香港房屋委員會 Hong Kong Housing Authority

Your Ref.: CB4/PAC/R81

Our Ref.: HD 3-8/SD/BW-5/8/15 (C)

Tel. No. : 2761 5878 Fax. No. : 2761 7630

8 January 2024

Clerk to Public Accounts Committee Legislative Council Complex 1 Legislative Council Road Central, Hong Kong (Attention: Ms. Shirley CHAN) By Email

Dear Ms. CHAN,

Public Accounts Committee Chapter 3 of the Director of Audit's Report No. 81 Maintenance and Modernisation of Lifts and Escalators in Public Rental Housing Estates

I refer to your letter dated 21 December 2023 to the Secretary for Housing concerning the captioned. Having consulted the relevant department, please find our response in the **Annex** to this letter to facilitate consideration of the matter by the members of the Public Accounts Committee.

Yours faithfully,

(HONG Wing-kit) for Secretary for Housing

Encl.

c.c. Secretary for Financial Services and the Treasury (email: sfst@fstb.gov.hk)
Director of Housing (email: psh@housingauthority.gov.hk)
Director of Electrical and Mechanical Services (email: ericpang@emsd.gov.hk)
Director of Audit (email: ncylam@aud.gov.hk)

香港九龍何文田佛光街 33 號房屋委員會總辦事處

Housing Authority Headquarters, 33, Fat Kwong Street, Ho Man Tin, Kowloon, Hong Kong.

Consideration of Chapter 3 of the Director of Audit's Report No. 81 (the Audit Report) Maintenance and Modernisation of Lifts and Escalators in Public Rental Housing Estates

Response from the Housing Bureau to Information Requested by Public Accounts Committee on 21 December 2023

Part 1: Introduction

- (a) Referring to paragraph 1.5 of the Audit Report regarding 173 cases of lift malfunctioning from 2006 to 2010 causing injury to over 20 people and an incident relating to lift plunging in Fu Shin Estate in Tai Po in 2008, please advise:
 - the respective numbers of incidents relating to lifts and escalators ("L/Es") in public rental housing ("PRH") estates causing injury to people in the past three years with information on the causes and conditions of the injuries arising from such incidents; and
 - (ii) preventive measures taken/to be taken by the Housing Department ("HD") to reduce the numbers of L/E incidents in PRH estates.

Response from the Housing Bureau

- (a) (i) From January 2020 to September 2023, there were three reported incidents of injury to passengers each in L/Es of PRH estates managed by the Housing Department (HD), please refer to **Appendix 1(a)(i)** for details.
 - (ii) HD has always attached great importance to the service and safety of L/Es, and adopted proprietary maintenance requiring the original manufacturers to take full responsibility for the design, installation, maintenance and repairs of the L/Es, and to provide spare parts and technical support directly. also proactively monitors the work of contractors and requires them to carry out periodic maintenance on a weekly basis to ensure the normal operation of L/Es. In addition, approximately 20% of the breakdown cases of lifts were caused by human behavior or environmental factors (e.g. obstruction of the normal opening/closing of lift doors by foreign objects), and the breakdown rate of escalators is even higher. HD will continue its education work to raise the public awareness on the proper and safe use of L/Es, and

strictly implement the "Marking Scheme for Estate Management Enforcement" to combat malicious damage.

On the other hand, the Housing Bureau (HB) is collaborating with the Hong Kong Applied Science and Technology Research Institute (ASTRI) to develop an Artificial Intelligence (AI) Predictive Maintenance System for lifts to analyse Internet of Things (IoT) data, and to obtain the data pattern of lift operations to effectively predict the lift breakdown patterns.

- (b) With reference to paragraph 1.6 of the Audit Report, please advise:
 - whether HD considers the proprietary maintenance arrangement for L/Es, which has been adopted since 1983, is still effective and reliable given the inadequacies identified by the Audit Commission in the maintenance of L/Es in PRH estates; if yes, why; if not, whether HD will review the current maintenance strategy for L/Es in PRH estates;
 - (ii) the respective responsibilities and liabilities for the original manufacturers/installers of L/Es in PRH estates under the term maintenance contracts ("TMCs") engaged with HD and the Lifts and Escalators Ordinance (Cap. 618), as well as the legal consequences to be borne by them for breaching the relevant TMCs and Cap. 618; and
 - (iii) whether the proprietary maintenance arrangement for L/Es has created a disincentive for contractors to maintain adequate level of service and performance, and will undermine the competitiveness of tendering exercises; if yes, the counter measures; if not, why not.

Response from the Housing Bureau

(b) (i) The design of L/Es involves a number of mechanical parts and electronic components. Each brand has its own unique features, and the electronic components used also have to be compatible with each other. Under the proprietary maintenance, the manufacturer/installer takes full responsibility for the L/Es, and provide spare parts and technical support directly for maintenance and repair services at all times. Hence, the adoption of proprietary maintenance

is an important element in safeguarding the safety and serviceability of L/Es.

As mentioned in the Audit Report, HD's lift breakdown rate has been on a decreasing trend from January 2020 to April 2023 (a total of 40 months), with an average breakdown rate of 0.13 and 0.16 respectively for the whole period, i.e. on average, there were less than one breakdown case for each lift and each escalator every six months. Meanwhile, services of 99% of lift breakdowns and 98% of escalator breakdowns could be resumed within two days and there were no serious incidents during the period. This shows that the L/Es have been maintained in good service condition under the proprietary maintenance. While the adoption of proprietary maintenance will be maintained, HD will continue to keep abreast of the situation and review the arrangement when necessary.

(ii) Under the proprietary maintenance, if any mechanical or safety problems are found in a lift or escalator, the manufacturer, installer or maintenance contractor is held responsible. If the performance of the contractor is found unsatisfactory, HD will follow up appropriately, such as issuing warning letters or adverse reports, suspending the contractor concerned from tendering for new works contracts, etc., depending on the circumstances. In addition, if the contractor fails to resume the normal service of lift/escalator for more than 60 days, HD may deduct the maintenance payment in accordance with the contract terms.

The relevant contractors, engineers and workers must register under the Lifts and Escalators Ordinance (Cap. 618 of the Laws of Hong Kong, hereinafter referred to as "the Ordinance") and are required to carry out lift/escalator works in accordance with the requirements of the Ordinance, the Lifts and Escalators (General) Regulations (Cap. 618A of the Laws of Hong Kong, hereinafter referred to as "the General Regulations"), and the Code of Practice on Lift Works and Escalator Works (hereinafter referred to as "the Code of Practice") issued under the Ordinance. In case of noncompliance, the relevant contractors, engineers and workers are liable to fines or imprisonment, please refer to our response to item (t)(i) for details.

