

2020

LAW FOR CHANGE STUDENT COMPETITION

TEAM 3	PROJECT TITLE L-E-T's Begain
MEMBERS	Lau Ka Yiu Lo Long Ching Mak Chun Kei, Ryan Ngai Wing Sze Tsang Chun Wai
SCHOOL	The University of Hong Kong

PROBLEM ANALYSIS

Hong Kong's Housing Problem and the Consequent Subdivided Flat Problem

Hong Kong has been plagued by the lack of housing for decades. It is the most expensive housing market worldwide. Public housing is also inadequate.

- Hong Kong tops the chart as the most expensive property markets worldwide (CBRE, 2020).
- The average waiting time for public housing is 5.6 years (Housing Authority, 2020).
- The average rent for a one-bedroom apartment in Hong Kong ranges from HKD 12,000 to 20,000 per month (Rating and Valuation Department, 2020).

Due to the lack of public housing, the underprivileged have to resort to renting subdivided flats.

- There are over 122,000 'subdivided' flats in Hong Kong (Housing Authority, 2020). This figure may be significantly underestimated, according to NGOs.
- These flats house over 200,000 tenants, which, again, may be understated.
- Average living space, 50 square feet per person, is the same as that of prisoners (SCMP, 2017).
- The median monthly rental payment for these flats is HKD 4,200, around half the income of those living inside (Census and Statistics Department, 2015).
- Only 1/4 of the tenants were satisfied with the general conditions of the flat (Policy 21, 2013).

Methodology

There are 3 major stakeholders for our project: tenants (SFTs), landlords and NGOs. To understand their current situation, needs and views towards our project, we used the following methods:

Tenants:

- Questionnaire: through our cooperating NGOs, we released our questionnaire to Sham Shui Po SFTs. We collected 20 responses.
- Face-to-face interview: we also visited Sham Shui Po to talk with SFTs in street interviews. We successfully approached 10 tenants.
- Talk: we organised a legal talk in September and discussed with various tenants before and after the talk about their current situation.

Landlords

- Online interview: 2 landlords of subdivided flats accepted our interview request.
- Rent Simulation: during our visit to Sham Shui Po, we also pretended to be interested in subdivided flats and communicated with agents and landlords.

NGOs

We distributed our survey to social workers of our partnering NGOs, Have A Good Home and Concern for Grassroots' Livelihood Alliance, and received 5 responses. Pursuant to their answers, we conducted follow-up online interviews with 2 social workers.

Tenants

From the survey, we observed that a lot of the conflicts or dissatisfaction with their landlords are rooted in poorly constructed contracts. This primarily includes problems like repair responsibility, electricity and water fees, termination of contracts, rent increases, etc. Most of these problems can be solved by clearer contractual terms. However, most of the respondents reported a lack of legal knowledge or support, with their main legal advisor only being close family and friends instead of professional help. However, it should also be noted that some tenants we met during the talk were quite knowledgeable when it comes to their rights and were well aware that their contractual terms are ambiguous.

Concluding from our experience of interviewing the Sham Shui Po SFTs, we realized the limitation of relying on NGOs to approach our target audience. The tenants that NGOs are in contact with are those who already have a certain degree of awareness. However, there are still a significant number of tenants who are not reached by NGOs and have little knowledge on their rights. In our interview with our tenant on the street, she mentioned to us the renovation argument she had with the landlord. We recommended her to approach Have a Good Home, an NGO which provides free renovation service. She was shocked to find out the help available to her as she seldom uses social media and people in her social circle do not have such information, too.

Landlords

Similar to our findings with tenants, the landlords also reported that they often obtain the tenancy contracts from agents or stationery shops. Most disputes arise from repairs. Excessive charges on water and electricity were also common.

The landlords mentioned 2 methods of negotiation of the tenancy contract: face-to-face or through communication software (e.g. WhatsApp). Most landlords would not mind having students negotiating a contract with the tenants as they do not view students as threats. The primary concern for them is to receive rent on time. Negotiation is even beneficial to them since they may save time explaining or bargaining duties afterwards.

