





積極執法 Proactive in Law Enforcement



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操守與守則

規例簡介

根據《地產代理條例》成立的監管局,獲賦予的權力包括規管與管制地產代理及營業員的執業,及採取其認為適當或需要的行動,以促使地產代理及營業員行事持正及稱職,或維持或提升他們的地位。從事地產代理工作之地產代理及營業員必須遵從所有《地產代理條例》及其附屬法例、由監管局發出的《操守守則》及執業通告內的所有適用指引。

發出執業通告

監管局不時檢視業界的執業手法及發出執 業通告,並提供指引予業界依循,使持牌 人能夠遵從他們在法律下的責任。年內, 監管局發出了一份如下所述的通告。

因應於2022年1月22日生效的《業主與租客 (綜合)條例》第IVA部的規定,監管局發佈 了一份新的執業通告,為地產代理在處理 受《業主與租客(綜合)條例》第IVA部下租務 管制制度規管的分間單位相關租賃(即「規 管租賃」)時,提供可依循的指引。

相關指引包括要求持牌人(i)在成功接觸準 租客後,立刻向準租客披露其於交易中行 事的身份;(ii)在安排客戶訂立租賃協議之 前,向客戶解釋《業主與租客(綜合)條例》 第IVA部下有關租住權保障及租金規管的 主要規定,及每項「規管租賃」隱含的強制 性條款;(iii)向客戶告知,租賃協議的條文 不應包含與租住權保障、租金規管規定及 每項「規管租賃」隱含的強制性條款不一致 的條文; (iv)向客戶提供每項「規管租賃」隱 含的強制性條款的摘要副本;(v)提醒客戶 注意《業主與租客(綜合)條例》第IVA部下 的相關罪行及罰則;及(vi)如客戶對《業主 與租客(綜合)條例》第IVA部下的規管制度 有疑問,則請客戶向差餉物業估價署作出 查詢,或建議客戶在有需要時尋求法律意 見。

Ethics and Regulations

Introduction of regulations

The EAA established under the Estate Agents Ordinance ("EAO") is tasked to, inter alia, regulate and control the practice of estate agents and salespersons and to take such actions as the EAA considers appropriate or necessary to promote the integrity and competence amongst, or maintain or enhance the status of, estate agents and salespersons. Estate agents and salespersons must observe and comply with all the relevant provisions in the EAO and its subsidiary legislation, the *Code of Ethics* and all the applicable guidelines set out in the practice circulars issued by the EAA when they carry out estate agency work.

Issuance of practice circular

The EAA reviews the practices of the trade and issues practice circulars to provide guidelines on estate agency practice from time to time, to enable licensees to comply with their duties under the law. During the year, one circular was issued as described below.

In light of the requirements under Part IVA of the Landlord and Tenant (Consolidation) Ordinance ("LTCO"), which came into effect on 22 January 2022, the EAA issued a new practice circular providing guidelines for estate agents to follow when handling tenancies in respect of subdivided units that are subject to the tenancy control regime under Part IVA of the LTCO (i.e. "regulated tenancies").

The guidelines include requirement for licensees to (i) disclose their capacity to act in the transaction to the prospective tenants at the first opportunity after they have successfully established contact with the prospective tenants; (ii) explain to the clients the key requirements under Part IVA of the LTCO in relation to the security of tenure and rent regulation, and the mandatory terms to be implied for every "regulated tenancy" before arranging for them to enter into the tenancy agreement; (iii) advise the clients that the provisions in the tenancy agreement should not contain provisions which are inconsistent with the security of tenure and rent regulation requirements, and the mandatory terms implied for every "regulated tenancy"; (iv) provide the clients with a copy of the summary mandatory terms implied for every "regulated tenancy"; (v) draw the clients' attention to the relevant offences and penalties under Part IVA of the LTCO; and (vi) invite the clients to make enquiry with the Rating and Valuation Department if they have questions concerning the regulatory regime under Part IVA of the LTCO, or recommend them to seek legal advice, if necessary.



