaving training programmes is shown in Table 6.

Note 29: *Under the 2024 Scheme, the course duration ranged from one to two months depending on the qualifications to be obtained, with trainees receiving a monthly allowance of \$14,640 or \$16,400. Trainees would first need to pay a deposit of \$2,500 for attending the training and examinations. The deposit would be refunded to trainees who have successfully completed and passed the required training and examinations, accepted the direct appointment as NCSC full-time seasonal lifeguards and satisfactorily completed the whole contract period. Otherwise, the deposit would be forfeited by LCSD.*

Note 30: *The course comprises 93 or 154 learning hours depending on the qualifications pursued. In 2024, the course fee was \$810 for pool lifesaving training and \$1,310 for pool and beach lifesaving training.*

Note 31: *The course comprises 39 learning hours. In 2024, the course fee was \$108.*

Table 6

**Analysis of LCSD's lifesaving training programmes
(2024)**

Item	CSLGTS	ICCLS	BM
No. of training places (a)	46	120	1,440
No. of applicants (b)	136	730	1,637
Subscription rate (c) = (b) ÷ (a) × 100%	296%	608%	114%
No. of trainees enrolled (d)	46	100 (Note 1)	1,026 (Note 2)
No. of trainees passing examination (e)	33	83	542
Passing rate (f) = (e) ÷ (d) × 100%	72%	83%	53%
No. of qualified trainees becoming LCSD lifeguards (g)	33	2	N.A.
Conversion rate (h) = (g) ÷ (e) × 100%	100%	2%	N.A.

Source: Audit analysis of LCSD records

Note 1: According to LCSD, some applicants of ICCLS did not pass the pre-course assessment. As such, 100 trainees enrolled in the course after pre-course assessment.

Note 2: According to LCSD, some applicants of BM did not make payment to confirm the allotted training places and some did not pass the pre-course assessment. As such, 1,026 trainees enrolled in the course after pre-course assessment.

3.35 As shown in Table 6, the demand and passing rates for CSLGTS and ICCLS were higher than those for BM. Moreover, far more qualified trainees from CSLGTS became LCSD lifeguards compared with those from ICCLS.

Audit recommendations

3.36 **Audit has recommended that the Director of Leisure and Cultural Services should:**

- (a) **consider adjusting the mix of course offerings (e.g. Combined Seasonal Lifeguard Training Scheme and Integrated Certificates Course on Life Saving) to better align with demand; and**

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- (b) **strengthen efforts to encourage more qualified trainees from the Integrated Certificates Course on Life Saving to become LCSD lifeguards.**

Response from the Government

3.37 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that LCSD is making efforts along the directions of the recommendations.

PART 4: MANAGEMENT OF SWIMMING POOL FACILITIES

4.1 This PART examines issues related to the management of swimming pool facilities, focusing on the following areas:

- (a) block-book arrangement of public swimming pools (paras. 4.2 to 4.29);
- (b) regulation of coaching activities (paras. 4.30 to 4.37); and
- (c) management and maintenance of facilities (paras. 4.38 to 4.52).

Block-book arrangement of public swimming pools

4.2 **Group booking.** Main pools, secondary pools, training pools, a multi-purpose pool, teaching pools and diving pools are open for group booking for organising training, competition and/or other sports activities (i.e. designated use of public swimming pools). According to LCSD guidelines, block-book applications are processed according to the following pre-set priority:

- (a) **Priority users.** Priority users mainly include schools (Note 32), NSAs and their affiliated clubs, government departments and non-governmental organisations (NGOs). Among the priority users, higher priority is given to some users such as LCSD and schools, and lower priority is given to others such as NGOs; and
- (b) **Non-priority users.** Non-priority users shall be organisations with proven track records in the development and promotion of the related sports, e.g. private sports organisations other than NSAs' affiliated clubs.

According to LCSD, the peak months for bookings are July and August. In the period from 2018-19 to 2024-25, 31 % of lane hours available for group booking were hired

Note 32: *This arrangement for schools only applies to sessions during normal school hours, which generally refer to 8:00 a.m. to 6:00 p.m. on weekdays and 8:00 a.m. to 1:00 p.m. on Saturday, except public holidays.*

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under the block-book arrangement on average (excluding the lower booking rate of 18% in 2020-21, which was attributable to the outbreak of the COVID-19 epidemic, the annual booking rates ranged from 29% to 35%) (Note 33).

4.3 **Central Lane Allocation Scheme (CLAS).** To assist major swimming pool facility users (i.e. primary users) such as NSAs and sports organisations in hiring swimming lanes in main pools (Note 34) for long-term sports development and training, LCSD has implemented CLAS since 2005 under the block-book arrangement (Note 35). Under CLAS, the Aquatic Venues Section of LCSD coordinates with primary users on the allocation of number of swimming lanes and lane hours in the main pools (Note 36). Each primary user then, based on a set of established mechanism and procedures, coordinates and nominates its affiliated clubs to hire the allocated swimming lanes and lane hours. As of September 2025, there were 7 primary users (comprising 6 NSAs and a sports organisation) under CLAS.

4.4 **Audit's visits to three swimming pool complexes.** Between June and August 2025, Audit visited three swimming pool complexes (i.e. Victoria Park,

Note 33: *The percentages were calculated by dividing the number of lane hours hired (i.e. approved and with hire charges paid) by the number of lane hours available for group booking under the block-book arrangement.*

Note 34: *According to LCSD, only certain sessions are available for block-booking under CLAS. These sessions comprise: (a) in months other than July and August, after 4:00 p.m. from Monday to Friday (except public holidays), 6:30 a.m. to 12:00 noon on Saturday and session breaks on Saturday and Sunday; and (b) in July and August, 6:30 a.m. to 10:00 p.m. from Monday to Friday (except public holidays), 6:30 a.m. to 12:00 noon on Saturday, and session breaks on Saturday, Sunday and public holidays.*

Note 35: *According to LCSD, it had received feedback from NSAs in the past that allocation of swimming lanes by ballot was undesirable, as affiliated clubs could not secure bookings at the same venue and the participants had to change to other venues for training. This would not only cause inconvenience to affiliated clubs and participants, but also hinder the sustainability of their training programmes. For comprehensive promotion of sports, LCSD, upon consultation with the Community Sports Committee of the Sports Commission (see para. 1.2), implemented CLAS in 2005.*

Note 36: *According to LCSD guidelines, the maximum number of swimming lanes that can be allocated to each affiliated club of primary users is two per hour (subject to a maximum number of eight per day in July and August, and six per day in September and October) under CLAS.*

Kowloon Park and Shing Mun Valley Swimming Pools) to review their work on managing swimming pool facilities. Audit selected block-book applications from a total of 15 applicants with hire dates fell within the period from July 2024 to June 2025 for examination (Note 37).

Need to process block-book applications in accordance with LCSD guidelines

4.5 According to LCSD guidelines:

- (a) block-book applications, comprising completed application forms (with details such as period of hire, names of authorised persons and coaches attending the sessions to be hired) and supporting documents (e.g. the relevant copies of valid coaches' certificates), shall be submitted to the respective swimming pool offices before specified application deadlines (e.g. 4 and 2 months before hire dates for priority users and non-priority users for organising training respectively) for processing and approval (including those from primary users' affiliated clubs under CLAS);
- (b) applications from affiliated clubs without the proper endorsement of the parent NSAs/sports organisations or submitted after the application deadlines shall be treated as non-priority applications; and
- (c) if more than one application for the same session from applicants of the same priority is received, the respective pool office will liaise with the applicants concerned for session adjustment. The allocation will be determined by ballot if the issue cannot be resolved.

LCSD will issue approval letters to successful applicants.

Note 37: *Audit visited one swimming pool complex from each of the three Leisure Services Divisions (see para. 1.15) whose selected pool complex recorded the highest expenditure in 2024-25. For each pool complex, 5 applicants were selected for Audit examination, comprising a school and 4 NSAs' affiliated clubs. The examination covered three months comprising two peak months for bookings and one non-peak month for bookings, during which the 15 applicants submitted a total of 65 applications with 2,693.5 lane hours (involving 1,604 sessions) hired.*

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4.6 Audit examined the block-book application records (including CLAS) for the 15 applicants (see para. 4.4) and found that of the 65 applications:

- (a) 7 (11%) applications lacked the names of authorised coaches and/or the relevant copies of valid coaches' certificates. However, there was no documentation indicating that the missing information was obtained before the issuance of approval letters; and
- (b) 28 applications were submitted after the priority application deadlines and/or lacked the endorsement from the parent NSAs (i.e. should have been treated as non-priority applications). However, 1 (4%) of these applications was approved, with the approval letter issued before the non-priority application deadline.

Room for improvement in handling matters relating to hire requirements

4.7 ***Need to ensure hirers' return of signed confirmation slips.*** According to the approval letters, hirers are required to accept the terms and conditions of hire of LCSD public swimming pools (hereinafter referred to as terms and conditions of hire) by returning signed confirmation slips to LCSD within specified periods from the issue dates of approval letters, and failure to do so will be regarded as withdrawals of the applications. Audit examination of the relevant records for the 15 applicants (see para. 4.4) revealed that, for 49 (75%) of the 65 applications, there was no documentation indicating that signed confirmation slips had been returned to LCSD or that the applications had been withdrawn.

4.8 ***Room for improvement in handling hirers' compliance with terms and conditions of hire.*** According to the terms and conditions of hire:

- (a) hirers shall pay hire charges at the respective swimming pool complexes within 14 days from the issue dates of the approval letters, and in any event before the hire dates (for applications with the time lapse between the issue dates of the approval letters and hire dates below 14 days). Otherwise, the bookings will be automatically cancelled;

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- (b) after hire charges are paid, hirers cannot cancel the bookings and will not be refunded unless LCSD is satisfied that the cancellations are caused by factors beyond the hirers' control or through no fault of the hirers, and the hirers give notices of such cancellations with justifiable reasons more than 14 days prior to the hire dates; and
 - (c) the number of participants using the water areas of the hired facilities shall fall within the upper and lower capacity limits of those facilities. LCSD can release the hired facilities immediately for public use if no reason acceptable to LCSD can be provided by the hirers (for non-compliances with the lower capacity limits).
- 4.9 Audit examined the relevant records for the 15 applicants and found that:
- (a) ***Delays in payment of hire charges.*** In 26 (40%) of the 65 applications, there were delays in payment of hire charges (ranging from 1 to 71 days), but the applications were not cancelled;
 - (b) ***Cancellation requirements not complied with.*** There were cases in which hirers cancelled some hired lane hours (involving 76.5 (3%) of 2,693.5 lane hours) without meeting the 14-day notice requirement and/or providing justifiable reasons to the satisfaction of LCSD (Note 38); and
 - (c) ***Capacity limits of hired facilities not met.*** In some sessions, the number of participants using the water areas of the hired facilities did not comply with the respective capacity limits (see para. 4.24(a)(iii)). However, there was no documentation indicating that the hirers had provided reasons acceptable to LCSD or the hired facilities were released for public use during the hire sessions.

Note 38: *This included: (a) a case (involving 4 lane hours) with the date of cancellation notice missing, but a reason (i.e. unable to arrange swimming class) was provided; and (b) another 2 cases (involving 4 lane hours) with the cancellation notices provided more than 14 days prior to hire dates, both citing unable to arrange trainees to attend the training as the reason. There was no documentation confirming that LCSD had accepted the reasons provided.*

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4.10 According to LCSD guidelines, LCSD shall issue a default notice to the hirer concerned for a breach of terms and conditions of hire and record in a register of breach. If a priority user has contravened the provisions of the terms and conditions of hire on two occasions at the same venue in any 30-day period, the priority status of the user concerned may be suspended for three months (for priority users other than schools) or for the next school year (for schools). However, for all the cases identified by Audit in paragraph 4.9, there was no documentation indicating that default notices were issued to the hirers concerned (which were priority users) or that the contravention was recorded in the register of breach.

4.11 *Need to lay down requirement for checking use of non-profit-making activity income/surplus.* According to the terms and conditions of hire, priority users shall be non-profit-making organisations and the hired facilities shall be used for non-profit-making activities (Note 39). The hirers shall only apply the income of non-profit-making activities for the activities themselves. Any surplus shall be reserved for the promotion of the sports by the hirers. In this connection, Audit noted that LCSD had included a new requirement in the terms and conditions of hire for, upon its request, submission of hirers' audited accounts or statement of accounts certified by certified public accountants and any other requested information to LCSD with effect from 31 May 2019. However, as of August 2025, LCSD had not requested the relevant submissions from hirers of 46 public swimming pool complexes (see para. 1.3) since the requirement came into effect, and no formal guidelines had been laid down for this requirement.

4.12 *Need to incorporate clauses on safeguarding national security in terms and conditions of hire.* The Law of the People's Republic of China on Safeguarding National Security in the Hong Kong Special Administrative Region was implemented on 30 June 2020. The Law stipulates that it is the constitutional duty of HKSAR to safeguard national security. Besides, the Safeguarding National Security Ordinance took effect on 23 March 2024. It is stated in section 8(3) of the Ordinance that if the law of the HKSAR confers any function on a person, the function is to be read as including a duty to safeguard national security, and accordingly, any person, in making any decision in the performance of the function, must regard national security as the most important factor, and give appropriate consideration to it accordingly. Audit examined the terms and conditions of hire and noted that there

Note 39: *The hire charges at normal rate apply to non-profit-making activities and commercial rate (around two times the normal rate) apply to profit-making activities.*

was no specific clause concerning safeguarding national security as of September 2025 (Note 40). Upon enquiry, LCSD informed Audit in October 2025 that:

- (a) while the relevant clauses had not yet been incorporated in the terms and conditions of hire for designated use of public swimming pools (see paras. 4.2 and 4.7), provisions on safeguarding national security had already been incorporated in the conditions for non-designated use of leisure venues (covering swimming pools); and
- (b) it had been making efforts in incorporating specific clauses on safeguarding national security in different sets of terms and conditions for hire of public swimming pools.

Room for improvement in handling CLAS matters

4.13 *Need to enhance monitoring of allocation of swimming lanes by LCSD.* According to LCSD guidelines, LCSD will closely monitor and record the actual utilisation of swimming lanes by each primary user under CLAS each year. When allocating swimming lanes to CLAS primary users for the coming year, LCSD will make reference to their actual utilisation, including take-up rates of lane hours allocated by the Aquatic Venues Section under CLAS, in the current year. Table 7 shows the take-up rates in the period from 2018-19 to 2024-25.

Note 40: *By way of reference, LCSD has incorporated specific clauses on safeguarding national security in the conditions of use for performance venues.*

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Table 7

**Take-up rates of lane hours
allocated by the Aquatic Venues Section under CLAS
(2018-19 to 2024-25)**

Year	No. of lane hours allocated (a)	No. of lane hours hired (b)	Take-up rate (c) = (b) ÷ (a) × 100%
2018-19	93,685	68,438	73%
2019-20	88,352	56,409	64%
2020-21	90,250	16,337 (Note)	18% (Note)
2021-22	88,947	47,811	54%
2022-23	84,569	40,668	48%
2023-24	82,969	37,133	45%
2024-25	82,241	29,985	36%

Source: Audit analysis of LCSD records

Note: According to LCSD, fewer lane hours hired in 2020-21 were attributable to the outbreak of the COVID-19 epidemic.

