

立法會
Legislative Council

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seen by the Administration)

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Panel on Welfare Services

Minutes of special meeting
held on Saturday, 24 April 2010, at 9:00 am
in the Chamber of the Legislative Council Building

Members present : Hon WONG Sing-chi (Chairman)
Hon CHEUNG Kwok-che (Deputy Chairman)
Hon Albert HO Chun-yan
Hon LEUNG Yiu-chung
Hon Paul CHAN Mo-po, MH, JP
Hon IP Wai-ming, MH
Dr Hon PAN Pey-chyou

Members absent : Hon LEE Cheuk-yan
Hon TAM Yiu-chung, GBS, JP
Hon LI Fung-ying, BBS, JP
Hon Frederick FUNG Kin-kee, SBS, JP
Hon Ronny TONG Ka-wah, SC
Dr Hon LEUNG Ka-lau
Hon WONG Kwok-kin, BBS

Public Officers attending : Mr Stephen SUI Wai-keung
Commissioner for Rehabilitation
Labour and Welfare Bureau

Mr CHEUNG Hing-wah
Deputy Director of Social Welfare (Services)

Mrs Cecilia YUEN
Assistant Director of Social Welfare
(Rehabilitation & Medical Social Services)

Mr Philip TANG Fei-lit
Senior Social Work Officer
(Rehabilitation & Medical Social Services) 6
Social Welfare Department

**Deputations
by invitation**

: Concord Mutual-Aid Club Alliance

Mr HUI Wai-chun
Executive Officer

香港區私營院舍聯會

Miss NG Yuet-yee
Vice Chairman

私營院舍社會工作者同盟

Mr PONG Kwok-boon
Board Member

新界東私營復康院舍聯會

Mr TSANG Kim-kwong
Convenor

The Hong Kong Council of Social Service

Mr Eddie SUEN
Chief Officer (Rehabilitation)

新界區私營院舍聯會

Mr CHEUNG Kin-wah

Direction Association for the Handicapped

Mr LAW Wai-cheung
Vice-Chairman

爭取私營院舍權益大聯盟

Ms WONG Yun-fong
Medical Superintendent

民主黨勞工及福利小組

Mr LO Kin-hei
Member

Hong Kong Private Hostel for Rehabilitation Association

Mr Joe LI
Chairman

新界西私營殘疾院舍聯會

Ms CHAN Kwok-chun
Officer

Civic Party

Mr LAY Yan-piau
Chairman of Health & Personal Well Being Branch

The Hong Kong Joint Council of Parents of the
Mentally Handicapped

Mrs YU CHEUNG Pui-lan
Executive Committee Member

Department of Social Work & Social Administration,
The University of Hong Kong

Ms WONG King-shui
Fieldwork Supervisor

The Association of Parents of the Severely Mentally
Handicapped

Ms CHENG Yee-man
Chairman

Clerk in attendance : Miss Betty MA
Chief Council Secretary (2) 4

Staff in attendance : Ms Yvonne YU
Senior Council Secretary (2) 5

Miss Maggie CHIU
Legislative Assistant (2) 4

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I. Progress on the Preparation of the Residential Care Homes (Persons with Disabilities) Bill

[LC Paper Nos. CB(2)1195/09-10(03), CB(2)1347/09-10(01), CB(2)1360/09-10(01), CB(2)1368/09-10(01) to (02), and CB(2)1384/09-10(01) to (07)]

The Chairman said that the special meeting was convened to receive views from deputations on the progress on the preparation of the Residential Care Homes (Persons with Disabilities) Bill ("the Bill"), and on which the Panel was briefed by the Administration at the meeting on 12 April 2010.

2. At the invitation of the Chairman, 15 deputations presented their views on the legislative proposal. A summary of the deputations' views is in the **Appendix**.

Discussions

3. Mr LEUNG Yiu-chung expressed disappointment that although several meetings had been held to discuss the introduction of a licensing system for residential care homes for persons with disabilities ("RCHDs"), the Administration had not acceded to the concerns repeatedly made by some deputations concerning the service standards of RCHDs. He was dissatisfied that the licensing requirements for RCHDs in the draft Code of Practice ("CoP") were lower than those in the existing non-statutory CoP for RCHD issued in 2002. He cast doubt as to whether the Administration was lowering the licensing requirements in a bid to prevent some private RCHDs from closing down for not being able to meet the licensing requirements. This was, however, trimming the toes to suit the shoes. In his view, the Administration should allocate more resources to alleviate the waitlisting situation for subsidised residential care places and enhance the service quality of private RCHDs.