為幫助業界更好地理解有關執業通告的規定,監管局網站刊發了一組「問與答」,供 業界參考。

發出致持牌人函件

為提醒持牌人在從事地產代理工作時需遵守相關法律及規例,以及提醒他們留意與 其執業相關的最新政府措施及/或文件, 監管局在年內向持牌人共發出了三封致持 牌人函件。

考慮到若干持牌人可能參與了租者置其屋計劃項下出售的公屋單位的非法出租,監管局發出致持牌人函件,提醒持牌人在未符合訂明要求的情況下,不應參與處理受轉讓限制規限的資助出售房屋的銷售或出租。

因應已落成住宅物業的按揭保險計劃作出 之修訂,監管局發出致持牌人函件,提醒 持牌人注意最新規定。 To assist the trade to better understand the requirements of the practice circular, a set of "Questions and Answers" was posted on the EAA's website for the trade's reference.

Issuance of Letters to Licensees

With a view to reminding licensees of the requirements under the relevant laws and regulations when carrying out estate agency work and to draw their attention to the updates on certain Government measures and/or documentation which may be relevant to their practices, the EAA issued three Letters to Licensees during the year.

In view of the concerns that some licensees might have participated in the illegal letting of public housing flats sold under the Tenants Purchase Scheme, the EAA issued a Letter to Licensees to remind them to refrain from handling the selling or letting of subsidised sale flats which were subject to restrictions on alienation where the specific requirements have not been met.

In light of the new inspection regime under the Companies Ordinance, the EAA issued a Letter to Licensees to draw their attention to the same and that the Companies Registry would eventually make available for public inspection correspondence addresses of directors in place of their usual residential addresses ("URAs") and partial identification numbers ("IDNs") of directors and company secretaries in place of their full IDNs. Although licensees could still apply for access to the URAs of the relevant persons and their full IDNs after implementation of the new inspection regime, the EAA also reminded licensees to use those information strictly in the performance of their functions under the Anti-Money Laundering and Counter-Terrorist Financing Ordinance.

In response to the amendments to the Mortgage Insurance Programme for completed residential properties, the EAA issued a Letter to Licensees to draw their attention to the latest requirements.

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投訴與巡查

處理投訴與查詢

監管局於2021/22年度共接獲285宗投訴,較2020/21年度的380宗減少了25%。年內,局方接獲的285宗投訴的指稱主要涉及發出違規廣告、不妥善處理臨時買賣合約(或臨時租約),以及提供不準確或具誤導性的物業資料。

總體而言,大多數的投訴類別均有所減少,包括發出違規廣告的投訴宗數由2020/21年度的108宗減少至2021/22年度的96宗。雖然有關廣告的投訴有所減少,但與網上廣告相關的投訴則由2020/21年度的80宗上升至2021/22年度的87宗,佔2021/22年度96宗廣告投訴的91%。受2019冠狀病毒病疫情影響,網上廣告日漸普及,監管局已持續加大執法行動力度,透過資訊科技的協助,監察網上物業平台及社交媒體,以抽查及監察網上廣告。

2022年第一季度受第五波2019冠狀病毒病疫情影響,一手住宅物業市場停滯不前。 與銷售一手住宅物業相關的投訴由2020/21 年度的71宗大幅減少至2021/22年度的47 宗,減幅達34%。投訴指稱主要為發出違 規廣告、未有履行回贈承諾及提供具誤導 性的按揭資料。

年內,監管局亦收到5,529宗有關地產代理 執業手法的查詢,並就1,449宗查詢採取相 關的跟進行動。

Complaints and Inspections

Complaints and enquiries handling

In 2021/22, the EAA received 285 complaints, a decrease of 25% from 380 complaints in 2020/21. Among the 285 complaints received in the year, key allegations included issuing non-compliant advertisements, mishandling of provisional agreements for sale and purchase (or provisional tenancy agreements), and providing inaccurate or misleading property information.

In general, there was a decrease in most types of complaints, including issuing non-compliant advertisements, from 108 in 2020/21 to 96 in 2021/22. However, although there was a decrease in advertisement complaints, those related to online advertisements increased from 80 in 2020/21 to 87 in 2021/22, constituting 91% of the 96 advertisement complaints in 2021/22. Due to the COVID-19 pandemic, online advertisements have become more popular and the EAA has and will continue to step up its enforcement actions to spot-check and monitor online advertisements, by way of patrolling property online platforms and social media in cyberspace with the aid of IT technology.

The first-hand residential property market was stagnant under the fifth wave of the COVID-19 pandemic in the first quarter of 2022. Complaints concerning the sale of first-hand residential properties experienced a significant decrease from 71 in 2020/21 to 47 in 2021/22, a drop of 34%. Key allegations of those complaints were issuing non-compliant advertisements, failing to honour rebate promises, and provision of misleading mortgage information.