NGOs

Existing services provided by NGOs include talks, voluntary repairs services, helping tenants apply for various welfare, etc. The NGOs have no previous experience of accompanying tenants in their negotiations with landlords.

The biggest problem that NGOs face is the lack of legal knowledge. They could only provide solutions to tenants based on previous experience, but not the law. Most of the legal services and advice they could access are one-off.

Existing Services Available for SFTs

Current Service Provider	Type of Services	Target Tenants	Scope of problem to be addressed	On 1-5, to what extent the tenants' legal needs can be addressed in long-term?
Faculty of Law in HKU	Free legal advice scheme	Tenants who have basic legal awareness to seek help from NGO	Assist tenants to resolve legal dispute	2 - The case intake only 3 rounds each year - Only cases with sufficient education value for law students will be given legal advice - SDT's lack of legal knowledge and unequal bargaining power remained unsolved
Outreach Legal Talk Initiatives	Free legal education talks	Tenants who have basic legal awareness to seek help from NGO	Educate tenants on basic legal knowledge on resolving disputes	3 - Proved increase in tenants' general legal awareness from directors and volunteers - Tenants are unable to put those learnt skills into actual practice
Good House	Social Property agent to link conscientious falt owners with SDTs	Tenants who have basic legal awareness to seek help from NGO	Match with conscientious landlords to prevent legal disputes and unfair treatment from arising	2 - Only 8 SDTs could benefit last year - The service is not attractive to general landlords since (1) rent is 20% lower than market price (2) the tenancy terms are more favourable to SDTs in general (3) limitations are imposed on landlords
NGOs (HKSHK Lady MacLehoe Centre)	Free legal talk, advice on tenancy agreement, advocacy of housing policies, free household repair services	Tenants who have basic legal awareness to seek help from NGO	Resolving disput, improving tenants living condition under unfair treatment	4 - Address tenants' all rounded needs - Some social workers may not be sufficient clear with certain legal terms - Lack of resources and manpower to deal with case-by-case and provide 1-on-1 bargaining service

As shown by this comparison, there exists several service deficiencies, which we aim to solve:

- The lack of outreach to SFTs that do not have legal awareness to seek help from NGOs
- Unsustained services with limited impact
- The lack of understanding on the practical situation of tenants and/or legal principles
- The focus on resolving disputes, instead of preventing disputes from arising

The Importance of Pre-contractual Negotiation

Analysing previous court judgments and textbooks, we discovered that both the common law and statutes do not afford great protection to tenants. For instance, the statutory regime of protection regarding the repairs problem consists of only the Buildings Ordinance (Cap. 123) and the Public Health and Municipal Services Ordinance (Cap. 132). Provisions of these 2 Ordinances mandate owners to remedy a “dangerous” building or to cleanse the property respectively. These are extremely low standards of protection. Landlords have no statutory obligation to do anything above these standards and repair any furniture or appliances, even if they malfunction due to fair wear and tear. Hence, the main source of rights of the tenants come from the rental contract.

However, many of the contracts currently used contain a lot of grey areas, as discussed below. In reality, tenants have minimal rights. Many tenants reflected that they simply have no bargaining power after signing the contract, since the landlord can just threaten to not extend the contract or reduce the repayment of deposit. Hence, according to our survey, most would simply not take action even if disputes arise, instead bearing the costs of repairs or electricity and water themselves.

Therefore, pre-contractual negotiation is paramount in protecting the rights of SFTs. Tenants have the greatest bargaining power in this phase and can bargain for fairer and more specific contract terms. As courts place great respect to the contractual terms signed by the parties, should disputes arise, tenants would be in a much better position.

Comparison of Different Contracts

We compared three different types of contract: HKU contract, regular “street” contracts sold in stationery shops and an “equality” contract promoted by various NGOs.