4.14 Audit noted that in the period from 2018-19 to 2024-25:

- (a) excluding 2020-21, the take-up rates of lane hours allocated under CLAS ranged from 36% to 73% (Note 41). Despite persistently low take-up rates, LCSD continued to allocate lane hours to primary users under CLAS at levels well above the actual lane hours hired in subsequent years. For example, in 2023-24, the number of lane hours hired was 37,133 (i.e. falling short of 82,969 lane hours allocated by 55%). Nevertheless, LCSD allocated 82,241 lane hours to primary users under CLAS in 2024-25, which were more than double the number of lane hours hired in 2023-24; and

Note 41: According to LCSD, the allocated lane hours not hired under CLAS will be released for non-CLAS bookings or open for public use (see paras. 1.8(b) and 4.15).

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- (b) the take-up rates of lane hours allocated under CLAS varied among primary users (e.g. ranging from 0% to 45% in 2024-25). In particular:
 - (i) for a primary user with take-up rate of 0% (with 20 lane hours allocated) in 2024-25, while the take-up rates were 0% in 2020-21 and 2022-23, LCSD had allocated 63 and 108 lane hours to the primary user under CLAS in 2021-22 and 2023-24 respectively; and
 - (ii) another primary user was not allocated any lane hours under CLAS during the seven-year period.

4.15 ***Need to monitor CLAS booking cancellations.*** According to LCSD guidelines, if no application is submitted for the swimming lanes allocated before the specified deadlines, the allocated lanes will be released and the respective swimming pool offices are no longer required to reserve the relevant swimming lanes and lane hours for the primary users concerned. Besides, if applicants (i.e. affiliate clubs) cancel the bookings after submitting the applications and before LCSD issues the approval letters, the respective swimming pool offices shall complete monthly record forms to notify the primary users (i.e. the parent NSAs/sports organisation) concerned and the Aquatic Venues Section the lane hours applied for and the respective lane hours cancelled (Note 42).

4.16 Among the 12 affiliated clubs selected for examination (i.e. 4 NSAs' affiliated clubs for each of the three swimming pool complexes visited — see Note 37 to para. 4.4), 11 applied for a total of 1,445 lane hours under CLAS, of which 1,286 lane hours were hired, in the selected period (see Note 37 to para. 4.4). Audit examined the relevant CLAS records for the 11 affiliated clubs and found that 62 of the 1,445 lane hours applied for were cancelled before the issuance of approval letter, but 3 (5%) of the 62 lane hours cancelled were not recorded in the monthly record form as required. Audit noted that, under the current practice for allocating swimming lanes under CLAS, the primary users were heavily relied upon (see paras. 4.3 and 4.18(a)), but were not informed of their affiliated clubs' cancellations

Note 42: *According to LCSD, the lane hours cancelled under CLAS will be released for non-CLAS bookings or open for public use.*

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made after the issuance of approval letters. Besides, LCSD did not maintain readily available information on the number of lane hours cancelled under CLAS (Note 43).

4.17 *Room for improvement in monitoring allocation of swimming lanes by primary users.* There were public concerns regarding the primary users' allocation of swimming lanes to their affiliated clubs under CLAS. Audit examined the relevant application and cancellation records for the 11 affiliated clubs in the selected period (see para. 4.16) and found that the cancellation rates (Note 44) ranged from 0% to 43% (averaging 12%). In view of the relatively high cancellation rate of 43% for an affiliated club, Audit examined the relevant records for the club covering the period from July 2023 to June 2025 and found that:

- (a) the cancellation rates remained at high levels (i.e. 47% and 39% in the periods from July 2023 to June 2024 and from July 2024 to June 2025 respectively); and
- (b) while the affiliated club cancelled 60 of 129 lane hours allocated in the period from July 2023 to June 2024, the parent NSA allocated 92 lane hours to the affiliated club under CLAS in the period from July 2024 to June 2025.

4.18 Upon enquiry about the primary users' allocation mechanisms and procedures under CLAS, LCSD informed Audit in August and October 2025 that:

- (a) while the approval power rested with LCSD, primary users were given the discretion to recommend the allocations taking into account the objective of sports development, past usage records and performance, projected needs of their respective affiliated clubs, etc. Primary users were required to publish their mechanisms and procedures through various public channels (e.g. their webpages, newsletters and emails); and

Note 43: *According to LCSD, apart from the monthly record forms (see para. 4.15), the cancellation records were kept in the subject files of individual affiliated clubs.*

Note 44: *The cancellation rates were calculated by dividing the number of lane hours cancelled by affiliated clubs by the number of lane hours applied for.*

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- (b) to ensure that the primary users allocated swimming lanes to their affiliated clubs through fair and reasonable mechanisms and procedures, CLAS primary users were required to establish/enhance three mechanisms, comprising:
 - (i) introducing a mechanism for declaration of interest to prevent actual or perceived conflict of interest (e.g. withdrawing members from discussions of issues with potential conflict of interest when necessary);
 - (ii) regarding the mechanism for allocation of swimming lanes, expanding the scope of representation of members involved for better balancing the training and development needs of affiliated clubs of different scales, enhancing transparency by publishing on the Internet the mechanisms (including the scoring system, criteria and list of affiliated clubs that benefit from CLAS) as well as announcing the specific details to their affiliated clubs, and reviewing regularly their internal mechanisms (including the scoring system, criteria and system operation); and
 - (iii) establishing a mechanism for processing complaints and appeals related to allocation of swimming lanes under CLAS and announcing the number of complaints annually.

4.19 Audit noted that CLAS primary users were not required to report compliance with the three-mechanism requirements (see para. 4.18(b)) regularly, and that some information about the allocation mechanisms was not published by the primary users on the Internet as of September 2025 (Note 45). Given the comparatively higher cancellation rates under CLAS than the block-book arrangement (see paras. 4.9(b) and 4.17), there is merit for LCSD to step up efforts to ascertain the reasons for the cancellations of lane hours applied for by affiliated clubs under CLAS, in particular for individual affiliated clubs with high cancellation rates, and take measures to address the issue as appropriate.

Note 45: *As of September 2025, of 7 CLAS primary users: (a) 3 published the scoring system and criteria on the Internet, but not the list of affiliated clubs that benefit from CLAS; and (b) 1 did not publish any allocation mechanism information on the Internet.*

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4.20 *Need to conduct a review on CLAS.* The aim of CLAS is to assist primary users in hiring swimming lanes in main pools for long-term sports development and training and there were 7 CLAS primary users as of September 2025 (see para. 4.3). Audit analysed the number of lane hours hired by the 7 CLAS primary users for main pools under the block-book arrangement (including CLAS) in the period from 2018-19 to 2024-25 (see Table 8) and noted that while the number of lane hours hired under CLAS decreased generally by 56% from 68,438 in 2018-19 to 29,985 in 2024-25 (see also Note 41 to para. 4.14(a)), the number of lane hours hired outside CLAS increased generally by 93% from 32,874 in 2018-19 to 63,488 in 2024-25. This indicated a shift in 7 CLAS primary users' preferences away from CLAS.

Table 8

**Number of lane hours hired by 7 CLAS primary users for main pools
(2018-19 to 2024-25)**

Year	No. of lane hours hired		
	Under CLAS (a)	Outside CLAS (b)	Under block-book arrangement (c) = (a) + (b)
2018-19	68,438	32,874	101,312
2019-20	56,409	25,959	82,368
2020-21 (Note)	16,337	11,595	27,932
2021-22	47,811	24,394	72,205
2022-23	40,668	39,526	80,194
2023-24	37,133	53,494	90,627
2024-25	29,985	63,488	93,473

Source: Audit analysis of LCSD records

Note: According to LCSD, fewer lane hours hired in 2020-21 was attributable to the outbreak of the COVID-19 epidemic.

4.21 Audit considers that LCSD needs to ascertain the reasons behind the declining user preferences for CLAS and implement appropriate measures to address the issue. Besides, Audit noted that the number of CLAS primary users during the period from 2015-16 to 2024-25 was 7 (i.e. remained unchanged for at least 10 years) and there was no documentation indicating that an evaluation of CLAS had been conducted. As CLAS had been in operation for 20 years as of August 2025, coupled

with several concerning trends, including primary users with no lane hours hired and/or allocated under the scheme in several years (see para. 4.14(b)), comparatively higher cancellation rates (see para. 4.19) and a decline in user preferences (see para. 4.20), it is opportune for LCSD to conduct a review of the scheme.

Need to lay down requirements for CLAS primary users' inspections relating to unauthorised transfers of swimming lanes

4.22 There are public concerns about the unauthorised transfer of swimming lanes. According to the terms and conditions of hire, hirers shall not transfer the bookings to any individual, firm, body corporate or unincorporated (whether established or incorporated). According to LCSD, in addition to LCSD's inspections (see para. 4.38), CLAS primary users are required to perform inspections on the hire dates at the swimming pool complexes to prevent unauthorised transfers of swimming lanes by their affiliated clubs. Audit examination of inspection records submitted by CLAS primary users to LCSD in 2024-25 revealed that, of the total 51 inspections conducted by 6 CLAS primary users (Note 46), only 2 (4%) were conducted in non-swimming season. In addition, the inspection time and the affiliated clubs concerned were not recorded for 37 (73%) inspections. Audit noted that there were no formal guidelines laid down for the inspections (e.g. inspection frequency and inspection report submission).

Need to enhance compliance with procedures for handling group entries on hire dates

4.23 According to LCSD guidelines, for handling group entries on hire dates:

- (a) the gate staff shall ask the hirers' authorised persons/coaches to show LCSD's approval letters and identity documents (to check that the hirers' authorised persons/coaches are the same as the ones listed in the application forms, or else the hired facilities cannot be used unless hirers' authorisation proofs and valid coaches' certificates are provided on site and hirers'

Note 46: 1 CLAS primary user was not allocated any lane hours in 2024-25 (see para. 4.14(b)(ii)).

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written notices are provided afterwards (Note 47)), and sign on registration forms (to confirm the hired facilities and the number of participants entered) (Note 48);

- (b) for session break bookings, if the coaches concerned do not hold valid lifesaving certificates (with Bronze Medallion or higher level issued by the Hong Kong China Life Saving Society), the hirers must arrange other people with the relevant certificates to attend the hired sessions to take care of participants' safety and sign on the registration forms; and
- (c) the gate staff shall count the number of participants (including coaches, teachers, trainees and parents) and the number of trainees to ensure compliance with the upper and lower capacity limits of the hired facilities (see para. 4.8(c)) respectively.

4.24 Audit noted that of the 1,604 sessions hired (see Note 37 to para. 4.4), 1,541 and 63 sessions were attended and cancelled respectively. Audit examined the relevant application and registration records and found that:

- (a) of the 1,541 sessions attended:
 - (i) for 388 (25%) sessions, the authorised persons or coaches who signed on the registration forms differed from those listed in the corresponding application forms. However, there was no documentation indicating that hirers' authorisation proofs or valid coaches' certificates (if applicable) had been verified upon entry or that hirers' written notice had been provided afterwards;
 - (ii) for 109 (7%) sessions that involved session breaks, no signatures from coaches holding the valid lifesaving certificates were found on the registration forms; and

Note 47: *According to LCSD guidelines, the swimming pool office shall contact the hirers immediately to confirm the authorisation if the hirers' authorised persons/coaches are different from the ones listed in the application forms.*

Note 48: *According to LCSD guidelines, hirers' authorised persons/coaches shall gather their participants prior to gate entry and participants can enter the gate only if the coaches have already arrived with identities checked.*

- (iii) for 21 (1%) and 34 (2%) sessions, the number of participants entering the hired facilities (as shown on the registration forms) exceeded or below the respective upper and lower capacity limits by 1 to 8 and by 1 to 3 respectively; and
- (b) of the 63 sessions cancelled, the hirer had indicated attendances for 12 (19%) sessions at Kowloon Park Swimming Pool (with signatures of its authorised person on the registration forms confirming the attendances and the number of participants entered) despite prior notifications of cancellation to LCSD. Upon enquiry, LCSD informed Audit in August 2025 that the registration forms were signed by hirer's authorised person by mistake.

Need to closely monitor implementation progress of swimming lane booking and management functions in SmartPLAY

4.25 Audit noted that LCSD initially planned to roll out enhanced functions on swimming lane booking and management (Note 49) in SmartPLAY by 2023 (Note 50). Upon enquiry, LCSD informed Audit in July 2025 that due to the complexity of the booking schemes with different priority users, the new functions would be launched progressively in batches (see Table 9). On 26 August 2025, the new functions for batch 1 were launched.

Note 49: *According to LCSD, the initiative aims to streamline the block-booking mechanism of swimming pool and covers:*

- (a) ***block-book arrangement.*** *Examples of new functions include pre-setting priority of different organisations with submission deadlines, submitting applications and uploading qualification of coaches, processing of applications, sending electronic notifications with approval letters, processing online payment, and generating reports for booking oversight; and*
- (b) ***CLAS.*** *Examples of new functions include allotting swimming lanes to primary users, assigning the allotted lanes by primary users to their affiliated clubs, and viewing of status of allotted CLAS lanes.*

Note 50: *LCSD informed LegCo that the swimming lane booking and management functions were planned to be rolled out: (a) by 2023 when seeking approval from FC in 2018; and (b) by 2024 when updating the LegCo Panel on Home Affairs, Culture and Sports the progress of SmartPLAY in June 2023.*

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Table 9

**New functions on swimming lane booking and management in SmartPLAY
(July 2025)**

	User involved	Scheduled launch date
Batch 1	Certain priority users, e.g. NSAs and sports organisations	August 2025
Batch 2	Schools	Fourth quarter of 2025
Batch 3	Other priority users, e.g. affiliated clubs and NGOs	Second quarter of 2026
Full launch	All (i.e. only electronic applications)	2026

Source: LCSD records

4.26 Audit noted that, under current practice, block-book applications (including CLAS) may continue to be submitted using paper form to individual swimming pool offices until the functions are fully launched in 2026. The manual vetting procedures involved were resource intensive, time consuming and prone to errors (see para. 4.6). In this regard, Audit considers that LCSD needs to closely monitor the implementation progress of the swimming lane booking and management functions in SmartPLAY to ensure that they are available for use as scheduled.

Need to keep under review implementation of Trial Scheme for Flexible Use of Swimming Pool Facilities

4.27 According to LCSD, for effective use of public swimming pool resources, it has implemented a Trial Scheme for Flexible Use of Swimming Pool Facilities to allow eligible organisations (see para. 4.2) to hire pool facilities which are expected to be closed due to the shortage of lifeguards, on the condition that the organisations have to arrange for their own lifeguards for such use. The first (i.e. 22 July to 31 August 2024) and second (i.e. 1 April to 31 October 2025) stages of the Trial Scheme cover 4 and 11 swimming pool complexes respectively (Note 51). Audit examination revealed that 157 and 833 lane hours were hired, accounting for 2% and

Note 51: *According to LCSD: (a) the first stage of the Trial Scheme covers Lei Cheng Uk, Kwai Shing, Pao Yue Kong and Tung Chung Swimming Pools; and (b) the second stage covers Chai Wan, Morse Park, Sha Tin Jockey Club, Tai Po, Tai Wan Shan, Tuen Mun and Yuen Long Swimming Pools, and those in the first stage.*

3% of lane hours available, in the first and second (up to June 2025) stages of the Trial Scheme respectively (Note 52). Audit considers that LCSD need to keep the implementation of the Trial Scheme under review, including ascertaining the reasons for low utilisation and adjusting the scheme as appropriate.