In the year, the EAA also received 5,529 enquiries on estate agency practices, and in response to those enquiries, the EAA took follow-up actions on 1,449 enquiries.



監管局於2021/22年度共接獲285宗投訴,較2020/21年度的380宗減少了25%。 In 2020/21, the EAA received 285 complaints, a decrease of 25% from 380 complaints in 2020/21.



投訴個案 Complaint Cases

個案數目 Number of Cases	2019/20	2020/21	2021/22
開立的個案 Opened	268	380	285
已完成的個案* Completed*	264	215	278

- * 年內完成的個案部分為往年接獲的個案。當中包括表面證據成立並轉介予紀律委員會處理的個案,以及由投訴部及行動部處理的表面證據不成立的個案。
- Some cases completed in a year were brought forward from previous years. The figures include prima facie cases referred to and dealt with by the Disciplinary Committee and non-prima facie cases disposed of by the Complaints and Enforcement Sections.

已完成的個案結果* Results of Cases Completed*	2019/20	2020/21	2021/22
指稱成立△ Substantiated△	75	71	111
指稱不成立 Unsubstantiated	123	87	95
資料不足 Insufficient information to pursue	17	22	19
其他# Others#	49	35	53
總數 Total	264	215	278

- * 年內完成的個案部分為往年接獲的個案。當中包括表面證據成立並轉介予紀律委員會處理的個案,以及由投訴部及行動部處理的表面證據不成立的個案。
- △ 如個案中所涉及任何一項指稱被分類為「指稱成立」,該已完成處理的個案即會被歸類 為「指稱成立」。
- * 包括擱置調查、取消投訴或因其他原因而終止調查的個案。
- * Some cases completed in a year were brought forward from previous years. The figures include prima facie cases referred to and dealt with by the Disciplinary Committee and non-prima facie cases disposed of by the Complaints and Enforcement Sections.
- A completed case will be classified as "Substantiated" if any of the allegations involved therein has been concluded as "Substantiated".
- Include cases which were curtailed, withdrawn or closed due to other reasons.

合規巡查及調查

雖然地產代理的銷售活動持續受到2019冠狀病毒病疫情影響,但透過網上廣告進行推廣卻越見普及。因應相關變化,監管局加大力度監察網上物業平台及廣告,以時發現違規做法並採取執法行動。在可疑案件期間,監管局亦著力檢查地產代理公司有否設立妥善程序或制度,監督及管理業務,以確保其員工及受其控制的人員遵守相關規定及指引。

Compliance inspections and investigations

While estate agents' sales activities continued to be affected by the COVID-19 pandemic, promotion through online advertisements was gaining increasing popularity. In response to the change, the EAA stepped up its effort on patrolling online property portals and advertisements in cyberspace so as to timely identify non-compliances and take enforcement actions. During investigation of suspected cases, the EAA also put effort into examining whether estate agency companies had established proper procedures or systems to supervise and manage their business to ensure that their staff and persons under their control abide by the relevant requirements and guidelines.

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年內,監管局在一手樓盤銷售地點進行 1,280次合規巡查,在地產代理商舖進行 766次合規巡查,並對是否遵守反洗錢及 反恐怖分子資金籌集規定進行1,311次合規 檢查。期內,監管局亦對網上廣告進行約 1,101次抽查。 During the year, the EAA conducted 1,280 compliance inspections at first-sale sites, 766 compliance inspections at agency shops and 1,311 compliance checks for Anti-Money Laundering ("AML")/Counter-Terrorist Financing ("CTF") requirements. Some 1,101 spot checks on online advertisements were also carried out during the period.

合規巡查/抽查

Compliance Inspections/Spot Checks

巡查/抽查次數 Number of Inspections/Spot Checks	2019/20	2020/21	2021/22
一手樓盤銷售地點* First-sale sites*	727	648	1,280
地產代理商舗 Agency shops	1,121	880	766
有關反洗錢及反恐怖分子資金籌集規定			
About AML/CTF requirements	666	1,193	1,311
網上廣告 Online advertisements	689	1,319	1,101

^{*} 包括樓盤所在處、樓盤銷售處及毗鄰區域。

從巡查和抽查當中,監管局共開立了160宗 可疑違規個案,以供進一步調查,同期完

Subsequent to inspections and spot checks, 160 suspected non-compliant cases were opened for further investigation, while in the same period 169 cases were completed.

