

For discussion  
on 4 November 2013

**Legislative Council Panel on Financial Affairs**

**Creation of  
One Permanent Chief Assessor Post in the Tax Treaty Section and  
One Supernumerary Chief Assessor Post in the Stamp Office of  
the Inland Revenue Department**

**PURPOSE**

This paper invites Members to consider a proposal to create two directorate posts in the Inland Revenue Department (“IRD”) to cope with operational requirements, as detailed below -

- (a) one permanent Chief Assessor (“CA”) (D1) post in the Tax Treaty Section (“TT Section”) of the IRD with effect from 1 April 2014 for the implementation of a number of initiatives in relation to tax treaties in Hong Kong, to be offset by the deletion of the supernumerary post created for this purpose on 1 April 2011, which would otherwise lapse on 31 March 2014; and
- (b) one supernumerary CA (D1) post in the Stamp Office (“SO”) under Unit 3 of the IRD for a period of three years with effect from 1 April 2014 to strengthen support at the directorate level and to enhance the SO’s capacity in the provision of support services for the implementation of various policy initiatives.

**JUSTIFICATIONS**

2. The permanent directorate establishment in the IRD has remained at 25 since 2006-07. Given the surge in workload arising from latest developments on exchange of information (“EoI”) for tax purposes and Hong Kong’s tax treaty obligations, and the need to cope with new legislative initiatives relating to Islamic bonds, betting duty, stamp duty, scripless securities, proposed levy on behalf of a proposed Property Management Services Authority

(“PMSA”), etc, there is an essential need to enhance the directorate support for the IRD.

### **Proposed Creation of a Permanent CA Post in the TT Section**

3. With approval from the Finance Committee, we created a supernumerary post (i.e. the current Chief Assessor (Tax Treaty) [CA(TT)] post) to head the TT Section for three years from 1 April 2011 to 31 March 2014. In the light of the latest circumstances, we propose to rationalise the current time-limited CA post and create a permanent CA post with justifications as detailed in paragraphs 4 to 12 below.

*To continue to enhance our efforts in expanding Hong Kong’s network of comprehensive avoidance of double taxation agreements (“CDTAs”)*

4. With our sustained efforts in recent years, we have significantly increased the number of CDTAs signed from five in 2008 to 29 at present, covering 11 of the top 20 trading partners of Hong Kong. A full list of our CDTA partners is at **Annex A**. We are also at various stages of negotiations with a handful of other jurisdictions such as Bangladesh, Bahrain, Finland, India, Pakistan, Saudi Arabia, South Africa, South Korea and United Arab Emirates. In the coming year, we plan to hold on average one round of negotiations every two months with a view to seeking to conclude at least six more CDTAs.

5. Given that international tax is a highly specialised area, heads of delegations of our negotiation partners are normally dedicated officials from the relevant tax authorities or ministries of finance, who have rich experience in tax treaty negotiations. On the part of Hong Kong, there is a practical need for long-term dedicated directorate leadership to steer CDTA negotiation strategies and to head Hong Kong’s delegation. In practice, strategic planning and detailed background research on the tax system and tax treaty policy of the negotiation partners are key to the success in CDTA negotiations. Such preparatory work is immense, technical and resource-demanding before every formal negotiation meeting. Directorate leadership is essential to facilitate the setting of broad directions of the research, review of the adequacy of research conducted and formulating negotiation strategies to strike a better deal for the overall interest of Hong Kong.

*To engage in discussions on tax information exchange agreements (“TIEAs”) to fulfill Hong Kong’s international obligation*

6. Following the enactment of the Inland Revenue (Amendment) (No. 2) Ordinance 2013, Hong Kong is now able to enter into TIEAs with other jurisdictions. While it is still our priority to expand Hong Kong’s CDTA network, we need to engage in TIEA negotiations with certain jurisdictions which have no interest in pursuing CDTAs with Hong Kong, given the international standard that preference for CDTA over TIEA cannot be a reason for refusing to enter into an EoI<sup>1</sup> agreement with relevant partners.

7. Same as CDTAs, prior to every TIEA negotiation, the Hong Kong delegation has to do a lot of preparatory work, which requires close supervision and steering of a dedicated CA. If a permanent CA(TT) post is not created when the supernumerary post lapses, the CDTA and TIEA negotiation programme will be adversely affected.