Common Problems related to Tenants	HKU Contract	Street Contract	Equality Contract
Late rent payment	Specified	Unspecified	Unspecified
Landlord entry into the apartment	Only in cases where the tenant is in violation of the contract, and with reasonable notice.	The tenant cannot reject entry of the landlord for inspection purposes.	Unspecified
Repairment Responsibility	Detailed and specified	Brief clause stating that the tenant is responsible for any damages.	Detailed and specified. Landlord is responsible for most repairs.
Deposit at the end of the contract	Returned in 15 days, and only deductible if there are damages to the property, with detailed provisions.	Returned in 7 days with undetailed provisions on deductibility.	Unspecified
Continuation of Contract	Not specified	If the tenant wishes to continue the contract, there must be a one-month written notice, otherwise there will be a penalty of one-month rent.	If there are no violations of contract by the tenant, the landlord must continue signing onto another contract. The rent in subsequent contracts are limited to a maximum of 10% increase.
Termination of Contract	Procedural clauses	Procedural clauses AND Additional clause that if there is a government-mandated demolish or redevelopment, the tenant must move out without any compensation from the landlord.	The landlord cannot prematurely terminate the contract, other than the reason below: If the landlord or tenant wants to terminate the contract as a result of government redevelopment or allocation of public housing, either side can terminate the contract with at least six months and one month of notice respectively.

As shown by the above comparison, “Street” Contracts contains many unspecified terms and restricts the rights of tenants. The “Equality” Contract, albeit being more tenants-friendly, would not be accepted by most landlords according to the 2 landlords we interviewed. The HKU Contract, on the other hand, roughly balances the rights of landlords and tenants. During our rent

simulation, we showed the contract to the landlord, and claimed that we wanted to sign it instead of the stationery shop contract. He was quite satisfied with the terms inside, with only one requirement of adding a term confining the purpose of the leased apartment to residential use. Therefore, the HKU contract is the most suitable for us in implementing the project.

PROJECT PLAN

We aim to assist subdivided flat tenants in addressing their tenancy problems through pre-contractual negotiation. To do so, we have to increase the awareness of tenants to their rights and provide 1-on-1 bargaining services.

Strategy: Precise Identification of Target Audience

As per our findings in the problem analysis, there is a wide variation of (1) level of awareness on legal rights and (2) reliance on NGO among tenants. Hence, we have designed a model to clearly identify our target audience and their respective needs.

As seen from the flow chart, tenants (pre-program) are divided into three categories (Types 1, 2 and 3). We would adopt three different ways to approach them and advertise our program. It is hoped that all three types of tenants would arrive at Type 4 or 5 after Stage 1 of our program. Stage 2 of our program targets Type 5 tenants. Our ultimate aim is to create behavioural change, so that the tenants would proactively take action to secure their rights and negotiate with the landlords (Type 6).

