

**For Discussion on
17 July 2017**

Legislative Council Panel on Home Affairs

**Review of the Hotel and Guesthouse Accommodation Ordinance
(Cap. 349) – Progress Report and Further Legislative Proposals**

Purpose

This paper –

- (a) informs Members of the progress on the proposed legislative amendments to the Hotel and Guesthouse Accommodation Ordinance (Cap. 349) (HAGAO) and the implementation of the administrative enhancement measures; and
- (b) seeks Members' views on the Government's further legislative proposals to amend the HAGAO.

Background

2. Operation of hotels and guesthouses in Hong Kong is regulated by the HAGAO through a mandatory licensing scheme. In July 2014, the Home Affairs Department (HAD) issued a public consultation document on the "Review of the HAGAO" (the Review) to gauge public views on a number of proposed measures, with a view to improving the licensing regime, minimising the nuisance caused by licensed guesthouses to nearby residents, and facilitating enforcement actions against unlicensed guesthouses.

3. At the meeting of the Legislative Council Panel on Home Affairs (HA Panel) held on 24 March 2015, we briefed Members on the outcome of the Review and our proposals to strengthen the existing regulatory regime by legislative amendments to the HAGAO and administrative enhancement measures. Members generally supported our proposals, and requested more information on –

- (a) the implementation arrangement for consideration of restrictive

covenants in a Deed of Mutual Covenant (DMC) when the Licensing Authority ¹ (the Authority) processes a licence application;

- (b) the proposed local consultation arrangement;
- (c) the transitional arrangement; and
- (d) any specific measures to facilitate the development of “home-stay lodging” in Hong Kong.

4. With Members’ general support, we have been working with the Department of Justice (DoJ) on the drafting of the Hotel and Guesthouse Accommodation (Amendment) Bill (the Bill). In the course of drafting, we have identified areas for refinement. Meanwhile, we implemented a series of administrative enhancement measures with effect from 28 December 2015. In the light of experience and feedback from the trade and stakeholders, we have introduced further refinements to the administrative measures in early 2017.

5. The present position of the various legislative proposals presented to the HA Panel in March 2015 and our further legislative proposals, as well as the implementation of the administrative measures are set out in paragraphs 6 to 17 below. A consolidated table, setting out (i) the proposals in the 2014 Consultation Paper; (ii) the proposals presented to the HA Panel on 24 March 2015; and (iii) the present position and further legislative proposals, is at **Annex**.

Present Position

Major Proposed Amendments to the HAGAO

6. We have been working closely with the DoJ on the drafting of the proposed legislative amendments to the HAGAO, covering the following five main areas, viz. –

- (a) **DMC considerations**

The Authority will be empowered to take into account whether the DMC of the building in which the premises under a new / renewal licence application are located contains any express provision which prohibits the premises concerned to be used (i) as a hotel or

¹ In accordance with section 4(1) of the HAGAO, the Secretary for Home Affairs is the Authority of the Ordinance.

guesthouse, (ii) for commercial purpose or (iii) for any purpose other than for private residential purpose. Applicants will be required to provide a certificate signed by a legal practitioner affirming that there are no such explicit restrictive provisions in the DMC.

(b) Local consultation

The Authority will be empowered, in processing a new or renewal licence application, to take into account the recommendations made by an administrative independent panel, after considering the views submitted by the residents living in the same building and the applicant's responses. To ensure fairness and consistency in assessing local views, a set of guiding principles will be drawn up for the panel's reference. Reference will be made to the established guidelines of other licensing authorities.

(c) Licensee to be a "fit and proper" person

The applicant (including a body corporate) must be a "fit and proper" person. The Authority may refuse to issue/renew a licence if the applicant or a related person² fails to meet this requirement.

(d) Enhanced enforcement powers

The Authority will be empowered to (i) rely on circumstantial evidence showing that any premises are used as an unlicensed guesthouse, to prosecute the owner, tenant, or occupier, who will be liable, unless the statutory defence is met (i.e. they do not have control over the use of the premises); (ii) apply for a search warrant to break into a suspected unlicensed guesthouse; and (iii) apply for a closure order against an unlicensed guesthouse if there is a previous conviction in respect of the premises concerned within a specified period.

(e) Greater deterrence

The maximum fines for operating unlicensed guesthouses will be increased from \$200,000 to \$500,000 and imprisonment from 2 years to 3 years.

² As an application can be made by a body corporate, a "related person" covers the applicant, a director, a person concerned in the management, or a company secretary of the body corporate.