- HD assesses the performance of lift contractors on a monthly (iii) basis through the Building Services Maintenance Assessment Scoring System (BSMASS). This performance score is one of the important assessment criteria for the Housing Authority (HA)'s tenders for the construction of new PRH estates and installation of new lifts/escalators, and hence has direct impact the contractors' opportunity of winning tenders. Contractors need to strive for good performance maintenance works in order to enhance the opportunity of successful tendering for new lift/escalator works. contractors have great incentives to continuously improve the quality of their maintenance works. In addition, HD may terminate the maintenance contracts of contractors in case of persistent poor performance.
- (c) According to paragraph 1.7 of the Audit Report, the total maintenance expenditure in 2022-2023 for 6 050 lifts and 277 escalators located in 193 PRH estates was \$763.2 million. Please advise:
 - (i) the average maintenance cost of each L/E in PRH estates, and details of the comparison with those of the private sector; and
 - (ii) whether the more stringent requirements adopted by HD in TMCs for routine maintenance and inspection works than the statutory requirements as mentioned in paragraph 2.8 of the Audit Report would incur additional expenditure on the maintenance of L/Es in PRH estates; if yes, the amount involved and the percentage of such additional expenditure in the total maintenance expenditure; and whether HD considers such practice necessary and cost-effective.

- (c) (i) & In 2022/23, the average monthly maintenance cost per HD's
 - lift was \$10,300, while the average monthly maintenance cost per lift in private residential buildings (based on buildings with more storeys) had exceeded \$10,000^{Note}. The usage of lifts in PRH estates is higher than that of private residential estates in general, and hence the lifts maintained by HD need to maintain a higher level of serviceability. In order to provide PRH residents with safer and more reliable lift services, HD has stipulated more stringent requirements in the lift maintenance contracts than the statutory requirements. For example, the

Ordinance requires lift contractors to carry out periodic maintenance for lifts at least once a month, i.e. 12 times a year, whereas HD requires contractors to carry out periodic maintenance once a week, i.e. 52 times a year. Therefore, the number of periodic maintenance for each lift is 40 times more than that of the statutory requirement. While HD requires a higher frequency of routine maintenance than the minimum statutory requirement, the maintenance cost of HD is similar to that of the private market.

In the same financial year, the average monthly maintenance cost per HD's escalator was \$5,300. As Electrical and Mechanical Services Department (EMSD) does not disclose the cost data of escalator maintenance for private buildings, we do not have public data for comparison.

Note: Reference was made to the Maintenance Price Figures for Lifts at Private Residential Premises released regularly by EMSD on its website.

- (d) With reference to Table 2 in paragraph 1.9 of the Audit Report, please provide:
 - (i) the reasons for the relatively small numbers of contracts awarded and lifts included in 2022-2023 as shown in Table 2 under the Lift Modernisation ("LM") Programme when compared with the last four financial years; and
 - (ii) the number of contracts awarded to the original manufacturers/installers and the percentage of such contracts in the total number of contracts awarded under LM Programme during the period from 2018-2019 to 2022-2023.

Response from the Housing Bureau

(d) (i) HD invites tender for modernisation works for about 80 to 90 lifts every year. Table 2 shows the number of contracts awarded in that financial year but not the number of projects tendered. Due to the time required for vetting and approving tender documents, it normally takes several months for HD to award the contract after tender closing. Hence, Table 2 cannot fully reflect the total number of lift modernisation (LM) works tendered in a particular year. This is also the reason why some of the contracts awarded will be reflected in the figures of the following financial year. For example, projects

tendered in February 2019 (i.e. for the 2018/19 financial year) will only be awarded in the 2019/2020 financial year. As a result, certain financial years may appear to involve a relatively small number of lifts. The total number of lifts awarded in 2018/2019 and 2019/2020 is 157, i.e. an average of 78 lifts per year. As compared to the total of 165 lifts in 2020/2021 and 2021/2022, i.e. an average of 82 lifts per year, which is in line with the annual target of 80 to 90 lifts.

A total of 77 lifts were planned to be tendered in the 2022/23 financial year. As at 31 March 2023, contracts for 60 of these lifts had been awarded; the documents of another 17 returned tenders were under assessment, and it would be included in the records of the 2023/24 financial year.

- (ii) HD has awarded a total of 27 LM contracts from 2018/19 to 2022/23, of which six contracts (22.2%) were awarded to the original lift manufacturers/installers.
- (e) With reference to Table 3 in paragraph 1.13 of the Audit Report, please provide/advise:
 - (i) the details of the lift breakdown incident with passengers trapped for 206 minutes; and
 - (ii) improvement measures taken/to be taken by HD to facilitate early identification of irregularities of lifts in PRH estates so that lift trapping incidents can be avoided as far as possible.

Response from the Housing Bureau

In that case, the contractor arrived the site after 23 minutes (e) (i) upon receipt of the emergency call, meeting the performance pledge. Upon inspection, the lift workers found that the lift was parked in the midway of the lift shaft, which was not close to the landing door, and hence on-site assistance from the firemen was required in rescuing the trapped passengers. the same time, estate management (EM) staff comforted the trapped passengers on site and provided support. arrival, the firemen assessed how the trapped passengers should be rescued and eventually decided that the High Angle Rescue Team should be engaged to assist in rescuing the Given the complexity of the case, trapped passenger. rescuing the trapped passengers was relatively timeconsuming.

- (ii) HB signed a Memorandum of Understanding (MOU) with ASTRI in November 2023 to, among other things, study the application of an AI Predictive Maintenance System for lifts to analyse IoT data, and to obtain the data pattern of lift operations to effectively predict the lift breakdown patterns, and then carry out preventive and targeted maintenance, so as to reduce the chances of trapping passengers due to lift breakdowns.
- (f) With reference to paragraph 1.14 of the Audit Report, please explain:
 - (i) detailed operation of the "three-tier regulatory control mechanism" put in place by HD for the maintenance of L/Es in PRH estates;
 - (ii) how such mechanism can achieve economy, efficiency and effectiveness in ensuring the safety of L/Es in PRH estates; and
 - (iii) whether such mechanism can be further streamlined to improve efficiency and reduce the number of suspension of service for inspection purpose which may cause inconvenience to L/E users.