Audit recommendations

4.28 **Audit has recommended that the Director of Leisure and Cultural Services should:**

- (a) **take measures to ensure that block-book applications are processed in accordance with LCSD guidelines and signed confirmation slips are returned by hirers;**
- (b) **regarding hirers' compliance with the terms and conditions of hire:**
 - (i) **take measures to ensure their compliance and that follow-up actions are taken against their non-compliances in accordance with LCSD guidelines; and**
 - (ii) **review the cases of non-compliance identified by Audit and take follow-up actions as appropriate (e.g. issuing default notices to the hirers concerned, recording in the registers of breach and suspending the priority statuses as appropriate);**
- (c) **lay down the requirement for checking the use of the non-profit-making activity income/surplus in LCSD guidelines;**
- (d) **incorporate specific clauses concerning safeguarding national security in terms and conditions of hire for designated use of public swimming pools;**

Note 52: *According to LCSD: (a) the restrictions on the number of swimming lanes opened for group bookings under the block-book arrangement (e.g. not more than four 50-metre lanes during opening hours — see para. 1.7) did not apply to the Trial Scheme; and (b) higher lifesaving qualification (i.e. Pool Lifeguard Award) was required for group bookings under the Trial Scheme to ensure the safety of the participants as LCSD would not arrange lifeguards for these sessions and the hirers had to arrange on their own.*

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- (e) **regarding CLAS:**
 - (i) **take measures to ensure that LCSD staff follows the CLAS allocation and cancellation procedures stipulated in LCSD guidelines;**
 - (ii) **for lane hours cancelled by affiliated clubs, lay down the requirement for notifying CLAS primary users of those cancelled after the issuance of approval letters in LCSD guidelines, and maintain management information;**
 - (iii) **ascertain the reasons for the cancellations of lane hours applied for by affiliated clubs under CLAS (e.g. in collaboration with their parent NSAs/sports organisation), in particular for individual affiliated clubs with high cancellation rates, and reasons behind the declining user preferences for CLAS and implement appropriate measures to address the issue;**
 - (iv) **require CLAS primary users to submit regular returns relating to their compliance with the interest-declaration, swimming lane allocation as well as complaint and appeal mechanisms; and**
 - (v) **conduct a review on CLAS (e.g. assessing the effectiveness in achieving the CLAS aim), taking into account the reasons for cancellation and declining user preferences for CLAS as well as the audit observations and recommendations in this Audit Report, and take follow-up actions as appropriate;**
- (f) **lay down the requirements (e.g. inspection frequency and inspection report submission) for inspections relating to unauthorised transfers of swimming lanes conducted by CLAS primary users in LCSD guidelines;**
- (g) **take measures to ensure that LCSD staff follows the procedures for handling group entries stipulated in LCSD guidelines, and review the incorrect signed-in attendance records identified by Audit in paragraph 4.24(b) and take follow-up actions as appropriate (e.g. reviewing whether the existing mechanism is sufficient to prevent the recurrence of similar incidents);**

- (h) **closely monitor the implementation progress of the swimming lane booking and management functions in SmartPLAY to ensure that they are available for use as scheduled; and**
- (i) **keep the implementation of the Trial Scheme for Flexible Use of Swimming Pool Facilities under review, including ascertaining the reasons for low utilisation and adjusting the scheme as appropriate.**

Response from the Government

4.29 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that:

- (a) LCSD has reminded pool staff to strictly follow its guidelines in processing block-book applications and will issue regular reminders to ensure compliance and take necessary follow-up actions regarding hirers' non-compliance cases;
- (b) LCSD has built-in relevant functions (i.e. acknowledgment of the terms and conditions of hire when submitting applications) in SmartPLAY;
- (c) LCSD will refine the guidelines on checking the use of the non-profit-making activity income/surplus;
- (d) LCSD is taking prompt actions to incorporate specific clauses concerning safeguarding national security in the remaining sets of terms and conditions for hire of public swimming pools;
- (e) LCSD has reminded pool staff to strictly follow CLAS guidelines on the lane hour allocation and cancellation procedures, and will issue regular reminders to pool staff to ensure compliance;
- (f) LCSD will refine CLAS guidelines along the direction of the audit recommendation in paragraph 4.28(e)(ii);
- (g) LCSD will discuss with NSAs the audit findings, examine the reasons for the cancellation of lane hours applied for by affiliated clubs under CLAS,

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and develop arrangements for CLAS primary users to submit regular returns relating to their compliance with the interest-declaration, swimming lane allocation as well as complaint and appeal mechanisms. The CLAS will be reviewed in collaboration with NSAs, with the audit observations and recommendations taken into account;

- (h) regarding the audit recommendation in paragraph 4.28(f), LCSD will refine the guidelines and develop a new inspection form to set out standardised inspection criteria and frequency. The primary users of the CLAS will be required to submit their inspection records periodically;
- (i) LCSD has reminded pool staff to strictly follow its guidelines in handling group entries and will issue regular reminders to ensure compliance. For the case mentioned in paragraph 4.24(b), LCSD will seriously remind the hirer concerned of the importance and need to ensure correct signing of registration forms;
- (j) LCSD will closely monitor the implementation progress of the swimming lane booking and management functions in SmartPLAY to ensure that they are available for use as scheduled; and
- (k) LCSD will review the implementation of the Trial Scheme for Flexible Use of Swimming Pool Facilities to examine necessary adjustments.

Regulation of coaching activities

4.30 There are public concerns about the disturbance or nuisance caused by coaching activities. To promote swimming while taking care of public safety, LCSD has started to designate PCAs for coaching activities in different public swimming pool complexes since 2003. In July 2023, LCSD laid down a mechanism for PCA designation in its guidelines. As of September 2025, LCSD has designated PCAs in 9 public swimming pool complexes (Note 53). According to LCSD, for swimming pool complexes with PCAs designated, coaching activities can only be carried out in

Note 53: *As of September 2025, PCAs were designated in various pool facilities (comprising 1 to 4 swimming lanes of main pools, secondary pools or training pools, and/or teaching pools) in the 9 swimming pool complexes.*

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PCAs, except in swimming lanes hired under the block-book arrangement. Despite so, swimmers not participating in coaching activities can also use PCAs.

4.31 ***Mechanism for PCA designation.*** According to LCSD guidelines, a 3-step approach is adopted to guide DLSOs in assessing the need for the designation of PCAs, as follows:

- (a) ***Step 1: assessing need for PCA designation on trial.*** If there are more than 1 swimming pool facility (other than children's pool, toddlers' pool, leisure pool and Jacuzzi) in the swimming pool complex and the complex receives complaints/suggestions regarding PCA designation from no less than 3 different parties/people in the past 3 years, DLSO needs to review the number of admissions (i.e. the average number is no less than 30% of the capacity of the swimming pool complex from 4:00 p.m. to 9:00 p.m.) and the number of swimmer participation in coaching activities (i.e. the number is no less than 30% of facility user of the respective pool) before moving to step 2;
- (b) ***Step 2: assessing need for starting PCA designation.*** Conducting a public opinion survey and its result showing that over 50% of the users agree to designate PCA on trial is required before moving to step 3; and
- (c) ***Step 3: starting PCA designation procedure.*** Conducting a public opinion survey in the trial period (Note 54) and its result showing that at least 60% of the respondents agree to designate PCA (Note 55) is required before formal designation.

Note 54: *According to LCSD guidelines, the designation of PCA on trial in a swimming pool complex requires the support from the respective DC prior to the designation and the trial period shall span the swimming season from April to October of that year.*

Note 55: *According to LCSD guidelines, if the respondents agreeing to designate PCA account for: (a) 40% to 59%, the trial period shall be extended to cover another swimming season and another public opinion survey shall then be conducted; and (b) less than 40%, the DLSO concerned shall, based on operational needs, decide whether to extend the trial period.*

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For swimming pool complexes that do not meet the criteria for the designation of PCAs, data relating to coaching activities shall be collected in the next swimming season for assessing the need for designation. According to LCSD, for swimming pool complexes where PCAs are not designated, none met all the above criteria in 2023 and 2024.

Scope for enhancing assessment processes for PCA designation

4.32 According to LCSD:

- (a) with a view to collecting the public opinions about the designation of PCAs for reviewing and enhancing relevant arrangement, LCSD conducted public opinion surveys during the swimming season in 2024 at 35 swimming pool complexes (Note 56) where PCAs had not been designated; and
- (b) the public opinion survey is an effective measure for collecting the relevant public opinions and serves as an important reference in starting the 3-step approach (Note 57). In this connection, LCSD conducts yearly public opinion surveys during the peak swimming season (i.e. June to August) since 2025 at swimming pool complexes where PCAs have not been designated to assess the need for designation and improve the service level of public swimming pools.

4.33 ***Room for improvement in assessing need for designation of PCAs.*** Audit noted the following issues:

- (a) ***Inconsistent practices in conducting public opinion surveys.*** Audit examined the records of 2024 public opinion surveys and found that a total

Note 56: *Among the 37 swimming pool complexes (i.e. 46 less 9 with PCAs) where PCAs were not designated, public opinion surveys were not conducted at 2 swimming pool complexes as one was reserved for group training and the other was under redevelopment as of 2024.*

Note 57: *According to LCSD, the 2024 survey results from 4 swimming pool complexes indicated that more than half of the respondents supported the designation of PCAs. In this connection, coaching activity data shall be collected in the next (i.e. 2025) swimming season for assessing the need for designation (except 1 complex with pool facility threshold not met).*

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of 15,623 questionnaires were collected, with the number of questionnaires collected across the 35 swimming pool complexes varied significantly (ranging from 9 to 2,790). In particular, 12 (34%) swimming pool complexes only collected no more than 100 questionnaires each (11 of which did not conduct the surveys in each operational month in the survey period);

- (b) ***Need to enhance accuracy of monthly returns for mechanism for PCA designation.*** According to LCSD, to assess whether the criteria in each step of the 3-step approach (see para. 4.31) are met during each swimming season, individual swimming pool complexes are required to submit monthly returns (Note 58). Audit examination of the complaint records for Kowloon Park and Shing Mun Valley Swimming Pools (see para. 4.4) (where PCAs were not designated and with more than 1 swimming pool facility each) over the past 3 years (covering the period from May 2021 to October 2024) revealed that both swimming pool offices received complaints regarding PCA designation from no less than 3 different people, which conflicted with the information provided in their monthly returns (which indicated that the required complaint/suggestion thresholds were not met for the swimming season in 2024);

- (c) ***Need to consider regularly collecting coaching activity data.*** Under the current practice, the need for the designation of PCAs is regularly assessed through two methods: public opinion surveys (see Note 57 to para. 4.32(b)) and monthly returns for the mechanism for PCA designation (see (b) above). Audit noted a difference in the extent of data collection and analysis between the two methods, as follows:
 - (i) in the monthly returns, the numbers of admissions and swimmer participation in coaching activities were not collected or analysed if the pool facility and/or complaint/suggestion thresholds were not met; and

Note 58: *According to monthly returns for the swimming season in 2024, 34 of the 35 swimming pool complexes could not meet the required pool facility and/or complaint/suggestion numbers, and 1 (i.e. Lam Tin Swimming Pool) could not meet the required admission number after meeting the required pool facility and complaint/suggestion numbers.*

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- (ii) in the public opinion surveys, all four key numbers were collected and analysed for swimming pool complexes where more than half of the respondents supported the designation of PCAs in previous year's survey results, and the pool facility threshold was met.

However, the current practices did not facilitate the collection of all data required in step 1 of the 3-step approach if the complaint/suggestion thresholds were found to be met after the submission of monthly returns (see (b) above) or found to be met in the month when the third complaint was received. In this regard, while the admission numbers were regularly maintained (see para. 2.3), the number of swimmer participation in coaching activities remained unavailable prior to the dates when the required complaint/suggestion thresholds were met. Full-month participation data would only be collected in the month following the point at which those thresholds were met; and

- (d) ***Need to lay down requirements for public opinion surveys and monthly returns for mechanism for PCA designation.*** Audit noted that the practices and requirements regarding yearly public opinion surveys (see para. 4.32(b)), monthly return submission (see (b) above) and coaching activity data collection (see (c) above) were not laid down in LCSD guidelines.

4.34 ***Need to lay down criteria to assess on-going need for designation of PCAs and consider conducting regular analysis of coaching activity data.*** Audit noted that, for the 9 swimming pool complexes with PCAs designated, no public opinion survey had been conducted (see para. 4.32(a)), and the number of admissions and swimmer participation in coaching activities were not collected and/or analysed. In addition, of the 9 swimming pool complexes, PCAs were designated at two of them in 2019, the remaining 7 had their PCAs designated between 2003 and 2014 (i.e. over 10 years ago). However, there was no documentation indicating that a review of these designations had been conducted since their approval, and no guidelines had been laid down in this regard.

Need to enhance accessibility and transparency of information relating to PCA designation

4.35 According to LCSD guidelines, for swimming pool complexes with PCAs designated, notices shall be displayed in conspicuous places at the pool entrances and pool decks informing swimmers of the designation of PCAs and other swimming areas (see para. 1.8). Audit noted that:

- (a) during Audit's visit to Victoria Park Swimming Pool (see para. 4.4) (where PCA was designated) in July 2025, no notice relating to the designation of PCA was displayed at the pool entrance as required;
- (b) while the information on the types of swimming pool facilities and their availability (e.g. not available for public use due to temporary closures or reservations for group bookings) was published on LCSD website, information on swimming pool facilities with PCAs designated or the mechanism for PCA designation was not included as of September 2025; and
- (c) according to the results of public opinion surveys conducted in 2024 (see para. 4.32(a)), 51% respondents were unaware that PCAs had been designated in some swimming pool complexes.

Audit recommendations

4.36 **Audit has recommended that the Director of Leisure and Cultural Services should:**

- (a) **align the practices in conducting public opinion surveys and take measures to enhance the accuracy of the information reported in the monthly returns for the mechanism for PCA designation by individual swimming pool complexes;**
- (b) **consider collecting swimmer participation numbers in coaching activities regularly to facilitate the assessment for PCA designation, and lay down the requirements for yearly public opinion surveys, monthly returns for the mechanism for PCA designation, and coaching activity data collection in LCSD guidelines;**

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- (c) for swimming pool complexes with PCAs designated, lay down the criteria to assess the on-going need for such designations in LCSD guidelines, and consider conducting regular analysis of admission and swimmer participation numbers in coaching activities; and
- (d) take measures to ensure that notices relating to the designation of PCAs and other swimming areas are properly displayed in accordance with LCSD guidelines, and publicise information on swimming pool facilities with PCAs designated, along with the mechanism for their designations on LCSD website.

Response from the Government

4.37 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that LCSD is taking measures along the directions of the recommendations.

Management and maintenance of facilities

Room for improvement in conducting inspections at public swimming pool complexes

4.38 According to LCSD guidelines, to ensure proper management of swimming pools, and safety, cleanliness and hygiene of facilities, LCSD conducts various types of inspections at public swimming pool complexes, as follows:

- (a) ***Daily inspections.*** Swimming pool supervisors shall conduct daily inspections covering general aspects (Note 59) and complete daily inspection forms to document the facilities inspected and follow-up actions taken against individuals violating swimming pool rules. They shall also conduct daily inspections that focus on cleanliness and sanitation aspects and complete cleanliness and sanitation inspection reports; and

Note 59: *Examples of the general aspects include: (a) operation and use of swimming pools; (b) safety, cleanliness, tidiness and completeness of facilities; (c) pool water quality; and (d) whether staff perform their duties in accordance with the relevant guidelines.*

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- (b) ***Surprise and holiday inspections.*** Surprise and holiday inspections shall be conducted by the manager grade staff during opening hours as well as annual maintenance period, and the inspection results shall be recorded in inspection reports.