巡查/抽查發現的違規個案

成了169宗個案。

Non-compliant Cases Arising from Inspections/Spot Checks

個案數目 Number of Cases	2019/20	2020/21	2021/22
開立的個案 Opened	154	210	160
已完成的個案* Completed*	115	126	169

^{*} 年內完成的個案部分為往年接獲的個案。當中包括表面證據成立並轉介予紀律委員會處理的個案,以及由投訴部及行動部處理的表面證據不成立的個案。

Include development sites, sales offices and vicinity areas.

Some cases completed in a year were brought forward from previous years. The figures include prima facie cases referred to and dealt with by the Disciplinary Committee and non-prima facie cases disposed of by the Complaints and Enforcement Sections.



對涉嫌向監管局作出虛假聲明或提供虛假 資料的持牌人/牌照申請人的調查

在2021/22年度,監管局調查了37宗有關 涉嫌在申請牌照或續牌時作出虛假聲明或 提供虛假資料(根據《地產代理條例》構成犯 罪)的個案。年內,監管局向警方轉介了16 個可疑個案,以進行刑事調查。

Investigations into licensees/licence applicants suspected of making false statements or furnishing false information to the EAA

In 2021/22, the EAA also conducted investigations into 37 licence applications in which the applicants were suspected of making false statements or furnishing false information in their licence application or licence renewal process, which is an offence under the Estate Agents Ordinance. In the year, the EAA referred 16 suspicious cases to the Police for criminal investigations.

個案數目 Number of Cases	2019/20	2020/21	2021/22
開立的個案 Opened	106	42	37
已完成的個案* Completed*	63	62	49

* 年內完成的個案部分為往年接獲的個案。

打擊物業交易中洗錢及恐怖分子資金籌集 的風險

監管局持續以風險為本的監督方法。 ,致反語管地產代理業界有否遵從反洗錢及 完全籌集的規定。地產代理業界的規定 大寶金等集的規定。地產代理公司 實力類為不同於錢管是 是不同險級別。而監管是 是不同險級別。而監管是 是不可於。

紀律行動

紀律研訊

倘若監管局行政總裁有理由相信任何持牌 人沒有遵守《地產代理條例》及/或其附屬 法例:或沒有資格持有或繼續持有牌照: 或沒有遵守附加於其牌照上的任何指明的 條件,行政總裁可向監管局紀律委員會提 出呈述,以決定是否就該個案進行研訊。

紀律委員會是一個根據《地產代理條例》成 立的常設委員會,負責接受、考慮及查究 投訴以及行政總裁所呈述的個案。倘若紀 Some cases completed in a year were brought forward from previous years.

Combatting money laundering and terrorist financing risks in property transactions

The EAA continued its efforts on supervising the estate agency trade practitioners' compliance with the Anti-Money Laundering ("AML") and Counter-Terrorist Financing ("CTF") requirements by adopting a risk-based approach. Estate agency companies were classified under different AML/CTF risk categories. The intensity of supervision and frequency of inspections by the EAA were based on the level of threats and vulnerability of the estate agency companies. Throughout the supervision, the EAA examined estate agencies' policies, procedures and control systems to assess their AML/CTF risks and the mitigation measures taken by them for the EAA's continuous monitoring.

Disciplinary Actions

Inquiry hearings

If the Chief Executive Officer ("CEO") of the EAA has reasons to believe that a licensee has failed to comply with the EAO and/or its subsidiary legislation; or is not eligible to hold or continue to hold a licence; or has failed to comply with a specified condition attached to his/her licence, the CEO shall make a submission to the EAA's Disciplinary Committee for consideration if an inquiry hearing should be conducted.

The Disciplinary Committee, a standing committee established under the EAO, receives, considers and conducts inquiries into complaints and submissions by the CEO. If the Disciplinary Committee, after conducting

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律委員會在紀律研訊後認為有關的投訴或 呈述成立,可行使紀律制裁權,當中包括 訓誡或譴責有關持牌人、將條件附加於有 關牌照上或更改附加於其牌照上的條件、 暫時吊銷或撤銷其牌照、判處罰款,以及 作出支付費用的命令。 an inquiry hearing, is satisfied that the complaint or submission is well-founded, it may exercise disciplinary powers including admonishing or reprimanding the licensee concerned, attaching/varying specified conditions attached to his/her licence, suspending/revoking his/her licence, imposing a fine and making a costs order.