4. Deputy Director of Social Welfare (Services) ("DD/SW(S)") said that the purpose of the licensing scheme was to ensure the service quality of RCHDs. As part of the statutory licensing system, the Director of Social Welfare ("DSW") would be empowered to issue a CoP which set out the detailed requirements and standards for the operation of RCHDs and compliance by the licensees. The standards proposed in the draft CoP had been prepared after balancing the different views of the rehabilitation sector and stakeholders, having regard to the practical situations of RCHDs and the needs of people with disabilities ("PWDs").

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5. Commissioner for Rehabilitation ("C for R") said that the Bill aimed to provide for the regulation of RCHDs through a licensing system administered by DSW. The Administration was fully aware of the concerns about the impact of the licensing scheme on the operation of private RCHDs and the residents. In tandem with the legislative proposal, the Administration would formulate suitable complementary measures to encourage private RCHDs to upgrade their service standards; minimise the impacts on existing service users of RCHDs; and help the market develop RCHDs of different operational modes, thereby providing more service options for PWDs. To this end, the Administration would introduce a pilot Bought Place Scheme for private RCHDs ("BPS") prior to the implementation of the statutory licensing system. The number of places to be purchased would be adjusted having regard to the response of service users and the availability of quality places. In addition, the Administration would also implement a Financial Assistance Scheme ("FAS") after the enactment of the Bill to provide subsidies to private RCHDs to carry out improvement works for compliance with the licensing requirements on building and fire safety. To allow time for the individual RCHDs to put in place suitable arrangements to meet the requirements for a licence or a Certificate of Exemption ("COE") upon commencement of the proposed legislation and for the Social Welfare Department ("SWD") to process all such applications, there would be a grace period of 18 months after which any RCHDs operating without a valid licence or COE would be guilty of an offence upon conviction.

6. Assistant Director of Social Welfare (Rehabilitation & Medical Social Services ("AD/SW(RMSS)")) said that SWD set up a Working Group on RCHDs ("the Working Group") in July 2007 to review the existing non-statutory CoP for RCHDs issued in 2002. Members of the Working Group included representatives from PWDs, parent groups, subvented RCHDs, private RCHDs, as well as the academia and the Hong Kong Council of Social Service. The Working Group convened six meetings during the period from July 2007 to January 2008 and organised two consultation sessions in December 2007 to gauge the views of the rehabilitation sector and stakeholders. Members of the Working Group generally agreed that the existing CoP should be simplified by adopting, as far as possible, the standards set out in the CoP for Residential Care Homes for Elderly Persons ("RCHEs") while, in parallel, standards that were specific to the situations of RCHDs should be devised. She stressed that the standards set out in the draft CoP had been prepared after balancing the different views of the rehabilitation sector and stakeholders. SWD would from time to time review CoP and refine the licensing standards as appropriate.

7. AD/SW(RMSS) pointed out that many RCHEs with residents suffering from frailty and psycho-geriatric illness would be caught by the future licensing scheme for RCHDs. For instance, the existing Care and Attention Home for the Aged Blind would fit into both categories of RCHDs and RCHEs. Given the prevailing policy of continuum of care, improved health services, and the

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increasing lifespan of the population of PWDs, some RCHDs would also be caught by the RCHE Ordinance. The Administration proposed, therefore, that one residential care home was to be covered only by a licence issued under either the RCHE Ordinance or the RCHD Ordinance (when enacted). If a residential care home fitted into the definitions of the home to be regulated as set out in both the existing RCHE Ordinance and the RCHD Ordinance (when enacted), the home operator would only need to indicate his intention to hold or apply for one licence under either of those Ordinances; and once a licence had been issued and remained in force, there was no need for the operator to apply for another licence under the other ordinance, unless the operator intended to switch over to provide the other type of service.

8. Mr Albert HO supported the introduction of a licensing system to enhance the service quality of RCHDs. However, he doubted the effectiveness of the legislative proposal as the proposed licensing requirements and standards were even lower than those in the existing non-statutory CoP. While acknowledging the operational difficulties faced by private RCHD operators, the Administration should by no means lower the licensing requirements and standards to facilitate compliance by RCHDs. Otherwise, the Administration was taking a retrogressive step to legitimise the substandard operation of RCHDs at the expense of the well-being of RCHD residents. In his view, the Administration should introduce appropriate complementary measures and provide financial assistance to help the private RCHDs meet the enhanced licensing requirements on space and staffing.

