

立法會
Legislative Council

LC Paper No. CB(2)2027/15-16
(These minutes have been seen
by the Administration)

Ref : CB2/PL/MP

Panel on Manpower

Minutes of special meeting
held on Tuesday, 24 May 2016, at 2:30 pm
in Conference Room 1 of the Legislative Council Complex

- Members present** : Hon KWOK Wai-keung (Chairman)
Dr Hon CHIANG Lai-wan, JP (Deputy Chairman)
Hon LEE Cheuk-yan
Hon LEUNG Yiu-chung
Hon CHAN Kin-por, BBS, JP
Hon IP Kwok-him, GBS, JP
Hon LEUNG Kwok-hung
Hon CHAN Yuen-han, SBS, JP
Hon LEUNG Che-cheung, BBS, MH, JP
Dr Hon KWOK Ka-ki
Hon SIN Chung-kai, SBS, JP
Hon POON Siu-ping, BBS, MH
Hon TANG Ka-piu, JP
Hon CHUNG Kwok-pan
- Members attending** : Hon Emily LAU Wai-hing, JP
Dr Hon Fernando CHEUNG Chiu-hung
- Members absent** : Hon Tommy CHEUNG Yu-yan, GBS, JP
Dr Hon LEUNG Ka-lau
Hon CHEUNG Kwok-che
Hon WONG Kwok-kin, SBS

**Public Officers
attending** : Item I

Mr Stephen SUI Wai-keung, JP
Under Secretary for Labour and Welfare

Ms Queenie WONG Ting-chi
Assistant Commissioner for Labour (Policy Support)

Ms Alice YEUNG Lai-shan
Senior Administrative Officer (Policy Support)
Labour Department

Mr Isaac SO Chi-keung
Principal Immigration Officer (Visa Control) Operations
Immigration Department

**Attendance
by invitation** : Item I

Hong Kong TKI Association Ltd.

Mr LEUNG Hing-ki
Chairman

Association of Hong Kong Agencies for Migrant Workers
Limited

Mr CHENG Chi-ming
Chairman

Democratic Alliance for the Betterment and Progress of
Hong Kong

Mr NGAN Man-yu
Deputy Spokesperson

Task Force on Foreign Helper's Problems of Liberal Party

Mr Michael LEE
Convenor

Pricerite Maid Limited

Ms POON Tsz-shan
Branch Manager

Yourmaid Services Centre Limited

Ms Susanna NG Ching-yih
Director

Enrich HK

Ms Mesina Ma. Rosalyn Galgana
Executive Director

Hong Kong Employment Industry Association

Ms Susanna LAU Mei-sze

Civic Party

Mr Jeremy TAM Man-ho

Association of Hong Kong Manpower Agencies Limited

Ms Teresa LIU Tsui-lan
Chairlady

Rights Exposure

Mr Robert GODDEN
Director of Campaigns and Communications

Hong Kong Catholic Commission for Labour Affairs

Miss LAW Pui-shan
Policy Research Officer

Association of Bangladesh Employment Agencies (HK)

Mr Patrick CHAN
Spokesperson

Hong Kong Home Services Association

Mr CHOI Yee
Director

Asosiasi PPTKI Hong Kong Limited

Mr CHEUNG Kin-man
Chairman

Domestic Workers Roundtable

Mr Allan BELL

Hong Kong Union of Employment Agencies

Mr Mclean NG Shu-kit
Chairman

Justice Centre Hong Kong

Miss Victoria Wisniewski Otero
Advocacy and Campaigns Manager

Committee concerning FDH Issues in HK Family

Ms YIU Hoi-yin

Support Group for Working Mothers with FDHs

Ms LIU Ming-chu

Retired People as FDH employers Alliance

Ms YAM Fam-kam

Senior People as FDH employers Alliance

Mr CHAM Tak-ming

HK Women with FDHs Association

Ms CHAU Yim-mui

HK Young Families with FDHs Association

Mr CHAN Tat-lun

Support Group for HK Employers with Foreign Domestic
Helpers

Mr Benny LEE
Chief Operating Officer

Amnesty International Hong Kong

Ms Doriane LAU Wen-wei
Human Rights Education Officer

Hong Kong Confederation of Trade Unions

Mr WONG Yu-loy
Organizing Coordinator

Progressive Labor Union of Domestic Workers - HK

Miss Ma. Veneranda Non
Executive Committee Member

Union of Nepalese Domestic Workers in Hong Kong

Mr TANG Kin-wa
Organizing Secretary

Thai Migrant Workers Union

Ms Parichat JAROENNON
Vice Chairperson

Hong Kong Federation of Asian Domestic Workers Unions

Miss Estrada Grace A.
Vice Chairperson

Community Care and Nursing Home Workers General Union

Mr CHENG Ching-fat
Representative

The Hong Kong Chamber

Ms TSE Fung-mui
Vice President

United Filipinos in Hong Kong (UNIFIL HK)

