

**EVANGELICAL LUTHERAN CHURCH
SOCIAL SERVICE – HONG KONG**

INDEPENDENT AUDITOR'S ASSURANCE REPORT ON

ANNUAL FINANCIAL REPORT

FOR THE YEAR ENDED 31 MARCH 2023


W. H. WONG & CO. (CPA)
黃永漢會計師事務所



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CERTIFIED PUBLIC ACCOUNTANTS

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黃永漢會計師事務所
黃永漢會計師
Page 1
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**INDEPENDENT AUDITOR'S ASSURANCE REPORT TO THE BOARD OF COUNCILLORS OF
THE EVANGELICAL LUTHERAN CHURCH OF HONGKONG
基督教香港信義會
(A COMPANY LIMITED BY GUARANTEE AND NOT HAVING A SHARE CAPITAL)
IN RESPECT OF THE AUDIT OF THE ANNUAL FINANCIAL REPORT OF
EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE – HONG KONG**

We have audited the financial statements of the **Evangelical Lutheran Church Social Service – Hong Kong** ("ELCSS-HK") for the year ended 31 March 2023 in accordance with Hong Kong Standards on Auditing issued by the Hong Kong Institute of Certified Public Accountants ("HKICPA"), and have issued an unmodified auditor's report thereon dated 30 October 2023.

Pursuant to the Lump Sum Grant ("LSG") Manual issued by the Social Welfare Department of the Government of the Hong Kong Special Administrative Region ("SWD"), we have been requested to issue this assurance report in connection with the Annual Financial Report ("AFR") of ELCSS-HK for the year ended 31 March 2023.

Responsibilities of Councillors

In relation to this report, the Councillors are responsible for ensuring the AFR of ELCSS-HK for the year ended 31 March 2023 is properly prepared in accordance with the relevant accounting and financial reporting requirements set out in the LSG Manual and other instructions issued by the SWD; and the use of the funds from the LSG by ELCSS-HK has complied with the purposes as specified in the LSG Manual and other instructions issued by the SWD.

Our Independence and Quality Management

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the HKICPA, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

The firm applies Hong Kong Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Auditor's Responsibility

Our responsibility is to form a conclusion, based on our engagement, and to report our conclusion to you.

(to be continued, P.T.O.)

**INDEPENDENT AUDITOR'S ASSURANCE REPORT TO THE BOARD OF COUNCILLORS OF
THE EVANGELICAL LUTHERAN CHURCH OF HONGKONG**
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IN RESPECT OF THE AUDIT OF THE ANNUAL FINANCIAL REPORT OF
EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE – HONG KONG
(CONTINUED)

Auditor's Responsibility (Continued)

We conducted our engagement in accordance with Hong Kong Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information and with reference to Practice Note 851 (Revised), Reporting on the Annual Financial Reports of Non-governmental Organisations issued by the HKICPA. We have planned and performed our work to obtain reasonable assurance for giving conclusion 1 and obtain limited assurance for giving conclusion 2 below.

The work undertaken in connection with this engagement is less in scope than an audit conducted in accordance with Hong Kong Standards on Auditing and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in an audit. Accordingly, we do not express an audit opinion.

In relation to our conclusion 1 below, we have planned and performed such procedures as we considered necessary with reference to the procedures recommended in PN 851 (Revised), to satisfy ourselves that the AFR has been properly prepared, in all material respects, in accordance with the relevant accounting and financial reporting requirements set out in the LSG Manual and other instructions issued by the SWD.

In relation to our conclusion 2 below, we have obtained an understanding in respect of the purposes of the use of the funds as specified in the LSG Manual and other instructions issued by the SWD and obtaining an understanding of the control procedures. We are not required to perform any procedures to search for instances of the use of funds from the LSG by ELCSS-HK being non-complied with the specified purposes. Our work was limited to reporting non-compliances identified as a result of the procedures performed in relation to conclusion 2 and during the normal course of our work relating to conclusion 1. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Conclusion

1. In our opinion, the AFR of ELCSS-HK for the year ended 31 March 2023 is properly prepared, in all material respects, in accordance with the relevant accounting and financial reporting requirements set out in the LSG Manual and other instructions issued by the SWD.
2. Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the use of the funds from the LSG by ELCSS-HK has not complied, in all material respects, with the purposes as specified in the LSG Manual and other instructions issued by the SWD.

(to be continued, P.T.O.)