- (f) (i), HD has put in place a comprehensive system to closely
 - (ii) & monitor the works of lift and escalator contractors. The
 - (iii) system can be summarised into three tiers:

1) Monitoring by district offices

District Maintenance Offices (DMOs) and Property Services Agents (PSAs) are responsible for the day-to-day monitoring of lift and escalator contractors and conduct biannual assessment of each lift and escalator with the assistance of the contractors by inspecting the plant rooms, lift shafts and lift landings to check the operational conditions of L/Es as well as the conditions of the major components.

2) <u>Inspection by headquarters staff</u>

The Central Services Team (CST) conducts additional surprise checks for the maintenance of L/Es. This arrangement aims to ensure effective monitoring of contractors' performance by DMOs/PSAs through

independent checking on the overall operation of L/Es by senior technical staffs at headquarters level. The surprise checks by CST, headed by the Chief Technical Officer of HD, are conducted having regard to the actual situation or the occurrence of special incidents, and hence the focus of each check may vary. In addition, CST makes appropriate improvement suggestions to DMOs/PSAs and reviews the safety standards and works of the lift and escalator contractors to ensure that they are in compliance with the requirements of the maintenance contracts.

3) <u>Sample independent checks conducted by the Lift</u> Inspection Focus Team

The Lift Inspection Focus Team under the Independent Checking Unit conducts sample independent checks on L/Es maintained by HD to check their safety standards and performance against the statutory requirements.

The monitoring work and scope of the above three tiers are different. We will continue to review and enhance the existing monitoring system, such as exploring ways to shorten the inspection time, coordinating the inspection schedules of different tiers, and considering integrating the inspections by district and headquarters staff, so as to minimise the number of suspensions of lifts for inspection and the impact on residents.

Part 2: Maintenance of lifts and escalators

(g) With reference to paragraph 2.2 of the Audit Report, please advise the measures to enhance the serviceability of those L/Es with high breakdown rates but not included under LM Programme for replacement.

Response from the Housing Bureau

(g) HD has always been monitoring the maintenance performance of contractors through the three tiers mentioned above, so as to identify areas requiring attention or rectification in maintenance of L/Es and reduce the breakdown rate. In addition, in collaboration with ASTRI, HD has actively explored the application of technology to enhance the level of lift service, including the application of AI Predictive Maintenance System for lifts to analyse IoT data, and to obtain the data pattern of lift operations to effectively predict the lift breakdown patterns, and carry out preventive maintenance to improve the serviceability of lifts.

- (h) With reference to paragraph 2.3(b) of the Audit Report and your reply letter dated 13 December 2023, please advise:
 - (i) whether the seven lifts which had service suspended for over two days twice within six months have been included under LM Programme for early replacement;
 - (ii) whether HD had imposed any penalties in accordance with TMC on the contractor concerned for the above incidents; if yes, the details; if not, why not; and
 - (iii) whether there is a sliding scale of penalties according to the severity of incidents; if yes, the details; if not, why not.

- (h) Among the seven lifts, one was planned for undergoing LM works this year, two were tentatively scheduled for tendering for modernisation works in 2024/25 and 2025/26, and the other four were not included in the LM Programme for the time being as their service life is less than 25 years. HD will continue to closely monitor the performance of lifts in PRH estates and arrange LM works according to actual needs and available resources.
 - (ii) The suspensions of services of the seven lifts twice within six months were all caused by different components, and were not due to the repeated breakdown of the same component resulted from improper handling by the contractors. Considering that the service suspension period ranged from three to six days only and the contractors' maintenance performance during the six months was generally acceptable, HD therefore did not penalise the contractors for these cases.
 - (iii) HD adopts BSMASS to objectively assess the performance of all lift contractors on a monthly basis. Under the scoring system, breakdown rate, number of suspension, time taken for resumption of service, etc. are the major factors for consideration. HD will take different levels of follow-up actions according to the performance of the contractors. For example, if a contractor's performance score is below the passing score, HD will issue a warning letter to the contractor; if the contractor's score is below the passing score twice in a rolling period of 12 months, HD will

consider issuing an adverse report to the contractor; and if the contractor's monthly performance score is below the passing score for three consecutive months, it will be suspended from tendering for at least three months. If the contractor fails to resume normal service of L/Es for more than 60 days, HD will deduct the maintenance payment in accordance with the contract terms.

(i) With reference to paragraph 2.4 of the Audit Report, please advise whether there is a timetable for HD to deploy new technologies to further reduce the breakdowns of L/Es by early identification of signs of L/E failures or incidents; if yes, the details; if not, the latest development.

Response from the Housing Bureau

- (i) HB signed a MOU with ASTRI to develop an AI Predictive Maintenance System for lifts, with some lifts be selected for the pilot programme, and the system is expected to be developed and tested within 24 months. Meanwhile, HD will continue to keep in view other new technologies in order to enhance the serviceability of L/Es.
- (j) With reference to paragraph 2.6(c) of the Audit Report, please provide in the past three years the number of cases where a PRH tenant was allotted penalty points or required to vacate the PRH unit under the Marking Scheme due to vandalism of L/Es.

Response from the Housing Bureau

(j) For willful damage to HA's property (including L/Es), once discovered and confirmed, HD will implement the Marking Scheme against the tenants concerned as a sanction. With effect from 18 December 2023, the allotment of points for such misdeed was increased from 7 to 15 points. When 16 valid points have been accrued, HA may terminate the tenancy by issuing a Notice-to-Quit in pursuant to the Housing Ordinance.

In the past three years, a tenant was allotted 7 points for willful damage to a lift in mid-2023. As the accrued points had not yet reached 16 within two years, HD did not issue a Notice-to-Quit to that tenant.

(k) With reference to paragraph 2.7(f) of the Audit Report, please advise the procedures for handling lift trapping incidents and whether HD has formulated guidelines in this respect; if yes, the details.

(k) HD has provided guidelines to frontline staff on handling cases of trapping. When a person is trapped in a lift, the EM staff should call the 24-hour hotline of the contractor immediately to request for emergency repairs, and provide relevant information including the location, lift number, position of lift, condition of the trapped passenger, etc. The EM staff should present on site to comfort the trapped passenger and explain to them that they should stay inside the lift car and remain calm while waiting for rescue. If the trapped passenger feels unwell or is injured, the EM staff should call 999 immediately and contact the Fire Services Department for assistance. Upon arrival at scene, the contractor's workers should take appropriate follow-up action immediately, and release the trapped passenger under a safe condition.

In addition, the contractor's workers should record the date and time of the emergency call, the arrival time and the time of release of the trapped passengers on the lift log-book. When the lift resumes normal operation, the contractor's workers should also record the work details and the resumption time. Subsequently, EM staff should sign on the relevant work records.