Project Development

Stage 0: Preparation Phase

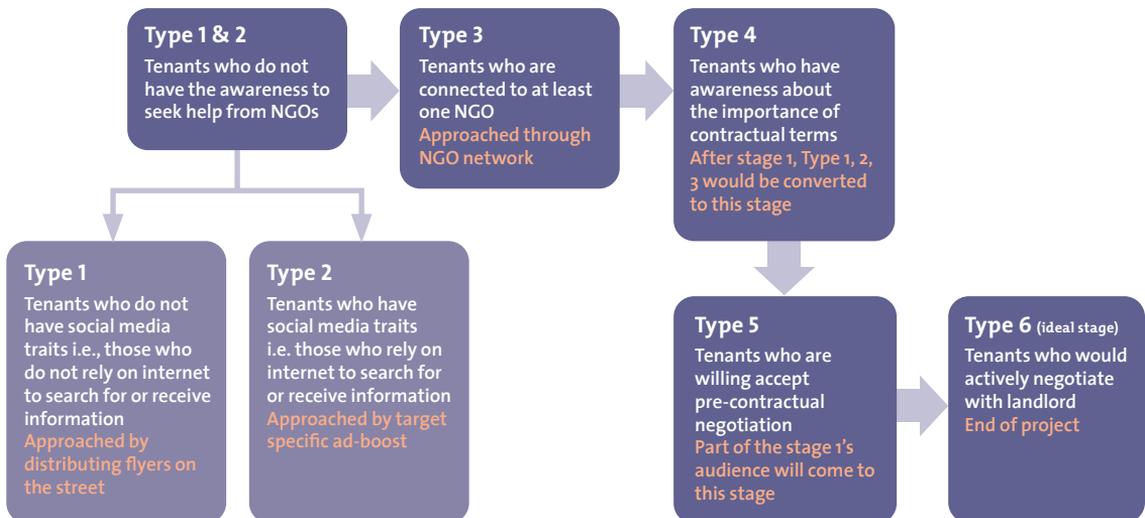
- **NGOs**

We will cooperate with organisations which have established networks with SFTs. Our cooperation domain would include:

- Outreach to potential target audience in need
- Adjust and amend our project absorbing their advice
- Exchange insights on the legal issues of subdivided flats

We have already engaged with an NGO (Have a Good Home) which provides free renovation services for SFTs and assists them on various tenancy problems. In September, we organized a legal education talk on the five major contractual conflicts between the tenants and the landlords, with around 30 tenants attending. Regular meetings are held and they have provided valuable advice on our project implementation from their past experiences.

Flow chart on the categories of our targets and their behavioural change through our project



- **Student helpers**

We aim to recruit a team of 10-20 students. We will apply for HKU's SELECT program to receive various forms of support (e.g. sending mass emails) from the Faculty. The endorsement from the Faculty would also be useful in building our reputation to attract more applications.

- **Legal Practitioners**

We will contact 2-3 experienced practitioners with an Alternative Dispute Resolution background. They would conduct seminars to equip students with the necessary knowledge and skills to carry out pre-contractual negotiation. We have already approached a barrister with background in arbitration in Hong Kong and she conducted an introductory session on negotiation with us.

- **Other Similar Initiatives**

There are similar organisations providing legal talks to the SFTs, such as OUTLET (winner of 2017 Law for Change Competition). Cooperating with them to carry out Stage 1 would create a win-win situation, as we can exchange resources and knowledge on the content of the talk. In the long-term, we would focus on collaboration in holding physical talks, so that we can allocate our manpower to other aspects and stages of our project which are more innovative and could bridge the service gap.

Stage 1: Education

Target Audience: All subdivided-flats tenants

Form: Talks and information packs

Objectives: To increase the subdivided flats tenants' awareness on the impact of contractual terms, thus encouraging them to consider pre-contractual negotiation.

Target:

- 150 SFTs @ 5 physical talks
- 1500 SFTs @ online talks and materials
- 500 information sheets distributed to SFTs @ street stands

Details: Physical talks would be held addressing tenants' concern on the tenancy issues they may face in order to raise their awareness. The talks mainly focus on the following four issues: (1) Unreasonable Deduction of Deposit, (2) Repairs Responsibility, (3) Electricity and Water Bill and (4) Tenancy End-Term.

Our approach in the talk: We would first introduce the concepts by raising some daily-life examples so that it would be easier for them to understand. We will then talk about how conflicts occur and analyse the relevant cases, as well as explain why it is difficult for them to argue with the landlords when conflicts arise and how pre-contractual negotiation can help.

In addition to the physical talk, we would also have an online streaming session to reach out to more tenants. Furthermore, as stated by NGOs, the opportunity cost of tenants to attend a talk is quite high, as the talk usually takes 2 hours and some of them might not be available. Thus, we would also make a series of videos (<5 minutes each) summarizing key aspects of the talk and post it on all our partnering NGO's Facebook pages (targeting type 3 tenants) and our own Facebook page (and other social media platforms as well).

Distributing information packs is an effective way to help us to deliver a concise summary of our content. We will spread the information pack in two ways: (1) through distributing it on the street (targeting type 1 tenants) and (2) online (targeting type 2 tenants). When distributing it on the street, we will include a small gift alongside with the information pack in order to encourage the tenants to read it. As for online, we will utilize social networking apps (Facebook) and messaging apps (WeChat, WhatsApp). We will conduct a social media campaign and design funny posts on tenancy issues, and spread them through our partnering NGO pages. For WhatsApp and WeChat, we will use different MEMEs or create different funny WhatsApp stickers to spread in their discussion groups. We will purchase advertisement recommendations on both Facebook and WeChat. We included WeChat specifically as around 1/6 of tenants are new-comers from Mainland (Census and Statistics Department, 2016) and use WeChat as their daily communication platform.