W. H. WONG & CO.
CERTIFIED PUBLIC ACCOUNTANTS

**INDEPENDENT AUDITOR'S ASSURANCE REPORT TO THE BOARD OF COUNCILLORS OF
THE EVANGELICAL LUTHERAN CHURCH OF HONGKONG**
基督教香港信義會
(A COMPANY LIMITED BY GUARANTEE AND NOT HAVING A SHARE CAPITAL)
IN RESPECT OF THE AUDIT OF THE ANNUAL FINANCIAL REPORT OF
EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE – HONG KONG
(CONTINUED)

Intended Users and Purpose

This report is intended solely for submission by ELCSS-HK to the SWD and is not intended to be, and should not be, used for any other purpose. We agree that a copy of this report may be provided to the SWD without further comment from us.

W. H. Wong and Company
Certified Public Accountants

Room 6, 16/F., Enterprise Square 3,
39 Wang Chiu Road,
Kowloon Bay, Hong Kong

Hong Kong, 30 October 2023

ANNUAL FINANCIAL REPORT

EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE - HONG KONG**(1 April 2022 to 31 March 2023)**

	<u>Notes</u>	<u>Total</u> <u>2022-23</u> \$	<u>Total</u> <u>2021-22</u> \$
A. INCOME			
1. Lump Sum Grant			
a. Lump Sum Grant (excluding Provident Fund)	1b	325,125,154.00	319,182,672.00
b. Provident Fund	1c	24,562,643.00	24,821,447.00
2. Fee Income	2	10,296,209.19	10,665,537.74
3. Central Items	3	51,388,142.00	54,473,173.00
4. Rent and Rates	4	10,014,509.00	8,718,290.00
5. Other Income	5	22,559,767.94	21,061,648.20
6. Interest Received		2,753,464.00	256,093.69
TOTAL INCOME		<u>446,699,889.13</u>	<u>439,178,861.63</u>
B. EXPENDITURE			
1. Personal Emoluments			
a. Salaries		300,239,015.61	277,598,377.17
b. Provident Fund	1c	23,392,476.96	21,617,135.05
c. Allowances		168,143.18	167,222.02
Sub-total	6	<u>323,799,635.75</u>	<u>299,382,734.24</u>
2. Other Charges	7	57,420,976.17	57,120,363.51
3. Central Items	3	60,893,205.27	48,323,016.18
4. Rent and Rates	4	<u>9,757,455.00</u>	<u>9,093,602.00</u>
TOTAL EXPENDITURE		<u>451,871,272.19</u>	<u>413,919,715.93</u>
C. (DEFICIT) / SURPLUS FOR THE YEAR	8	<u>(5,171,383.06)</u>	<u>25,259,145.70</u>

The Annual Financial Report from pages 4 to 11 has been prepared in accordance with the requirements as set out in the Lump Sum Grant Manual.



Mr. Kwok Kang Ming
Chairman
Evangelical Lutheran Church Social Service -
Hong Kong

Date: 30 October 2023



Ms. Chan Lai Kwan
Chief Executive
Evangelical Lutheran Church Social Service -
Hong Kong

Date: 30 October 2023

EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE - HONG KONG
NOTES ON THE ANNUAL FINANCIAL REPORT
FOR THE YEAR ENDED 31 MARCH 2023
(Expressed in Hong Kong dollars)

1. Lump Sum Grant (LSG)

- a. Basis of preparation** The Annual Financial Report (AFR) is prepared in respect of all Funding and Service Agreement (FSA) activities (including support services to FSA activities) funded by the Social Welfare Department under the Lump Sum Grant Subvention System. AFR is prepared **on cash basis**, that is, income is recognised upon receipt of cash and expenditure is recognised when expenses are paid. **Non-cash items** such as depreciation, provisions and accruals **have not been included** in the AFR.
- b. Lump Sum Grant (excluding Provident Fund)** This represents LSG (excluding Provident Fund) received for the year.
- c. Provident Fund** This is Provident Fund received and contributed during the year.
Snapshot staff are defined as those staff occupying recognised or holding against subvented posts as at 1 April 2000.
6.8% and other posts represent those staff that are employed after 1 April 2000.
The Provident Fund received and contributed for staff under the Central Items have been shown under **Note 3**.
Details are analysed below :