- (l) With reference to paragraphs 2.12 and 2.13 of the Audit Report, please advise:
 - (i) aspects of work where Contractor C underperformed; the difficulties encountered by Contractor C in meeting the required standard of service; and whether HD has provided assistance to Contractor C to facilitate compliance with the requirements in TMC; if yes, the details;
 - the follow-up actions taken against Contractor C whose performance remained unsatisfactory throughout the period from 2019 to June 2023; whether HD has imposed any penalties on Contractor C in accordance with TMC; if yes, the details and whether they have sufficient deterrence effect; if not, why not; and whether HD has exercised any powers conferred by Cap. 618 to take enforcement actions against those contractors who have failed to comply with statutory requirements stated in TMCs; if yes, the details; if not, why not;

- (iii) the remedial measures taken by Contractor C to fulfill the contractual requirements; and the latest performance of Contractor C; and
- (iv) whether HD considers the current Building Services Maintenance Assessment Scoring System ("BSMASS") still effective in monitoring contractors' performance given the persistent substandard performance of Contractor C; if yes, the reasons; if not, whether HD will consider reviewing BSMASS, which was launched in 1991.

- (1) (i), From 2019 to 2021, there were generally no major problems
 - (ii) & with the lifts maintained by Contractor C. In certain
 - (iii) months of 2019 and 2021, Contractor C scored lower marks under BSMASS as compared with other contractors mainly due to its average higher breakdown rate. Furthermore, Contractor C also experienced difficulties in manpower arrangement due to the epidemic of coronavirus disease in 2021. In handling some lift breakdown cases, the arrival time of the lift workers on site failed to meet the requirements of the performance pledge, and the scores were consequentially lowered. In view of the performance of Contractor C, HD issued two adverse reports to it in 2021.

After HD met with Contractor C for several times to review its performance and discuss improvement measures, including enhanced maintenance for lifts with high breakdown rates and deployment of additional maintenance workers to individual districts, etc., Contractor C's performance has improved. The average score in 2022 and 2023 has improved to about 67 (with a passing score of 50). Its performance has gradually stabilised and its manpower arrangements have also been improved. Although the maintenance performance of Contractor C has once been unsatisfactory, we have not found any non-compliance with the requirements of the Ordinance by Contractor C.

(iv) HD has adopted BSMASS to assess the performance of all lift contractors objectively on a monthly basis, with consideration on the breakdown rate, number of suspension, time taken for resumption of service, etc. This has made it easier for us to identify the items that need to be improved by the contractors, and the contractors can also take focused

follow-up actions on the low-scoring items for performance enhancement. Therefore, the prevailing BSMASS can effectively reflect and monitor the performance of contractors in maintenance services.

HD has been updating the content of BSMASS in response to the statutory requirements. HD will continue to pay close attention to the updates of relevant Ordinances and codes of practice on L/Es, and to review and update the content of BSMASS in a timely manner to keep abreast of the times.

- (m) With reference to paragraph 2.15 of the Audit Report, please explain/advise:
 - (i) why neither routine assessments nor half-yearly assessments had been performed on the 21 and 26 lifts in 2021 and 2022 respectively identified by the Audit Commission;
 - (ii) whether the incidents suggest that there are deficiencies in the current monitoring mechanism for the lift inspection work of contractors; if yes, the remedial measures taken/to be taken by HD to prevent recurrence of similar incidents; if not, why not; and
 - (iii) the progress of the review on the relevant procedures and guidelines by HD as mentioned in paragraph 2.24(b).

Response from the Housing Bureau

- (m) (i), In recent years, HD has been applying information
 - (ii) & technology system to ensure that the routine and half-yearly
 - (iii) assessments of over 6 000 lifts can be evenly distributed throughout the year. In this connection, upon completion of new lifts installation, HD staff are required to input the data of the new lifts into the system. Due to delays in collating lift information and inputting data by individual staff in some district offices, there were delays in the routine and half-yearly assessments of a small number of lifts in 2021 and 2022.

HD has enhanced the guidelines for handover of new lifts. Apart from requesting the relevant staff to input the data into the information technology application system in a proper and timely manner, HD has also requested the immediate

supervisors of the staff to review the input so as to prevent the recurrence of similar incidents. Currently, relevant staff have entered the data of newly installed lifts into the system in a timely manner.

- (n) With reference to paragraphs 2.16 and 2.17 of the Audit Report, please advise/explain:
 - (i) the purposes of surprise checks and additional lift inspections conducted by the Central Services Team ("CST") under the Estate Management Division of HD; whether it is necessary to arrange these two types of inspections; and
 - (ii) why the results of both surprise checks and additional lift inspections are not included as scoring items under BSMASS.

Response from the Housing Bureau

- (n) (i) & Although both surprise checks and additional lift
 - (ii) inspections are conducted by CST, they are two very different inspections. Surprise checks are targeted at all lift and escalator contractors and the main objective is to obtain an independent understanding of the overall operation of L/Es to ascertain whether the existing documentation system and supervisory control over the contractors by DMOs/PSAs are operating effectively. Sometimes, surprise checks are conducted on an ad-hoc basis, so some key lift inspection items may vary from each surprise check, and thus difficult to standardise the scoring mechanism. Therefore, surprise checks are not included as part of performance assessment (i.e. BSMASS Score) of lift contractors.

The additional inspections of lifts are mainly aimed at strengthening the monitoring of contractors with unsatisfactory scores in BSMASS, so that they would be more proactive in improving their performance. Each additional lift inspection follows the existing routine or half-yearly assessment checklist and the results are counted towards the BSMASS as part of the contractor's performance assessment after the inspection.

- (o) With reference to paragraph 2.18 of the Audit Report, please explain/advise:
 - (i) why the relevant District Maintenance Offices ("DMOs")/Property Services Agents ("PSAs") took 7 to 128 days (30 days on average) to issue the Notification of Completion in respect of 26 surprise checks to CST; does HD consider it acceptable; if yes, why; if not, the follow-up actions taken/to be taken by HD to address the issue; and
 - (ii) whether HD has set any performance pledge/timeframe for the issuance of the Notification of Completion by DMOs/PSAs; if yes, the details; if not, why not.

- (o) (i) & Among the issues identified by CST during surprise checks,
 - some simple items can be handled within a relatively short period of time. However, some of the improvement items involving building works, more complicated or that do not fall within the scope of the term maintenance contracts, with more procedures to deal with, or which may involve the drawing up of works plans, the preparation of materials, the coordination of the works programme, etc., and thus require a longer time to handle. Coupled with the fact that such items do not involve safety, we did not require DMOs/PSAs to return the Notification of Completion within a specified period of time in the past.