*To cope with increasing workload in the implementation of CDTAs and TIEAs*

8. Out of the 29 CDTAs signed, 22 have already taken effect, while the remaining ones are expected to become effective from 2014-15 onwards. Inevitably, the workload arising from the implementation of CDTAs and future TIEAs will increase substantially, in particular in handling EoI requests. The number of EoI requests in recent years has already shown a rising trend -

<u>Year ended 31 March</u>	<u>Number of EoI requests</u>
2007	1
2008	2
2009	14
2010	18
2011	18
2012	13
2013	24

9. To safeguard taxpayers’ privacy and confidentiality of information exchanged, the Inland Revenue (Disclosure of Information) Rules require that the decision on whether to accede to an EoI request has to be personally made

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<sup>1</sup> It refers to an arrangement for exchange of information for tax purposes, be it in the form of CDTA or TIEA.



by a directorate officer. Timeliness in processing EoI requests is also of equal importance given the international practice that EoI should be completed within 90 days. The proposed creation of the permanent CA(TT) post will ensure prompt and close supervision of the TT Section in carrying out proper statutory procedures whilst satisfying treaty partners' expectation, timely resolution of disputes with treaty partners through mutual agreement procedures, and constant review of the effectiveness of Hong Kong's EoI regime.

*To continue to involve actively in international exchanges on taxation matters*

10. Over the years, there has been significant increase in the IRD's involvement in the international arena concerning tax cooperation and transparency. These include the Global Forum on Transparency and Exchange of Information for Tax Purposes ("the Global Forum"), the Global Forum Competent Authority Meeting, the Global Forum on Transfer Pricing, the Forum on Tax Administration, the Organisation for Economic Cooperation and Development's annual meeting on tax treaty matters, etc. Active participation in these international fora is instrumental to demonstrate Hong Kong's commitment to tax transparency. Yet, they require intensive inputs and technical knowledge from participants. It is therefore important to have a permanent dedicated directorate officer to closely monitor the world trend on tax matters and to build up network with the tax authorities of other jurisdictions for effective communication as and when necessary.

11. This year, Hong Kong as represented by the IRD is an observer on the Peer Review Group ("PRG") of the Global Forum. We have indicated interest in becoming a PRG member beginning 2014. PRG members have to attend quarterly meetings, review and comment on all peer review reports, and provide inputs on the development of EoI standards and related issues. We envisage that experience gained in serving as a PRG member could be transformed into positive inputs in enhancing the EoI regime of Hong Kong. Given the complexity of the work involved, a directorate level officer would be better placed to take this up.

*To closely monitor international development on tax transparency*

12. The international landscape on tax transparency and cooperation is ever-changing. For instance, there is growing aspiration in practising EoI on an automatic basis and signing the Multilateral Convention on Mutual



Administrative Assistance in Tax Matters (“the Multilateral Convention”)<sup>2</sup>. There is also increasing concern in the international community about tax base erosion and profit shifting. We need to closely monitor international discussions on these important topics and to assess in a timely manner any implications on Hong Kong in the years ahead. There is a strong call for a dedicated directorate officer to supervise the expectedly intensive and extensive follow-up work.

13. In view of the commitments and challenges ahead as set out in paragraphs 4 to 12 above, there is a genuine need to rationalize the current time-limited CA post and create a permanent CA post to oversee the TT Section with effect from 1 April 2014.

### **Proposed Creation of a Supernumerary CA Post in the SO**

*To strengthen directorate leadership in Unit 3 to cope with additional responsibilities*

14. Currently, Unit 3 in the IRD is responsible for a wide range of duties, including assessment and collection of stamp duty for transactions of Hong Kong stocks and immovable properties, administration of the Business Registration Ordinance, matters relating to betting duty in respect of horse races, football matches and lotteries, tax collection and recovery action, as well as handling of estate duty cases, etc. Unlike the other five Units in the IRD which are underpinned by two to four CAs, there is only one CA in Unit 3 (i.e. CA3) (see the IRD’s organisation chart at **Annex B**). Apart from overseeing the day-to-day operation of Unit 3, CA3 is already over-stretched to take charge of additional assignments as outlined in paragraphs 15 and 16 below which require timely input and intensive supervision in the coming few years.

15. CA3 serves as the unit representative in the Project Assurance Team for Stage III of the IRD System Infrastructure Enhancement (“SIE”) Project. The implementation of SIE Project Stage III involves the migration of various tax applications currently used by Unit 3 to the new midrange platform, which is

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<sup>2</sup> The Convention is a multilateral agreement designed to facilitate international cooperation among tax authorities to improve their ability to tackle tax evasion and avoidance. It provides for all possible forms of administrative cooperation between jurisdictions in the assessment and collection of taxes, including automatic EoI, simultaneous tax examination and international assistance in the collection of tax debts.

a very complicated process. As the unit representative, CA3 is required to closely monitor the undertaking of system analysis and design as well as the performance of the required User Acceptance Testing. All these will have to be completed within the next three years.