<u>Provident Fund Contribution</u>	<u>Snapshot Staff</u>	<u>6.8% and Other Posts</u>	<u>Total</u>
	\$	\$	\$
Subvention Received	6,275,534.00	18,287,109.00	24,562,643.00
Provident Fund Contribution			
Paid during the Year	(5,416,793.71)	(17,975,683.25)	(23,392,476.96)
Surplus for the Year	858,740.29	311,425.75	1,170,166.04
<u>Add</u> : Surplus b/f	1,971,217.29	21,650,639.18	23,621,856.47
<u>Add</u> : Additional subvention received for previous year(s)	-	133,438.00	133,438.00
<u>Less</u> : Refund to Government	(703,839.00)	-	(703,839.00)
Surplus c/f	2,126,118.58	22,095,502.93	24,221,621.51

- 2. Fee Income** This represents social welfare fee income received for the year in respect of the fees and charges recognised for the purpose of subvention as set out in the LSG Manual.

EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE - HONG KONG
NOTES ON THE ANNUAL FINANCIAL REPORT
FOR THE YEAR ENDED 31 MARCH 2023
(Expressed in Hong Kong dollars)

- 3. Central Items** These are subsidies allocated to NGOs for specified purposes on a recurrent, time-limited or one-off basis which are not included in LSG and are subject to their own procedures as set out in other SWD's papers and correspondence with the NGOs. Any surplus, which is not allowed to be offset by any deficit of another item, is subject to claw-back by SWD according to the terms and conditions of individual central items. The Provident Fund received and contributed for staff under the Central Items have been separately included as part of the income and expenditure of the relevant items (paragraph 3.14 of the LSG Manual). The income and expenditure of each of the Central Items are as follows:

	<u>2022-23</u>	<u>2021-22</u>
	\$	\$
a. Income		
Dementia Supplement for Residential Elderly Services	905,592.00	944,834.00
Infirmity Care Supplement for Residential Elderly Services	1,413,450.00	2,760,278.00
After School Care Programme - Fee Waiving Subsidy Scheme	649,644.00	688,896.00
Training Subsidy under Training Scheme for child Care Supervisors and Special Child Care Workers in Pre-school Rehabilitation Services	-	60,000.00
Training Sponsorship Scheme for Master in Occupational Therapy and Physiotherapy programmes	-	1,600,000.00
Navigation Scheme for Young Persons in Care Services (Unit BB33)		
- Operating Expenses	-	288,000.00
- Training Cost	-	-
Navigation Scheme for Young Persons in Care Services (Unit 1957)		
- Operating Expenses	1,357,000.00	1,341,000.00
- Training Cost	6,587,200.00	9,680,000.00
- Incentive Allowance	804,000.00	588,000.00
- Preparation Cost	-	-
Pilot Scheme on Multi-disciplinary Outreaching Support Teams for the Elderly (MOSTE) - Annual Funding Allocation	30,613,622.00	34,499,004.00
MOSTE - Annual Rent and Rates	1,040,784.00	1,040,784.00
Child Care Training for Grandparents - Contract Subsidy	-	115,973.00
Child Care Training for Grandparents - Subsidy for Fee Reduction/Waiving	-	7,000.00
Time-defined Allocation of Ethnic Minority District Ambassador Posts - salary and provident fund	191,792.00	187,114.00
Time-defined Allocation of Ethnic Minority District Ambassador Posts - other charges	16,284.00	16,123.00
One-off Subsidy for Strengthened Provision of Visting Medical Officer Service for Residential Care Homes for the Elderly and Visiting Medical Practitioner Scheme for Residential Care Homes for Persons with Disabilities	-	585,000.00
Time-defined Service Contract of Social Work Service for Pre-primary Institutions		
- (SWT-103) -Allocation	5,158,600.00	-
-Rent and Rates	-	-
- (SWT-203#) -Allocation	2,579,300.00	-
-Rent and Rates	-	-

For the following Central Items, please take note of para. 4(f) of Points to Note on Preparation of AFR and Analysis Schedules in reporting the amounts of subvention:

Time-defined Subsidy Scheme for Extended Hours Service Users^	18,404.00	18,167.00
Time-defined Subsidy Scheme for Occasional Child Care Service^	52,470.00	53,000.00
Total	<u>51,388,142.00</u>	<u>54,473,173.00</u>

EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE - HONG KONG
NOTES ON THE ANNUAL FINANCIAL REPORT
FOR THE YEAR ENDED 31 MARCH 2023
(Expressed in Hong Kong dollars)