Ms Dolores BALLADARES
Chairperson

Asian Migrants Coordinating Body (AMCB)

Ms Eni LESTARI
Spokesperson

Indonesian Migrant Workers Union

Ms Sringatin
Chairperson

Mission for Migrant Workers

Mr Norman CARNAY
Program Officer

Labour Party

Mr KWOK Wing-kin
Vice Chairman

Hong Kong Employers of Domestic Helpers Association

Ms Betty YUNG MA Shan-yee
Chairperson

Clerk in attendance : Miss Betty MA
Chief Council Secretary (2) 1

Staff in attendance : Ms Rita LAI
Senior Council Secretary (2) 1

Ms Mina CHAN
Council Secretary (2) 1

Ms Kiwi NG
Legislative Assistant (2) 1

Miss Lulu YEUNG
Clerical Assistant (2) 1

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I. Draft Code of Practice for Employment Agencies
(LC Paper Nos. CB(2)1295/15-16(05) and CB(2)1533/15-16(01))

The Chairman advised that as agreed at the meeting on 19 April 2016, the special meeting was scheduled to receive deputations' views on the draft Code of Practice ("CoP") for Employment Agencies ("EAs").

2. Members noted the updated background brief entitled "Regulation of employment agencies placing foreign domestic helpers" prepared by the Legislative Council Secretariat.

Presentation of views by deputations

3. At the invitation of the Chairman, a total of 39 deputations presented their views on the draft CoP for EAs. A summary of views of these deputations is in the **Appendix**.

Discussion

Administration's overall response to the views expressed by deputations

4. At the invitation of the Chairman, Under Secretary for Labour and Welfare ("USLW") gave a consolidated response to the views expressed by deputations as follows:

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- (a) the Administration noted various concerns relating to employment of foreign domestic helpers ("FDHs") and regulation of EAs. Apart from the introduction of the CoP, the Administration had also put in place the following measures:
 - (i) the Labour Department ("LD") had since 2014-2015 increased manpower and conducted more inspections to EAs by increasing the target inspections of EAs per year from 1 300 to 1 800 (representing a 38% increase). In 2016-2017, the number of Labour Officers of the Employment Agencies Administration ("EAA") would be increased from four to 15 so as to step up the regulation of EAs and take forward the work of the draft CoP;
 - (ii) LD had enhanced its publicity and educational efforts through various channels to raise the awareness of FDHs about their rights and benefits. FDHs who considered that their rights and benefits under the Employment Ordinance (Cap. 57) ("EO") had been infringed could report to LD or approach the relevant government departments/organizations as listed in the CoP; and
- (b) the Administration attached great importance to the welfare and well-being of FDHs in Hong Kong.

5. Principal Immigration Officer (Visa Control) Operations of the Immigration Department ("ImmD") added that:

- (a) ImmD had since June 2013 set up a special duties team to process new visa applications from FDHs who had a record of premature termination of contracts twice or more in the past 12 months with a view to stepping up actions against "job-hopping". From June 2013 to April 2016, ImmD processed some 8 000 employment visa applications from FDHs whose employment contracts were prematurely terminated, and around 20% of these applications were not successful. ImmD considered it effective to prevent the job-hopping problem;

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- (b) in light of the strong demand of local families for FDHs, ImmD often received employers' requests to expedite processing of their FDHs' employment visas. On the other hand, FDHs whose previous contracts had been terminated owing to various reasons also wished to resume employment as soon as possible to make ends meet. As a measure to facilitate both parties, ImmD adopted a flexible approach in handling the requirement imposed on FDHs that they had to return to their places of domicile upon termination of their contract. Nonetheless, ImmD would ensure that FDHs concerned had left Hong Kong to submit their new employment visa applications upon termination of contracts before vetting their applications; and
- (c) it would normally take six weeks to process an application for the employment of a FDH upon receipt of all necessary documents. In the past three years, the processing time of more than 98% of such applications met the service pledge. Discretion might be exercised to process urgent cases having regard to the merits of individual circumstances and the provision of all necessary supporting documents.