Further Proposed Amendments to HAGAO

Land Lease Considerations

7. In the course of incorporating the DMC considerations into the proposed legislative amendments, we have identified multi-storey buildings with licensed hotels or guesthouses that are without DMCs. For example, there may be multi-storey buildings under sole ownership in which individual floors are rented out for different commercial activities, including hotels and guesthouses; or low-rise/ bungalow type buildings under sole ownership operating as a hotel or guesthouse. To ensure that the operation of hotel or guesthouse is permissible in buildings without DMCs, we **propose** that the Authority should take into account any land use restrictions in the land lease when processing applications concerning premises without DMCs, and the applicant concerned should, as with buildings with DMC, provide a certificate signed by a legal practitioner affirming that there are no explicit restrictive provisions in the land lease prohibiting the premises concerned (i) to be used as a hotel or guesthouse, (ii) for commercial purpose or (iii) for any purpose other than for private residential purpose.

Local Consultation

8. Our earlier proposal to take into account the views of residents living in the same building and the applicant's responses in the licensing process was mainly targeted at premises in multi-storey / multi-ownership buildings with DMCs. Having regard to the variations of applications under the HAGAO involving different types of premises as per those mentioned in paragraph 7 above, we **propose** that all applications, whether for hotel or guesthouse licences, should be subject to one consultation, either –

- (a) where statutory consultation, e.g. consultation conducted by the Town Planning Board (TPB) in the context of the Outline Zoning Plan for the proposed hotel/guesthouse use, has been or will be conducted, the application will be exempted from the administrative consultation under the HAGAO; or
- (b) if no statutory consultation has been or will be conducted on the proposed use as hotel or guesthouse, an administrative consultation under the HAGAO should be conducted.

9. We **propose** that, for premises which are subject to the

administrative consultation arrangement under the HAGAO, the scope of consultation should depend on whether the premises –

- (a) form part of a building (typically premises in multi-storey / multi-ownership buildings with DMCs), in which case, the owners, residents and business operators in the same building should be consulted; or
- (b) take up a whole building, in which case, affected persons including business operators in the vicinity³ should be consulted.

10. We **propose** to set out the details for conducting local consultation in the administrative guidelines to be promulgated by the Authority after the passage of the Bill, with a view to maintaining flexibility and catering for changing circumstances and future developments.

Administrative Enhancement Measures

11. To enhance the safety and management of hotels and guesthouses under the HAGAO, the Authority has, with effect from 28 December 2015, implemented three administrative enhancement measures as follows –

- (a) Third party risks insurance
All licensees are required to procure a third party risks insurance policy with a minimum limit of indemnity of \$10 million per event.
- (b) Different types of licences
Having regard to the approved use of the premises, four different types of licences are issued, i.e. –
 - (i) “hotel licence” for purpose-built hotels;
 - (ii) “guesthouse (general) licence” for short-term sleeping accommodation located in residential buildings;
 - (iii) “guesthouse (holiday camp) licence” for short-term sleeping accommodation within camp sites;
 - (iv) “guesthouse (holiday flat) licence” for short-term sleeping accommodation in village type houses in the New Territories.

³ Reference can be made to the guidelines and existing practice adopted for conducting local consultation in respect of applications for various types of licences (e.g. liquor licence under the Dutiable Commodities Ordinance (Cap. 109) and amusement game centre licence under the Amusement Game Centres Ordinance (Cap. 435)).

Guesthouse licensees are required to indicate clearly the words “(licensed guesthouse)” in all promotional materials or advertisements related to the guesthouse.

(c) 24-hour manned counter

A 24-hour manned counter is required to be set up in premises licensed as a “guesthouse (general)”.

12. All new licence applications received on or after 28 December 2015 have to comply with the above measures. Existing licensees were given a grace period of 12 months upon licence renewal to comply. Starting from 28 December 2016, all existing licensees, whose 12-month grace period has lapsed, have to comply with the three administrative measures upon licence renewal, failing which their applications will not be renewed. Overall speaking, licensees have been able to comply with these measures. Details since 28 December 2016 are as follows –

(a) Third-party risks insurance

Up to 31 May 2017, of the 695 licences which are subject to this requirement upon application / renewal (i.e. 12-month grace period expired), 389 (56%) have complied with the requirement, and the remaining 306 applications are being processed by the Authority. Moreover, 228 out of the 1,230 licences which have not yet expired or are still entitled to the 12-month grace period, had voluntarily complied with this requirement, making up a total of 617 licensees complying with the requirement.