- 3. Central Items** These are subsidies allocated to NGOs for specified purposes on a recurrent, time-limited or one-off basis which are not included in LSG and are subject to their own procedures as set out in other SWD's papers and correspondence with the NGOs. Any surplus, which is not allowed to be offset by any deficit of another item, is subject to claw-back by SWD according to the terms and conditions of individual central items. The Provident Fund received and contributed for staff under the Central Items have been separately included as part of the income and expenditure of the relevant items (paragraph 3.14 of the LSG Manual). The income and expenditure of each of the Central Items are as follows:

	<u>2022-23</u>	<u>2021-22</u>
<u>b. Expenditure</u>	\$	\$
Dementia Supplement for Residential Elderly Services	909,374.32	945,187.38
Infirmary Care Supplement for Residential Elderly Services	1,413,828.90	2,760,349.08
After School Care Programme - Fee Waiving Subsidy Scheme	616,836.00	415,888.00
Training Subsidy under Training Scheme for child Care Supervisors and Special Child Care Workers in Pre-school Rehabilitation Services	-	30,000.00
Training Sponsorship Scheme for Master in Occupational Therapy and Physiotherapy programmes	1,600,000.00	(405,000.00)
Navigation Scheme for Young Persons in Care Services (Unit BB33)		
- Operating Expenses	-	157,349.17
- Training Cost	-	1,117,560.00
Navigation Scheme for Young Persons in Care Services (Unit 1957)		
- Operating Expenses	945,599.59	1,037,447.05
- Training Cost	7,615,940.30	5,978,070.00
- Incentive Allowance	918,000.00	780,000.00
Pilot Scheme on Multi-disciplinary Outreaching Support Teams for the Elderly (MOSTE) - Annual Funding Allocation	37,013,851.95	33,035,596.57
MOSTE - Annual Rent and Rates	1,821,372.00	2,081,568.00
Child Care Training for Grandparents - Contract Subsidy	-	170,454.43
Child Care Training for Grandparents - Subsidy for Fee Reduction/Waiving	-	-
Time-defined Allocation of Ethnic Minority District Ambassador Posts - salary and provident fund	102,885.66	182,171.50
Time-defined Allocation of Ethnic Minority District Ambassador Posts - other charges	16,251.96	-
One-off Subsidy for Strengthened Provision of Visting Medical Officer Service for Residential Care Homes for the Elderly and Visiting Medical Practitioner Scheme for Residential Care Homes for Persons with Disabilities	167,500.00	36,375.00
Time-defined Service Contract of Social Work Service for Pre-primary Institutions		
- (SWT-103) -Allocation	5,427,033.67	-
-Rent and Rates	-	-
- (SWT-203#) -Allocation	2,323,130.92	-
-Rent and Rates	-	-
Time-defined Subsidy Scheme for Extended Hours Service Users	1,600.00	-
Time-defined Subsidy Scheme for Occasional Child Care Service	-	-
Total	60,893,205.27	48,323,016.18

EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE - HONG KONG
NOTES ON THE ANNUAL FINANCIAL REPORT
FOR THE YEAR ENDED 31 MARCH 2023
(Expressed in Hong Kong dollars)

- 4. Rent and Rates** This represents the amount paid by SWD in respect of premises recognised by SWD. Expenditures on rent and rates in respect of premises not recognised by SWD have not been included in AFR.
- 5. Other Income** This includes programme income and all income other than recognised social welfare fee income received during the year. Non-SWD subventions and donations received have not been included as Other Income in AFR. In this respect, donations have been included if it is used to finance expenditure reflected in the AFR.

The breakdown on Other Income is as follows:

	2022-23	2021-22
	\$	\$
Other Income		
(a) Programme income	10,311,195.60	8,897,211.99
(b) Production income	-	-
(c) Donation	9,449,742.37	9,719,644.03
(d) Income from Other Activities	-	-
(e) Utilised allocation under Central Items (CI): After School Care Programme (ASCP)/Enhanced ASCP / ASCP(PC) - Fee Waiving Subsidy Scheme (FWSS) which forms as part of Other Income *	616,836.00	415,888.00
(f) Reimbursement of Maternity Leave Pay (RMLP) Scheme reimbursement received	103,117.30	228,170.73
(g) Miscellaneous income	2,695,712.67	2,216,621.45
Sub-Total	23,176,603.94	21,477,536.20
<u>Less:</u> Utilised allocation under CI: ASCP/Enhanced ASCP / ASCP(PC) - FWSS which forms as part of Other Income*	(616,836.00)	(415,888.00)
Total	22,559,767.94	21,061,648.20