Stage 2: Bargaining Service

Target Audience: Tenants that are going to renew their contracts soon

Form: For face-to-face negotiation, we would either (1) accompany the tenants to bargain with the landlord, or (2) provide 1-on-1 detailed consulting before the negotiation process, depending on whether the landlords are comfortable with having a student

around. For online negotiation, we would communicate with the tenant throughout the negotiation process.

Objective: To negotiate a fairer contract that states clearly the rights and liabilities of the tenants and landlords.

Target: Around 15 tenants converted from Stage 1

Details: As analysed in problem analysis, the so-called 'standard contracts' adopted by the landlords often do not state clearly the liabilities of each party and are considerably harsher to the tenants. In our bargaining service, we would first invite lawyers to provide training sessions to our student helpers recruited. Our aim in this bargaining session is to persuade the landlord to adopt the HKU standard contract.

Reaching out to our targets is key. We must be able to identify and help our targets before the negotiation begins. Therefore, we would promote our services through various channels—our information packs, posters (in community centres or NGOs and other places tenants would usually visit), our talks and our cooperating NGOs.

We understand that the negotiation process involves 2 parties. Not only the tenants need to benefit from the contract, but landlords also. Hence, we will propose some practical benefits to landlords to convince them to sign the HKU contract:

- Prepayment of rent: the 2 landlords we interviewed were very enthusiastic about this benefit as this satisfies their need for the tenants to be able to pay the rent on time.
- Longer tenancy agreement: the landlords also showed interest about this as the security level would be higher as well.
- Reduce disputes later on: a benefit that would arise from signing a fairer and clearer contract is that any disputes arising later could be solved swiftly based on the contractual terms. However, the landlords were not entirely convinced with this benefit as it is not very significant.

We are currently reaching out to tenants that may require our services through our partnering NGOs. This would help us test out the feasibility of the proposal

and discover ways to improve the details of our services (e.g. any other benefits we could propose, ways that we could frame the contract terms).

Stage 3: Cooperation

Target Audience: NGO workers, tenants and landlords

Form: Workshop, hotline for NGOs, matching platform

Objective: Achieve a long-term and sustainable platform in behavioural change

Target:

- 2 workshops held
- A platform matching 5 tenants and landlords

Details: We aim to establish a long-term relationship with NGOs, in which the NGO would provide substantive help to the tenants and we would offer legal advice, so that we could supplement each other.

For example, we analysed a few small claims tribunal cases involving landlords' unreasonable deduction of deposit due to defaults in furniture/wall, and realised the court would accept the decoration workers' statement on the actual cost needed to renovate as expert opinion. The NGO could help the tenants to examine the defaults and provide quotation as they have an established network with the decoration workers.

We realise that not just subdivided flats tenants but NGO workers also want to learn more about legal knowledge on tenancy issues. Therefore, we wish to organise 2 workshops aiming to educate and discuss with workers from various NGOs tenancy issues. Moreover, a hotline for NGO workers to find us for urgent legal questions could also be set up to further help them.

On top of that, from our experience of dealing with subdivided flat landlords, we observed that the bargaining power of the tenants would increase when the tenancy agreement is signed by the landlord and tenants directly. As this will save the landlords the commission fee paid to the real estate agents, they will be more tolerant to the tenants' request. Therefore, by setting up a platform and provide free agency service in matching tenants and landlords, we can significantly increase the tenants' bargaining power.

We will mandate the contract to be adopted must be the fairer HKU version of standard contracts and our student helpers would assist the parties in negotiating the details of the contracts. Differing from other similar initiatives providing free matching service, our terms are less demanding on the landlords thus would motivate the them in joining our platform.

Project Timeline

Our project would start preferably from January 2021. Below is a cycle of our project. More cycles could be run, with previous experience and evaluation helping us to improve elements of our project.