9. Mr Albert HO then invited views from the Hong Kong Private Hostel for Rehabilitation Association ("HKPHRA") on the difficulties envisaged by private RCHDs in meeting the licensing requirements on space and staffing. In response, Mr Joe LI of HKPHRA told the meeting that private RCHDs attached great importance to the welfare of residents and were strived to provide quality services to the residents. The fundamental difficulty faced by private RCHD operators was inadequate resources to meet the operating costs. Notably, in meeting the minimum floor area of 6.5 square metres per resident would inevitably lead to increase fees or to cut staffing costs to compensate loss of income arising from reduction in the number of beds.

10. In response to Mr CHEUNG Kwok-che's enquiries, the deputations made the following views -

- (a) Mr Joe LI of HKPHRA said that the enrolment rate of those conveniently accessible private RCHDs was almost 100%, but most private homes were located at remote areas;

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- (b) Mr PONG Kwok-boon of 私人院舍社會工作者同盟 said that a grace period of three years, which was extendable for another three years where justifiable, was proposed having regard to the fact that RCHD operators would need time to carry out improvement works for compliance with the licensing requirements on building and fire safety, or to identify suitable premises for relocation; and
- (c) Miss NG Yuet-ye of 香港區私營院舍聯會 reckoned that the additional costs for meeting the licensing requirements on building and fire safety would be in the region of \$500,000 for a RCHD with 40 places. It urged the Administration to provide subsidy up to 50% to 80% of the additional costs.

11. Pointing out that the operation cost of a quality RCHD place was much higher than the monthly Comprehensive Social Security Assistance ("CSSA") payments, Mr CHEUNG Kwok-che said that the Administration should consider the option of co-payment of home fees. Topping-up by RCHD residents and their family members could enable those who could afford a higher fee to choose services of better quality, instead of merely relying upon public subsidy. DD/SW(S) said that the co-payment arrangement would require more thorough consideration. To facilitate members' future discussion on the co-payment arrangement for RCHD places, Mr Albert HO requested the Administration to provide a paper outlining the impacts of the proposal on the existing residential care services.

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12. Regarding 香港區私營院舍聯會's request for providing subsidy to private RCHDs, DD/SW(S) said that after the enactment of the Bill, the Administration would further discuss with the sector the level of subsidy taking into account the costs of the improvement works. As for the grace period, DD/SW(S) advised that a grace period of 18 months was proposed so as to allow RCHDs to put in place suitable arrangements to meet the requirements for a licence after the enactment of the Bill. Relevant departments such as the Fire Services Department ("FSD") and the Buildings Department ("BD") would provide necessary and professional advice to the private RCHD operators to comply with the statutory requirements on building and fire safety.

13. Mr CHEUNG Kwok-che considered that a grace period of 18 months was acceptable. To facilitate private RCHDs to comply with the licensing requirements, a coordination group should be set up under SWD to provide assistance to the operators after the implementation of the licensing scheme.

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14. AD/SW(RMSS) said that a Licensing Office would be set up under SWD to ensure the compliance of the requirements as specified in the RCHD Ordinance (when enacted), its Regulation and CoP. The Licensing Office comprising officers from FSD and BD would process applications for a licence or COE and provide the applicants with services in a one-stop manner.

15. Responding to Mr CHEUNG Kwok-che's concern about the educational programmes in place to enhance public acceptance of RCHDs, C for R said that as part of the on-going initiatives, the Labour and Welfare Bureau would continue to launch regularly educational and promotional programmes to promote a barrier free society. The Rehabilitation Advisory Committee had visited 18 District Councils to solicit their support in setting up rehabilitation service units and collaboration in organising activities to promote social inclusion. In 2009-2010, funding for educational programmes on rehabilitation services had been increased from some \$2 million to \$12 million, and \$12.5 million would be allocated for 2010-2011 for the purpose. Apart from this, funding, which had been increased from \$1 million to \$3 million in 2009-2010, would also be provided to non-governmental organisations to launch promotional activities. Mr CHEUNG Kwok-che urged the Administration to consider deploying resources to enhance public acceptance of the set-up of new RCHDs in the New Territories so as to save rental costs.