(b) Different types of licences

The number of each of the four types of licences is tabulated below –

Type of Licences		Number (as at 31.5.2017)
(i)	Hotel	286
(ii)	Guesthouse (General)	1 454
(iii)	Guesthouse (Holiday Camp)	47
(iv)	Guesthouse (Holiday Flat)	138
Total		1 925

In the course of conducting annual and ad hoc inspections, the Authority has found that guesthouse licensees have generally complied with the requirement to indicate clearly the words “(licensed guesthouse)” in their promotional materials or advertisements.

(c) 24-hour manned counter

Up to 31 May 2017, of the 603 guesthouse (general) licences which are subject to this requirement upon application / renewal (i.e. 12-month grace period expired), 290 (48%) have complied with the requirement, and the remaining 313 applications are being processed by the Authority. Moreover, 143 of the 851 licences which have not yet expired or are still entitled to the 12-month grace period had voluntarily complied with this requirement, making a total of 433 guesthouses in compliance, either by setting up physical counters, or by adopting alternative arrangements in compliance with the “*Supplementary Guideline on the Provision of 24-hour Manned Counter*” promulgated by the Authority on 3 January 2017. The *Supplementary Guideline* sets out clear criteria⁴ to facilitate preparation of alternative proposals if there are insurmountable constraints to set up a 24-hour manned counter. Of the 433 guesthouses complying with this requirement, the situation is tabulated below –

Position as at 31.5.2017	Number of Guesthouses
(i) Physical counters	179
(ii) Complying alternative arrangements	254
(iii) Total (i) + (ii)	433

The Authority will continue to monitor the situation and adopt a flexible approach in handling alternative proposals for the requirement to set up a 24-hour manned counter.

Transitional Arrangement

13. At the Panel meeting in 2015, we proposed that existing licences would be renewed once, for a period of 12 months, after commencement of the Bill, on the basis of the existing licensing requirements. With the introduction of the three administrative measures and the 12-month grace period, the Authority reduced the duration of all “Guesthouse (General)” and “Guesthouse (Holiday Flat)” licences to one year with effect from 28 December 2015.

14. Taking into account the general compliance by the guesthouse licensees with the three administrative measures and the trade’s request for

⁴ Applicants should, within areas proved to be under their management, offer means of 24-hour manned direct communication and proposals to effectively monitor the situation in the guesthouse. They should also pledge that assistance will be provided or requests attended within around 20 minutes from the time of a patron’s call.

a longer licence duration in view of the lead time to complete the legislative exercise, and in order to better prepare existing licensees to migrate to the new regime, we have resumed issuing 3-year “Guesthouse (General)” and “Guesthouse (Holiday Flat)” licences with effect from 1 March 2017, provided that (i) the applications have complied with the administrative measures and (ii) there is no indication that the operation of “hotel” and “guesthouse” in the premises concerned will contravene restrictive provisions in the DMC, failing (ii), only 1-year licences will be issued.

Development of Home-stay Lodging

15. At the HA Panel meeting in 2015, Members enquired about possible measures under the HAGAO to facilitate the development of “home-stay lodging”. The development of home-stay lodging may involve land use, planning, tourism, environmental and transport issues, which are under the purview of different bureaux and departments.

16. If the home-stay lodging involves the provision of temporary sleeping accommodation within the meaning of “hotel” and “guesthouse” under the HAGAO⁵, a licence is required. In this regard, we have promulgated a set of *Guidelines on Applications for Guesthouse (Holiday Flat)* in 2014, which is designed for New Territories Exempted Houses (NTEH). The Guidelines set out the fire and structural safety requirements for Holiday Flats, which are generally more relaxed as compared to those applicable to “Guesthouse (General)”. The Authority will conduct site inspection on receipt of individual applications, and adopt a flexible and pragmatic approach in accepting alternative proposals, provided that fire and building safety are not compromised. As at 31 May 2017, we have issued more than 130 Guesthouse (Holiday Flat) licences to NTEH.