16. In addition, the Business Registration Office under the purview of CA3 has committed to launch a new electronic service for business registration targeting small and medium enterprises (“SMEs”)<sup>3</sup> in 2014-15 with a view to enhancing the business-friendly environment for SMEs. CA3 will need to formulate an action plan for such a new service and supervise its implementation in a timely manner. The existing staffing provision at the directorate level in Unit 3 is far from enough to handle all these projects on top of their existing daily duties. It is not feasible for CA3 to absorb all the new responsibilities relating to the SO as detailed below. There is a clear need to strengthen directorate leadership in Unit 3.

*To cope with substantial increase in workload in stamping and adjudication cases and implement new initiatives*

17. In recent years, there has been a significant growth in the workload and the number of complicated cases in relation to stamp duty<sup>4</sup>. The increase in the caseload from 2009-10 to 2012-13 ranged from 30% to 1,465% (see **Annex C**). In addition to the over-stretching of staff resources to clear the caseload amidst the increasing stamping work, the SO has been heavily involved in providing technical support to the relevant policy bureaux in implementing the various policy initiatives in recent years. Two recent initiatives introduced relate to -

- (a) the provision of a comparable taxation framework for some common types of Islamic bonds (sukuk) vis-a-vis conventional bonds, with a view to promoting the development of a sukuk market in Hong Kong; and
- (b) the implementation of the betting duty arrangement for two-way commingling for horse races in Hong Kong.

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<sup>3</sup> Electronic application for exemption from payment of business fee and levy for small businesses.

<sup>4</sup> There has been a significant increase in the number of adjudication and valuation cases filed over the years and more objections lodged by the duty payers against the assessments made by the SO.



Following the enactment of relevant legislation on the above initiatives in July 2013, the quantity and complexity of the work of the SO has increased. The existing arrangement, under which the SO is headed by a Senior Superintendent pitched at the rank of Senior Assessor, is clearly not sustainable to render the necessary support for the relevant policy bureaux. In particular, dedicated directorate leadership is essential to supervise the SO in providing expert advice on appropriate stamp duty treatment for new product arrangements under (a) above. As for (b) above, the SO also needs to conduct constant review of the betting duty arrangement in the light of implementation of new two-way commingling for horse races in Hong Kong.

*To support the introduction of scripless securities*

18. Currently, Hong Kong has a paper-based securities regime. The law compels the issue of paper certificates and the use of paper instruments of transfer for certain securities (namely, shares, debentures and units in unit trust schemes). To enhance the overall efficiency and competitiveness in the securities market, and secure an appropriate and improved level of investor choice and protection, the Government proposes that Hong Kong should progress to a scripless securities regime. To this end, it is imperative to amend the Stamp Duty Ordinance. The legislative exercise requires intensive work on the part of the SO in the coming few years. There is a strong call for dedicated directorate leadership to provide prompt steer from a strategic perspective to the SO.

*To make necessary arrangement for levy collection to fund the proposed PMSA*

19. The Government has proposed to establish a PMSA to take up the roles of both a regulatory body for the property management industry and an industry promoter. The PMSA will be self-financed and supported by, among others, a levy to be imposed on property transactions in Hong Kong. Under the preliminary proposal, the SO will be appointed as the collection agent of the levy on behalf of the PMSA, subject to a recharge of handling fees by the IRD. The proposed supernumerary CA post is expected to establish close liaison with the relevant policy bureau to work out the necessary legal framework and logistical arrangement for levy collection in the coming few years.

*To support the implementation of stamp duty measures to address the overheated property market*

20. Since 2010, the Government has implemented a number of measures to curb speculation and reduce the risk of a property bubble so as to ensure the healthy and stable development of the property market. The Stamp Duty (Amendment) (No. 2) Ordinance 2010 was passed on 22 June 2011 to impose Special Stamp Duty (“SSD”) to curb short-term resale activities. With the continued abundant liquidity and low interest rates to fuel the current property boom, the Government proposed to introduce two demand-side management measures with effect from 27 October 2012, i.e. the enhanced SSD and Buyer’s Stamp Duty. In order to reinforce the demand-side management measures for both residential and non-residential properties, the Government proposed to introduce a new round of measures, by doubling the rates of the ad valorem stamp duty, with effect from 23 February 2013. The two Amendment Bills are currently scrutinized by the relevant Bills Committees of the Legislative Council. The SO has been closely involved in providing technical support to the policy bureau concerned, monitoring the caseload, and addressing enquiries from stakeholders and members of the community. Subject to the enactment of the relevant legislation, the SO is duty-bound to undertake various follow-up actions, including re-visiting no less than 55 000 transactions for residential properties and no less than 16 000 transactions for non-residential properties since November 2012 and March 2013 respectively, issuing demand notes, verifying cases and processing claims for exemption and refund. It is expected that the SO will need to take a few years to clear the outstanding cases.