Starting from January 2024, we have required DMOs/PSAs to return the Notification of Completion within one month from the issuance of the surprise check reports; if the rectification cannot be completed within one month, DMOs/PSAs are required to state the expected completion date on the Notification of Completion. CST will also monitor the return of Notification of Completion and issue reminder letters to DMOs/PSAs who failed to return on time until the Notification of Completion is received.

(p) With reference to paragraph 2.22 of the Audit Report, please advise whether there is a mechanism put in place by HD to address the delays in replying by DMOs/Property Service Administration Units ("PSAUs") to the list of defects/outstanding items identified by the Lift Inspection Focus independent checks, and Team's any performance

- pledge/timeframe set by HD in this regard; if yes, the details; if not, why not; and
- (q) with reference to paragraph 2.24(e) of the Audit Report, please advise the progress of updating the procedural manual for the Lift Inspection Focus Team under the Independent Checking Unit of HD on the issuance of reminders for outstanding replies from DMOs/PSAUs.

Consolidated Response from the Housing Bureau

- (p)& Upon completion of each independent check, the Lift Inspection
- (q) Focus Team (the Focus Team) will issue a list of defects/outstanding items to DMOs/PSAUs for follow-up and request for a reply within 30 days. For outstanding replies, the Focus Team will issue reminders to them.
 - In order to strengthen the monitoring of follow-up of outstanding items, the Focus Team will directly address the list to Chief Manager of Regional Management Offices for follow-up in the future. In addition, the Focus Team had already updated the procedural guideline in December 2023 to clearly indicate the new workflow and timeframe of issuing reminders.
- (r) According to paragraph 2.26 of the Audit Report, of the 53 submissions made by the 11 L/E contractors from January 2022 to March 2023, there were delays in 22 (42%) submissions made by eight L/E contractors. Please advise whether such delays are common among L/E contractors and the reasons for the delays, as well as the measures taken/to be taken by HD to address the issue; and
- (s) With reference to paragraph 2.27(b) of the Audit Report, please advise whether HD has investigated the reasons behind the failures of Registered L/E Engineers to certify/sign the quarterly inspection reports; whether HD agrees that it is improper for Registered L/E Engineers not to duly certify/sign the reports; and whether there have been any legal disputes arising from reports without certification/signature by Registered L/E Engineers; if yes, the details.

Consolidated Response from the Housing Bureau

- (r)& The submission of quarterly inspection reports is an additional
- (s) requirement imposed by HD on lift and escalator contractors in addition to the statutory requirements. HD noted that the frontline maintenance staff of the contractors generally focused on

maintenance works and there was room for improvement in the quality of document handling. Coupled with the impact of the epidemic of coronavirus disease at that time, the progress of processing the quarterly inspection reports was far from satisfactory. HD has immediately stepped up efforts in monitoring the submission of quarterly inspection reports and once again urged contractors to timely submit duly completed quarterly inspection reports being signed by registered engineers. Depending on the situation, follow-up actions such as issuing reminder letters and warning letters will also be taken. At present, the overall situation on the submission of quarterly inspection reports has improved. Lift and escalator contractors and their registered engineers have all along been carrying out periodic examinations, submitting examination reports, and issuing safety certificate to certify that the L/Es are in safe working order and obtaining use permits for all L/Es in HD in accordance with relevant statutory requirements.

- (t) With reference to paragraphs 2.31 and 2.32 of the Audit Report, please advise:
 - (i) who is "the Responsible Person" in terms of the maintenance and repair of L/Es in PRH estates under Cap. 618 and the Lifts and Escalators (General) Regulation (Cap. 618A), the legal responsibilities and liabilities borne by that person and concerned parties (including L/E contractors) as well as the penalties imposed on different parties for non-compliance and in the event of L/E accidents involving casualties; and
 - (ii) the workflow of and the party responsible for checking the maintenance schedules and log-book records completed by lift contractors of HD.

Response from the Housing Bureau

(t) Under the Ordinance, "the Responsible Person" of a lift/escalator means the person who owns the lift/escalator; or any other person who has the management or control of the lift/escalator; and in the case of the Audit Report, "the Responsible Person" is HA. The legal responsibilities and liabilities and the relevant penalties can be referred to in **Appendix 2(t)(i)(I)**.

The responsibilities and liabilities and the relevant penalties of lift and escalator contractors under the Ordinance and the General Regulations can be referred to in **Appendix** 2(t)(i)(II).

(ii) It is the responsibility of a registered lift/escalator contractor to carry out periodic maintenance of a lift or escalator in accordance with the maintenance scheme recommended by the manufacturer. According to the Code of Practice, the registered lift/escalator contractor is required to print on the anticipated maintenance log-book the time accomplishing the maintenance scheme which should be completed within the maintenance cycle recommended by At the same time, registered engineers, the manufacturer. registered workers and general workers shall sign and chop their names with identification numbers on the log-books to certify that the lift/escalator works have been carried out in accordance with the requirements of the relevant ordinances and codes of practice.

HD has noticed that there are deficiencies in the records of some contractors in respect of individual items and has immediately reminded the contractors to take appropriate follow-up actions. We will also step up the monthly review of log-book records and maintenance plan.

- (u) With reference to paragraph 2.34 of the Audit Report, please advise:
 - (i) the progress of the trial adoption of digital log-books ("DLBs") for L/Es, the number of DLB accounts to be activated, and the timetable for full implementation of DLBs;
 - (ii) the features of the system for DLBs developed by HD and whether it can perform data analysis apart from storage of log-book records as that launched by the Electrical and Mechanical Services Department ("EMSD"); and
 - (iii) whether HD has studied the cost and manpower that can be saved from the adoption of DLBs; if yes, the details; if not, how HD can evaluate the cost-effectiveness of this initiative.

Response from the Housing Bureau

(u) As of December 2023, HD has activated about 74% of the digital log-books (DLBs) accounts for L/Es, targeted to

activate DLBs accounts for all L/Es in the first quarter of 2024, and encouraged lift and escalator contractors and EM staff to use them as soon as possible. After the contractors and HD staff have familiarised themselves with the operation of DLBs, DLBs will be fully adopted, eventually replacing the log-books in paper format.