17. We note that there is both demand for and supply of “home-stay lodging” in Hong Kong as with other places, and that this unique type of short-term accommodation may help attract tourists who look for different

⁵ According to section 2 of HAGAO, “hotel” and “guesthouse” mean “any premises whose occupier, proprietor or tenant holds out that, to the extent of his available accommodation, he will provide sleeping accommodation for any person presenting himself who appears able and willing to pay a reasonable sum for the services and facilities provided and is in a fit state to be received.” Pursuant to the Hotel and Guesthouse Accommodation (Exclusion) Order (Cap. 349C), “premises in which all accommodation is exclusively provided on the basis of a minimum period of 28 continuous days for each letting and no waiver, refund or reduction of fees will be made if the letting is for any reason shortened to less than 28 continuous days”, among others, are excluded from the application of HAGAO.

accommodation experience. For instance, some owners of residential units in multi-storey buildings may want to lease their own flat or a room in their apartment as short-term accommodation to tourists. It is however important that in considering any licensing regime for “home-stay lodging”, the necessary fire and building requirements must not be compromised. We are exploring with relevant bureaux and departments the idea of drawing up a set of guidelines to cater for licence applications for home-stay lodging with a view to simplifying the licence requirements provided that fire and building safety will not be compromised.

Financial and Staffing Implications

18. The new licensing regime under the HAGAO and the implementation of the various administrative measures will entail additional manpower, and have implications on the licence fees. In the meantime, we will assess the manpower implications and seek additional resources as necessary in accordance with the established resource allocation mechanism. We will review the licence fee level and structure in the light of implementation experience under the new regime.

Way Forward

19. We will continue to work closely with the DoJ to finalise the proposed legislative amendments to the HAGAO, with a view to introducing an Amendment Bill into LegCo in 2017-18 legislative year. Meanwhile, we will continue to monitor the implementation of various administrative measures to ensure the safety and safeguard the interest of tourists patronising licensed hotels and guesthouses in Hong Kong.

Advice Sought

20. Members are invited to note the progress of the Review of the HAGAO and comment on the further legislative proposals set out in this paper.

Home Affairs Department
July 2017

Consolidated Proposals in (i) the Consultation Paper on Review of the Hotel and Guesthouse Accommodation Ordinance (Cap. 349) (HAGAO) in July 2014, (ii) the Paper for the Legislative Council Panel on Home Affairs (HA Panel) in March 2015 and (iii) the Latest Position in 2017

(A) Consultation Paper on Review of HAGAO in 2014	(B) Proposals in the HA Panel Paper in 2015	(C) Latest Position in 2017
(I) <u>Enhancing the Licensing Regime</u>		
(a) Consideration of Land Documents		
<ol style="list-style-type: none"> 1. To enable the Authority to refuse to issue/renew licences or cancel the existing licences where the DMC of the building concerned contains explicit restrictive provisions stipulating that guesthouse operations or commercial activities are not allowed in the building concerned, or the premises are for “private residential use” only. 2. To require the applicant to submit a certificate signed by a solicitor affirming that there are no such explicit restrictive provisions in the DMC. 	<ol style="list-style-type: none"> 1. To adopt item (1) in Column A. 	<ol style="list-style-type: none"> 1. Apart from DMC considerations, to empower the Authority to take into account any land use restrictions in the land lease when processing applications concerning premises without DMCs. 2. Applicants concerned should provide a certificate signed by a legal practitioner affirming that there are no explicit restrictive provisions in the DMC (and without which the land lease), prohibiting the premises concerned to be used as (i) a hotel or guesthouse, (ii) for commercial purpose or (iii) for any purpose other than for private residential purpose.

(A) Consultation Paper on Review of HAGAO in 2014	(B) Proposals in the HA Panel Paper in 2015	(C) Latest Position in 2017
(b) Consideration of Views from Residents		
<p>3. To enable the Authority to take into account local views by one of the following three options –</p> <ul style="list-style-type: none"> (i) To conduct local consultation through District Officers (DOs) (ii) To set up an independent panel to consider local views (iii) To set up a new statutory body responsible for the licensing work. 	<p>2. To adopt item 3(ii) in Column A.</p> <p>3. Views to be taken into account will be submitted by residents living in the same building.</p> <p>4. To ensure fairness and consistency in assessing local views, a set of guiding principles will be drawn up for panel members' reference. Reference to be made to the established guidelines of other licensing authorities.</p>	<p>3. All applications, whether for hotel or guesthouse licences, should be subject to one consultation, either –</p> <ul style="list-style-type: none"> (a) a <u>statutory consultation</u>, e.g. consultation conducted by the Town Planning Board in the context of Outline Zoning Plan for the proposed use, in which case they will be exempted from the administrative consultation under HAGAO; or (b) if a statutory consultation is not required for the proposed use, an <u>administrative advisory consultation</u> under HAGAO. <p>4. For premises which have to be subject to the administrative consultation arrangement under HAGAO, the scope of consultation should depend on whether the premises –</p> <ul style="list-style-type: none"> (a) form <u>part of a building</u> (typically premises in multi-storey / multi-ownership buildings with DMCs), in which case, the owners, residents and business operators in the same building will be consulted;