21. All the initiatives pertaining to the SO are in fact highly specialised and time-critical. There is thus a strong call for a dedicated CA to head the SO to facilitate policy deliberations, legislative exercises and delivery of various initiatives in an effective manner. We propose that the CA post is to be time-limited for three years as a start. We will critically review the continued need for this post towards the end of the three-year period in the light of the circumstances prevailing at that time.

## **PROPOSED ORGANISATION STRUCTURE**

22. The proposed permanent CA post in the TT Section will continue to be designated as CA(TT). The proposed job description of CA(TT) is at



**Annex D.** The existing organisation structure of the TT Section which will remain unchanged is at **Annex E**.

23. The proposed supernumerary CA post in the SO will be designated as CA(SO). The proposed job description of CA(SO) is at **Annex F**. The proposed organisation structure of Unit 3 is at **Annex G**.

## **NON-DIRECTORATE SUPPORT**

24. The proposed permanent CA(TT) post will continue to be supported by eight non-directorate professional posts, namely four Senior Assessors and four Assessors.

25. To provide necessary support to the proposed supernumerary CA post in the SO and to relieve the increasing workload and enhance service delivery in the SO, the IRD plans to create eight permanent posts, comprising one Senior Assessor, one Assessor, two Assistant Assessors and four Assistant Taxation Officers in 2014-15.

## **ESTABLISHMENT CHANGES**

26. Despite service enhancement and increasing workload over the years, since 2006-07, the number of directorate posts in the IRD has remained at 25, except for the addition of the supernumerary CA(TT) post since 2011-12. As for non-directorate posts, before the slight increase of eight posts in the current financial year, the number has been ever decreasing from 3 269 in 2001-02 to 2 792 in 2012-13.

## **ALTERNATIVE CONSIDERED**

27. We have critically examined the feasibility of internal redeployment of resources to take up the new responsibilities. However, all existing CAs are already fully engaged in their existing schedules with distinctively different duties. None of them has the spare capacity to lead the TT Section or to head the SO without adversely affecting the discharge of their current duties.

28. Brief description of the organisation of the IRD and the work of both the TT Section and the SO is at **Annex H**.

## **FINANCIAL IMPLICATIONS**

29. The proposed creation of a permanent CA post and a supernumerary CA post will bring about an additional notional annual salary at mid-point of \$2,930,400. The full annual average staff cost, including salaries and on-cost, is \$4,045,632.

30. For the eight non-directorate permanent posts as set out in paragraph 25 above, the notional annual mid-point salary cost is \$3,675,480 and the full annual average staff cost, including salaries and staff on-cost, is \$5,636,304.

31. We will include sufficient provision in the draft Estimates of 2014-15 and subsequent years to meet the cost of the proposal.

## **WAY FORWARD**

32. Members are invited to comment on the proposal. Subject to Members' views, we will seek the recommendation of the proposal by the Establishment Sub-committee on 8 January 2014 and approval from the Finance Committee on 7 February 2014.