4.39 Audit examined the inspection records for the three swimming pool complexes (see para. 4.4) in the period from April 2024 to June 2025 (Note 60) and noted the following:

- (a) ***Need to ensure compliance with requirements for inspections at public swimming pool complexes.*** Audit noted that:
 - (i) for Victoria Park and Shing Mun Valley Swimming Pools, while the daily inspection forms indicated that some individuals had violated swimming pool rules (e.g. taking photographs or using floating objects in main pools) in 43 and 3 daily inspections respectively, no documentation of the follow-up actions taken was found in the daily inspection forms for 16 (37%) and 2 (67%) of those cases; and
 - (ii) some required daily, surprise and holiday inspections during opening hours were not conducted in accordance with the frequencies stipulated in LCSD guidelines (see Appendix C). For example, for Shing Mun Valley Swimming Pool, the stipulated frequencies for the required daily and surprise inspections during opening hours were not met; and
- (b) ***Need to review design of daily inspection reports.*** Audit noted that for the daily inspections:
 - (i) covering general aspects (see para. 4.38(a)), the daily inspection forms only require inspecting officers to document the facilities

Note 60: *Audit examination covered: (a) August 2024 and March/June 2025 (June 2025 applied only to Victoria Park Swimming Pool as it was closed for annual maintenance in March 2025) for daily inspections; and (b) 2024-25 for surprise and holiday inspections.*

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inspected (Note 61) and any follow-up actions taken against swimming pool rule violations. As such, the number and nature of inspection items covered could not be ascertained; and

- (ii) focusing on cleanliness and sanitation aspects (see para. 4.38(a)), the checklist in the cleanliness and sanitation inspection reports had included an item for checking compliance with the requirement for raising/maintaining free residual chlorine to/at a specified level under various circumstances (e.g. raising to 3 parts per million (ppm) and 2 ppm after closing the pools every night and weekly cleansing operation respectively). There was no documentation indicating that the free residual chlorine level was raised to 3 ppm on any night in August 2024 and June 2025 at Victoria Park Swimming Pool (see para. 4.41). In addition, while no relevant daily inspections were conducted after closing the pools in these two months, the respective swimming pool supervisors reported compliance with this item in all relevant cleanliness and sanitation inspection reports.

Room for improvement in handling of water-quality related matters

4.40 According to LCSD, to ensure that the hygiene of pool water is up to standard, various water quality testing was performed. The details are as follows:

- (a) **Daily testing.** LCSD staff takes water samples for testing on pH value and free residual chlorine on an hourly basis during opening hours;
- (b) **Bacteriological testing.** LCSD has engaged an accredited laboratory to collect sample and conduct bacteriological testing on the pool water on a weekly basis and as requested (e.g. emergency testing after discovery of vomit). The testing covers 6 items (i.e. turbidity, total bacterial count,

Note 61: *LCSD guidelines include a list of inspection items (generally categorised into groups based on facilities involved such as gate entrance and main pool). A remark states that inspecting officers may add or drop items, depending on actual operational needs and estimated time required for the inspections. For example, one of the inspection items involved checking whether the gate staff follows the procedures for handling group entries, but the daily inspection forms only require inspection officers to indicate whether the gate entrance has been inspected.*

escherichia coli, vibrio cholera, and the 2 items that are covered in the daily testing); and

- (c) **Chemical testing.** LCSD has engaged an accredited laboratory to collect sample and conduct chemical testing as requested (e.g. re-opening of swimming pools after annual maintenance and amidst the peak months for bookings — see para. 4.2). The testing covers 11 items, of which 3 are covered in the bacteriological testing (Note 62).

4.41 **Need to document compliance with requirement for raising free residual chlorine to a specified level every night.** To enhance the disinfection effect of the pool water, LCSD guidelines have stipulated a requirement for raising the free residual chlorine level to 3 ppm and maintaining for an hour after closing the pools every night. Audit examined the daily testing records for the three swimming pool complexes (see para. 4.4) for August 2024 and March/June 2025 (Note 63), and found that there was no documentation indicating that Victoria Park Swimming Pool had met the requirement (Note 64).

4.42 **Need to step up monitoring of bacteriological testing report submissions.** According to the service agreements, the laboratories are required to submit bacteriological and chemical testing reports to LCSD within 2 and 7 days after sample collection respectively. Audit examined the bacteriological and chemical testing reports of the three swimming pool complexes in 2024-25 and found that 98 (52%) of 188 bacteriological testing reports had not been submitted to LCSD within 2 days after sample collection, with delays ranging from 1 to 3 days (averaging 2 days).

Note 62: *The 11 items covered in chemical testing comprise colour, conductivity at 25 degree Celsius, total residual chlorine, total alkalinity, total hardness, chloride, permanganate index, aluminium, and the 3 items that are covered in the bacteriological testing (i.e. pH value, free residual chlorine and turbidity).*

Note 63: *Audit examination covered June 2025 for Victoria Park Swimming Pool as it was closed for annual maintenance in March 2025.*

Note 64: *According to LCSD: (a) as a normal daily practice, the duty filtration plant staff sets the free residual chlorine level to 3 ppm immediately after the pool's operating hours (i.e. 10:00 p.m.) and it takes approximately one hour to reach the desired level of 3 ppm; and (b) the results of 2 ppm indicated in the daily testing records only reflected the level at the time of testing, and in fact, the level reached 3 ppm after closing of pool every night at Victoria Park Swimming Pool.*

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4.43 *Need to set acceptable standards for all items covered in chemical testing.*

Audit noted that LCSD had set acceptable standards for the 6 items covered in the bacteriological testing (see para. 4.40(b)) and 1 item (i.e. the colour item) covered in the chemical testing, but had not set standards for the other 7 (i.e. 11 less 3 less 1 — see para. 4.40(c)) items that were only covered in the chemical testing. In the absence of defined acceptable standards, testing results requiring attention and follow-up could not readily be identified.

4.44 *Need to enhance accuracy, timeliness and comprehensiveness of water quality testing result dissemination.*

According to LCSD guidelines, the latest water quality testing results (together with sampling dates and report dates) shall be displayed outside each swimming pool complex. Audit noted that LCSD had kept copies of the displayed notices and had published the bacteriological testing results (together with sampling dates and report dates) on its website. Audit's visit to the three swimming pool complexes (see para. 4.4), together with Audit examination of the copies of the displayed notices and the testing reports of the three swimming pool complexes in 2024-25, and the testing results of 45 swimming pool complexes (Note 65) published on LCSD website as at 31 August 2025, revealed that:

- (a) no water quality testing results were displayed outside Shing Mun Valley Swimming Pool as required;
- (b) in 27 (28%) of 97 weekly bacteriological testing conducted for Victoria Park and Kowloon Park Swimming Pools (Shing Mun Valley Swimming Pool did not display any notices — see (a) above), discrepancies were noted between the testing results for some items or report dates shown in the displayed notices and those in the testing reports submitted by the laboratories, including 2 testing results with total bacterial count exceeded the acceptable standard in the first attempts (Note 66);

Note 65: *As at 31 August 2025, no testing results were published for Kowloon Tsai Swimming Pool which was closed for redevelopment.*

Note 66: *According to LCSD guidelines, LCSD shall repeat the pool water sampling exercises immediately in the next session break or after closing the swimming pools at night. The testing results fell within the acceptable standard in the second attempts for both cases.*

- (c) the testing results shown in the displayed notices and on LCSD website only included 5 of the 6 items covered in the bacteriological testing (i.e. the turbidity item was not included) (see para. 4.40(b)); and
- (d) the testing results shown on LCSD website and in the displayed notices were not timely. In particular, the testing results were publicised on LCSD website and shown in displayed notices about 3 to 4 weeks and 1 to 9 days (averaging 2 days) following the testing report dates respectively.

Room for improvement in managing repair and maintenance of facilities

4.45 According to LCSD, defective parts are repaired and replaced in a timely manner in response to wear and tear of facilities and swimming pools are closed for several months (generally about 2 months for heated pools and about 5 months for non-heated pools) for annual maintenance, with closures scheduled in months other than July and August. The details are as follows:

- (a) ***Repairs.*** According to LCSD guidelines, swimming pool offices shall request the relevant works departments to repair the defects (e.g. leaking water pipes) as soon as they are identified, and keep proper repair records (e.g. dates of request and completion, and photographs of the defects before and after repairs). Monthly repair reports showing all repair work not completed within 1 month after request (i.e. long outstanding cases) shall be submitted to manager grade staff at regional level for follow-up actions; and
- (b) ***Annual maintenance.*** According to LCSD, swimming pool offices and the relevant works departments will discuss the maintenance and enhancement items (e.g. minor renovation) to be included in the annual maintenance. The swimming pool offices will confirm the work schedule proposed by the works departments, monitor the work progress during the annual maintenance period, and collaborate with the works departments to ensure that all work items are up to standard and safe for public use before opening the swimming pools to the public.

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4.46 *Need to maintain proper records for monitoring repair work and ensure timely follow-up on long outstanding cases.* Audit examined the repair records for the three swimming pool complexes (see para. 4.4) for August 2024 and March/June 2025 (see Note 63 to para. 4.41) and found that:

- (a) photographs of the defects before and after repairs were not taken as required;
- (b) based on the repair register of Shing Mun Valley Swimming Pool (see (c) below), of 217 repair requests, 13 (6%) lacked complete information (i.e. dates of request or completion), and 8 (4%) were long outstanding (ranging from 35 to 195 days; averaging 94 days), for which no monthly repair reports were submitted; and
- (c) while Shing Mun Valley Swimming Pool maintained a repair register, the other two swimming pool complexes did not. According to LCSD, some repair requests had been made orally to the relevant works departments. In such cases, details of the defective items and the request dates were only recorded by the works departments. This practice did not facilitate monitoring of the progress of the repair work or the preparation of monthly repair reports.

4.47 *Room for improvement in scheduling annual maintenance work.* According to LCSD, annual maintenance is generally scheduled in non-swimming season (i.e. from November to March — see para. 1.4(b)) for non-heated pools and in the period from mid-April to June or in September and October for heated pools (to avoid the heated pool operating periods and peak months for bookings — see Note 2 to para. 1.3 and para. 4.2), taking into account the annual maintenance periods of swimming pools in the same district. Audit examined the annual maintenance schedule for 2024/25 (covering the period from November 2024 to October 2025) of 46 swimming pool complexes and noted that:

- (a) while June fell within the peak swimming season (see para. 1.4(a)), the annual maintenance of all/some swimming pools at 15 swimming pool complexes was scheduled during that month;
- (b) while the maintenance work could have been scheduled in the period from mid-April to June or in September and October to avoid overlapping with

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the annual maintenance periods of other swimming pools in the same district, the heated pools in Kwun Tong, Sham Shui Po Park, Victoria Park and Wan Chai Swimming Pools were closed for annual maintenance with closure dates fell within the period from mid-November to mid-April (i.e. heated pool operating periods); and

- (c) the annual maintenance periods for both heated main pools and non-heated secondary pools overlapped in Sham Shui Po Park and Kwun Tong Swimming Pools, resulting in the full closure of each complex for 51 days. This arrangement might cause inconvenience to habitual swimmers in winter months.

4.48 Upon enquiry, LCSD informed Audit in October 2025 that:

- (a) in order to ensure the availability of at least one heated pool for each district in the winter swimming season (i.e. November to March of the following year), annual maintenance of most heated pools could only take place before or after winter season (see para. 4.47);
- (b) when scheduling annual maintenance for heated pools, LCSD also considered factors including:
 - (i) the availability of a second heated pool in the district or neighbouring district; and
 - (ii) the usage pattern of other heated or non-heated pools in the district for key events (e.g. swimming galas by schools or regular competitions), which were usually held in September and October, to minimise the impact on swimming pool users; and
- (c) regarding the audit findings in paragraph 4.47(c):
 - (i) the annual maintenance arrangement had taken a number of factors into consideration, including ensuring that there was at least one swimming pool open to the public within the same district or neighbouring district as far as practicable;

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- (ii) experience had shown that many schools had the practice of arranging swimming competitions in September and October during which annual maintenance should be avoided; and
- (iii) LCSD only proceeded with the annual maintenance schedule of Sham Shui Po Park and Kwun Tong Swimming Pools upon consulting the respective DCs.

However, Audit noted that there were no formal guidelines laid down for scheduling annual maintenance of swimming pools including the criteria and consideration factors mentioned in paragraphs 4.47 and 4.48. Also, there was no documentation of the justifications for scheduling annual maintenance during June or heated pool operating periods, or for full closure of the swimming pool complexes concerned. In Audit's view, LCSD needs to review the annual maintenance schedule, taking into account the results of the public opinion surveys relating to swimming pool facilities (see para. 5.47) and factors such as peak swimming season, heated pool operating periods, and the feasibility of partial closure of swimming pool complexes. LCSD also needs to set out criteria and consideration factors for scheduling annual maintenance of swimming pools in its guidelines and take measures to ensure that justifications for deviations from guidelines are properly documented.

Need to closely monitor progress of public swimming pool complexes' construction and enhancement works

4.49 According to the Government, to meet the demand for swimming pool facilities and promote sports development, new swimming pool complexes will be developed or existing swimming pool facilities will be enhanced through conversion or redevelopment works (para. 1.9(a)) as and when necessary. Audit noted that there were delays in the construction and enhancement works, as follows:

- (a) the conversion works at Morse Park Swimming Pool (which commenced in December 2018) were scheduled for completion in the second quarter of 2022. The converted indoor heated secondary pool and outdoor children's pool eventually opened in March and April 2023 respectively (i.e. delays of 9 to 10 months);
- (b) the construction works of a new swimming pool complex, namely Tin Sau Road Swimming Pool (which commenced in January 2019), were scheduled

for completion in the third quarter of 2022. The complex eventually opened in August 2024 (i.e. a delay of about two years); and

- (c) the redevelopment works of Kowloon Tsai Swimming Pool (which commenced in December 2020) were scheduled for completion in the second quarter of 2024. On 11 September 2025, the main pool re-opened. However, as of September 2025, the other pool facilities had not yet re-opened (i.e. a delay of at least one year).

4.50 Upon enquiry, LCSD informed Audit in August and October 2025 that:

- (a) the works progress of all three projects was affected by the COVID-19 epidemic from 2020 to early 2023 (during which issues such as insufficient manpower, material shortage and logistics disruptions were encountered by the entire construction industry), and the delays in supply and delivery of some key materials during the construction stage of Tin Sau Road Swimming Pool; and
- (b) time was spent for defects rectification and improvement works after works completion to enhance public safety and ensure the quality of public facilities. Specifically for Tin Sau Road Swimming Pool, comprehensive testing and commissioning of various systems (e.g. water heating and water filtration) needed to be conducted to ensure the water quality before its opening to the public. For Kowloon Tsai Swimming Pool, substantial efforts were made on defects rectification (e.g. modifications to the play equipment in the outdoor leisure pool area and improvements to the shower cubicles in the changing rooms).

Audit considers that LCSD needs to draw on experience from completed projects including the availability of key materials and the time required for testing and commissioning of critical systems when planning similar projects in future.