- (ii) & The DLBs adopted by HD is a platform rolled out by EMSD
- (iii) for use by the industry. DLBs help to clearly record the information of maintenance works to ensure its authenticity and completeness. However, the adoption of DLBs does not necessarily lead to a direct saving in manpower resources, but it can indirectly enhance the work efficiency and reduce the error rate, thereby enabling more effective use of existing manpower resources. In the long run, HD will more actively explore the use of records stored in DLBs to analyse the conditions of L/Es, so as to provide better facility management services.

Part 3: Lift Modernisation Programme

(v) According to paragraph 3.2 of the Audit Report, the Hong Kong Housing Authority evaluates the performance of all lifts maintained by HD which have been in use for 25 years or more and sets priority for the LM works. As at 30 June 2023, 1 380 (23% of 6 056) lifts maintained by HD had been in use for 25 years or more and 1 325 (22%) of lifts maintained by HD were with service years ranging from 20 to less than 25. According to paragraph 3.3(a) of the Audit Report, HD could only modernize around 80 to 90 lifts per year with the resources available currently. Please advise the implementation timetable for LM Programme in view of the budget constraint.

Response from the Housing Bureau

(v) In formulating the LM Programme, HA has to consider not only its internal resources but also the affordability of the lift industry. HD will actively discuss arrangements with the lift industry on training of technical staff, resources allocation, etc. with a view to enhancing the overall capacity of the industry to undertake the works.

The timetable of the approved LM Programme for 2023 is set out below:

- 2023/24 : a total of 92 lifts
- Tentative programme for 2024/25 : a total of 94 lifts

• Long-term programme from 2025/26 to 2031/32 : a total of 553 lifts

Meanwhile, to alleviate the pressure on LM works to increase capacity, HD has adopted a two-pronged strategy. Apart from continuing with the LM works, it has also commenced the lift safety enhancement works in accordance with EMSD's guidelines in mid-2020 for those lifts which have not been equipped with the latest three safety devices (including the double brake system, the unintended car movement protection device and the ascending car overspeed protection device).

(w) With reference to paragraph 3.4 of the Audit Report, please advise whether the lift performance assessment form, technical evaluation report and scoresheet summary currently adopted under LM Programme will be digitalized so that they can be processed electronically.

Response from the Housing Bureau

- (w) HD has commissioned an electronic system since mid-2020 to assist in the collection, storage and management of maintenance-related activities and data. HD will also digitise the lift performance assessment forms and score sheets currently in use, and the technical evaluation reports for lifts currently in use will be digitally archived to facilitate easy retrieval of records at any time. The above series of digitisation measures will be completed and implemented within the first quarter of 2024.
- (x) With reference to Note 29 in paragraph 3.4 of the Audit Report, please explain how the normalized score can accurately reflect the conditions of the lifts with similar service years but in two different PRH estates.

Response from the Housing Bureau

(x) From late 2020, HD has been adopting a lift performance assessment form developed by the consultant to quantify the performance of existing lifts. The assessment covers three main areas, namely lift condition, level of service and risk. A weighted score can be generated for each lift based on the assessment. However, as some of the scoring items may not be applicable to all lifts in all estates, the total score available for each lift varies. It is therefore necessary to adjust the scores for lifts in each estate (i.e. normalised scores) according to the ratio of the scores obtained to the total available scores, thereby objectively compare the performance of lifts in PRH

estates, which can serve as a reference for setting priorities for implementing the LM Programme.

(y) With reference to paragraph 3.4(a) of the Audit Report, please advise whether the extension of the lift age for the annual technical assessment for modernization purpose from 25 to 30 years as recommended in the consultancy study will have any impacts on the lift safety.

Response from the Housing Bureau

- (y) In general, both new and old lifts can be used safely with proper periodic examination and maintenance. Therefore, increasing the age requirement from 25 years to 30 years will not have any direct impact on the overall safety of lifts. Although the consultant has recommended that the threshold for examining the need for replacement of lifts be raised from 25 years to 30 years of service, given the more stringent practice of requiring the submission of a technical evaluation report when the lift reaches 25 years or more of service and the relatively less resources involved, HD considers it a more prudent and secure arrangement to continue with the assessment of lifts with service life of 25 years or more.
- (z) With reference to paragraphs 3.19 and 3.23(b) of the Audit Report, please advise the measures taken/to be taken by HD to shorten the shut-down period of lifts undergoing LM works.

Response from the Housing Bureau

(z) Unlike many LM works in private sectors, HD adopts a comprehensive and full LM under which the entire machinery for the lift installation is totally renewed, and building fabric of the lift machine room, lift shaft and lift pit will be thoroughly rectified, modified or re-conditioned as necessary. In some cases, extra lift landing openings would also be provided to enhance lift services and access for tenants, should site and technical constraints permit.

On shortening the suspensions of lift services, since 2013, HD has implemented a streamlined process for LM works with an aim to reduce the project duration of LM works with extensive building supporting works. With the streamlined process, the number of site handovers could be reduced and the shut-down period of lifts undergoing LM works has been shortened from a minimum of 10.5 months to 7.5 months at the earliest.

To minimise the downtime of LM works in progress, HD is actively considering ways to compress the time required for modernisation

works without compromising safety and as far as practicable, e.g. by considering partial LM works, or exploring the use of alternative modes of contract works to encourage speeding up of the works, etc. HD will also further review the project management of site works to strike a balance between the scope of modernisation works and the downtime of lifts, with a view to providing better and safer lift services to tenants.

(aa) With reference to paragraph 3.21 of the Audit Report, please explain why there were 149 (63%) and 30 (12%) lifts out of 238 lifts with LM works completed from 2018-2019 to 2022-2023 taking 11 to 30 days and over 30 days respectively to resume service after obtaining use permits from EMSD; and the measures taken/to be taken by HD to address the delay in resuming lift services.

Response from the Housing Bureau

(aa) After obtaining the use permit for a new lift installation, the lift car and lift lobby will normally be required to undergo the necessary final touch-up and decoration works, as well as further adjustment of components such as lift door switches, levelling adjustment and repeated trials to ensure the ride comfort of the lift before the lift service can be resumed for the tenants. In addition, for some projects, due to the longer-than-usual time required for the transmission of documents during the epidemic period, the receipt of the original use permits and posting them at the lift sites by the contractors were delayed, which also affected the date of resumption of lift service.

To further reduce the time required for resumption of the service, we will take measures to resume lift service to the public as soon as possible through strengthening of management guidelines and procedures for LM projects, such as limiting a maximum run-in buffer period of two weeks after the issue of the use permits.