**Financial Services and the Treasury Bureau**  
**October 2013**

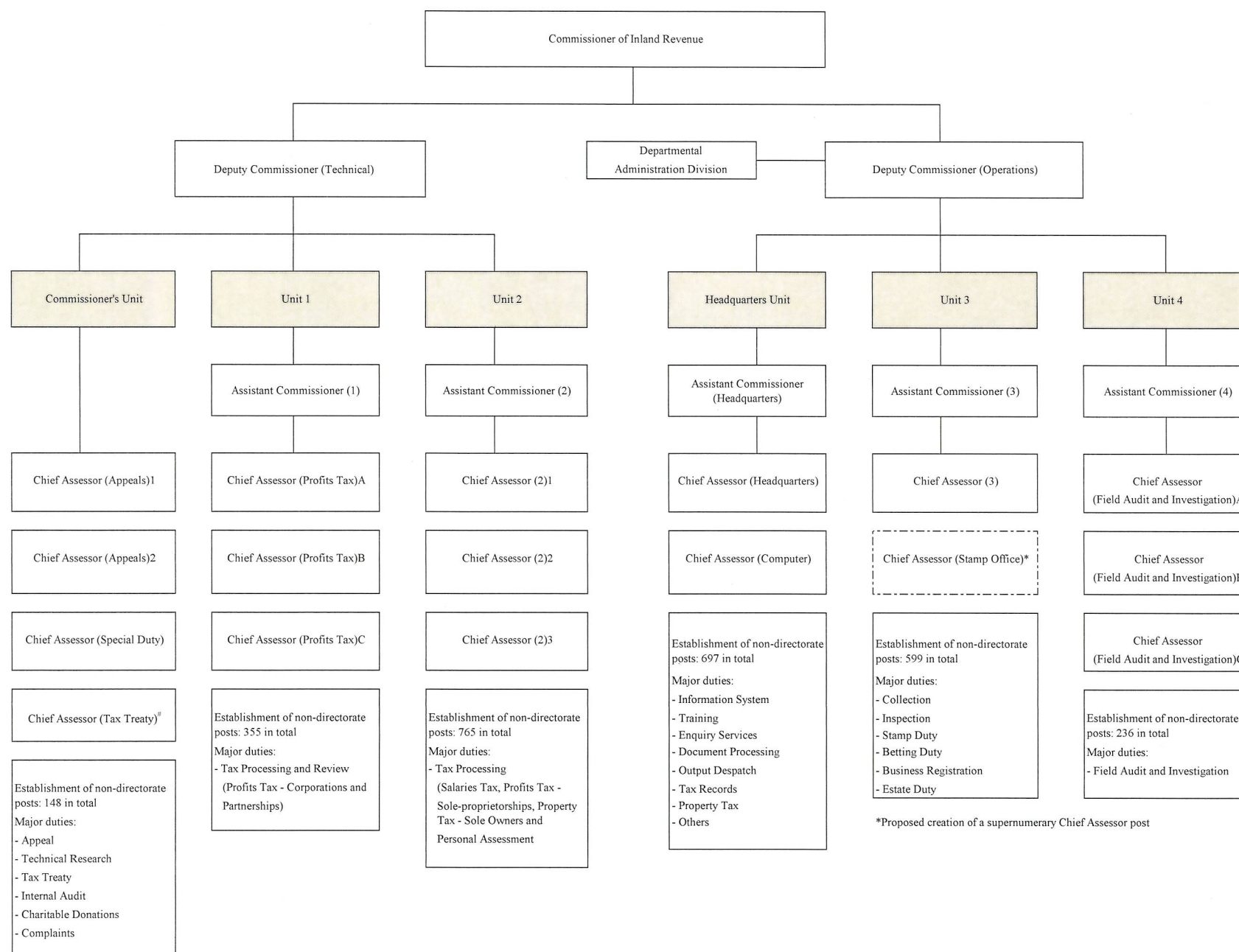


**List of Hong Kong's CDTA Partners**  
(as at October 2013)

	<b>Jurisdictions</b>	<b>Date of Signing</b>
1	Belgium*	10.12.2003
2	Thailand*	7.9.2005
3	Mainland China*	21.8.2006
4	Luxembourg	2.11.2007
5	Vietnam*	16.12.2008
6	Brunei	20.3.2010
7	Netherlands*	22.3.2010
8	Indonesia	23.3.2010
9	Hungary	12.5.2010
10	Kuwait	13.5.2010
11	Austria	25.5.2010
12	United Kingdom*	21.6.2010
13	Ireland	22.6.2010
14	Liechtenstein	12.8.2010
15	France*	21.10.2010
16	Japan*	9.11.2010
17	New Zealand	1.12.2010
18	Portugal	22.3.2011
19	Spain	1.4.2011
20	Czech Republic	6.6.2011
21	Switzerland*	4.10.2011
22	Malta	8.11.2011
23	Jersey	22.2.2012
24	Malaysia*	25.4.2012
25	Mexico	18.6.2012
26	Canada	11.11.2012
27	Italy*	14.1.2013
28	Guernsey	22.4.2013
29	Qatar	15.5.2013

\* Among the top 20 trading partners of Hong Kong

# Inland Revenue Department Organisation Chart



\*Proposed creation of a permanent Chief Assessor post



## Upsurge in the SO's Workload relating to Property Transactions

### Monthly caseload for inflow cases

	2009-10 <sup>(1)</sup>	2012-13 <sup>(1)</sup>	% Change
Adjudication cases	40	111	+178%
Valuation cases <sup>(2)</sup>	354	461	+30%
Enquiry cases <sup>(3)</sup>	62	970	+1,465%

Note: (1) The figures represent the monthly average number of inflow cases during the periods from 1 April 2009 to 31 March 2010 (2009-10) and from 1 April 2012 to 31 March 2013 (2012-13).

- (2) The efficiency in completing valuation cases largely depends on (a) the time spent by the Commissioner of Rating and Valuation ("CRV") in providing property valuations, and (b) the duty payers' willingness to accept the CRV's valuations. Amidst the hectic property market, there has been a significant increase in the number of cases referred to the CRV for valuation. There have also been more objections lodged by the duty payers against the CRV's valuations.
- (3) It is the IRD's performance pledge that written enquiries on simple matters and on technical matters should be replied within 7 days and 21 days respectively.