Audit recommendations

4.51 **Audit has recommended that the Director of Leisure and Cultural Services should:**

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- (a) take measures to ensure that inspections at public swimming pool complexes are conducted in accordance with the requirements, including the frequencies, stipulated in LCSD guidelines;**
- (b) review the design of the daily inspection reports (e.g. including the number of inspection items and specific inspection items inspected in the daily inspection forms, and including the compliance checking on the requirement for raising free residual chlorine in pool water to a specified level every night as a distinct item of the checklist in the cleanliness and sanitation inspection reports);**
- (c) take measures to ensure that compliance with the requirement for raising the free residual chlorine in pool water to a specified level every night is documented;**
- (d) step up efforts in monitoring the compliance with the service agreement regarding the submission of bacteriological testing reports of pool water by the laboratory, and set acceptable standards for all items covered in the chemical testing of pool water;**
- (e) step up efforts to enhance the accuracy, timeliness and comprehensiveness of water quality testing result dissemination;**
- (f) take measures to ensure that proper records for monitoring repair work are maintained and long outstanding cases are timely followed up;**
- (g) review the annual maintenance schedule, taking into account the results of the public opinion surveys relating to swimming pool facilities and factors such as peak swimming season, heated pool operating periods, and the feasibility of partial closure of swimming pool complexes to promote year-round swimming and minimise inconvenience to swimmers;**
- (h) set out criteria and consideration factors for scheduling annual maintenance of swimming pools in LCSD guidelines and take measures to ensure that justifications for deviations from guidelines are properly documented; and**

- (i) **closely monitor the progress of the construction and enhancement works of public swimming pool complexes, and draw on experience from the completed projects when planning similar projects in future.**

Response from the Government

4.52 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that LCSD:

- (a) has reminded pool staff to strictly follow its guidelines in conducting inspections at public swimming pool complexes and will issue regular reminders to ensure compliance;
- (b) will refine the daily inspection form as recommended;
- (c) has reminded pool staff to comply with the requirement for raising the free residual chlorine in pool water to a specified level every night and record the measurements properly. Regular reminders will be issued;
- (d) has reminded pool staff to strictly monitor the contractor's performance and take necessary follow-up actions to ensure compliance with the contract terms. LCSD will consider setting acceptable standards for the items covered in the chemical testing of pool water, subject to professional advice;
- (e) is stepping up efforts in enhancing the accuracy, timeliness and comprehensiveness of water quality testing result dissemination;
- (f) has reminded pool staff to strictly follow its guidelines in maintaining proper repair records and timely handling long outstanding cases. Reminders will be issued regularly to ensure compliance;
- (g) is formulating clearer criteria and consideration factors, including those recommended by Audit in paragraph 4.51(g), for pool management staff to draw up the annual maintenance schedule as well as the requirement for proper documentation of the justifications for a decision; and
- (h) will continue to closely monitor the progress of the construction and enhancement works of public swimming pool complexes, and draw reference from completed projects.

PART 5: OTHER RELATED ISSUES

5.1 This PART examines other issues related to the management of public swimming pool complexes, focusing on the following areas:

- (a) delivery of swimming courses (paras. 5.2 to 5.25);
- (b) fees and charges for public swimming pools (paras. 5.26 to 5.43);
- (c) collection and handling of feedback on public swimming pool services (paras. 5.44 to 5.49); and
- (d) follow-up on drowning incidents at public swimming pool complexes (paras. 5.50 to 5.58).

Delivery of swimming courses

5.2 LCSD has launched the progressive swimming scheme primarily providing three levels of progressive training courses for people of all ages. A swimming course comprises 10 lessons. As of June 2025, the normal course fee was \$100 for a swimming course, and a 50% concessionary fee was applicable to a person aged below 15, elderly (i.e. a person aged 60 or above), a full-time student, a person with disabilities (PWD) and the accompanying carer of the PWD. LCSD's swimming courses specifically designed for elderly or PWDs were free of charge. In 2024-25, 2,474 swimming courses were organised (see Table 10 for details).

Table 10

**Swimming courses organised by LCSD
(2024-25)**

Level	Topic	Class group (Note 1)	Pre-course assessment	Course-end assessment (Note 2)	No. of courses organised
Level I	Front crawl, breast stroke	Child, junior, youth, adult	Nil	<u>Child:</u> No assessment required, only the achieved swimming distance recorded <u>Others:</u> Able to swim 20 metres	1,118
	Training course for elderly	Elderly			285
Level II	Front crawl, breast stroke	Child, junior, youth, adult	Achieved Level I standard	Able to swim 50 metres	404
	Training course for elderly	Elderly			149
Level III	Front crawl, breast stroke	All ages	Achieved Level II standard	Able to swim 100 metres	220
	Training course for elderly	Elderly			57
-	Back stroke	All ages	Achieved Level II standard	Able to swim 100 metres	81
-	Butterfly stroke	All ages	(Front crawl or breast stroke)	Able to swim 50 metres	76
-	Water safety class	Toddler	Nil	Nil	77
-	Swimming training course	PWD			7
Total					2,474

Source: LCSD records

Note 1: The class size was 16 (for Level I course), 20 (for Level II, Level III, back stroke and butterfly stroke course) and 8 to 16 (for courses for toddler and PWD).

Note 2: Participants who pass the course-end assessment will receive a record sheet.

Other related issues

Estimated numbers of swimming courses and participants not achieved in some districts

5.3 LCSD has formulated an annual plan for recreation and sports activities (including swimming courses). Each year, LCSD would inform 18 DCs of the estimated numbers of the recreation and sports activities to be organised and the participants expected to join these activities in the coming financial year. Audit compared the actual numbers of swimming courses and participants in 2024-25 with the estimated numbers reported to 18 DCs and the results are shown in Table 11.

Table 11
Estimated and actual numbers of swimming courses and participants (2024-25)

District	No. of swimming courses		No. of participants	
	Estimate	Actual (Percentage of estimate)	Estimate	Actual (Percentage of estimate)
<i>Hong Kong Island</i>				
Central and Western	86	104 (121%)	1,548	1,771 (114%)
Eastern	101	100 (99%)	1,654	1,500 (91%)
Southern	132	131 (99%)	2,392	2,207 (92%)
Wan Chai	159	188 (118%)	2,880	3,300 (115%)
<i>Kowloon</i>				
Kowloon City	168	197 (117%)	3,024	3,309 (109%)
Kwun Tong	120	160 (133%)	1,940	2,464 (127%)
Sham Shui Po	145	172 (119%)	2,604	2,972 (114%)
Wong Tai Sin	130	121 (93%)	2,368	2,131 (90%)
Yau Tsim Mong	153	148 (97%)	2,770	2,606 (94%)
<i>New Territories</i>				
Islands	113	84 (74%)	2,040	1,498 (73%)
Kwai Tsing	87	54 (62%)	1,540	909 (59%)
North	121	133 (110%)	2,072	2,090 (101%)
Sai Kung	88	78 (89%)	1,488	1,220 (82%)
Sha Tin	189	224 (119%)	3,268	3,693 (113%)
Tai Po	124	164 (132%)	2,144	2,666 (124%)
Tsuen Wan	91	108 (119%)	1,548	1,665 (108%)
Tuen Mun	126	69 (55%)	2,224	1,170 (53%)
Yuen Long	215	239 (111%)	3,628	3,636 (100%)
Total	2,348	2,474 (105%)	41,132	40,807 (99%)

Legend: Districts not achieving the estimated numbers of swimming courses and participants

Source: *Audit analysis of DC papers and LCSD records*

5.4 As shown in Table 11, LCSD did not achieve the estimated numbers of swimming courses and participants in 8 districts in 2024-25. Upon enquiry, LCSD informed Audit in October 2025 that, generally speaking, the estimated numbers of swimming courses and participants were not achieved because some courses were cancelled due to low enrolment rates, lack of instructors or closure of facilities. In Audit's view, LCSD needs to take measures to achieve the estimated numbers as far as possible.

Need to keep under review swimming courses organised for persons with disabilities

5.5 According to LCSD's annual plan for 2024-25, it has advised 18 DLSOs to organise sports programmes for PWDs in order to provide more opportunities for them to participate in sports activities, and LCSD targeted to serve 88,380 PWDs during the year. According to LCSD, to understand the needs of PWDs, it has annually consulted organisations serving PWDs to gather suggestions on the possible sports programmes (including swimming courses) that may be organised for them. In the 2024-25 consultation exercise, LCSD sent questionnaires to 365 such organisations, of which 220 responded with suggestions. Among the 220 replies, 6 organisations proposed organising 7 swimming courses (5 in Kwun Tong District, and 1 each in Central and Western District and Kowloon City District) for 83 PWDs.

5.6 In 2024-25, LCSD organised 7 swimming courses for PWDs in the aforementioned three districts, and all 87 training places were fully enrolled. Given the high demand for swimming courses for PWDs (with 100% enrolment rate in 2024-25), Audit considers that LCSD needs to keep under review the offering (e.g. number, location and type) of swimming courses for PWDs and take follow-up actions as appropriate.

Need to better align swimming course offerings with public demand

5.7 In 2024-25, LCSD organised 2,474 swimming courses offering 43,185 training places and received 114,659 applications, representing an overall subscription rate of 266%. An analysis of the subscription rate of the swimming courses is shown in Table 12.

Table 12

Subscription rate of LCSD’s swimming courses
(2024-25)

Subscription rate	No. of courses (Percentage)	
50% or less (Note)	110 (4.5%)	} 475 (19.3%)
More than 50% to 75%	168 (6.8%)	
More than 75% to 100%	197 (8.0%)	
More than 100% to 200%	735 (29.7%)	} 1,264 (51.0%)
More than 200% to 300%	501 (20.2%)	
More than 300% to 500%	463 (18.7%)	
More than 500% (Note)	300 (12.1%)	
Total	2,474 (100.0%)	

Source: Audit analysis of LCSD records

Note: The lowest and highest subscription rate was 5% and 1,706% respectively.

5.8 As shown in Table 12, 110 (4.5% of 2,474) courses had subscription rates of 50% or less (mainly courses for children and juniors), while 300 (12.1%) courses were heavily oversubscribed, with subscription rates exceeding 500% (mainly courses for adults and elderly). This indicated that the course provision was not adequately aligned with the actual demand patterns. In Audit’s view, LCSD needs to review the subscription patterns for swimming courses regularly, and adjust the course offerings as appropriate.

Room for improvement in allocation of training places for swimming courses

5.9 An applicant should submit a ballot e-application form via SmartPLAY (see Note 7 to para. 1.13) to apply for a swimming course. In a ballot exercise under SmartPLAY, applicants would be classified as either “new applicants” or “non-new

applicants” (Note 67). Based on both groups’ orders of preference for the activities stated in the application forms, “new applicants” would be first allocated places by ballot, and remaining places (if any) would be subsequently be allocated to “non-new applicants”. Successful applicants in a ballot should settle the course fees or confirm via SmartPLAY to secure their training places. Places that are still available after the payment and confirmation deadline would be open for enrolment via SmartPLAY on a first-come-first-served basis starting from a specified date.

5.10 Audit noted a complaint (involving 5 swimming courses) concerning the allocation of training places for swimming courses organised at Victoria Park Swimming Pool in the ballot exercise held in May 2024. In this connection, Audit examined a total of 515 applications (comprising 427 new applicants and 88 non-new applicants) in the ballot exercise concerned for 5 front crawl swimming courses for adults (Level I) and 3 breast stroke swimming courses for adults (Level I) held at the swimming pool complex. With a total of 128 training places available, these 8 courses had a high subscription rate of 402%.

5.11 Audit examination revealed that the 128 training places were allocated only to 111 applicants after the ballot exercise, with 3 applicants allocated training places in three courses and other 11 applicants allocated places in two courses. According to SmartPLAY data, all the 14 applicants were new applicants with respect to the swimming course concerned in the ballot exercise. Of these 14 applicants, 3 subsequently enrolled in two courses (2 applicants each enrolled in two front crawl swimming courses for adults (Level I) and 1 applicant enrolled in two breast stroke swimming courses for adults (Level I)), 10 in one course and 1 did not enrol in any course. Of the 3 applicants enrolled in two courses, 1 was absent from all lessons and the remaining 2 attended most lessons in each course.

5.12 According to LCSD guidelines, SmartPLAY would first allocate training places to new applicants in a ballot exercise (see para. 5.9). Audit examination found that even after a new applicant had already been allocated a place in a swimming course during an earlier round of the same ballot exercise, SmartPLAY continued to

Note 67: *A “new applicant” refers to an applicant who has not been admitted to the same type and same level of an activity over the past 12 months. An applicant who has been admitted to an activity of the same type and same level in the past 12 month would be classified as a “non-new applicant” regardless of whether he was absent or partially attended the activity.*

Other related issues

treat the applicant as “new” in subsequent rounds for the same swimming style and level (Note 68). As a result, some applicants were repeatedly given priority for placement in other courses of the same swimming style and level. As mentioned in paragraphs 5.7 and 5.8, the demand for LCSD’s swimming course was high, the aforementioned observations regarding the allocation of training places in the courses were less than satisfactory and not conducive to LCSD’s promotion of swimming to the general public. There is scope for improvement in this regard.

Need to take measures to address low attendance rate of some swimming courses

5.13 To review the delivery of swimming courses, Audit visited four public swimming pool complexes to examine the relevant records. The four selected swimming pool complexes were Pao Yue Kong Swimming Pool, Tai Wan Shan Swimming Pool, Fanling Swimming Pool and Kowloon Park Swimming Pool (Note 69).

5.14 A swimming course comprises 10 lessons. At the start of each swimming lesson, the instructor or his assistant would record the names of all the participants attending the lesson. Audit analysis of the average attendance rate of the 2,474 swimming courses organised in 2024-25 is shown in Table 13.

Note 68: *According to LCSD, in a ballot exercise, an applicant is still considered “new” to a swimming course if its swimming style or proficiency level differs from another course for which a training place has been allocated to the applicant in an earlier round of the ballot exercise.*

Note 69: *The first three swimming pool complexes were selected because each held the highest number of swimming courses during the period from July 2024 to June 2025 in the respective Leisure Services Division. The relevant records of July 2024 and June 2025 were reviewed. Kowloon Park Swimming Pool was also selected because swimming courses were organised around a year and it held the highest number of such courses in the territory during the period from July 2024 to June 2025. The relevant records of July 2024, October 2024 and January 2025 were reviewed.*

Table 13

Average attendance rate of LCSD’s swimming courses
(2024-25)

Average attendance rate (Note 1)	No. of courses (Percentage)
25 % or less (Note 2)	12 (0.48 %)
More than 25 % to 50 %	377 (15.24 %)
More than 50 % to 75 %	1,832 (74.05 %)
More than 75 % to less than 100 %	252 (10.19 %)
100 %	1 (0.04 %)
Total	2,474 (100.00 %)

} 2,221
(89.77 %)

Source: Audit analysis of LCSD records

Note 1: The average attendance rate of a swimming course is defined as:

$$\frac{\text{Total number of lessons attended by participants}}{\text{Total number of participants} \times 10 \text{ lessons}} \times 100\%$$

Note 2: The lowest average attendance rate was 13%.