Part 4: Other safety enhancement measures for lifts and escalators

(bb) With reference to paragraph 4.4 of the Audit Report, please advise the latest progress of the lift safety enhancement works, in particular the works for lifts shortlisted as prioritized items and the expected timeframe for completing the whole exercise.

- (bb) Since 2020/21, the lift safety enhancement works have been implemented more than three years, and the number of lifts with enhanced safety devices is in line with the planned progress, including the completion of about a total of 300 lifts in the first three years, with an average of about 100 lifts per year. After a three-year familiarisation period, we will gradually ramp up the number of lifts to be enhanced annually. As at 30 November 2023, enhancement works have been completed for about 404 out of the 1 871 priority lifts. We are confident that we can complete the safety enhancement works for all the prioritised items of lifts by 2031/32 as planned.
- (cc) With reference to paragraph 4.5 of the Audit Report, please advise whether HD has set any timeframe for contractors to shut down the lifts for enhancement works; if not, why not; if yes, the details; under what situations HD will consider extending such timeframe and are there any penalties imposed on contractors if they fail to meet the timeframe.

Response from the Housing Bureau

- (cc) The shut-down period of lift safety enhancement works varies according to the complexity of individual projects, and is generally ranged from 4 to 6 weeks. The working period of the enhancement works is specified in the works orders. In case of delay of works which is not the responsibility of the contractors, like unforeseen technical difficulties encountered in the course of installation, etc., the contractors will be granted an extension of time, otherwise, they are required to pay liquidated damages in accordance with the contractual requirements.
- (dd) With reference to paragraphs 4.7(b) and 4.8(b) of the Audit Report, please advise the progress of the review on the project management of lift safety enhancement works and measures taken/to be taken by HD with a view to shortening the shut-down period of lifts during the lift safety enhancement works.

Response from the Housing Bureau

- (dd) HD has examined the management of lift safety enhancement works and taken measures to shorten the shut-down period of lifts, including:
 - 1) ensure that manpower and materials are properly arranged before suspension of lift for lift safety enhancement works;
 - 2) avoid the spanning of works over long holidays as far as possible, such as Lunar New Year, Christmas, etc.; and

- 3) encourage contractors to make good use of EMSD's online inspection booking system to facilitate the safety checking and resumption of lift services as early as possible after completion of works.
- (ee) Referring to paragraph 4.10 of the Audit Report about the delays in conducting periodic overhauls of escalators maintained by HD, please advise the monitoring effort and enhancements to the procedures for overhauls made by HD to ensure timely conduct of periodic overhauls of escalators in accordance with HD's Instruction.

(ee) HD has revised its instructions on escalator overhaul in 2018, and all escalators under its management (except newly handed-over escalators which are not yet required to undergo overhaul) have been overhauled at least once. We will continue to closely monitor the periodic overhaul of escalators, including regularly reviewing the progress and related information of overhaul submitted by the project teams, as well as the overhaul status of each district at regular management meetings, and reminding staff of the requirements of overhaul from time to time to ensure that they are carried out in accordance with HD's instruction.

- End -

	Incident Date (Day/Month/Year)	Estate	Causes of the Reportable Accident	Condition of the Injured
	25/05/2021	L Lan Kok Estate	Passenger tripping due to levelling difference of lift car at landing arisen from levelling device malfunction	A resident tripped and fell while entering into a lift, later expressed discomfort in her legs and required further treatment at hospital.
Lift	01/06/2021	Hau Tak Estate		A resident tripped and fell while stepping out of the lift and sprained her foot. She left the scene on her own afterwards.
	02/04/2022	Lai King Estate		A resident tripped and fell while stepping out of the lift with no superficial injury. The resident informed the estate management staff that no treament at hospital is required. He then left the scene on his own after resting at the lobby for about ten minutes.
	14/06/2020			Two residents fell while riding on an escalator. One suffered a slight scratch on her right wrist. She informed the estate management staff that no treament at hospital is required and left the scene on her own afterwards. Another person suffered from injuries to her hands and feet and required further treatment at hospital.
Escalator	30/05/2021	Yau Tong Estate	due to maltunction of handrail drive unit resulting	Two residents fell while riding on an escalator. One had no superficial injury and the other had abrasions on her calf. Both informed the estate management staff that no treament at hospital is required and left the scene on their own afterwards.
	13/10/2021		a busning between the step & drive chain and triggered the combplate safety switch resulting in	A resident fell while riding on an escalator with no superficial injury and informed the estate management staff that no treament at hospital is required.

 $Extracts\ from\ Cap.\ 618\ and\ Cap.\ 618A\ on\ the\ responsibilities\ of\ "the\ Responsible\ Person"\ for\ lifts/escalators\ and\ the\ penalties\ for\ non-compliance$

	Ordinance	Responsibilities of "the Responsible Person" for Lifts/Escalators	Penalty
1	Cap. 618 Part 2, Division 2, Sub-division 1, Section 12 Cap. 618 Part 3, Division 2, Sub-division 1, Section 44	The responsible person must ensure that the lift/escalator are kept in a proper state of repair and in safe working order	Fine at level 5
2	Cap. 618 Part 2, Division 2, Sub-division 1, Section 13 Cap. 618 Part 3, Division 2, Sub-division 1, Section 45	Duties of responsible persons in respect of use and operation of lifts/escalators For example, the responsible person for a lift/escalator must ensure that the lift/escalator is not used or operated if there is no use permit in force in respect of the lift/escalator.	Fine at level 6 and imprisonment for 12 months
3	Cap. 618 Part 2, Division 2, Sub-division 1, Section 14	Additional duties of responsible persons regarding lifts specified in Schedule 4 For example, the lift is not used for carrying any load that exceeds the rated load of the lift.	Fine at level 6 and imprisonment for 12 months
4	Cap. 618 Part 2, Division 2, Sub-division 1, Section 15 Cap. 618 Part 3, Division 2, Sub-division 1, Section 46	Duties of responsible persons to ensure that registered lift/escalator contractors undertake maintenance works and certain other lift/escalator works	Fine at level 5
5	Cap. 618 Part 2, Division 3, Section 20 Cap. 618 Part 3, Division 3, Section 51	Before a lift/escalator is put into use and operation, the responsible person for the lift/escalator must cause a registered lift/escalator engineer to examine the lift/escalator	Fine at level 3
6	Cap. 618 Part 2, Division 3, Section 21 Cap. 618 Part 3, Division 3, Section 52	After major alterations, the responsible person for the lift/escalator must cause a registered lift/escalator engineer to examine the lift/escalator	Fine at level 3
7	Cap. 618 Part 2, Division 3, Section 22 Cap. 618 Part 3, Division 3, Section 53	The responsible person for the lift/escalator must cause a registered lift/escalator engineer to periodically examine the lift/escalator	Fine at level 3
8	Cap. 618 Part 2, Division 3, Section 23	The responsible person for the lift must cause a registered lift engineer to examine the lift with load	Fine at level 3