(A) Consultation Paper on Review of HAGAO in 2014	(B) Proposals in the HA Panel Paper in 2015	(C) Latest Position in 2017
		<p>or</p> <p>(b) are a <u>whole building</u>, in which case, affected persons including business operators in the vicinity will be consulted, and depending on the location of the whole building, the scope of the vicinity may vary.</p>
(c) Requirement on Applicants to be “Fit and Proper”		
<p>4. To require the applicant to be “fit and proper”, having regard to whether the applicant (including every partner or director if the applicant is a partnership and company respectively) –</p> <ul style="list-style-type: none"> (i) has been convicted of an offence against any provision of the Ordinance (ii) has been convicted, whether in Hong Kong or elsewhere, of a criminal offence involving fraud or dishonesty (iii) is an undischarged bankrupt (in the case of an individual) or is in liquidation or the subject of a winding up order (in the case of a body corporate); or (iv) is a mentally disordered person. 	<p>5. To adopt item (4) in Column A.</p>	<p>5. Liaising with the DoJ on the drafting of the relevant provisions. Drawing reference to other enactments, details e.g. period of conviction record will be set out in administrative guidelines.</p>

(A) Consultation Paper on Review of HAGAO in 2014	(B) Proposals in the HA Panel Paper in 2015	(C) Latest Position in 2017
(II) <u>Enhanced Enforcement Powers</u>		
(a) “Deeming Provision” and Circumstantial Evidence		
<p>5. To add new “deeming provisions” to the effect that until the contrary is proved, any premises which are found to be offering or have provided short-term sleeping accommodation at a fee shall be deemed to be used as a guesthouse.</p> <p>6. Property owner, tenant or occupier of the premises should be deemed to be the operator of the guesthouses.</p>	<p>6. To introduce a new “strict liability” offence (instead of a “deeming provision” owing to human right concerns).</p> <p>7. To specify in the provisions that any premises must not be used as a guesthouse without a valid licence. If there is sufficient evidence, circumstantial or otherwise, showing that any premises are used as unlicensed guesthouse, the owner, tenant, or occupier will be liable.</p> <p>8. To provide a statutory defence for innocent parties that do not have control over the use of the premises.</p>	<p>6. Liaising with the DoJ on the drafting of the relevant provisions.</p>
(b) Entry to a Suspected Unlicensed Guesthouse		
<p>7. To allow the Authority to apply to the Magistrate’s Court for warrants to facilitate its public officers to enter into, and break in if necessary, individual premises for inspection and enforcement actions.</p>	<p>9. To adopt item (7) in Column A.</p>	<p>7. Liaising with the DoJ on the drafting of the relevant provisions.</p>

(A) Consultation Paper on Review of HAGAO in 2014	(B) Proposals in the HA Panel Paper in 2015	(C) Latest Position in 2017
(III) <u>Greater Deterrence</u>		
(a) Imposition of Heavier Penalties		
8. To increase the maximum fines for operating unlicensed guesthouses from \$200,000 to \$500,000 and imprisonment from 2 years to 3 years.	10. To adopt item (8) in Column A.	8. Liaising with the DoJ on the drafting of the relevant provisions.
(b) Closure of Premises		
<p>9. To empower the Authority to apply to the Court, upon the second conviction of an unlicensed guesthouse, to issue a Closure Order against relevant premises for six months.</p> <p>10. Reference to be made to the established practice of closing vice establishments pursuant to relevant provisions in the Crimes Ordinance (Cap. 200).</p>	11. To adopt items (9) and (10) in Column A.	9. Liaising with the DoJ on the drafting of the relevant provisions.
(IV) <u>Transitional Arrangement</u>		
Nil	12. To empower the Authority to renew the existing licences once, for a period of 12 months, after commencement of the Bill on the basis of the existing licensing requirements.	10. In response to the trade's request for a longer licence duration and taking into account the lead time for completing the legislative exercise, to better prepare existing licensees to migrate to the new regime, the Authority has resumed