**Job Description**  
**Chief Assessor (Tax Treaty)**

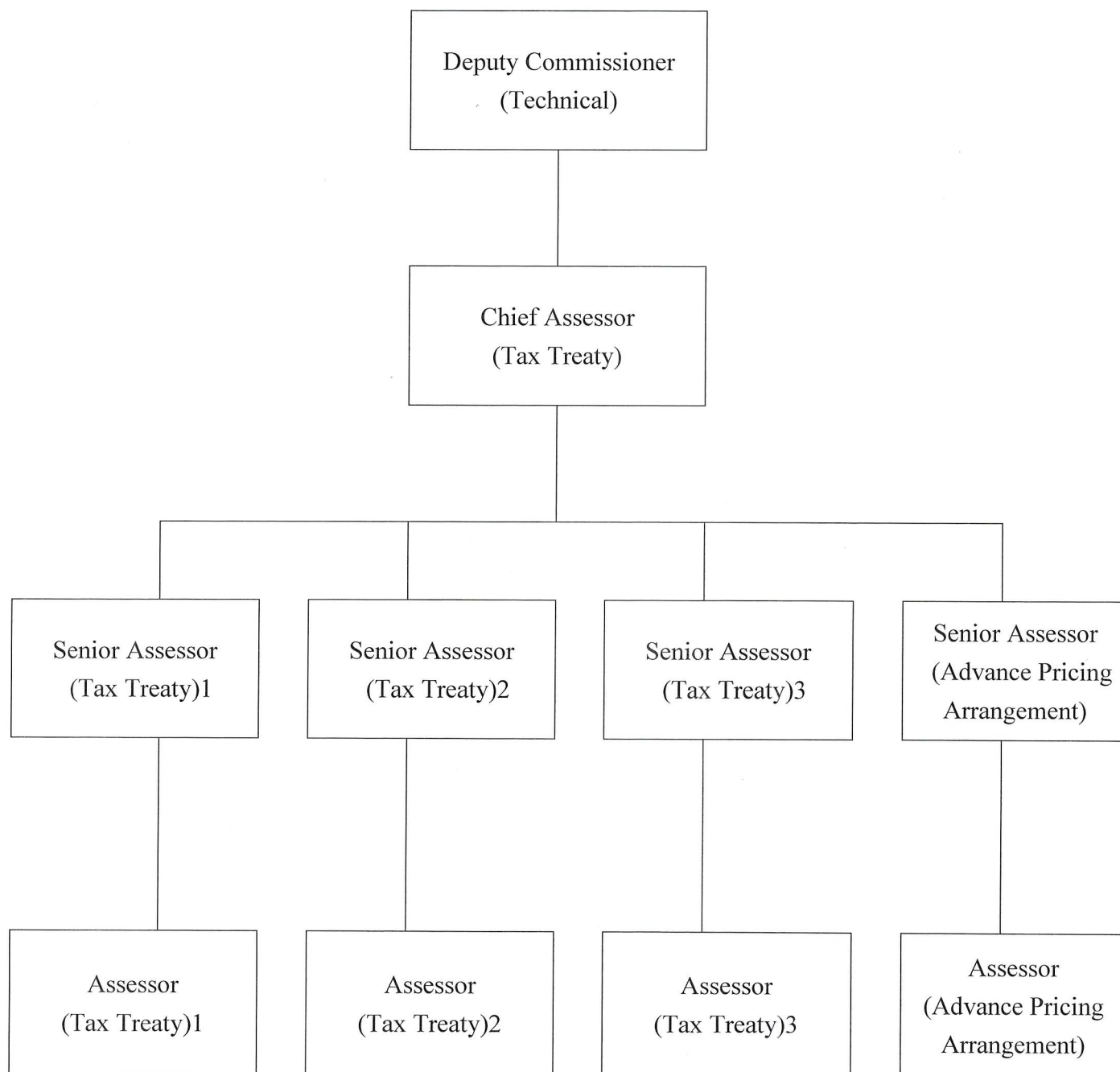
Rank : Chief Assessor (D1)

Responsible to : Deputy Commissioner (Technical) [DCIR(T)]