16. Mr IP Wai-ming considered that it was not appropriate to model on the outdated licensing requirements for RCHEs and devise the minimum licensing requirements and standards for RCHDs bearing in mind that the care and rehabilitation needs of the elderly and PWDs were different. As evidenced by the repeated media reports about the malpractice and substandard services of certain RCHEs, he envisaged that similar problems would be reported if the licensing requirements of RCHDs were modelled on those for RCHEs. In his view, the Administration should change its mindset on the long-term plan to shorten the waitlisting situation for subsidised RCHD places. Instead of increasing the number of BPS places, the Administration should consider leasing Government premises at concessionary rental to RCHDs to facilitate operation of private RCHDs. Mr Joe LI of HKPHRA welcomed Mr IP Wai-ming's proposal. as high rental had jeopardized the stable operation of RCHDs.

17. DD/SW(S) said that the Administration would endeavour in identifying new resources and suitable sites for setting up new RCHDs. Nevertheless, the set-up of new RCHDs would depend on the availability of suitable premises and physical constraints of the sites. It would on occasion take longer time for the local community to understand the nature of the facilities.

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18. Mr Albert HO considered that in view of the difficulties encountered in soliciting local support for setting up RCHDs, SWD should take the initiative to identify potential suitable sites at the development stage and request the Government to earmark the sites for setting up new RCHDs. Sharing similar views with Ms WONG King-shui of the Department of Social Work & Social Administration, the University of Hong Kong, Mr HO said that dedicated RCHDs should be provided to children with disabilities aged between six and 15 to meet their specific developmental and educational needs.

19. In concluding the discussion, the Chairman said that various issues of concerns relating to the service quality of RCHDs raised at the meeting could be followed up by the Subcommittee on Residential and Community Care Services for Persons with Disabilities and the Elderly as appropriate. The Chairman further said that as the Administration intended to introduce the Bill into the Legislative Council within the current session, concerns about the licensing system could be further discussed at the relevant Bills Committee formed to study the Bill, if the House Committee so decided.

20. There being no other business, the meeting ended at 11:15 am.

Council Business Division 2
Legislative Council Secretariat
17 September 2010

Panel on Welfare Services

Special meeting on Saturday, 24 April 2010

Progress on the Preparation of the Residential Care Homes (Persons with Disabilities) Bill

Summary of views and concerns expressed by deputations

No.	Name of deputation	Major views and concerns
1.	Concord Mutual-Aid Club Alliance	<ul style="list-style-type: none"> ● about 65% of residents of private residential care homes for persons with disabilities ("RCHDs") were ex-mentally ill patients who required only low level of care and little support in daily activities. Instead, there was a greater need for social skills training as well as community rehabilitation and support services ● the Administration should stipulate in the Code of Practice ("CoP") for RCHDs the statutory requirements of the provisioning of social workers in RCHDs ● considered that private RCHDs served to fill the service gap arising from an inadequate subsidised places. In the long run, the Administration should increase the provision of subsidised RCHD places ● urged the Administration to strengthen the monitoring of service quality in private RCHDs given that some of the private RCHDs were providing substandard services ● was worried that some private RCHDs would cease operation after the implementation of the licensing system. The Administration should consider adopting measures and decanting arrangements to safeguard the well-being of residents of the affected RCHDs

No.	Name of deputation	Major views and concerns
2.	香港區私營院舍聯會	<ul style="list-style-type: none"> ● the Administration should provide outreaching rehabilitation services including visiting medical practitioners, physiotherapy, occupational therapy, speech therapy and community psychiatric nursing services to persons with disabilities ("PWDs") living in RCHDs ● the Administration should consider providing transport subsidy to residents of private RCHDs to enable them to participate in outdoor activities ● the Administration should provide more training and enhance publicity to attract more talents to join the nursing care field in RCHDs
3.	私營院舍社會工作者同盟 [LC Paper No. CB(2)1384/09-10(01)]	<ul style="list-style-type: none"> ● urged the Administration to extend the grace period of 18 months to 36 months such that private RCHDs could have sufficient time to carry out the necessary improvement works or to relocate for continued operation. The grace period should be further extendable if so justified ● in view of the difficulties in identifying suitable sites for RCHDs, the Administration should actively consider converting vacant schools, industrial buildings, car-parks and ex-military camps into RCHDs
4.	新界東私營復康院舍聯會 [LC Paper No. CB(2)1384/09-10(02)]	<ul style="list-style-type: none"> ● the Administration should set out explicitly the licensing requirements and standards for compliance by private RCHDs so that the operators could carry out the necessary improvement works without delay ● expressed concern over the difficulties and restrictions faced by private RCHDs in complying with the licensing standards. Notably, alteration works for meeting the licensing requirements on building and fire safety should conform with the covenants and conditions of the Deeds of Mutual Covenants relating to the premises and be supported by the landlord and other tenants ● welcomed the introduction of the Financial Assistance Scheme to assist private RCHDs to carry out improvement works for compliance with the licensing requirements on building and fire safety ● urged the Administration to enhance the publicity to eradicate the negative perception of PWDs and facilitate public acceptance of private RCHDs