6. Assistant Commissioner for Labour (Policy Support) ("AC for L (PS)") supplemented the following:

- (a) as regards EAs' overcharging of commission from FDHs, FDHs were encouraged to report such cases to LD as soon as possible and come forward as prosecution witnesses;
- (b) in relation to the implementation of the CoP, LD would issue warning letters to EAs for rectification of irregularities detected upon receipt of complaints and completion of investigation, including but not limited to failing to meet the statutory requirements and/or standards set out in the CoP. When making decision of issuing, revoking, or refusing to issue or renew EA licences, LD would consider, amongst other relevant factors, whether a person was fit and proper to operate an EA in accordance with section 53(1)(c)(v) of EO based on the relevant track record (for example whether EAs had persistently failed to meet the requirements and/or standards set out in the CoP, as well as records of failure to rectify upon warning of LD, etc.) of EAs and/or their capability of meeting such requirements/standards. LD

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would continue with its public education efforts to enhance the professionalism and service quality of the EA industry; and

- (c) to protect the interest of employers as well as EAs and to avoid misunderstanding on the services to be provided by EAs, a service agreement needed to be drawn up between EA and employer and agreed by both parties. The service agreement should list out the service terms and scope as well as the fees (if any) that would be charged by EAs for the services, including whether refund or change of FDH would be available in case the EA services were not fully delivered.

7. The Chairman raised concern about whether LD would initiate investigation into job placement business being undertaken through mobile application. AC for L (PS) said that all EAs (including intermediaries placing FDHs) were required to obtain a licence from LD before they could operate any business of employment service in Hong Kong, regardless of whether EAs would charge a fee for the provision of such service. EAs that operated without a licence would contravene the law under section 51(1) of EO. She appealed to members of the public to lodge complaints of EAs' operation without licence with LD's EAA. Upon receipt of the complaints, LD would investigate and take out prosecution if there was sufficient evidence.

The draft CoP

8. Mr POON Siu-ping enquired about the implementation timetable of the CoP upon completion of the consultation exercise.

9. Mr LEE Cheuk-yan cast doubt about the effectiveness of the CoP, which was not legally binding, in regulating local/ FDH EAs. Dr Fernando CHEUNG and Ms Emily LAU shared similar views. Dr CHEUNG, Mr LEUNG Kwok-hung and Mr POON Siu-ping were concerned about the criteria for evaluating the effectiveness of the CoP. Mr LEE, Mr LEUNG and Mr POON enquired whether the Administration would consider legislating for the CoP if it was proven to be ineffective. The Chairman was of the view that the draft CoP could not adequately regulate EAs. The Administration should draw up a concrete timetable for legislating for CoP.

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10. Acknowledging the contribution made by FDHs to Hong Kong, Ms Emily LAU considered that the welfare and well-being of FDHs should be safeguarded. That said, it was equally important to protect the interests of FDH employers. Expressing grave concern about the malpractice of EAs, such as withholding FDHs' passports so as to force them to make loan repayment, Ms LAU was in support of stepping up regulation of EAs, such as publishing the names of unscrupulous EAs on the LD's website. Ms LAU held the view that the Administration should step up its regulatory efforts of EAs so as to safeguard the interests of both FDHs and their employers.

11. Responding to members' concerns and views, USLW made the following points:

- (a) the salient legislative requirements that EAs had to follow were listed in Chapter 3 of the draft CoP. Notably, an EA or any other person withholding a FDH's passport and/or other identification documents without the latter's consent would have committed an offence under the Theft Ordinance (Cap. 210). In addition, unfair trade practices were prohibited under the Trade Description Ordinance (Cap. 362);
- (b) Chapter 4 of the draft CoP specified the Commissioner for Labour ("C for L")'s expectation of the minimum standards of EAs, which were important factors to be taken into account by C for L when considering applications for issuance, renewal or revocation of licences. As compared with the Practical Guide for Operating an Employment Agency which concerned more about the operational procedures, the draft CoP defined the roles and obligations of an EA such that job-seekers and employers would know clearly what to expect from EAs; and
- (c) LD would collect views, including arranging consultation sessions for different stakeholder groups (e.g. the EA industry, employers and FDHs) during the two-month consultation period which would end on 17 June 2016 so as to further refine the draft CoP and publish it for EAs to follow as soon as possible. The Administration would closely monitor the implementation of the CoP, in particular complaints against EAs and EAs' compliance with the minimum standards expected from C for L. If the

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effectiveness of the CoP was far from satisfactory, consideration would be given to adopting other means including introducing legislative amendments to suitably regulate the industry.

