

**Leisure and Cultural Services Department's new measures
for booking of sports venues
Investigation Report**

Since 16 May 2022, the Leisure and Cultural Services Department (“LCSD”) has implemented three new measures against touting. One of those measures is arranging the Leisure Link online booking to open at 7 am while its counters and self-service kiosks to accept bookings only from 7:15 am (referred to as “the Arrangement”).

2. This Office received multiple complaints from complainants who said that they could book sports venues in the past by lining up at the counter, but the Arrangement rendered them unable to secure their preferred venues and sessions, and thus disrupted their exercise routine. Some less tech-savvy complainants (including elderly people) criticised the Arrangement for causing inconvenience to them. Meanwhile, certain complainants having tried to access online booking via “iAM Smart” found it difficult to log in. After successful login at long last, their preferred venues and sessions were no longer available. As observed by some of the complainants who had experience of queuing overnight, most people doing so were genuine users, with only a small fraction suspected of booking venues for touting (colloquially referred to as “queuing gangs”). They accused LCSD of slander to describe people lining up overnight as “queuing gangs” and queried the rationale for introducing the Arrangement. Some complainants opined that since computer programmes were widely used to book venues via the online system for touting, the Arrangement was unfair to genuine users who queued for booking and ineffective in curbing touting.

Our Findings

3. Having scrutinised the information provided by LCSD, The Ombudsman decided to initiate a full investigation. Pursuant to section 12(1) of The Ombudsman Ordinance, the Director of Leisure and Cultural Services and all complainants were informed of the decision. On 3 November, LCSD provided us with further information. This investigation report was finalised after our thorough consideration of all relevant information and LCSD’s response.

Response from LCSD

4. LCSD explained that in comparison with the online booking system, its booking counters and self-service kiosks adopt simpler login designs without the need for getting “transaction token” and CAPTCHA input. Hence, booking via the counters and self-service kiosks is normally faster with higher success rate than online booking, and allow more transactions be completed. People at the front of the queue have a higher chance of booking venues successfully. As such, touts would deploy “queuing

gangs” to wait overnight and book the facilities and popular sessions that are likely to generate profits for subsequent scalping.

5. LCSD noticed that an aggregate of more than 1,000 people form queues at various venues every day in the morning. Some people even waited overnight. The queues usually dissipated within 15 minutes after booking opened. Over the past three years, the complaints about “queuing gangs” received by LCSD soared from less than five in 2019 to 40 in 2021. LCSD regularly reviewed the booking records of venues suspected of being touted found on online platform. It found that most of those bookings were made within the first minute via counters or self-service kiosks. Such activities seriously affected the general public’s booking of recreation and sports facilities. The Arrangement is necessary to ensure people to make bookings simultaneously at 7 am via a single channel, thereby preventing unfairness caused by the time discrepancy¹ in using different channels.

6. After the implementation of the Arrangement, LCSD noticed that the queues have shortened considerably, while overnight queuing has almost disappeared. According to LCSD’s statistics and analysis, since the Arrangement has been introduced, many peak-hour sessions at popular facilities are still available for booking after 7:15 am. Analysis of the booking records about half a month after and one month after the Arrangement was introduced showed that more than 1,500 bookings for facilities of popular sports (such as basketball, badminton, tennis and table tennis) were made via counters and self-service kiosks between 7:15 and 7:30 am. Hence, the Arrangement has not kept out bookings via counters and self-service kiosks. Moreover, after checking a random sample of basketball court sessions booked by individuals and suspected of being touted online, LCSD found none of those sessions were booked via counters and self-service kiosks. This indicated that the Arrangement was effective to curb the activities of “queuing gangs” and facilitate the booking of sports venues by genuine users.

7. LCSD also explained that in tandem with the Arrangement, it added a new feature in the Leisure Link enabling login through the “iAM Smart” mobile app which does not require CAPTCHA input, patron account number and password. This would facilitate people who are less tech-savvy to access the online booking system in an easier and quicker way. Given that identity is verified upon “iAM Smart” registration to ensure that each Hong Kong Identity Card (“HKIC”) number is entitled to register only one account linked to one smartphone, the new feature not only steps up verifying patron’s identity, but also prevents touts from using another person’s HKIC to book facilities. Currently, 70% of the transactions completed within the first 15 minutes every day are by patrons accessing the Leisure Link online system through “iAM Smart”. In other words, most venue users make bookings using their personal smartphones with authenticated identity.

¹ Generally, each booking counter can complete an average of more than three transactions within the first minute, each self-service kiosk around two, while each transaction via the online booking system takes more than one minute.

8. In order to inform less tech-savvy patrons of how to use the Leisure Link online system and link up “iAM Smart” account for easy and fast booking, LCSD has posted demonstration and instructions on its website and social media. Additionally, a dozen workshops, with a total quota of more than 200 participants, have been held in various districts since June, giving demonstration of using “iAM Smart” to book sports venues for those not acquainted with or not knowing how to make online bookings. To extend the reach, the current quota of 20 participants per workshop will be increased to 80 for the two workshops to be held in December². LCSD will continue to organise roving workshops in various districts.