5.15 As shown in Table 13, the average attendance rate of about 90% of the swimming courses was 75% or below, with 12 courses recording an average attendance rate of only 25% or below. While the Table shows the average attendance rate at course level, the attendance of individual participants at a swimming course was not readily available. In this connection, Audit’s sample checks of attendance records for 244 swimming courses (involving 4,071 participants) held at the four LCSD’s swimming pool complexes (see para. 5.13) found that:

- (a) 361 (8.9% of 4,071) participants were absent from all 10 lessons of the courses concerned;

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- (b) 164 (4% of 4,071) participants attended the concerned courses only from the fourth or subsequent lesson (Note 70). In particular, 6 participants attended only the eighth lesson, 1 attended only the ninth lesson and 3 attended only the last lesson; and
- (c) LCSD did not impose any penalty measures on those participants with low attendance (Note 71). According to LCSD, the absence of participants might be caused by various factors such as their health and hygienic condition.

Need to take measures to address low passing rate of some swimming courses

5.16 During the last two lessons of a swimming course, the instructor would assess whether participants have achieved the required standard (see Table 10 in para. 5.2). In 2024-25, of the 2,474 swimming courses organised, course-end assessment was conducted for 2,030 courses (Note 72). Among the 34,172 participants, 19,789 passed the assessment, representing an overall passing rate of 58%. Audit analysis of the passing rate of the 2,030 swimming courses is shown in Table 14.

Note 70: *According to LCSD guidelines, participants without the relevant qualification (e.g. a valid Level I record for a Level II swimming course) should take part in the pre-course assessment in the first three lessons of the swimming course. Participants having the relevant qualification are exempted from the pre-course assessment but are still required to attend the first lesson.*

Note 71: *By way of reference, LCSD has imposed a penalty measure on hirers who fail to take up a booked session on the use of an LCSD's recreation and sports facility on two occasions within a 60-day period. LCSD will suspend the booking rights of such hirers for 90 days.*

Note 72: *Course-end assessments were not conducted for the remaining 444 swimming courses including Level I courses for children, water safety classes for toddlers and swimming training classes for PWDs (see Table 10 in para. 5.2), or due to urgent maintenance at the public swimming pool complexes concerned.*

Table 14

**Passing rate of LCSD’s swimming courses
(2024-25)**

Passing rate	No. of courses (percentage)
0%	7 (0.4%)
More than 0% to 25%	108 (5.3%)
More than 25% to 50%	701 (34.5%)
More than 50% to 75%	901 (44.4%)
More than 75% to less than 100%	254 (12.5%)
100%	59 (2.9%)
Total	2,030 (100.0%)

} 816
(40.2%)

Source: *Audit analysis of LCSD records*

5.17 As shown in Table 14, about 40% of the swimming courses had a passing rate of 50% or below, including 7 courses in which no participant passed the course-end assessment. In this connection, Audit’s sample checks of records from four LCSD’s swimming pool complexes (see para. 5.13) further found that, among the 244 swimming courses reviewed, 336 participants did not pass either the pre-course or course-end assessment. According to LCSD guidelines, the failure reasons (e.g. breathing issues or incoordination of limbs) of each participant should be recorded. However, Audit found that the failure reasons for 262 (78% of 336) participants were not recorded. Furthermore, LCSD guidelines did not require the course instructor to notify participants of their failure reasons.

Need to document checking on participants’ eligibility for concessionary course fees

5.18 According to LCSD guidelines, for participants of swimming courses applying for a 50% concessionary course fee (see para. 5.2), the responsible LCSD staff should check the relevant documents (e.g. full-time student card or Registration Card for People with Disabilities) upon the participants’ first attendance at the course to ascertain their eligibility for concessionary course fee. The checking records should be maintained. If a participant is unable to produce the relevant

Other related issues

documents for eligibility checking, he would need to pay the difference between the normal fee and concessionary fee.

5.19 Audit's sample checks of records from four LCSD's swimming pool complexes (see para. 5.13) found that, among the 244 swimming courses reviewed, 2,843 participants had applied for a 50% concessionary fee. However, there was no documentation showing that the eligibility status of 1,318 (46% of 2,843) participants had been checked, and they were not required to pay the difference between the normal fee and concessionary fee.

Need to provide more information on course demand and effectiveness

5.20 LCSD's Community Sports Section has included the total number of swimming courses, training places, participants, revenue collected and expenditure incurred in a financial year in an annual statistical report. However, Audit noted that, as of August 2025, the subscription, attendance and passing rates for swimming courses were not included in the statistical report and the report had not been submitted to LCSD's senior management for information.

Delay in implementing some SmartPLAY functions for administration of swimming courses

5.21 In November 2023, the core functions (e.g. submission of applications, allocation of training places and course fee payment — see para. 5.9) of SmartPLAY were made available for use by the public. According to LCSD guidelines on the administration of swimming courses issued in March 2024, it has planned to introduce some enhanced functions in SmartPLAY including:

- (a) a self check-in function for participants to take attendance by themselves via SmartPLAY; and
- (b) an instructor check-in website and a handheld device website for the swimming instructor and his assistant to record participants' attendance and assessment results.

5.22 Upon enquiry, LCSD informed Audit in September 2025 that:

- (a) while the self check-in function (see para. 5.21(a)) had been in use since January 2024, this function could be used in conjunction with the instructor check-in website and the handheld device website (see para. 5.21(b)) to ensure a complete recording of the whole process in a swimming course; and
- (b) while LCSD originally targeted to roll out the instructor check-in website and the handheld device website in the second quarter of 2024, the target implementation date was subsequently revised to the fourth quarter of 2025 owing to the need to handle other projects of higher priority (e.g. balloting for free use of LCSD’s leisure facilities on the Sport For All Day). As of September 2025, a user acceptance test was being conducted.

5.23 In Audit’s view, LCSD needs to closely monitor the progress in implementing the enhanced functions in SmartPLAY for supporting the administration of swimming courses as early as possible.

Audit recommendations

5.24 **Audit has *recommended* that the Director of Leisure and Cultural Services should:**

- (a) **take measures to achieve the estimated numbers for swimming courses and participants as far as possible, take into account the subscription patterns for swimming courses, and regularly adjust the course offerings as appropriate to better align with participant needs and demand trends;**
- (b) **keep under review the offering (e.g. number, location and type) of swimming courses for PWDs and take follow-up actions as appropriate;**
- (c) **review the allocation of training places for swimming courses and take appropriate measures (e.g. designating an applicant as a “non-new applicant” after he has been allocated a training place in a ballot exercise) to address the identified issues;**

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- (d) take measures to enhance the attendance rate of swimming courses, including ascertaining the reasons for low attendance and taking appropriate measures to address these issues, and considering the imposition of appropriate penalty measures on those participants with low attendance;**
- (e) take measures to improve the passing rate of swimming courses as far as possible, including notifying participants of their failure reasons and keeping the relevant records;**
- (f) take measures to ensure that the participants' eligibility for concessionary swimming course fee is checked and documented;**
- (g) take measures to include the subscription, attendance and passing rates for swimming courses in the annual statistical report, and submit it to LCSD's senior management to facilitate monitoring of the course demand and effectiveness; and**
- (h) closely monitor the progress in implementing the instructor check-in website and the handheld device website in SmartPLAY for supporting the administration of swimming courses as early as possible.**

Response from the Government

5.25 The Director of Leisure and Cultural Services generally agrees with the audit recommendations. She has said that:

- (a) the 18 DLSOs of LCSD will critically review the annual plan for recreation and sports activities (including swimming courses) to adjust the course offerings in response to participant needs and demand trends;**
- (b) LCSD will keep a close contact with organisations serving PWDs and invite their views when reviewing the course offerings;**
- (c) LCSD will review the priority balloting mechanism for new applicants and non-new applicants;**

- (d) LCSD will ask instructors to encourage participants to attend courses actively, hence standing a higher chance of passing the course-end assessment, and consider the imposition of appropriate penalty on participants with low attendance;
- (e) LCSD will also ask instructors to advise on possible measures to improve the passing rate of swimming courses, and to notify participants of their failure reasons and keep the relevant records; and
- (f) LCSD is taking actions along the directions of the audit recommendations in paragraph 5.24(f) to (h).

Fees and charges for public swimming pools

5.26 According to Financial Circular No. 6/2016 on “Fees and Charges” issued by the Financial Services and the Treasury Bureau (FSTB — Note 73):

- (a) it is the Government’s policy that fees and charges should in general be set at levels adequate to recover the full cost of providing the goods or services;
- (b) bureaux/departments (B/Ds) should always place great emphasis on cost effectiveness and must therefore take the initiative to improve efficiency and control costs in the delivery of their services;
- (c) full-cost fees are for goods, services or regulatory schemes whose users should pay for the full cost incurred. The fees should therefore be set at a level aiming at the attainment of full-cost recovery. This category comprises the majority of fees levied by the Government;
- (d) a subsidised fee may be charged provided that there is a clear policy backing for the exception to the full-cost recovery principle. These fees should be set in accordance with an agreed subsidy formula;

Note 73: *Upon the reorganisation of the Government on 1 July 2002, FSTB was formed by merging the former Finance Bureau and the former Financial Services Bureau. For simplicity, the former bureaux are hereinafter referred to as FSTB in this Audit Report.*

Other related issues

- (e) fees should generally be reviewed and, where necessary, revised on an annual basis. The review of full-cost fees and subsidised fees should be supported by costing statements. If B/Ds consider that, in respect of a fee item, the underlying modus operandi for the concerned service has not changed since completion of the last vetted costing statements, they may consider using appropriate cost projection rates to update the full cost of the fee item. Nevertheless, a fresh costing should be conducted at least once every four years;
- (f) after conducting the annual fee reviews, B/Ds should derive their fee proposals and forward a self-contained submission to FSTB, including the background and full justifications for the fee proposals, fee items to be revised, financial implications and duly vetted costing statements for reflecting the latest cost recovery position;
- (g) after seeking approval from FSTB, B/Ds should take necessary action to implement their fee proposals. To avoid revenue loss, B/Ds should aim to implement new/revised fees as soon as possible; and
- (h) B/Ds should aim at achieving full-cost recovery (or other targets that have been agreed) as early as practicable. If fee increase for recovering full cost at one go is not feasible, a phased approach can be adopted (Note 74).

Need to review fees and submit fee proposals to FSTB annually

5.27 As of June 2025, LCSD was responsible for the management of:

- (a) 6 statutory fee items (see para. 1.14) for individual admission to a public swimming pool complex (e.g. normal admission fee of \$17 on Monday to Friday (except public holidays) and \$19 on Saturday, Sunday and public holidays);

Note 74: *The requirements in paragraph 5.26(h) were introduced in July 2016 when Financial Circular No. 6/2016 was issued to replace Financial Circular No. 6/2006.*

- (b) 157 administrative fee items (see para. 1.14) for group booking of public swimming pool facilities (e.g. normal hourly rate of \$342 for booking a training pool in July/August and \$171 in other months); and
- (c) 8 administrative fee items for swimming and lifesaving courses (e.g. normal fee of \$100 for a 10-lesson swimming course and \$108 for a 19-lesson lifesaving course).

5.28 Audit noted that:

- (a) for the statutory fees for individual admission to a public swimming pool complex, FSTB had not set a target cost recovery rate as of September 2025;
- (b) for the administrative fees on the group booking of public swimming pool facilities, FSTB set a target cost recovery rate of 14% in August 2000; and
- (c) for the administrative fees for recreation and sports programmes (including swimming and lifesaving courses), FSTB set a target cost recovery rate of 11% (for all recreation and sports programmes as a whole) in August 2000 (see paras. 5.36 and 5.37 for the related audit observations).

5.29 When LCSD was established in 2000, the fees and charges for the use of recreation and sports facilities (including public swimming pools) followed those of the former municipal councils. In this connection, Audit noted that, according to the 2013 Policy Address and the 2013-14 Budget:

2013 Policy Address (in January 2013)

- (a) it had been 12 years since the abolition of the former municipal councils, but the levels of fees and charges for certain municipal facilities and services still varied between the urban areas and the New Territories. The Chief Executive of HKSAR had decided to amend the legislation to align these fees and charges. As a first step, where the fee or charge for a facility or service differed between the urban areas and the New Territories, the lower rate would prevail;

Other related issues

- (b) as most of the fees and charges for the facilities and services of LCSD had remained unchanged since 2000, the Chief Executive had asked LCSD to conduct a comprehensive review of its fee levels and charging policy, and to put forward recommendations to the Financial Secretary as soon as possible;

2013-14 Budget (in February 2013)

- (c) the provision of government services is generally charged in accordance with the “user pays” principle. To prevent cost recovery items being turned into heavily subsidised items, the Government needed a systematic review. The Financial Secretary would ask all B/Ds to review their respective fees and charges, and submit plans for their revision for the coming one or two years (i.e. the plans should be submitted by 2015); and
- (d) apart from the fee items that had not been revised for years and did not directly affect people’s livelihood, the Government should also deal with fee items which had low cost recovery rates. The Government would make appropriate fee revisions as and when necessary. There would not be substantial revisions at one go to avoid affecting people’s livelihood. The Government should also strictly control costs and reduce the need for increasing fees and charges as far as possible.

5.30 According to the initiative announced in the 2013 Policy Address, LCSD aligned the different fees and charges for same types of facilities and services (including public swimming pools) in the urban areas with those of the New Territories based on the lower of the two rates in 2013. However, Audit noted that LCSD submitted the fee review results and fee proposals to FSTB only in August 2019. Audit examination revealed that:

- (a) in March 2013, the former Home Affairs Bureau (HAB — Note 75) informed FSTB that it expected to submit the fee review results and fee proposals to FSTB in the third quarter of 2014;

Note 75: *Before 1 July 2022, HAB was responsible for overseeing the operation and management of LCSD. Upon the reorganisation of the Government on 1 July 2022, the above responsibility was transferred to CSTB.*

- (b) from October 2014 to November 2016, FSTB issued 10 reminders to HAB/LCSD urging for timely submission of fee review results and fee proposals. In February 2017, the Financial Secretary also issued a reminder to the former Secretary for Home Affairs;
- (c) in March 2017, LCSD submitted the costing statements of swimming pool fees for 2015-16 and 2016-17 to FSTB. However, there were no records showing that LCSD had submitted the fee proposals for 2013-14 to 2018-19 and the costing statements for 2013-14, 2014-15 and 2017-18 to FSTB, thereby not complying with the requirement of Financial Circular No. 6/2016 (see para. 5.26(f));
- (d) in January 2018, HAB/LCSD informed FSTB that it would provide the submission in the first quarter of 2018. In May and September 2018, FSTB issued two further reminders to LCSD; and
- (e) eventually, in August 2019, LCSD submitted the fee review results and fee proposals to FSTB (see para. 5.33 for the related developments since 2019).

Need to step up efforts in implementing endorsed fee proposals and consult FSTB on setting of target cost recovery rate for statutory fees

5.31 Based on the costing statements prepared by LCSD for 2018-19 to 2024-25, the actual cost recovery rates for the statutory fees on individual admission to a public swimming pool complex and the administrative fees on group booking of swimming pool facilities are set out in Table 15.

Table 15

**Actual cost recovery rates
(2018-19 to 2024-25)**

Year	Actual cost recovery rate for	
	Statutory fees on individual admission to a public swimming pool complex	Administrative fees on group booking of public swimming pool facilities
2018-19	10.3%	14.9%
2019-20	8.7%	12.1%
2020-21	2.3%	3.3%
2021-22	6.6%	7.9%
2022-23	6.6%	8.0%
2023-24	7.3%	10.2%
2024-25	7.2%	11.5%

Source: LCSD records

5.32 As shown in Table 15:

- (a) for the statutory fees on individual admission to a public swimming pool complex, the actual cost recovery rate ranged from 2.3% to 10.3% in 2018-19 to 2024-25; and
- (b) for the administrative fees on group booking of public swimming pool facilities, the actual cost recovery rate in 2019-20 to 2024-25 (ranging from 3.3% to 12.1%) did not meet the target cost recovery rate of 14% (see para. 5.28(b)).