12. Mr SIN Chung-kai declared that he was employer of an FDH. Given there were more than 340 000 FDHs in Hong Kong and that the employment-related issues of FDHs might be different from those of local employees, Mr SIN considered that the Administration should consider introducing a specific legislation for the employment matters of FDHs. At the invitation of Mr SIN, Mr Michael LEE of Task Force on Foreign Helper's Problems of Liberal Party and Ms Susanna NG Ching-yih of Yourmaid Services Centre Limited indicated their support for the proposal. Mr TANG Kin-wa of Union of Nepalese Domestic Workers in Hong Kong said that FDHs should enjoy the same employee' rights and benefits as those of local employees and therefore considered it unnecessary for introducing another piece of employment legislation for FDHs. Miss Victoria Wisniewski Otero of Justice Centre Hong Kong was concerned about the absence of legislation governing forced labour in Hong Kong.

Other issues

Overcharging of intermediary fees and regulation of EAs

13. In light of the impending implementation of the CoP, Mr POON Siu-ping expressed concern about whether LD had sufficient manpower for the regulation of EAs.

14. Mr LEE Cheuk-yan was concerned that the existing penalty for overcharging of intermediary fees by EAs, which was subject to a maximum fine of \$50,000, was too low to have adequate deterrent effect. Mr POON Siu-ping shared a similar concern and asked whether consideration would be given to conducting a review of the penalty level.

15. Mr LEE Cheuk-yan expressed concern that most Indonesian domestic helpers ("IDHs") had to pay intermediary and training fees amounted to some \$15,000 before taking up employment in Hong Kong. He was particularly concerned about whether local EAs were involved in arranging FDHs to take out loans from financial institutions and deducting wages from FDHs for loan repayment.

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16. At the invitation of Mr LEE Cheuk-yan, Ms Teresa LIU Tsui-lan of Association of Hong Kong Manpower Agencies Limited said that IDHs had to pay a huge amount of intermediary and training fees in Indonesia as they were required to undergo 60-day training in Indonesia prior to working overseas, including Hong Kong. As for the placement fees collected by local EAs from employers of IDHs, such fees covered IDHs' airfare to Hong Kong and fees so charged by the intermediaries in Indonesia. Mr CHENG Chi-ming of Association of Hong Kong Agencies for Migrant Workers Limited echoed that most IDHs had to borrow money to pay the intermediary and training fees before taking up employment in Hong Kong and repay the debts when working in Hong Kong.

[The Chairman informed members that the meeting would be extended by 15 minute.]

17. Dr Fernando CHEUNG declared that he was an FDH employer and acknowledged the contribution of FDHs to Hong Kong, in particular families with children, elderly persons and people with disabilities. Dr CHEUNG expressed grave concern that most FDHs had incurred huge debts in order to meet the high level of fees and commissions charged by EAs. Dr CHEUNG was concerned about how the Administration could address the situation and safeguard the rights of FDHs. Mr LEUNG Kwok-hung shared a similar view.

18. Noting the Administration's plan of setting up a new office of the Hong Kong Economic and Trade Office ("ETO") of the Hong Kong Special Administrative Region Government in Jakarta, which would be responsible for economic and trade matters among Hong Kong and four countries of the Association of Southeast Asian Nations including Indonesia and the Philippines, Ms Emily LAU considered that the Administration should make use of the channel to raise concerns with these countries on the huge amount of intermediary and training fees that FDHs were required to borrow from the intermediaries in their home countries prior to arriving in Hong Kong and request the governments of Indonesia and the Philippines to tackle the problem at source.