* For those programmes which are regarded as FSA services/ FSA-related activities only

- 6. Personal Emoluments** Personal Emoluments include salary, provident fund and salary-related allowances. The analysis on number of posts with annual Personal Emoluments over \$700,000 each paid under LSG is appended below:

Analysis of Personal Emoluments paid under LSG	No of Posts	\$
HK\$700,001 - HK\$800,000 p.a.	34	25,884,295.59
HK\$800,001 - HK\$900,000 p.a.	15	12,613,607.13
HK\$900,001 - HK\$1,000,000 p.a.	13	12,702,747.53
HK\$1,000,001 - HK\$1,100,000 p.a.	16	16,809,170.41
HK\$1,100,001 - HK\$1,200,000 p.a.	0	-
>HK\$1,200,000 p.a.	5	6,794,355.85

EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE - HONG KONG
NOTES ON THE ANNUAL FINANCIAL REPORT
FOR THE YEAR ENDED 31 MARCH 2023
(Expressed in Hong Kong dollars)

7. Other Charges

The breakdown on Other Charges is as follows:

	<u>2022-23</u>	<u>2021-22</u>
	\$	\$
Other Charges		
(a) Utilities	3,861,593.12	3,340,814.04
(b) Food	5,368,062.43	5,455,551.40
(c) Administrative Expenses	2,186,025.94	2,014,187.28
(d) Stores and Equipment	8,470,348.55	8,762,616.57
(e) Repair and Maintenance	1,750,830.20	1,424,840.04
(f) Special Allowances	2,740.00	1,190.00
(g) Programme Expenses	15,332,703.19	13,350,155.95
(h) Transportation and Travelling	2,270,098.48	2,090,855.03
(i) Insurance	2,780,961.14	2,655,648.59
(j) Miscellaneous		
-Cost of Sales	1,565.86	50,452.55
-Hire of Services	1,317,106.00	1,209,066.90
-Hire of Medical Service	4,573,431.00	4,232,793.20
-Information Technology Expenses	4,630,096.79	7,082,039.12
-Others	5,492,249.47	5,866,040.84
Sub-Total	<u>58,037,812.17</u>	<u>57,536,251.51</u>
<u>Less:</u> Utilised allocation under CI-ASCP		
/ Enhanced ASCP-FWSS*		
which forms as part of Other		
Income to fund the operating		
expenses of FSA-related activities	<u>(616,836.00)</u>	<u>(415,888.00)</u>
Total	<u><u>57,420,976.17</u></u>	<u><u>57,120,363.51</u></u>

* For those programmes which are regarded as FSA services/ FSA-related activities only

EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE - HONG KONG
NOTES ON THE ANNUAL FINANCIAL REPORT
FOR THE YEAR ENDED 31 MARCH 2023
(Expressed in Hong Kong dollars)