**Main Duties and Responsibilities –**

1. To update the model Comprehensive Double Taxation Agreement (“CDTA”) and Tax Information Exchange Agreement (“TIEA”) of Hong Kong in consultation with the Financial Services and the Treasury Bureau, supervise preparatory work for CDTA/TIEA negotiations, lead the negotiations and formulate negotiation strategies.
2. To vet draft Inland Revenue (Double Taxation Relief and Prevention of Fiscal Evasion with respect to Taxes on Income) Orders for submission to the Executive Council and the Legislative Council.
3. To oversee the adoption of and compliance with the latest exchange of information (“EoI”) standards in CDTAs/TIEAs that Hong Kong has entered into.
4. To safeguard the privacy of taxpayers and confidentiality of information exchanged under the Inland Revenue (Disclosure of Information) Rules; personally consider and approve/disapprove EoI requests having regard to the proper statutory procedures.
5. To resolve disputes with treaty partners through the Mutual Agreement Procedure (including arbitration); liaise and negotiate with treaty partners on Advance Pricing Arrangements with multi-national companies on the acceptable transfer prices.
6. To represent the IRD at international meetings concerning tax treaties and oversee the overall operation and administration of the Tax Treaty Section.

**Existing Organisation Chart of Tax Treaty Section  
(as at October 2013)**





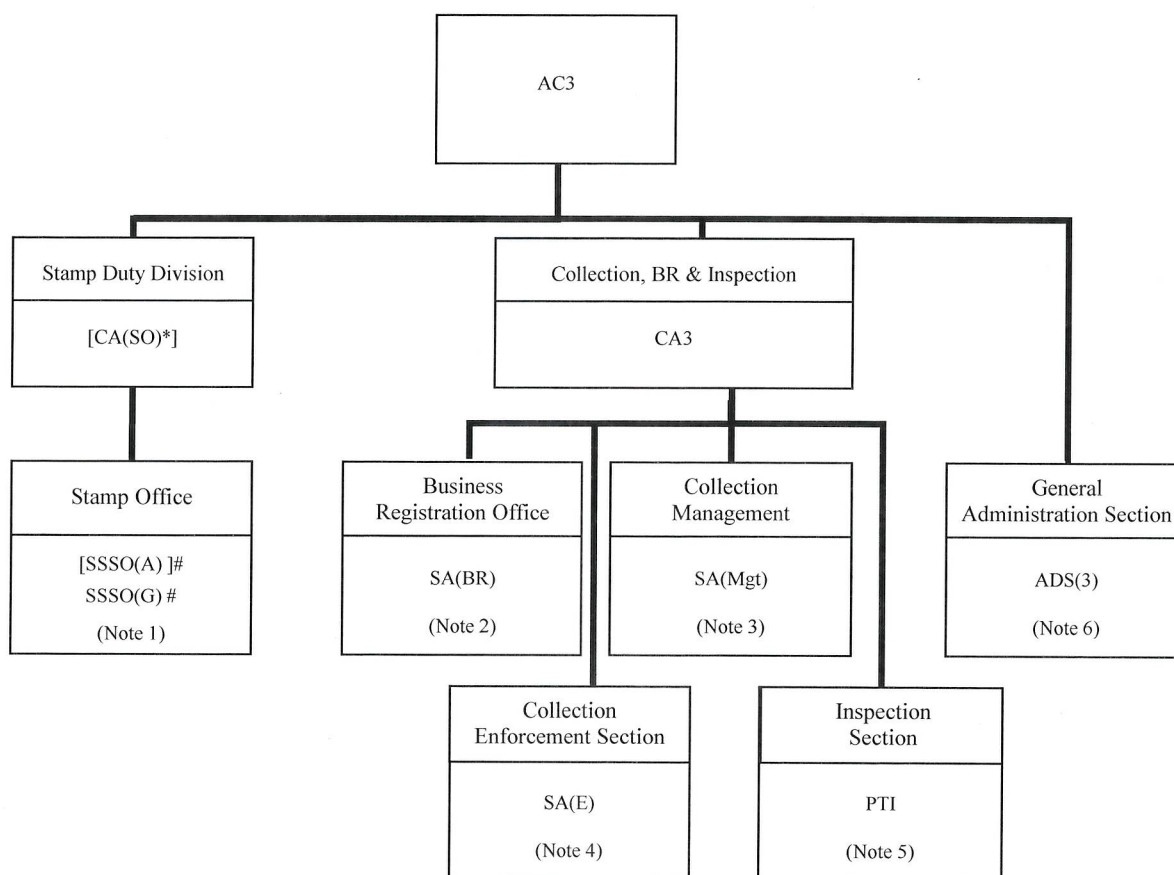
**Proposed Job Description  
Chief Assessor (Stamp Office)**

Rank : Chief Assessor (D1)  
Responsible to : Assistant Commissioner of Inland Revenue 3 [AC3]