5.33 Audit noted the following developments related to the fees and charges on LCSD’s leisure facilities and services (including public swimming pools) since 2019:

- (a) in early August 2019, LCSD submitted the fee review results to FSTB and proposed to increase the fees by two phases taking into account the need to consider public affordability. Audit noted that LCSD did not submit any

costing statement to FSTB in its fee proposals, thereby not complying with the requirement of Financial Circular No. 6/2016 (see para. 5.26(f));

- (b) in mid-August 2019, the Financial Secretary announced a fee review moratorium on government fees and charges until December 2020 with a view to supporting the business and relieving people's financial burden. Under the moratorium, B/Ds were not required to review the relevant fees and charges in accordance with Financial Circular No. 6/2016 (see para. 5.26(e)). The moratorium also applied to fee proposals submitted to FSTB pending approval (including LCSD's fee proposals in (a) above). In September 2020, the Financial Secretary extended the moratorium for one more year until December 2021;
- (c) in January 2022, LCSD informed FSTB that it would review the fee proposals submitted in 2019 (see (a) above) and targeted to complete the review in the second quarter of 2022. In July 2022, LCSD informed FSTB that the target completion date would be adjusted to the fourth quarter of 2022 owing to the impacts of the fifth wave of the COVID-19 epidemic and the reorganisation of the Government at that time (see Note 75 to para. 5.30(a));
- (d) following three reminders issued by FSTB between February and June 2023, LCSD submitted the revised fee review results to FSTB in July 2023 and proposed to increase the fee levels by two phases within three years, mainly with reference to the cumulative inflation rate and users' affordability. Audit noted that LCSD did not submit any costing statement to FSTB in its fee proposals. In November 2023, FSTB expressed no in-principle objection to LCSD's fee proposals, and requested LCSD to implement the revised fees as expeditiously as possible and map out the way forward and work plan for achieving the target cost recovery rates;
- (e) in January 2024, CSTB/LCSD informed FSTB that they were prepared to introduce fee revisions in tandem with other B/Ds that also implemented their fee proposals. In the same month, FSTB replied that, as the fees for LCSD's leisure services had not been adjusted for a long time, CSTB/LCSD should implement the fee proposals starting from 2024-25 without further delay. FSTB also noted that LCSD's leisure facilities and services would continue to be provided to the general public at heavily subsidised rates after the proposed fee increase;

Other related issues

- (f) in May 2025, CSTB/LCSD submitted another fee review results to FSTB and proposed to first increase the statutory fee levels by two phases in two years. Audit noted that LCSD did not submit any costing statement to FSTB in its fee proposals. In June 2025, FSTB expressed no in-principle objection to the submitted fee proposals. FSTB also requested LCSD to take steps to improve the utilisation rate for leisure facilities and services, devise cost-saving measures to improve the cost recovery rates, and evaluate the effectiveness of such measures in order to lower the level of subsidies on leisure facilities and services; and
- (g) upon Audit's enquiry in July 2025, LCSD submitted the costing statements of swimming pool fees for 2018-19 to 2023-24 to FSTB in August 2025. In September 2025, LCSD also submitted the costing statement for 2024-25 to FSTB.

5.34 Upon enquiry, LCSD and FSTB informed Audit in October and November 2025 that:

LCSD

- (a) cost recovery was not the only consideration in the mechanism for the review and setting of LCSD's fees and charges. Apart from cost recovery, the Government had also been observing a number of guiding principles in setting and reviewing the fee levels of leisure facilities and services. These principles included the policy objective to promote sports, users' affordability and economic conditions;
- (b) the 2024-25 Budget had set out that the Government would review various fees and charges in a timely manner. Besides adhering to the "user pays" principle, the affordability of the general public and business sector would also be taken into account. The 2025-26 Budget had further stated the principle to uphold the "user pays" and the "affordable users pay" principles as far as practicable whilst increasing revenue;
- (c) FSTB had noted the cost recovery position of leisure facilities and services (including public swimming pools) in LCSD's submission of fee review proposals since mid-2023, and FSTB had not specifically required any submission of costing statements as supporting documents;

- (d) from June to September 2025, CSTB/LCSD also looked into other relevant factors (including public affordability) to be considered in the exercise of adjusting LCSD's fees and charges;

FSTB

- (e) in July 2023, LCSD submitted the fee proposals (see para. 5.33(d)) to FSTB for advance information while seeking CSTB's policy support in parallel. FSTB expressed no in-principle objection to the fee proposals in November 2023 with a view to improving the cost recovery position gradually as most leisure facility fees had remained unchanged since the fee alignment in 2013. FSTB also requested LCSD to submit fee increase proposals to be implemented in (i) 2023-24; and (ii) 2024-25 and onwards, cleared with CSTB, for processing; and
- (f) regarding the fee proposals submitted by CSTB/LCSD in May 2025 (see para. 5.33(f)), FSTB expressed no in-principle objection in June 2025 after considering that fees of leisure facilities were last revised in 2013 and the proposed magnitude of fee revisions was sufficient to catch up with the cumulative inflation from 2013 to 2023 (i.e. a 10-year period after the 2013 fee alignment exercise — see para. 5.30).

5.35 Audit noted that the fees and charges for LCSD's leisure facilities and services (including public swimming pools) were last revised in 2013 (see para. 5.30). According to the 2013 Policy Address and 2013-14 Budget respectively (see para. 5.29(b) and (c)), LCSD was asked to conduct a comprehensive review of its fee levels and charging policy, and plans for revising the fees and charges were to be submitted by 2015. However, LCSD submitted the fee review results and fee proposals to FSTB only in August 2019 (see para. 5.33(a)). Although LCSD had submitted a number of fee proposals to FSTB since then, the fees and charges for LCSD's leisure facilities and services (including public swimming pools) were not revised as of September 2025. In Audit's view, LCSD needs to step up efforts in this regard. Furthermore, it also needs to consult FSTB on whether a target cost recovery rate should be set for the statutory fees for individual admission to a public swimming pool complex (see para. 5.28(a)). Besides, FSTB needs to continue to regularly remind B/Ds to review (and revise where necessary) their fees and charges and submit the related fee proposals (including costing statements) on an annual basis in accordance with Financial Circular No. 6/2016, and take appropriate follow-up actions in case of non-compliance by B/Ds.

Other related issues

Need to review course fees for swimming and lifesaving courses

5.36 Audit noted that the fees for swimming and lifesaving courses were relatively low compared to the admission fee for a public swimming pool complex. For example, as of June 2025, the normal fee of a 10-lesson swimming course was \$100, representing only 59% of the total admission fee of \$170 ($\17×10 admissions — assuming that all lessons were held on Monday to Friday). The normal fee of a 19-lesson lifesaving course on Bronze Medallion was \$108, representing only 33% of the total admission fee of \$323 ($\17×19 admissions). The course fees appeared to be relatively low, considering that participants received not only the relevant training but also access to the swimming pool services provided by LCSD (e.g. lifeguarding, lighting, water filtration and changing rooms).

5.37 In this connection, in August 2000, FSTB set a target cost recovery rate of 11% for the administrative fees on recreation and sports programmes (see para. 5.28(c)). Audit noted that LCSD had prepared a costing statement covering all its recreation and sports programmes. According to the costing statement for 2023-24 (Note 76), the actual cost recovery rate was 5.4%, lower than the target cost recovery rate of 11%.

Need to consult FSTB on fee exemption for swimming courses specifically designed for elderly and persons with disabilities

5.38 In August 2000, FSTB delegated the power to LCSD's public officers of D2 rank or above to waive/reduce the fees and charges for leisure services, provided that the total revenue foregone would not exceed 1.2% of the total fees and charges of leisure services for the financial year concerned. In this connection, Audit noted that LCSD had exempted the course fee for swimming courses specially designed for elderly and PWDs. In 2024-25, of the 2,474 swimming courses organised by LCSD, 491 and 7 courses were specifically designed for elderly and PWDs respectively.

5.39 Upon enquiry, LCSD informed Audit in October 2025 that FSTB's requirement in 2000 to assess the revenue foregone was considered inapplicable because the requirement did not touch on specific user groups (e.g. elderly and PWDs)

Note 76: *According to LCSD, as of September 2025, it was preparing the costing statement of recreation and sports programmes for 2024-25, and planned to complete the costing statement by November 2025.*

and the fee exemption had received positive feedback from the general public. However, Audit noted that FSTB had not been informed of the fee exemption arrangement.

Audit recommendations

5.40 **Audit has recommended that the Director of Leisure and Cultural Services should:**

- (a) **review the fees and charges for public swimming pools and submit the related fee proposals (including costing statements) to FSTB on an annual basis in accordance with Financial Circular No. 6/2016;**
- (b) **step up efforts in finalising and implementing the fee proposals endorsed by FSTB and CSTB, and consult FSTB on whether a target cost recovery rate should be set for the statutory fees for individual admission to a public swimming pool complex;**
- (c) **review the course fees for swimming and lifesaving courses and take measures to achieve the related target cost recovery rate set by FSTB (e.g. implementing appropriate efficiency initiatives and formulating a cost recovery timetable with reference to Financial Circular No. 6/2016); and**
- (d) **regarding the fee exemption for swimming courses specifically designed for elderly and PWDs, consult FSTB on whether the requirement to assess the revenue foregone is applicable in this case, and take follow-up actions accordingly.**

5.41 **Audit has recommended that the Secretary for Financial Services and the Treasury should continue to regularly remind B/Ds to review (and revise where necessary) their fees and charges and submit the related fee proposals (including costing statements) on an annual basis in accordance with Financial Circular No. 6/2016, and take appropriate follow-up actions in case of non-compliance by B/Ds.**

Response from the Government

5.42 The Director of Leisure and Cultural Services agrees with the audit recommendations in paragraph 5.40. She has said that LCSD is taking actions along the directions of the recommendations, and LCSD in consultation with CSTB is drawing up a timetable for proceeding with the next adjustment for LCSD's fees and charges.

5.43 The Secretary for Financial Services and the Treasury agrees with the audit recommendation in paragraph 5.41.

Collection and handling of feedback on public swimming pool services

Need to ensure that complaint information is properly kept and monitored

5.44 According to LCSD guidelines, a complaint register shall be maintained by each office/section to record all complaints. Pool offices are required to use a standard format that includes fields such as name of complainant and dates of receipt, interim reply and substantive reply.

5.45 ***Need to properly record complaints in complaint registers.*** Audit examination of the complaint records for the three swimming pool complexes (see para. 4.4) and the Aquatic Venues Section (Note 77) in 2024-25 found that:

- (a) Kowloon Park Swimming Pool office and the Aquatic Venues Section did not maintain a complaint register, despite 117 and 2 complaints were received respectively; and
- (b) the complaint register of Shing Mun Valley Swimming Pool office was not maintained in the standard format. Some information such as the name of

Note 77: *According to LCSD, while individual swimming pool complexes handles complaints concerning them, the Aquatic Venues Section handles complaints relating to the overall management of public swimming pool complexes.*

complainant, dates of interim and substantive replies was not recorded in the complaint register.

5.46 *Need to respond to complaints in accordance with stipulated timeframes.* According to LCSD guidelines, an interim reply (if a substantive reply cannot be issued within 10 days) and a substantive reply shall be issued to the complainant within 10 and 30 days respectively after receipt of the public complaint. Audit examination of the complaint records for the three swimming pool complexes and the Aquatic Venues Section in 2024-25 found that of the total 298 public complaints, there were delays in issuing interim and substantive replies to the complainants in 4 (1%) and 20 (7%) cases respectively, ranging from 1 to 10 days (averaging 2 days).

Need to conduct public opinion surveys on public swimming pool complexes

5.47 Audit noted that public complaints had been received concerning various aspects (e.g. lifeguard shortages, swimming courses ballot exercises, profit-making activities, facilities and the closure periods) of public swimming pool complex operations. However, apart from the public opinion surveys relating to PCA designation (see para. 4.32(a)), no survey had been conducted in the period from 2019-20 to 2024-25 to collect public opinion on public swimming pool complexes.

Audit recommendations

5.48 **Audit has recommended that the Director of Leisure and Cultural Services should:**

- (a) **take measures to ensure that the complaints are properly recorded in the complaint register in accordance with LCSD guidelines;**
- (b) **take measures to ensure that complaints relating to the management of public swimming pool complexes are responded to in accordance with the timeframes stipulated in LCSD guidelines; and**
- (c) **conduct public opinion surveys on public swimming pool complexes, including users' preference, swimming courses, facilities and the closure period.**

Response from the Government

5.49 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that LCSD is taking measures along the directions of the recommendations.

Follow-up on drowning incidents at public swimming pool complexes

5.50 In 2023 and 2024, the actual attendance at public swimming pools exceeded 12 million. According to LCSD, it attaches great importance to water safety, and procedural manuals and guidelines (e.g. rescue plan and drill protocol) are in place to ensure that sufficient manpower is provided to support opening of swimming facilities and to handle different incidents. It has also implemented various measures to promote water safety, including publishing the Swimmer's Handbook, providing safety advice on LCSD's website, organising water safety outreaching programmes, and holding slogan and poster design competitions. Drowning incidents (Note 78) could not be ruled out and often involve different circumstances and risk factors.

5.51 According to LCSD guidelines for handling of drowning incidents:

- (a) if drowning occurs at a public swimming pool complex, the pool management staff should submit a case report to the Senior Leisure Services Manager concerned within 24 hours of the incident providing the case details (e.g. victim details, incident date, time and location, rescue circumstances, date and place of death), with a copy of the report sent to the Clerk of Coroner (Note 79); and

Note 78: *According to LCSD, a drowning incident is classified when a forensic pathologist confirms drowning as the direct cause of death.*

Note 79: *Under the Coroners Ordinance (Cap. 504), a coroner (a judicial officer) may hold an inquest (with or without a jury) into the death of a person who dies suddenly or by accident. After the inquest, the coroner or the jury would deliver the findings on the death and may make recommendations with a view to preventing recurrence of similar fatalities.*

- (b) the pool management staff should submit a review report to the Chief Leisure Services Manager concerned within four months of the incident. A review report should cover 13 aspects (e.g. “duty periods and posts of lifeguards on duty were appropriate”, “regular drills for rescue plans were in place”, “first-aid equipment was functioning normally” and “normal flow of users or number of swimmers at the facility involved”). Any necessary follow-up actions should be completed within a reasonable time period (Note 80).

5.52 The number of drowning incidents at public swimming pool complexes between 2018 and 2025 (up to August) is shown in Table 16.

Table 16

**Drowning incidents at public swimming pool complexes
(2018 to 2025 (up to August))**

Year	2018	2019	2020	2021	2022	2023	2024	2025 (up to August)
Number	2	1	1	0	0	4	7	0

Source: LCSD records

Need to step up public education efforts on water safety to prevent occurrence of drowning incidents

5.53 According to LCSD’s review reports for the seven drowning incidents in 2024, follow-up actions were required regarding “duty periods and posts of lifeguards on duty were appropriate”.