8. Analysis of Lump Sum Grant Reserve and balances of other SWD subventions

	Lump Sum Grant (LSG)	Holding Account (HA)	Adjustment for Utilised allocation under ASCP / Enhanced ASCP / ASCP(PC)-FWSS	Rent and Rates	Central Items (CI)	Total
	\$		\$	\$	\$	\$
Income						
Lump Sum Grant	349,687,797.00		-	-	-	349,687,797.00
Fee Income	10,296,209.19		-	-	-	10,296,209.19
Other Income	23,176,603.94		(616,836.00)	-	-	22,559,767.94
Interest Received (Note (1))	2,753,464.00		-	-	-	2,753,464.00
Rent and Rates	-		-	10,014,509.00	-	10,014,509.00
Central Items	-		-	-	51,388,142.00	51,388,142.00
Total Income (a)	385,914,074.13	-	(616,836.00)	10,014,509.00	51,388,142.00	446,699,889.13
Expenditure						
Personal Emoluments	323,799,635.75		-	-	-	323,799,635.75
Other Charges	58,037,812.17		(616,836.00)	-	-	57,420,976.17
Rent and Rates	-		-	9,757,455.00	-	9,757,455.00
Central Items	-		-	-	60,893,205.27	60,893,205.27
Total Expenditure (b)	381,837,447.92	-	(616,836.00)	9,757,455.00	60,893,205.27	451,871,272.19
Surplus/(Deficit) for the Year (a) - (b)	4,076,626.21		-	257,054.00	(9,505,063.27)	(5,171,383.06)
Less : Surplus of Provident Fund	1,170,166.04		-	-	-	1,170,166.04
	2,906,460.17		-	257,054.00	(9,505,063.27)	(6,341,549.10)
Surplus/(Deficit) b/f (Note (2))	67,528,165.06	53,186,902.78	-	(803,584.86)	29,389,162.06	149,300,645.04
	70,434,625.23	53,186,902.78	-	(546,530.86)	19,884,098.79	142,959,095.94
Add: Refund from Government	-			0.50	-	0.50
Less : Refund to Government				(259,465.00)	(857,930.85)	(1,117,395.85)
Transfer from LSG Reserve to cover the salary adjustment for Dementia Supplement and Infirmary Care Supplement (Note (3))	-			-	-	-
Adjustment for utilised allocation under Enhanced ASCP / ASCP(PC)-FWSS* (over-estimated) / under-estimated in previous	-			-	-	-
Deficit borne by the agency as follows:						
- Dementia Supplement and Infirmary Care Supplement for Residential Elderly Services	-			-	4,161.22	4,161.22
Surplus/(Deficit) c/f (Note (4))	70,434,625.23	53,186,902.78	-	(805,995.36)	19,030,329.16	141,845,861.81

Note :

Including an amount \$ being the utilised allocation under CI-ASCP / Enhanced ASCP / ASCP(PC)-FWSS*

* For those programmes which are regarded as FSA services/ FSA-related activities only

EVANGELICAL LUTHERAN CHURCH SOCIAL SERVICE - HONG KONG
NOTES ON THE ANNUAL FINANCIAL REPORT
FOR THE YEAR ENDED 31 MARCH 2023
 (Expressed in Hong Kong dollars)

8. Analysis of Lump Sum Grant Reserve and balances of other SWD subventions

Note :

- (1) Interest received on LSG (including HA) and Provident Fund reserves, rent and rates, Central Items are included as one item under LSG; and the item is considered as part of LSG reserve.
- (2) Accumulated balance of LSG Surplus b/f from previous years (including all interest received in previous years (see (1) above) and the balance of HA should be separately reported as in the surplus b/f under LSG and HA respectively.
- (3) Amount of LSG Reserve used to cover the salary adjustment for Dementia Supplement and Infirmity Care Supplement, if any, as per Schedule for Central Items.
- (4) For NGOs without HA, separate disclosure of the movement of HA in their respective AFRs is not necessary. The level of LSG cumulative reserve (i.e. S1) will be capped at 25% of the NGO's operating expenditure (i.e. Total Expenditure (T1) excluding Provident Fund Contribution (K)) for the year.

For NGOs with HA, with effect from 2022-23, the calculation of the annual claw-back is as follows:

- (i) With Snapshot Staff (SS) [i.e. Position of SS as at 1 September being reported on the Agency Staff List submitted by NGO last year was greater than zero]
 The level of LSG cumulative reserve (i.e. S1) will be capped at 25% of the NGO's operating expenditure (i.e. Total Expenditure (T1+T2) excluding Provident Fund Contribution (K)) for the year.
- (ii) Without SS [i.e. Position of SS as at 1 September being reported on the Agency Staff List submitted by NGO last year (which is regarded as Year 0) was zero]
 For the next three years (Year 1 to Year 3), the level of LSG cumulative reserve (i.e. S1) will be capped at 25% of the NGO's operating expenditure (i.e. Total Expenditure (T1) excluding Provident Fund Contribution (K)) for the year.
 From the fourth financial year (Year 4) onwards, the level of LSG cumulative reserve and HA reserve will be counted altogether and the combined reserve amount (i.e. S1+S2) will be capped at 25% of the NGO's operating expenditure (i.e. Total Expenditure (T1+T2) excluding Provident Fund Contribution (K)) for the year. In this regard, separate disclosure of the movement of HA in their respective AFRs is not necessary

[For (4)(i) and (4)(ii) above, please also refer to SWD's letter under reference (11) in SWD/S/109/1/10 of 4 April 2022.]

For any amount above the cap, SWD would arrange the claw-back (including provisional in the following financial year) accordingly.