No.	Name of deputation	Major views and concerns
5.	The Hong Kong Council of Social Service [LC Paper No. CB(2)1360/09-10(01)]	<ul style="list-style-type: none"> ● supported the strategic directions set out in the 2007 Rehabilitation Programme Plan that the Administration should, among others, regulate RCHDs through a statutory licensing scheme so as to ensure their service quality and help the market develop residential care homes of different types and operational modes ● it was concerned that the licensing requirements for staff stipulated in the draft CoP was lower than those in the existing non-statutory CoP for RCHDs issued in 2002. In light of the ageing profile and the consequential deterioration of health conditions of PWDs living in RCHDs, the Administration should require RCHDs to increase the nursing care and night shift staffing ● the Administration should introduce complementary measures and arrange social workers to provide appropriate daily training and community support services to the RCHD residents ● the Administration should enhance the monitoring mechanism with a view to improving the service quality of private RCHDs ● of the 54 private RCHDs known to the Social Welfare Department which provided some 2 900 residential care places, only six had joined the Voluntary Registration Scheme ("VRS"), HKCSS considered that in the light of the possible closure of some RCHDs for not being able to meet the licensing requirements, the Administration should make appropriate displacement of the affected residents ● noting that over 6 000 PWDs were on the central waiting list for subsidised RCHD places and the average waiting time was about six to eight years, the Administration should continue increasing the number of subsidised RCHD places. While the pilot Bought Place Scheme for private RCHDs provided another option to address the residential care needs of PWDs, it should not be considered as a long-term plan for alleviating the waitlisting situation of subsidised residential care places. The Administration should devise a long-term policy and plan for the provision of residential care services for PWDs

No.	Name of deputation	Major views and concerns
6.	新界區私營院舍聯會	<ul style="list-style-type: none"> ● the RCHD sector supported the introduction of a licensing system ● since only six private RCHDs had joined VRS, it was envisaged that only limited unoccupied quality RCHD places would be available under BPS. Moreover, as evidenced by the fact that 48 private RCHDs had not joined VRS, it was worried that a number of private RCHDs would close down or would have to relocate after the implementation of the licensing scheme for being unable to meet the higher licensing standards and requirements ● the Administration should provide financial assistance to private RCHD operators to carry out improvement works or relocation to other premises to continue operation, in order to satisfy the licensing requirements on building and safety as stipulated in the Code of Practice
7.	Direction Association for the Handicapped	<ul style="list-style-type: none"> ● there were practical needs to stipulate in CoP the staff requirement of social workers in RCHDs to take care of the welfare needs of the PWD residents ● specific services to address the residential and care needs of individual PWDs should be provided according to their types and level of disabilities
8.	爭取私營院舍權益大聯盟 [LC Paper No. CB(2)1384/09-10(03)]	<ul style="list-style-type: none"> ● while it supported the introduction of a licensing regime to improve the service quality of RCHDs, some private RCHDs would be unable to meet the licensing requirements if the standards were too stringent ● in view of the difficulties faced by private RCHD operators in identifying suitable premises to set up RCHDs, the Administration should extend the grace period such that private RCHDs could have more time to take necessary actions to meet the licensing requirements ● the existing staffing of most private RCHDs had already met the minimum licensing standards ● SWD should consider arranging visiting social workers to provide outreaching welfare services to residents of private RCHDs