Note 80: *LCSD introduced the requirements in March 2024 for submitting review reports and completing follow-up actions within a reasonable time period, in response to the coroner’s recommendations made in May 2022 for a drowning incident in July 2017.*

Other related issues

5.54 Upon enquiry, LCSD emphasised in October 2025 that:

- (a) for the seven drowning incidents in 2024, the actual overall situation at the time of incident was satisfactory. The lifeguards involved in the drowning incidents had taken immediate rescue operations and ensured that the swimmers concerned were sent to the hospital without delay. The causes of a drowning incident differed from one case to another, and there might be wide-ranging factors (e.g. a swimmer's personal fitness and medical condition) leading to the incident; and
- (b) under the Coroners Ordinance (Cap. 504), a coroner is the statutory authority to decide whether an inquest is needed (see Note 79 to para. 5.51(a)). As such, extra caution should be taken to prevent conveying any connotation that there was any causal relationship between the drowning incidents and any single aspect of the review reports. There should not be any pre-judgement or misjudgement of any lifeguards while the investigation was underway. This would be unfair to the lifeguards involved. Individual lifeguards suspected to have left their duty posts were handled in accordance with the Government's established disciplinary mechanism and procedures (see paras. 3.24 and 3.25).

5.55 For the seven drowning incidents in 2024, most of the victims were aged 60 or above (75 on average). According to LCSD, they were all swimming alone at the time of the incidents, with some known to be good swimmers and others not possessing good swimming skills. Audit noted that LCSD had implemented various measures to promote water safety (see para. 5.50), including publishing the Swimmer's Handbook to provide the general public with water safety advice for enhancing their safety awareness. However, the occurrence of drowning incidents indicates a need for LCSD to step up public education efforts on water safety to prevent such occurrence as far as possible (e.g. providing targeted messages to specific groups highlighting risk factors).

Need to submit review reports within stipulated timeframe

5.56 For two drowning incidents in 2024, there were delays of 3 and 178 days in submitting the review reports to the Chief Leisure Services Manager concerned, not complying with the related LCSD guidelines (see para. 5.51(b)). Upon enquiry, LCSD informed Audit in October 2025 that, for the case with a delay of 178 days,

the pool management staff concerned had submitted a review report (without adequate supporting documents) within four months of the incident. Upon clarification with the responsible officers of staff management, the pool management staff re-submitted the review report (with the necessary supporting documents) about six months later. Audit considers that there is scope for improvement in this regard.

Audit recommendations

5.57 Audit has recommended that the Director of Leisure and Cultural Services should:

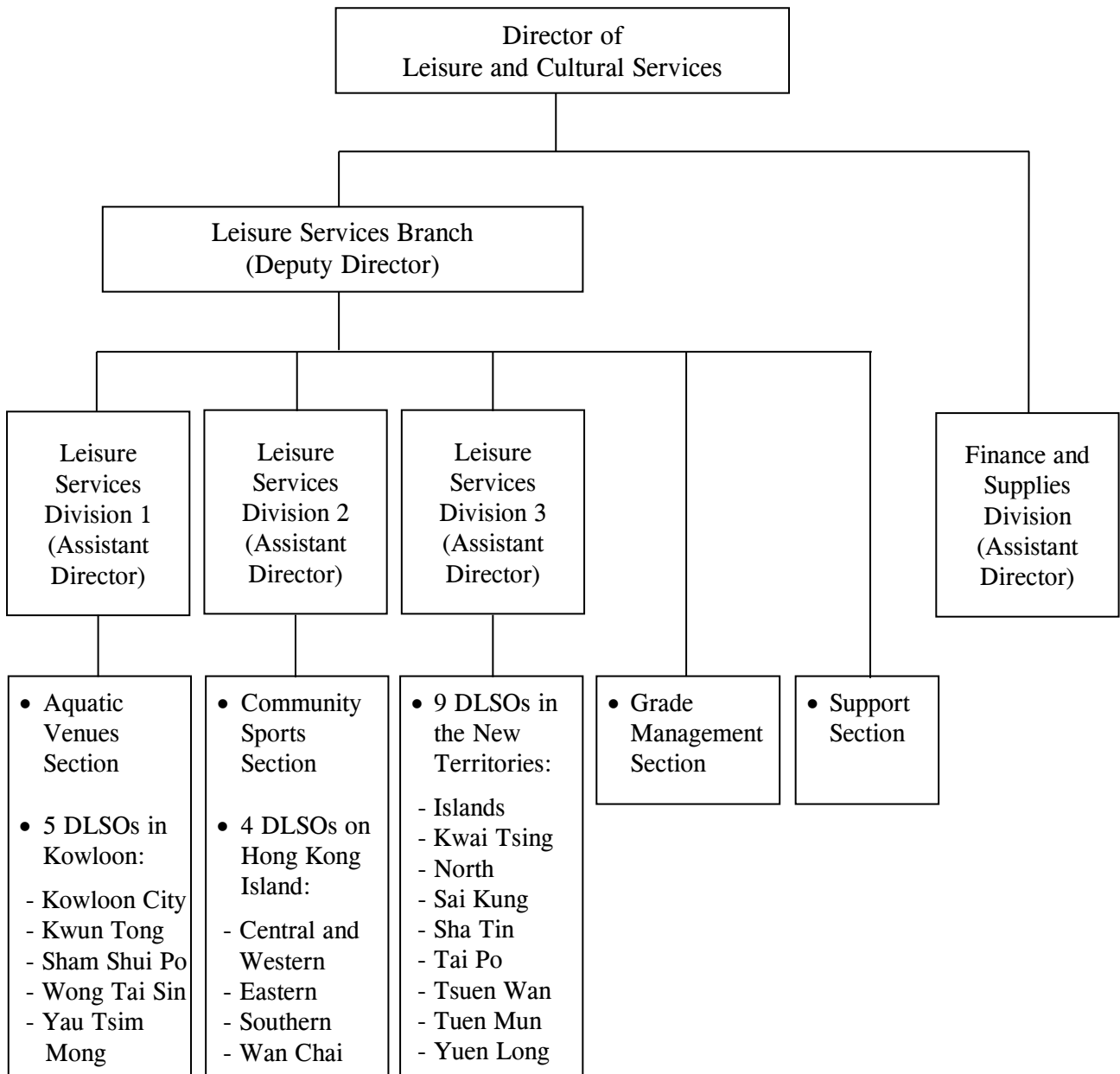
- (a) taking into account the review reports on drowning incidents and the audit findings in this Audit Report, step up public education efforts on water safety to prevent occurrence of drowning incidents as far as possible (e.g. providing targeted messages to specific groups highlighting risk factors); and**
- (b) take measures to ensure that review reports on drowning incidents are submitted in accordance with the timeframe stipulated in LCSD guidelines.**

Response from the Government

5.58 The Director of Leisure and Cultural Services agrees with the audit recommendations. She has said that LCSD will:

- (a) continue to conduct targeted outreach public education programmes/ activities to enhance the awareness of senior citizens on water safety. Messages about not to swim alone and when the physical condition is unfit will be highlighted; and**
- (b) improve the case reporting mechanism. LCSD is already taking measures to enhance procedural efficiency and ensure timely submission of reports in accordance with the guidelines.**

**Leisure and Cultural Services Department:
Organisation chart (extract)
(30 June 2025)**



Source: LCSD records

Remarks: According to LCSD, some of its staff were also responsible for duties other than management of public swimming pool complexes and relevant sports activity programmes (e.g. management of other venues in a district or recruitment of other staff in the Leisure Services Branch).

Appendix B
(paras. 2.19 and 2.22 refer)

**Attendance and expenditure of public swimming pool complexes
(2024-25)**

District	Swimming pool complex	Maximum capacity (a) (No.)	Actual attendance (b) (No.)	Opening days (c) (No.)	Expenditure (d) (\$ million)	Average daily attendance (e) = (b) ÷ (c) (No.)	Unit LCSD's cost per swimmer (f) = (d) ÷ (b) (\$)
<i>Hong Kong Island</i>							
Central and Western	Kennedy Town	901	566,955	362	39.6	1,566	70
	Sun Yat Sen Memorial Park	1,041	287,144	272	34.8	1,056	121
Eastern	Chai Wan	1,900	121,712	214	25.8	569	212
	Island East	190	162,385	311	13.9	522	86
	Siu Sai Wan	582	337,190	317	23.6	1,064	70
Southern	Pao Yue Kong	1,972	122,004	214	28.6	570	234
Wan Chai	Morrison Hill	1,116	500,403	362	31.0	1,382	62
	Victoria Park	1,037	536,430	286	48.2	1,876	90
	Wan Chai	250	142,439	311	21.3	458	150
<i>Kowloon</i>							
Kowloon City	Ho Man Tin	312	132,368	311	16.8	426	127
	Kowloon Tsai	Note 1			8.9	Note 1	
	Tai Wan Shan	2,000	245,716	243	22.1	1,011	90
Kwun Tong	Jordan Valley	823	77,696	214	22.1	363	284
	Kwun Tong	2,450	986,624	314	41.9	3,142	42
	Lam Tin	582	288,773	312	26.9	926	93
Sham Shui Po	Lai Chi Kok Park	2,150	607,891	362	40.8	1,679	67
	Lei Cheng Uk	2,000	135,351	214	20.1	632	148
	Sham Shui Po Park	2,186	280,437	311	36.4	902	130
Wong Tai Sin	Hammer Hill Road	906	189,488	357	30.4	531	161
	Morse Park	2,096	556,156	362	34.7	1,536	62
Yau Tsim Mong	Kowloon Park	1,433	658,760	362	70.2	1,820	107
	Tai Kok Tsui	250	152,773	311	19.9	491	130
<i>New Territories</i>							
Islands	Mui Wo	183	16,448	214	11.0	77	669
	Tung Chung	1,250	322,834	362	31.2	892	97
Kwai Tsing	Kwai Shing	2,010	75,215	214	24.9	351	332
	North Kwai Chung Jockey Club	1,242	76,776	214	18.6	359	242
	Tsing Yi	801	197,867	214	29.9	925	151
	Tsing Yi Southwest	125	133,872	310	14.0	432	105
North	Fanling	1,710	359,927	362	32.4	994	90
	Sheung Shui	246	62,054	214	14.2	290	228

Appendix B
(Cont'd)
(paras. 2.19 and 2.22 refer)

District	Swimming pool complex	Maximum capacity (a) (No.)	Actual attendance (b) (No.)	Opening days (c) (No.)	Expenditure (d) (\$ million)	Average daily attendance (e) = (b) ÷ (c) (No.)	Unit LCSD's cost per swimmer (f) = (d) ÷ (e) (\$)
<i>New Territories (Cont'd)</i>							
Sai Kung	Sai Kung	836	65,454	214	19.1	306	292
	Tseung Kwan O	1,600	320,040	362	36.9	884	115
Sha Tin	Hin Tin	1,024	432,744	362	41.1	1,195	95
	Ma On Shan	1,098	223,253	214	28.6	1,043	128
	Sha Tin Jockey Club	2,175	321,035	362	35.1	887	109
Tai Po	Tai Po	1,097	262,920	214	29.0	1,229	110
	Tung Cheong Street	618	234,402	240	17.1	977	73
Tsuen Wan	Shing Mun Valley	715	537,135	362	41.3	1,484	77
	Tsuen King Circuit Wu Chung	387	45,794	214	16.5	214	360
Tuen Mun	The Jockey Club Yan Oi Tong	370	17,447	213	13.3	82	763
	Tuen Mun	2,200	213,277	344	25.8	620	121
	Tuen Mun North West	923	556,601	362	37.6	1,538	68
Yuen Long	Ping Shan Tin Shui Wai	250	331,220	311	21.6	1,065	65
	Tin Sau Road	1,509	163,981	213	27.2	770	166
	Tin Shui Wai	710	210,768	214	21.0	985	100
	Yuen Long	1,660	365,420	362	31.1	1,009	85
Overall		50,916	12,635,179	289 (Note 2)	1,276.5	43,720	101

Legend: Swimming pool complex equipped with heated pool(s)

Swimming pool complex whose unit LCSD's cost per swimmer was above the overall average of \$101

Source: *Audit analysis of LCSD records*

Note 1: *According to LCSD, while Kowloon Tsai Swimming Pool was closed for redevelopment in 2024-25, the LCSD staff originally working there were temporarily redeployed to other swimming pool complexes in Kowloon City District. The expenditure of \$8.9 million mainly included the salary expenses of these staff.*

Note 2: *The overall average number of opening days is calculated by dividing the total number of opening days by the number of swimming pool complexes (i.e. 45) open for public use in 2024-25.*

Appendix C
(para. 4.39(a)(ii) refers)

**Compliances with frequencies of inspections
at public swimming pool complexes stipulated in
Leisure and Cultural Services Department's guidelines
(April 2024 to June 2025)**

	Stipulated frequency	Responsible staff	Victoria Park Swimming Pool	Kowloon Park Swimming Pool	Shing Mun Valley Swimming Pool
<i>During opening hours</i>					
Daily inspection (covering general aspects)	Twice every shift (Note 1)	Swimming pool supervisors	✓	✓	✗ (97%)
Daily inspection (focusing on cleanliness and sanitation aspects)	Once every shift (Note 1)		✓	✓	✗ (24%)
Surprise inspection	Once every 4 months	Manager grade staff at regional level	✓	✗ (33%)	✗ (33%)
	Once every month	Manager grade staff at district level	✗ (91%)	✗ (92%)	✗ (42%)
	Once every week	Other manager grade staff (e.g. swimming pool managers)	✗ (93%)	✓	✗ (46%)
Holiday inspection (Note 2)	Once daily	Manager grade staff	✓	✗ (56%)	✓
<i>During annual maintenance period (for full closure of swimming pool complex)</i>					
Surprise inspection	On a need basis	Manager grade staff at regional and district levels	✓	N.A.	N.A.
	Once every month	Other manager grade staff	✓	N.A.	N.A.

Legend: ✓ Compliance with frequency stipulated in LCSD guidelines
✗ Non-compliance with frequency stipulated in LCSD guidelines

Source: Audit analysis of LCSD records

Note 1: There are two shifts daily.

Note 2: Holiday inspection is applicable to Sunday and public holidays in July and August only.

Remarks: The percentage in bracket represents the attainment of the respective stipulated frequency.

Acronyms and abbreviations

AI	Artificial intelligence
Audit	Audit Commission
B/Ds	Bureaux/Departments
BM	Life Saving Training Course on Bronze Medallion
CLAS	Central Lane Allocation Scheme
COR	Controlling Officer's Report
CSLGTS	Combined Seasonal Lifeguard Training Scheme
CSTB	Culture, Sports and Tourism Bureau
DC	District Council
DLSO	District Leisure Services Office
FC	Finance Committee
FEHD	Food and Environmental Hygiene Department
FSTB	Financial Services and the Treasury Bureau
GLD	Government Logistics Department
HAB	Home Affairs Bureau
HKPSG	Hong Kong Planning Standards and Guidelines
HKSAR	Hong Kong Special Administrative Region
ICCLS	Integrated Certificates Course on Life Saving
LCSD	Leisure and Cultural Services Department
LegCo	Legislative Council
NCSC	Non-civil service contract
NGO	Non-governmental organisation
NSA	National Sports Association
PCA	Public coaching area
ppm	Parts per million
PRSC	Post-retirement service contract
PWD	Person with disabilities
PWSC	Public Works Subcommittee
SAW Letter	Deduction for Shortage/Absence of Worker Letter
SmartPLAY	"Smart Public Leisure Activities for You" system
SPRs	Stores and Procurement Regulations
WWP	Winter Works Programme