	Ordinance	Responsibilities of "the Responsible Person" for Lifts/Escalators	Penalty
9	Cap. 618 Part 2, Division 4, Section 34 Cap. 618 Part 3, Division 4, Section 64	Carrying out any work specified in examination orders	Fine at level 4 and imprisonment for 6 months and, if the offence is a continuing offence, to a fine of \$2,000 for each day during which the offence continues.
10	Cap. 618 Part 2, Division 4, Section 35 Cap. 618 Part 3, Division 4, Section 65	Carry out any work specified in removal orders	Fine at level 6 and imprisonment for 12 months and, if the offence is a continuing offence, to a fine of \$2,000 for each day during which the offence continues.
11	Cap. 618 Part 2, Division 4, Section 36 Cap. 618 Part 3, Division 4, Section 66	Carry out any work specified in the improvement orders	Fine at level 4 and imprisonment for 6 months and, if the offence is a continuing offence, to a fine of \$2,000 for each day during which the offence continues.
12	Cap. 618 Part 2, Division 5, Section 39 Cap. 618 Part 3, Division 5, Section 69	Display of use permits	Fine at level 3
13	Cap. 618 Part 2, Division 5, Section 40 Cap. 618 Part 3, Division 5, Section 70	Incidents to be reported to Director	Fine at level 3
14	Cap. 618 Part 2, Division 5, Section 41 Cap. 618 Part 3, Division 5, Section 71	Provide and assist the investigation of incidents by Director	Fine at level 3
15	Cap. 618A Part 2, Division 1, Section 2 Cap. 618A Part 2, Division 5, Section 17	Keep log-books	Fine at level 3

 $Extracts\ from\ Cap.\ 618\ A\ on\ the\ responsibilities\ of\ the\ registered\ lift\ and\ escalator\ contractors\ and\ the\ penalties\ for\ non-compliance$

	Ordinance	Responsibilities of Registered Lift/Escalator Contractors	Penalty
1	Cap. 618 Part 2, Division 2, Sub-division 2, Section 16 Cap. 618 Part 3, Division 2, Sub-division 2, Section 47	Duties of registered lift/escalator contractors to carry out lift/escalator works properly and safely, etc.	Fine at level 6 and imprisonment for 12 months
2	Cap. 618 Part 2, Division 4, Section 31 Cap. 618 Part 3, Division 4, Section 61	Director's power to disconnect supply of electricity For examples, the Director may disconnect or, if any works of the lift/escalator are undertaken by a registered lift/escalator contractor, by order served on the contractor direct the contractor to disconnect, the supply of electricity to the lift/escalator; and carry out, or by order served on the contractor, direct the contractor to carry out, any work that is necessary to prevent, as far as possible, any person from reconnecting the supply of electricity to the lift/escalator before written permission has been obtained from the Director to reconnect the supply.	Fine at level 6 and imprisonment for 12 months
3	Cap. 618 Part 2, Division 5, Section 38 Cap. 618 Part 3, Division 5, Section 68	Subcontracting restricted	Fine at level 6 and imprisonment for 12 months
4	Cap. 618 Part 2, Division 5, Section 40 Cap. 618 Part 3, Division 5, Section 70	Incidents to be reported to Director For example, the registered lift/escalator contractor must cause a registered lift/escalator engineer to investigate the incident and to prepare and complete, within 7 days after the date on which the contractor is notified, a full report of the investigation that complies with any regulation made under section 154	Fine at level 3
5	Cap. 618 Part 2, Division 5, Section 41 Cap. 618 Part 3, Division 5, Section 71	Provide assistance or information for the investigation of incidents by Director	Fine at level 3
6	Cap. 618A Part 2, Division 2, Section 3 Cap. 618A Part 2, Division 6, Section 18	Duties of registered lift/escalator contractors to notify Director of undertaking of lift/escalator works	Fine at level 3

	Ordinance	Responsibilities of Registered Lift/Escalator Contractors	Penalty
7	Cap. 618A Part 2, Division 2, Section 4 Cap. 618A Part 2, Division 6, Section 19	Duties of registered lift/escalator contractors to notify Director of subcontracting of lift/escalator works	Fine at level 3
8	Cap. 618A Part 2, Division 2, Section 5 Cap. 618A Part 2, Division 6, Section 20	Duties of registered lift/escalator contractors to enter into log-books certain information and particulars For example, a description of the lift/escalator works, the date on which the works begin and completed, the date on which and the time at which the incident occurs etc.	Fine at level 3
9	Cap. 618A Part 2, Division 2, Section 6 Cap. 618A Part 2, Division 6, Section 21	Duties of registered lift/escalator contractors to keep certain records etc. For example, the registered contractor must keep, for a specified period, every document or manual that contains the design specifications of the lift/escalator	Fine at level 3 and imprisonment for 6 months
10	Cap. 618A Part 2, Division 2, Section 7 Cap. 618A Part 2, Division 6, Section 22	Duties of registered lift/escalator contractors regarding incidents relating to lifts/escalators For example, the responsible contractor for a lift/escalator becomes aware that there is an incident relating to the lift/escalator, and display in a conspicuous part of the lift/escalator, or in a conspicuous place in the vicinity of the lift/escalator, a notice that complies with the requirements	Fine at level 3
11	Cap. 618A Part 2, Division 2, Section 8	Duties of registered lift contractors regarding failure of certain emergency devices For example, if a registered lift contractor who undertakes any of the maintenance works of a lift becomes aware that there is a failure of any emergency device of the lift, the contractor must, within 4 hours after the contractor becomes aware of the failure, attend to the failure.	Fine at level 3
12	Cap. 618A Part 2, Division 2, Section 9 Cap. 618A Part 2, Division 6, Section 23	Duties of registered lift/escalator contractors to notify Director if registered lift/escalator contractors unable or unwilling to continue to undertake lift/escalator works	Fine at level 3
13	Cap. 618A Part 2, Division 2, Section 10 Cap. 618A Part 2, Division 6, Section 24	Duties of registered lift/escalator contractors to notify Registrar of certain changes For example, if there is a change in the name, business address or other correspondence address of a registered lift/escalator contractor, the contractor must, within 14 days after the date on which the change takes place, notify in the specified form the Registrar of the change.	Fine at level 1