No.	Name of deputation	Major views and concerns
9.	民主黨勞工及福利小組	<ul style="list-style-type: none"> ● given that the Panel on Welfare Services and many deputations had expressed concerns about the licensing requirements for space and staffing, it wondered if the Administration would take into account the views and revise the licensing requirements accordingly ● it was concerned that the licensing requirements for RCHDs were lower than those set out in the existing non-statutory CoP for RCHDs. Although this would enable more private RCHDs to meet the licensing requirements and continue operation, it would also compromise the service standards and the well-being of residents ● expressed concern about the deterrence of the penalties for non-compliance with the licensing requirements
10.	Hong Kong Private Hostel for Rehabilitation Association [LC Paper No. CB(2)1384/09-10(04)]	<ul style="list-style-type: none"> ● the private RCHD sector supported the introduction of a licensing regime, but was concerned about the cost implications for meeting the licensing requirements ● most private RCHDs attached great importance to the welfare of residents and were strived to provide quality services to the residents. The existing staffing of private RCHDs was in fact higher than the licensing requirements for staffing ● highlighted the findings of the survey conducted by the Association among private RCHD operators - <ul style="list-style-type: none"> (a) the optimal staffing ratio to residents in RCHDs would be 1:6 - 8; (b) as a result of the high rental, the floor area per resident was lower than the spatial requirements in order to save costs. To meet the higher spatial requirement, this would cause displacement of residents or relocation of RCHDs; (c) some private RCHDs would have to increase fees to cover the additional costs for meeting the licensing requirements on building and fire safety and space. Given that the majority of private RCHD residents were Comprehensive Social Security Assistance recipients, they could not afford the increased home fees. The Administration should consider providing additional financial assistance to residents of private RCHDs after the introduction of the licensing scheme; and

No.	Name of deputation	Major views and concerns
		(d) the Administration should make reference to the experience of the licensing scheme for residential care homes for the elderly and provide RCHD operators with financial assistance to meet the additional costs for improvement works (which was estimated to be \$250,000 to \$500,000) to meet the licensing requirements.
11.	新界西私營殘疾院舍聯會 [LC Paper No. CB(2)1384/09-10(05)]	<ul style="list-style-type: none"> ● welcomed the proposed Financial Assistance Scheme to help RCHD operators meet the additional costs for improvement works to comply with the licensing requirements ● in view of the difficulties in identifying suitable sites for setting up RCHDs, the Government should consider converting vacant schools, car-parks and ex-military camps into RCHDs
12.	Civic Party [LC Paper No. CB(2)1384/09-10(06)]	<ul style="list-style-type: none"> ● objected to setting licensing requirements on space and staffing lower than those in the existing non-statutory CoP. The Administration should not compromise the service standards of private RCHDs in a bid to facilitate substandard homes to continue operation. This was unacceptable ● considered that the pilot Bought Place Scheme for private RCHDs could not alleviate the waitlisting situation for subsidised residential care places ● to safeguard rights of children with disabilities to receive education, it should be spelt out explicitly in the legislative proposal that private RCHDs should not accommodate children with disabilities. Instead, the Administration should increase the provision of residential places of special schools specifically for these children
13.	The Hong Kong Joint Council of Parents of the Mentally Handicapped	<ul style="list-style-type: none"> ● expressed no comment on the subject
14.	Ms WONG King-shui, Department of Social Work & Social Administration, The University of Hong Kong [LC Paper No. CB(2)1368/09-10(01)]	<ul style="list-style-type: none"> ● the drafting of the Bill was departed from the objective of improving the service quality of RCHDs, if the licensing requirements were lower than those set out in the existing non-statutory CoP ● dedicated RCHDs should be provided to PWDs according to their types of disabilities. Specifically, dedicated RCHDs should be provided to children aged between six and 15 so that their developmental and educational needs would be properly taken care of

No.	Name of deputation	Major views and concerns
		<ul style="list-style-type: none"> ● the spatial requirement should be in line with that in the existing non-statutory CoP, i.e. no less than 8 square metres for the high-care-level home and no less than 6.5 square metres for other types of homes ● the minimum staffing requirements should not be lower than those in the existing non-statutory CoP for RCHDs. Consideration should be given to stipulating the staffing requirement of social workers to provide appropriate services to residents in RCHDs
15.	The Association of Parents of the Severely Mentally Handicapped [LC Paper No. CB(2)1368/09-10(02)]	<ul style="list-style-type: none"> ● deeply regretted that the minimum spatial and staffing requirements were lower than those in the existing non-statutory CoP for RCHDs, which was a retrograde step ● the proposed classification of RCHDs into three categories according to the level of care provided to the residents was too board. If more than 1/3 residents in a RCHD required high-care-level, such home should be classified as a high-care-level home ● the minimum staffing requirements was lower than those in the existing non-statutory CoP for RCHDs ● SWD should set out in the relevant Funding and Service Agreements the minimum staffing requirements for subsidised RCHDs and RCHDs participating in BPS to ensure their service quality ● children with disabilities aged below 15 should be admitted to boarding schools, instead of private RCHDs