模擬紀律研訊圖片。 A staged inquiry hearing.

儘管香港疫情形勢不穩定,監管局仍在2021/22年度大部分時間成功開展紀律研訊。紀律委員會在2021/22年度內共判決了318宗個案,相較去年增長了近一倍。受疫情影響,2021/22年度內九宗紀律研訊需要延期舉行。

2021/22年度判決的318宗個案中,309宗 (即佔97.2%)的指稱成立。結果,共有313 名持牌人被紀律處分,其中157名為個人持 牌人¹,156名為公司持牌人。

同期,紀律委員會暫時吊銷了18個牌照, 吊銷期由一星期至一個月不等。這些被處 分的持牌人涉及作出違反專業操守的行 為,例如作出誤導性陳述、未有保障和促 進客戶的利益,或沒有盡量小心及盡力履 行職務。

在2021/22年度內,共有265名持牌人被罰款,金額由1,000元至250,000元不等。

Despite the instability of the pandemic situation in Hong Kong, the EAA managed to conduct inquiry hearings throughout most of 2021/22. The Disciplinary Committee adjudicated 318 cases in 2021/22, which almost doubled the number from last year. Nine hearings were adjourned in 2021/22 due to the pandemic.

Out of the 318 adjudicated cases in 2021/22, 309 were substantiated (i.e. 97.2%). As a result, a total of 313 licensees were disciplined, among which 157 were individual licensees¹ and 156 were company licensees.

During the same period, 18 licences were suspended by the Disciplinary Committee for periods that ranged from one week to one month. Licensees disciplined were found to have been engaged in unprofessional conduct such as misrepresentations, failure to protect and promote the interests of their clients, or failure to exercise due care and due diligence when carrying out their duties.

In 2021/22, a total of 265 licensees were fined, with fines that ranged from \$1,000 to \$250,000.

¹ 包括地產代理公司的獨資經營者及合夥人。

¹ Including sole-proprietors and partners of estate agency firms.



公布研訊的裁決理由

監管局在其「近期的紀律研訊結果」網頁上公布最近的紀律研訊的裁決結果。在兩年或三年後(視乎個案的裁決日期而定),監管局會將所有在「近期的紀律研訊結果」中指稱成立的面晤紀律研訊個案及其裁決理由,移至標題為「過往的紀律研訊案件的裁決理由」的網頁,為期五年。

上述公布不但提高了監管局工作的透明度,亦能讓地產代理業界更了解監管局的 紀律裁決及如何遵從《地產代理條例》,以 減低日後出現類似違規行為的風險。長遠 來說,期望這項措施將會協助提升業界的 專業水平。

同時,公布紀律研訊裁決理由亦能讓公眾 明白監管局的紀律裁決,讓他們在使用持 牌人服務時能作出明智的選擇。

Publication of reasons for the decisions of inquiry hearings

The EAA publishes results of recent inquiry hearings on its webpage titled "Recent Inquiry Hearing Results". After a period of two or three years depending on the date of adjudication of the cases, the EAA will move all the substantiated full inquiry hearing cases and their reasons for decisions under "Recent Inquiry Hearing Results" to its webpage titled "Reasons for Decisions of Past Inquiry Hearing Cases" for a period of five years.

The aforesaid publication not only enhances the transparency of the EAA's work, it also enables the estate agency trade to have a better understanding of the EAA's disciplinary decisions and learn how to comply with the EAO, which helps reduce the risks of similar non-compliances in the future. In the long run, it is hoped that such publication will contribute to the improvement of the professional standard of the trade.

Publication of the reasons for disciplinary decisions also provides a way for the public to understand the EAA's disciplinary decisions, and enables consumers to make informed choices when they engage the services of licensees.