19. In response to members' concerns and views, USLW made the following points:

- (a) under EO, EAs were only allowed to receive from FDHs for successful job placement service the prescribed commission in the Second Schedule of EAR, which was no more than 10% of job-seeker's first month salary;

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- (b) the Administration had been strengthening the publicity and educational efforts to raise FDH's awareness of their rights and entitlements, including channels for filing complaints. LD would initiate investigation immediately upon receipt of malpractice complaints of EAs;
- (c) in 2013, 2014 and 2015, LD conducted 1 341, 1 806 and 1 803 inspections respectively to EAs across the territory. In 2015, among which 1 348 (75%) were inspections to FDH EAs. In the same year, a total of 12 EAs were prosecuted by LD, amongst which nine were convicted of overcharging commission from job-seekers and/or unlicensed operation. In 2015, C for L revoked/refused to renew licences to five EAs, for reasons including the licensee being convicted of overcharging commission from FDHs and unlicensed operation before a licence was granted; and
- (d) given that the Government did not have any jurisdiction on overseas EAs, the Government had been urging the FDH-sending countries to tackle the issue at source through liaising with the relevant Consulates General ("CGs") in Hong Kong. LD had since 2014 intensified collaboration with CGs of major FDH-sending countries in Hong Kong by participating in briefings for newly-arrived FDHs and cultural events organized by these CGs from time to time to promote among FDHs the important information on employment rights and ways to file complaints from various channels. In addition, an inter-departmental regular liaison mechanism with both the Indonesian and Philippines CGs respectively had been set up since 2014 for information sharing and coordination of efforts on FDH-related matters. The Government would continue the liaison and regular meetings with the FDH-sending countries and urge them to tackle the issue of debt-bondage at source. With the setting up of the ETO in Jakarta, it was expected that it would help further strengthen the liaison with the FDH-sending countries.

20. Dr Fernando CHEUNG enquired whether consideration would be given to setting up a division/help desk in LD for provision of dedicated services to FDHs and their employers. USLW responded that FDHs who

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considered that their rights and benefits under EO had been infringed could report to LD for follow-up. Dr CHEUNG's suggestion would be relayed to LD for consideration.

21. There being no other business, the meeting ended at 5:30 pm.

Council Business Division 2
Legislative Council Secretariat
7 September 2016

Panel on Manpower

Special meeting on Tuesday, 24 May 2016, at 2:30 pm
Meeting to receive views on "Draft Code of Practice for Employment Agencies"

Summary of views and concerns expressed by deputations

No.	Name of deputation	Submission / Major views and concerns
1.	Hong Kong TKI Association Ltd.	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1559/15-16(01)
2.	Association of Hong Kong Agencies for Migrant Workers Limited	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1533/15-16(02)
3.	Democratic Alliance for the Betterment and Progress of Hong Kong	<ul style="list-style-type: none"> ● Expressed concern about when and how the Administration would assess the effectiveness of the Code of Practice for Employment Agencies ("CoP") in regulating the operation of employment agencies ("EAs") providing placement services for foreign domestic helpers ("FDHs"). ● Queried how the CoP would regulate the making of false claims by EAs and prevent them from involving in financial affairs of FDHs.
4.	Task Force on Foreign Helper's Problems of Liberal Party	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1593/15-16(01)
5.	Pricerite Maid Limited	<ul style="list-style-type: none"> ● The CoP should spell out clearly the statutory requirements in relation to the scope of services of EAs given that EAs undertaking job placement business for FDHs had been offering additional ancillary services, such as pre-employment training and visa application. ● Expressed concern about the regulation of unlicensed EAs providing placement services for FDHs through mobile applications.
6.	Yourmaid Services Centre Limited	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1533/15-16(03) ● LC Paper No. CB(2)1593/15-16(02)
7.	Enrich HK	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1533/15-16(04)
8.	Hong Kong Employment Industry Association	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1533/15-16(05)
9.	Civic Party	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1770/15-16(01)