**Main Duties and Responsibilities –**

1. To supervise and plan for the administration of the Stamp Office of Unit 3 to ensure that all work programmes of the Stamp Office are carried out efficiently to achieve the overall objectives.
2. To administer and exercise specific duties under the Stamp Duty Ordinance, including remission or refund of stamp duty, remission of late stamping penalty or additional stamp duty, conduct of operational reviews on intra-group exemption cases, approving settlement of informer cases and review of adjudication cases.
3. To provide guidance and give instructions to SSSO(A) and SSSO(G), on management and technical matters, including the handling of computer projects, system infrastructure enhancement, complaint cases, audit queries, informer cases, drafting staff handbook, stamp circulars and Stamp Office Interpretation and Practice Notes.
4. To make and comment on submissions on procedural and technical matters in relation to the Stamp Office, including rendering advice to the senior management on policies and practices, and on formulation of Budgets, betting duty reform, law amendments and procedural changes relating to the Stamp Duty Ordinance and Betting Duty Ordinance.
5. To liaise with other Units of the Department and to represent the Department in liaising with other Government departments and outside bodies on matters relating to stamp duty and betting duty.
6. To take up committee work and other duties as assigned by the management.

### Proposed Organisation Chart of Unit 3



- \* [CA(SO)] - Chief Assessor (Stamp Office) to be created
- # [SSSO(A)] - Senior Superintendent of Stamp Office (Assignment ) to be created
- SSSO(G) - Senior Superintendent of Stamp Office (General)

#### Responsible duties of each section -

- Note 1: Assessing stamp duty chargeable on assignments, agreements for sale and purchase, leases of immovable property and transfers of shares
- Note 2: Maintaining a system for business registration
- Note 3: Collecting tax payments and processing refunds; issuing and redeeming tax reserve certificates, examining estate duty affidavits/accounts, and issuing assessments for dutiable cases and certificates of exemption for exempt cases
- Note 4: Taking recovery action in relation to tax in default
- Note 5: Performing various inspection activities, conducting court proceedings on behalf of the IRD when the cases are not undertaken or represented by the Department of Justice, and administering betting duty in respect of horse races, football matches and lotteries
- Note 6: Handling all matters of general administration including personnel matters, provision of secretarial and clerical support to the Unit and handling all the inward and outward mail.



**Organisation of the IRD and  
Work of the TT Section and the SO**

*Organisation of the IRD*

At present, there are two Deputy Commissioners in the IRD, underpinning Commissioner of Inland Revenue for co-ordinating the full range of duties of IRD (see IRD's organisation chart at **Annex B**). The Deputy Commissioner (Technical) is in charge of the Commissioner's Unit, Units 1 and 2. As shown at **Annex B**, the four CAs in the Commissioner's Unit are responsible for handling tax appeal cases, tax exemption cases and tax treaty negotiations and implementation. Unit 1 is headed by an Assistant Commissioner and underpinned by three CAs to handle all matters relating to profits tax cases. Unit 2 is headed by an Assistant Commissioner and underpinned by three CAs to handle all matters relating to salaries tax cases. The Deputy Commissioner (Operations) is in charge of the Headquarters Unit, Units 3 and 4. The Headquarters Unit is headed by an Assistant Commissioner and underpinned by two CAs to oversee property tax cases, the departmental centralized processing centres and information technology management. Unit 4 is headed by an Assistant Commissioner and underpinned by three CAs to conduct field audit and investigation.

*Work of the TT Section*

2. The IRD established the Double Taxation Section, subsequently renamed as the TT Section in April 2010, which was manned by a Senior Assessor at the start. The major functions of the TT Section are as follows -

- (a) CDTA negotiations and implementation, including formulating and reviewing the negotiation position, researching into the tax system of negotiation partners and their tax treaty systems, conducting negotiations, arranging signing and ratification of CDTAs, resolving problems in connection with the implementation of CDTAs and liaising with treaty partners as appropriate;

- (b) processing EoI requests and applications for certificates of resident status;
- (c) conducting mutual agreement procedure and arbitration; and
- (d) maintaining and enhancing the database for double taxation relief claims.

3. With the substantial increase in both the quantity and complexity of work handled by the TT Section, a supernumerary CA post was created in April 2011 to head the Section for three years from 1 April 2011 to 31 March 2014. The TT Section now consists of eight professional staff, namely four Senior Assessors and four Assessors.

#### *Work of the SO*

4. Subsumed under Unit 3 of the IRD, the SO deals with the assessment and collection of stamp duty and betting duty. It consists of two sub-sections, namely the Assignment Sub-section responsible for the stamping of property transfer documents and the General Sub-section taking care of the stamping of leases, share transfer documents and other miscellaneous instruments as well as the administration of the Betting Duty Ordinance. At present, the SO has an establishment of 82 posts.