9. LCSD understood that there are genuine users in the queues at booking counters, and the Arrangement might have caused inconvenience to them. However, if touts were allowed to continuously snap up a large number of popular venues and sessions through their “queuing gangs”, it would likewise compromise the chances of booking the venues for genuine users and cause unfairness to them. It would also greatly reduce the effectiveness of other measures implemented against touting.

10. As regards the problem of system overload during the morning peak hour, LCSD explained that it was caused by massive demand for sports facilities. The online booking system could be overwhelmed when people scrambled for login at 7 am, and they might only succeed after several attempts. LCSD admitted that despite regular system upgrades over recent years, the system has reached its load capacity. LCSD will closely monitor the system’s daily operation and, where feasible, allocate more system resources to alleviate the crush in the morning.

11. Furthermore, LCSD has adopted security measures to block computer programmes, or bots, from accessing the Leisure Link online system, such as installing multiple layers of safeguards against bots, periodically updating the complexity of CAPTCHA and engaging specialised anti-bot services (including data analysis and instant updates of corresponding strategies) to counter the ever-evolving computer programmes and operations. The system’s usage is monitored constantly to block the access by unusual networks and protect against bot interference. LCSD believed that the relevant expert team can effectively tackle booking attempts by bots.

12. In the long run, LCSD is developing a new intelligent sports and recreation services booking and information system to replace the Leisure Link, which is expected to be launched in 2023. All bookings will then be conducted online. Counter booking will be discontinued. All facilities will be booked via the mobile app, self-service ticketing machines and self-service kiosks. Service ambassadors will be stationed at sports venues to help the public adapt to the new service mode. LCSD will implement anti-bot solutions of a new generation in the new system. On top of the

² For details of the “Leisure Link x iAM Smart in practice” workshop, please refer to: <https://w1.leisurelink.lcsd.gov.hk/index/index.jsp?jsessionid=A26012FADFB0EAC4DDB23EB7750E7A74>, or call the Leisure Link enquiry hotline at 2679 6822.

first-come, first-served allocation mechanism, a new function to allocate facilities by ballot will be added according to the demand for particular venues and sessions to prevent abuse.

Our Comments

13. It is highly unsatisfactory for touts capitalising on the persistent shortage in LCSD venues. Nonetheless, the situation has complicated causes. This investigation focuses on scrutinising the rationale and effectiveness of implementing the Arrangement, and whether or not any unfairness has been caused.

14. We concur with LCSD's overarching direction of curbing touting. As shown above, LCSD had analysed the touting activities before launching the Arrangement (see **paras. 4 and 5**), and monitored its effectiveness subsequently (see **para. 6**). We consider it more satisfactory if LCSD had elaborated on the rationale for the Arrangement at an earlier stage. As regards its effectiveness, LCSD revealed that the basketball court sessions booked by individuals and suspected of being touted online were no longer booked via counters and self-service kiosks. This only indicated that the Arrangement was effective to curb "**queuing gangs**", but could not prove whether it was effective to address "**touting**" in general (i.e. whether touts have switched to online booking of venues). Nevertheless, LCSD also revealed that 70% of the transactions completed within the first 15 minutes every day are by patrons accessing the Leisure Link online system through "iAM Smart", which restricts the registration of only one account by each HKIC number linked to one smartphone (see **para. 7**). Moreover, LCSD added that since the Arrangement has been introduced, many peak-hour sessions at popular facilities are still available for booking after 7:15 am (see **para. 6**). We accept LCSD's view that generally speaking, the Arrangement can facilitate the booking of sports facilities by genuine users.

15. While the Arrangement has inevitably caused inconvenience to those who are less tech-savvy, LCSD has balanced it against the overall benefits brought to genuine users by implementing the Arrangement and other measures against touting. Meanwhile, LCSD has adopted measures to simplify online booking with an option of login through "iAM Smart" (see **para. 7**), and organised workshops promoting the above login method (see **para. 8**) to inform people of how to access online booking. We consider LCSD to have made thorough assessment and weighed up the pros and cons before implementing the Arrangement, and there is no evidence of maladministration.

16. In fact, wider use of online services is the norm. For the booking of LCSD venues, it is expected that more people will need or opt to use the new system mentioned in **paragraph 12** upon its launch. The support of LCSD for less tech-savvy users will become more important. We are pleased to note that since our investigation, LCSD has increased the quota of participants in the workshops (see **para. 8**). Upon the launch

of the new system, service ambassadors will also be stationed at sports venues to provide instructions and more support for those who are less tech-savvy.

17. As regards the problem of system overload, we understand that the Leisure Link has reached its maximum capacity, pending solution by the launch of the new system in the long run (see **para. 12**). The suspected use of computer programmes to access online booking (see **para. 11**) has come to the attention of LCSD, with corresponding measures already taken to counter it. There is no impropriety from an administrative perspective. Whether the measures taken are adequate is a matter involving professional judgement in the field of computer science, which is not subject to our comment.

18. Based on the above analysis, The Ombudsman considers the complaints **unsubstantiated**.

Office of The Ombudsman
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