已舉行並作出裁決的紀律研訊次數

Number of Inquiry Hearings Held with Decision Handed Down

	2019/20	2020/21	2021/22
研訊次數 Number of hearings	129	167	318

Proactive in Law Enforcement



	I/22年度常見違規事項* nmon Types of Non-compliance in 2021/22*	指稱宗數 Number of Allegations
1.	發出包含在要項上屬虛假或具誤導性資訊的廣告/提供與發放廣告相關的虛假或具誤導性的資訊:未獲賣方/業主事先書面同意下發放廣告或發出違反賣方/業主指示的廣告 Issuing an advertisement with false or misleading information in a material particular; providing false or misleading information in relation to publication of an advertisement; advertising without the vendor/landlord's prior written consent or in contravention of their instruction	123
2.	沒有在物業的廣告內清楚及可閱地和準確地述明相關物業編號及/或該廣告的發放/更新的日期 Failing to state clearly, legibly and accurately in a property advertisement the property number concerned and/or the date on which the advertisement was issued/updated	98
3.	以持牌人的個人名義而非地產代理公司的名義發出有關一手住宅樓盤的廣告 Issuing an advertisement concerning a first-hand residential development in the licensee's personal capacity instead of in the capacity of an estate agency company	41
4.	未有遵守監管局所發出的有關遵守反洗錢及反恐怖分子資金籌集規定的指引 Failing to comply with the guidelines issued by the EAA in respect of compliance of anti-money laundering and counter-terrorist financing requirements	41
5.	在廣告內提供住宅物業的樓面面積時未有遵守監管局所發出的指引 Failing to comply with the guidelines issued by the EAA when providing the floor area information of a residential property in an advertisement	40
6.	於公共場所張貼/放置或管控廣告牌/海報/折疊桌/椅/遮陽篷或易拉架廣告;或促使或許可員工作出以上事項 Affixing/placing or being in possession and having control of an advertisement board/a poster/folding table/chair/sun shade or pull-up banner in a public area, or causing or permitting staff to do so	35
7.	未管有訂明的物業資料;未能確保持牌人管有的訂明物業資料準確無誤 Failing to possess prescribed property information; failing to ensure that the prescribed property information in the licensee's possession was accurate	30
8.	未有履行向買家作出的現金回贈承諾及/或以書面形式列明有關承諾 Failing to provide to purchasers and/or set out in writing the cash rebate as promised	23
9.	提供不準確的物業或交易資料;未有核實向客戶提供的物業或交易資料的準確性 Providing property or transactional information which is inaccurate; failing to verify the accuracy of property or transactional information provided to clients	21



2021/22年度常見違規事項*(續) Common Types of Non-compliance in 2021/22* (continued)		指稱宗數 Number of Allegations
10.	未有按照訂明表格中所列明的指示和指引填寫該表格:未有在地產代理協議中清楚列明該協議 有效期的屆滿日	
	Failing to complete a prescribed form in accordance with the directions and instructions specified	20
	in the form; failing to state clearly in an estate agency agreement the expiry date of its validity	
	period	

- * 部分紀律研訊個案或涉及超過一項違規事宜。
- There could be more than one type of non-compliances in some inquiry hearing cases.

	I	T	I
向持牌人或前持牌人採取的行動* Actions Taken Against Licensees or Former Licensees*	2019/20	2020/21	2021/22
有關的持牌人或前持牌人數目 Number of licensees or former licensees involved	234	252	432
行動性質¹ Type of actions¹			
訓誡/譴責 Admonishment/reprimand	123	163	313
罰款 Fine	98	141	265
在牌照上附加條件 ² Attachment of conditions to licence ²	111	102	206

* 這些行動是根據《地產代理條例》所賦予的權力而採取的。當中部分行動屬紀律性質,其他則是由牌照委員會裁定的。部分個案是往年持續至今的個案。

暫時吊銷牌照

撤銷牌照

Suspension of licence

Revocation of licence

- 1 在部分個案中,會對同一持牌人或前持牌人 採取超過一項行動。
- ² 部分條件於批出牌照時附加,其餘則隨後附加。
- △ 這些個案均由牌照委員會裁定,理由是持牌 人不再符合相關的發牌條件。
- These actions were taken pursuant to powers under the EAO. Some actions were disciplinary in nature whereas others were decided by the Licensing Committee. Some cases were carried over from previous years.

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36△

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32△

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- In some cases, more than one action was imposed on the same licensee or former licensee.
- Some conditions were attached upon the granting of licences while others were attached subsequently.
- These cases were decided by the Licensing Committee on the ground that the licensees concerned no longer met the relevant licensing requirements.