(A) Consultation Paper on Review of HAGAO in 2014	(B) Proposals in the HA Panel Paper in 2015	(C) Latest Position in 2017
	<p>13. To issue a special alert to the affected operators of the new licensing requirements and advise them to seek legal advice as early as possible.</p> <p>14. Priority be given to the processing of relocation applications.</p>	<p>issuing 3-year “Guesthouse (General)” and “Guesthouse (Holiday Flat)” licences with effect from 1 March 2017, provided that (i) the applications have complied with the administrative measures and (ii) there is no indication that the operation of “hotel” and “guesthouse” in the premises concerned will contravene restrictive provisions in the DMC, failing (ii), only 1-year licence will be issued.</p>
(V) <u>Administrative Enhancement Measures</u>		
(a) Third Party Risks Insurance		
<p>11. To require the licensees to procure third-party risk insurance for their guesthouses.</p>	<p>15. To include a new condition in the guesthouse licences (for both new and renewed licences) requiring the procurement of third party risks insurance with the minimum insured amount of \$10 million per event.</p>	<p>11. All licensees are required to procure a third party risks insurance policy with a minimum limit of indemnity of \$10 million per event.</p> <p>12. Up to 31 May 2017, of the 695 licences which are subject to this requirement upon application / renewal (i.e. 12-month grace period expired), 389 (56%) have complied with the requirement, and the remaining 306 applications are being processed by the Authority. Moreover, 228 licences,</p>

(A) Consultation Paper on Review of HAGAO in 2014	(B) Proposals in the HA Panel Paper in 2015	(C) Latest Position in 2017
		which are still entitled to the 12-month grace period, had voluntarily complied with this requirement, making up a total of 617 licensees complying with the requirement.
(b) Continuous and Personal Supervision		
12. To specify in the licensing conditions that the licensee shall provide a 24-hour manned reception counter inside their guesthouses.	16. To include a new condition in the guesthouse licences (for both new and renewed licences) requiring the provision of a 24-hour manned counter in the guesthouses. 17. If there are insurmountable physical constraints in the premises, the applicant may submit an alternative proposal for the Authority's consideration and approval.	13. The Authority promulgated on 3 January 2017 the " <i>Supplementary Guideline on the Provision of 24-hour Manned Counter</i> ", which sets out the following criteria for an alternative proposal to meet the requirement – (a) To provide some other means of 24-hour manned direct communication between the guesthouse operator and patrons, in tandem with the installation of closed-circuit television; (b) Licensee / applicant to pledge that assistance would be provided and requests attended to at the guesthouse concerned within around 20 minutes from the time of a patron's call; and (c) To provide documentary proof that the means of 24-hour manned direct communication and the installation of CCTV are in a location under

(A) Consultation Paper on Review of HAGAO in 2014	(B) Proposals in the HA Panel Paper in 2015	(C) Latest Position in 2017
		<p>management / control.</p> <p>14. Up to 31 May 2017, of the 603 guesthouse (general) licences which are subject to this requirement upon application / renewal (i.e. 12-month grace period expired), 290 (48%) have complied with the requirement, and the remaining 313 applications are still being processed by the Authority. Moreover, 143 licences, which are still entitled to the 12-month grace period, had voluntarily complied with this requirement, making up a total of 433 guesthouses complying with the requirement.</p>
(c) Different Types of Licences		
<p>13. To issue “hotel licence” to purpose-built hotels and “guesthouse licence” to other types of short-term sleeping accommodation located in residential buildings.</p>	<p>18. To issue four types of licences based on the use of the premises approved or accepted by the other authorities i.e. Buildings Authority and the Director of Lands, etc. –</p> <ul style="list-style-type: none"> (a) “hotel licence” for purpose-built hotels; (b) “guesthouse licence” for short-term sleeping accommodation located in residential buildings; (c) “holiday camp licence” for short-term sleeping accommodation 	<p>15. To issue hotel licence and the three types of guesthouse licences, namely, guesthouse (general), guesthouse (holiday camp) and guesthouse (holiday flat).</p> <p>16. Guesthouse licensees should indicate clearly “(licensed guesthouse)” in all promotional materials/advertisements related to the guesthouse. The font size shall not be smaller than the smallest print of the promotional</p>

(A) Consultation Paper on Review of HAGAO in 2014	(B) Proposals in the HA Panel Paper in 2015	(C) Latest Position in 2017
	<p>within camp sites;</p> <p>(d) “holiday flat licence” for short-term sleeping accommodation in village type houses in the New Territories.</p> <p>19. To specify in the licence condition that other than hotel licensees, holders of other licences shall not use the word “hotel” in their business names.</p>	<p>materials/advertisements.</p> <p>17. Liaising with the DoJ on item (19) in Column B.</p>