No.	Name of deputation	Submission / Major views and concerns
10.	Association of Hong Kong Manpower Agencies Limited	● LC Paper No. CB(2)1533/15-16(06)
11.	Rights Exposure	● LC Paper No. CB(2)1533/15-16(07)
12.	Hong Kong Catholic Commission for Labour Affairs	● LC Paper No. CB(2)1574/15-16(01)
13.	Association of Bangladesh Employment Agencies (HK)	● LC Paper No. CB(2)1533/15-16(08)
14.	Hong Kong Home Services Association	● LC Paper No. CB(2)1533/15-16(09)
15.	Asosiasi PPTKI Hong Kong Limited	● LC Paper No. CB(2)1533/15-16(10)
16.	Domestic Workers Roundtable	● LC Paper No. CB(2)1673/15-16(01)
17.	Hong Kong Union of Employment Agencies	● LC Paper No. CB(2)1533/15-16(11)
18.	Justice Centre Hong Kong	● LC Paper No. CB(2)1559/15-16(02)
19.	Committee Concerning FDH Issues in HK Families	● LC Paper No. CB(2)1770/15-16(02)
20.	Support Group for Working Mothers with FDHs	● LC Paper No. CB(2)1770/15-16(03)
21.	Retired People as FDH employers Alliance	● LC Paper No. CB(2)1593/15-16(03)
22.	Senior People as FDH employers Alliance	● LC Paper No. CB(2)1593/15-16(04)
23.	HK Women with FDHs Association	● LC Paper No. CB(2)1770/15-16(04)
24.	HK Young Families with FDHs Association	● LC Paper No. CB(2)1593/15-16(05)

No.	Name of deputation	Submission / Major views and concerns
25.	Support Group for HK Employers with Foreign Domestic Helpers	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1562/15-16(01)
26.	Amnesty International Hong Kong	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1562/15-16(02)
27.	Hong Kong Confederation of Trade Unions	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1574/15-16(02)
28.	Progressive Labor Union of Domestic Workers - HK	<ul style="list-style-type: none"> ● The existing penalty for overcharging of intermediary fees by EAs, which was subject to a maximum fine of \$50,000, was too low to have adequate deterrent effect. The penalty for EA's overcharging of commission fee should be increased to the level same as that for an employer who failed to pay wages due, i.e. a fine of \$350,000 and three years' imprisonment upon conviction.
29.	Union of Nepalese Domestic Workers in Hong Kong	<ul style="list-style-type: none"> ● The CoP was only an extended version of the current "Practical Guide for Employment of Foreign Domestic Helpers", and failed to address the problem of overcharging of intermediary charges by EAs placing FDHs. ● The maximum penalty for overcharging of intermediary charges by EAs should be increased to enhance the deterrent effect. ● Local EAs should be required to provide information about their overseas partners for regulatory purpose.
30.	Thai Migrant Workers Union	<ul style="list-style-type: none"> ● Stringent enforcement actions should be taken against EAs for overcharging intermediary charges. ● The level of penalty for overcharging of intermediary fees by EAs should be increased. ● The Administration should ensure that EAs were fully aware of the relevant legislation governing their operation.
31.	Hong Kong Federation of Asian Domestic Workers Unions	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1559/15-16(03)
32.	Community Care and Nursing Home Workers General Union	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1559/15-16(04)
33.	The Hong Kong Chamber	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1533/15-16(12)

No.	Name of deputation	Submission / Major views and concerns
34.	United Filipinos in Hong Kong (UNIFIL HK)	<ul style="list-style-type: none"> ● FDHs were often discouraged from pursuing their complaints against unscrupulous EAs mainly due to the low prosecution rate, difficulties in providing evidence of EAs' illegal acts or malpractices, and the "two-week rule" which required FDHs to leave Hong Kong within two weeks upon termination or completion of their employment contracts. ● While welcoming the introduction of the CoP, the Administration should formulate effective policy and regulatory regime for the operation of EAs.
35.	Asian Migrants Coordinating Body (AMCB)	<ul style="list-style-type: none"> ● Welcomed the introduction of the CoP. ● Expressed concern whether the implementation of the CoP was adequate to provide FDHs with adequate protection against abuse and exploitation by EAs and to curb EAs' malpractices. ● The Government policy and the legislation governing the operation of EAs should be thoroughly reviewed.
36.	Indonesian Migrant Workers Union	<ul style="list-style-type: none"> ● While acknowledging that the CoP was a step forward in the regulation of EAs, it remained inadequate to protect FDHs. ● The Administration should take measures to prevent EAs from arranging FDHs to take out loans from financial institutions in Hong Kong.
37.	Mission for Migrant Workers	<ul style="list-style-type: none"> ● The CoP, which was not legally binding, could only provide guidance for both employers and FDHs when dealing with EAs, but lacked deterrence against the malpractices of EAs. ● The CoP should be made mandatory to ensure that EAs were in full compliance with the relevant regulations governing their operations.
38.	Labour Party	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1770/15-16(05)
39.	Hong Kong Employers of Domestic Helpers Association	<ul style="list-style-type: none"> ● LC Paper No. CB(2)1574/15-16(03)