Activity	Plan start	Plan duration	Months																						
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	
Stage 0																									
Finding partners	1	4	█	█	█	█																			
Stage 1																									
Legal research	1	2	█	█																					
Creating talk materials and information packs	3	3			█	█	█	█																	
Holding talks, uploading videos and distributing the packs	6	8							█	█	█	█	█	█	█	█	█	█							
Stage 2																									
Testing out and improving our services	3	6			█	█	█	█	█	█	█	█	█												
Provide bargaining services	9	8												█	█	█	█	█	█	█	█	█	█	█	
Stage 3																									
Workshops for NGOs	6	5							█	█	█	█	█	█											
Hotline for NGOs	3	20			█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	
Matching Platforms	14	9																							

PROPOSED BUDGET

All items listed in the proposed budget will be covered by the HK\$50,000 awarded to the winning team. However, measures to reduce costs may be available subject to negotiation. For example, our team may

reach out to universities and relevant NGOs for free venues. The negotiable items have been marked with an asterisk (*).

Category	Item	Cost per unit (HK\$)	Quantity	Estimated expense (HK\$)
Phase 0: Preparation				
Promotion	Printing and Stationery	-	-	500
	Social Media (FB, IG, etc.)	50	100	5,000
Recruitment	Venue booking for Recruitment Talks (per hour)* Tentative: 3 Talks, 1 hour each	500	3	1,500
	Venue booking for Interviews (per hour)* Tentative: 4 Interviews, 0.5 hour each	250	2	500
Phase 1: Legal Talks and Information Packs				
Operational	Printing and Stationery	-	-	500
	Venue booking for Bargaining Service (per hour)* Tentative: 15 services, 1 hour each	500	10	5,000
	Videos Creation	-	-	15,000
Phase 2: Contract Bargaining Services				
Operational	Printing and Stationery	-	-	500
	Venue booking for Bargaining Service (per hour)* Tentative: 15 services, 1 hour each	250	15	3,750
Phase 3: Evaluation				
Administrative	Honorarium for Post-talk Survey Completion	20	150	3,000
	Honorarium for Follow-up Interviews after our Bargaining Service	100	10	1,000
	Honorarium for Student Helpers	1,250	10	12,500
			TOTAL:	50,000

EVALUATION

Phase 0: Preparation	
Training workshops will be provided for student helpers by legal practitioners. Materials include a comparison table of different tenancy agreements in the market, relevant legal research, suggested contract template and a flow chart of negotiation procedure.	
Quantitative	<ul style="list-style-type: none"> The number of student helpers recruited. The number of training workshops held.
Qualitative	<ul style="list-style-type: none"> We may have a quiz at the end to test their understanding.
Phase 1: Education	
Quantitative	<ul style="list-style-type: none"> The number of talks held. The number of tenants coming to our talks and receiving our information packs.
Qualitative	<ul style="list-style-type: none"> We may ask some simple scenario questions at the end to test their understanding.
Phase 2: Bargaining Services	
Quantitative	<ul style="list-style-type: none"> The number of successful contracts signed. The amount of time and money saved by both tenants and landlord in resolving disputes (e.g. arguing the responsibility of repairing the air-conditioner) after signing the contract.
Qualitative	<ul style="list-style-type: none"> The smoothness of bargaining, the fairness of the contract.
Phase 3: Cooperation	
Post-talk surveys will be distributed to tenants and NGOs. Follow-up interviews will also be conducted after our bargaining services for tenants and landlord to evaluate on our performance.	
Quantitative	<ul style="list-style-type: none"> Percentage of positive comments.
Qualitative	<ul style="list-style-type: none"> Overall perception by stakeholders (tenants, landlords, NGOs etc.).

Social Impact Assessment

For \$1 of investment, the project can produce \$4.26 worth of impact. The figures are calculated based on the

estimation of probabilities and values of the benefits according to our survey, NGO information and online sources:

Indicator	Calculations (if applicable)	Value (in HKD)
Benefits to tenants (Number of tenants benefiting: stage 1: 1000; stage 2: 15)		
Decreased cost of moving	$0.05 * 25000$	1250
Decreased cost of repairs	$0.6 * 2500$	1500
Better living condition	$0.6 * 500$	300
Decreased cost of disputes (e.g. legal costs, time costs)	$0.9 * 500 + 0.05 * 5000$	700
Security from longer contracts		500
Increase in legal knowledge		50
Total benefits to tenants	$(1250 + 1500 + 300 + 700 + 500) * 15 + 50 * 1000$	113750
Benefits to landlords (Number of landlords benefiting: 15)		
Decreased cost of disputes (e.g. legal costs, time costs)	$0.9 * 500 + 0.05 * 5000$	700
Security from rent prepayment		1500
Security from longer contracts		500
Less: cost of repairs	$0.6 * 1500$	(1080)
Total benefits to landlords	$(700 + 1500 + 500 - 1080) * 15$	24300
Benefits to NGOs (Number of NGOs benefiting: 5)		
Increase in legal knowledge		5000
Outreach to more tenants		10000
Total benefits to NGOs	$(5000 + 10000) * 5$	75000
Total benefits generated	$113750 + 24300 + 75000$	213050

SUSTAINABILITY

Organisational Sustainability

To run this project, we will recruit university students to be our associates and divide them into 3 teams (i.e. social media team, legal education talk team and one-to-one bargaining service team). Our current team members will be the team leaders. As the leaders, we will administer the entire project ranging from conducting training for associates, liaising with our NGO partners and monitoring the talks and bargaining service for at least two cycles. For each team, there will be 3 stages per cycle: (1) team building - pre-education and setting team goals (2) performance - regular performance tracking and adequate support system from team leader and among associates (3) closing - debriefing and evaluation. We will offer opportunities for them to take up new roles such as being PIC for a legal talk or a social media campaign. After the end of a cycle, associates can progress to be team leaders or PIC of a certain task force. We will then stay as consultants who offer advice or direction to the new leadership team members. By having an effective talent pipeline, we can ensure the sustainability of our project.

Financial Sustainability

The initial budget will be utilised to support the administrative cost, mainly for social media campaigns and organising talks. With the support of the initial budget, we are confident that our project can be effectively implemented and attract a larger pool of SFTs. The social measurement data collected in the first cycle will be a useful tool for us to present our project impact to the community. Hence, to sustain our financial needs in future cycles, we will actively approach various donors to diversify and sustain our sources of funding. The sources can be foundations, universities, high-net-worth individuals and the general public.

Community Sustainability

Firstly, our project aims to empower tenants and allow them to spread their experience to their neighbours after being taught relevant legal knowledge and negotiating skills. Secondly, we realized that most social workers are not familiar with basic tenancy rights. By

providing training to NGOs, we can ensure that they can better equip themselves with legal knowledge and address tenants' concerns. Thirdly, by acting as a middleman, we can set up a matching platform for landlords and tenants in the future. This can surely increase the popularity of HKU standard contract and the effectiveness of our bargaining service.

Strategy for Growth and Multiplier Effect

(a) Stronger Bonding within the Community:

- (1) **Diversification of NGOs** - while building stronger connections with existing partnering NGOs, we will also outreach to a wider range of NGOs serving different districts and parties such as ethnic minorities and the disabled.
- (2) **Approaching district councillors** - apart from NGOs, we also hope to cooperate with district councillors to utilise their platform to disseminate information packs and our service. Ultimately, we hope that more subdivided flats tenants can enjoy better quality of life with better legal protection and higher bargaining power.

(b) Contribute to Law Reform

The success of law reform can greatly improve the bargaining power and quality of life of subdivided flats tenants. Hence, to support the law reform, we will express our opinions during public forums and consultations. Moreover, we hope to cooperate with HKU professors to formulate a report to the Task Force on the legal basis of tenancy control based on our observations and work in LET's BEGAIN. Our proposals of law reform, if implemented, can drastically shift the dynamic of subdivided flats market and protect tenants from exploitation