For information on 24 February 2025

### **Legislative Council Panel on Manpower**

### **Improving the Trade Union Regulatory Regime**

#### **Purpose**

The Government proposes to amend the Trade Unions Ordinance (Cap. 332) (TUO) to enhance the protection of national security and improve the regulatory regime for trade unions. This paper briefs Members on the proposed amendments.

### **Background**

- 2. The Registry of Trade Unions (RTU) of the Labour Department administers TUO to foster sound trade union management with a view to ensuring that trade unions' administration and conduct of affairs are in compliance with TUO and their rules registered with RTU (or called constitutions).
- 3. The trade union scene has undergone major changes after the 2019 black-From November 2019 to May 2020, RTU received a total of 4 386 applications for registration of trade unions, some of which were submitted by persons with ulterior motives of performing unlawful or defiant activities under the guise of trade unions. During the period from 2021 to 2022, RTU implemented measures to strengthen the vetting of registration applications. at end-2024, of the 4 386 registration applications, 736 applications were registered under TUO (among these 736 applications, 192 were later de-registered by voluntary dissolution, at their own request or owing to contravention of TUO) and the remaining 3 650 applications were withdrawn. The reasons for withdrawal included failure to submit the required documents or information, failure to respond to RTU's enquiries and failure to secure sufficient voting members, etc. At end-2024, there were 1 412 registered trade unions, increased by 54% over 917 at end-2019, apart from 17 registered trade union federations.

- 4. Besides, in recent years, the activities of some trade unions were suspected to be inconsistent with TUO and / or their constitutions. RTU has proactively monitored the trade unions concerned and taken timely follow-up actions. Depending on the circumstances, RTU gives verbal advice or issues advisory / warning letters to the trade unions concerned. In case of serious non-compliance, RTU may cancel the registration of trade unions in accordance with the law. RTU cancelled the registration of one trade union, each in 2021 and 2023, on the grounds that they had been used for purposes inconsistent with their objects or constitutions, thus contravening TUO.
- 5. Pursuant to Article 9 of the Hong Kong National Security Law (NSL), the Government of the Hong Kong Special Administrative Region (the HKSAR) shall take necessary measures to strengthen public communication, guidance, supervision and regulation over national security matters relating to social organisations. Such "social organisations" include trade unions registered under TUO.
- 6. According to section 8 of the Safeguarding National Security Ordinance (SNSO) (6 of 2024), if the law of the HKSAR confers any function on a person (including the Registrar of Trade Unions (the Registrar)), the function is to be read as including a duty to safeguard national security. In making any decision in the performance of the function, the Registrar must regard national security as the most important factor, and give appropriate consideration to it accordingly.
- 7. To enable the Registrar to better fulfil the duty of safeguarding national security under NSL and SNSO, we propose to amend TUO to strengthen the statutory powers of the Registrar over the supervision and regulation of trade unions. We also propose related amendments to improve the trade union regulatory regime.
- 8. Important considerations of the Government in drawing up the proposed amendments included addressing the current situation of local trade unions; complementing NSL and SNSO; as well as protecting employees' right and freedom to form and join trade unions pursuant to the Basic Law of the HKSAR of the People's Republic of China (the Basic Law), the Hong Kong Bill of Rights

Ordinance (Cap. 383) 1 and relevant international conventions2. However, the right to freedom of association is not absolute or unrestricted. According to Article 22 of the International Covenant on Civil and Political Rights (its provisions as applied to the HKSAR are incorporated into the domestic law of the HKSAR by the Hong Kong Bill of Rights Ordinance), the right to freedom of association may be subject to restrictions prescribed by law and which are necessary in the interests of national security or public safety, public order, the protection of public health or morals or the protection of the rights and freedoms of others. Article 8 of the International Covenant on Economic, Social and Cultural Rights also stipulates that the right to form and join trade unions of his choice for the promotion and protection of his economic and social interests, and the right of trade unions to function freely may be subject to limitations prescribed by law and which are necessary in the interests of national security or public order or for the protection of the rights and freedoms of others.

#### **Proposed Amendments**

9. The proposed amendments outlined below mainly cover two aspects, namely safeguarding national security and improving the trade union regulatory regime.

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Article 27 of the Basic Law and Article 18 of the Hong Kong Bill of Rights, as set out in the Hong Kong Bill of Rights Ordinance, guarantee that Hong Kong residents shall have the right to freedom of association with others, including the right to form and join trade unions for the protection of his interests.

Relevant international conventions include the Freedom of Association and Protection of the Right to Organise Convention, 1948 (International Labour Convention (ILC) No. 87) of the International Labour Organisation. ILC No. 87 is applied to Hong Kong after modifications. Article 3 of the Convention stipulates that workers' organisations shall have the right to draw up their constitutions and rules, to organise their administration and activities and to formulate their programmes, etc. The public authorities shall refrain from any interference which would restrict this right or impede the lawful exercise thereof. Article 4 of the Convention also stipulates that workers' organisations shall not be liable to be dissolved or suspended by administrative authority. Moreover, Article 8 of the Convention stipulates that in exercising the rights provided for in the Convention, workers, employers and their respective organisations shall respect the law of the land.

## (A) Proposed Amendments Relating to Safeguarding National Security

10. To safeguard national security, we propose to strengthen the powers of the Registrar on supervising and regulating trade unions under TUO (see specific contents at Annex 1), including:

# (I) Regulation over trade union registration and eligibility for assuming union office

- (i) empowering the Registrar to refuse applications for new registration or amalgamation of trade unions as necessary for safeguarding national security (paragraph 2 of <u>Annex 1</u>);
- (ii) prohibiting persons convicted of specified offences from serving as officers of any trade unions or promoters for new union registration applications (paragraphs 3 to 5 of Annex 1);

# (II) Forestalling undue interference from an external force / organizations of an external place

- (iii) regulating trade unions' receipt and use of funds provided by an external force (paragraph 6 of <u>Annex 1</u>);
- (iv) regulating trade unions' affiliation with organizations of an external place (paragraph 8 of <u>Annex 1</u>);
- (v) regulating the assumption of office by trade union officers in organizations of an external place (paragraph 9 of <u>Annex 1</u>); and

# (III) Enhancement of enforcement powers

(vi) strengthening the statutory powers of the Registrar on regulating and investigating trade unions (paragraph 10 of <u>Annex 1</u>).

# (B) Other Proposed Amendments for Improving the Trade Union Regulatory Regime

11. Apart from the aforementioned proposed amendments for enhancing the protection of national security, we also propose related amendments to improve the trade union regulatory regime (see specific contents at <u>Annex 2</u>), including:

# (I) Regulation over cancellation of trade union registration and naming of trade unions

- (i) empowering the Registrar to cancel the registration of a trade union undergoing dissolution on the "members' interest ground" (paragraph 2 of Annex 2);
- (ii) aligning the notice period and appeal period for cancelling the registration of a trade union (paragraph 3 of Annex 2);
- (iii) improving regulation over the naming of trade unions (paragraph 4 of Annex 2);

# (II) Relaxing the eligibility for trade union membership and the use of trade union funds for local elections

- (iv) allowing trade unions to consider whether to admit persons who are not ordinarily resident in Hong Kong as their members (paragraph 5 of Annex 2);
- (v) allowing trade unions to use their funds (must not be provided by an external force) for elections of the Election Committee and the Chief Executive (paragraph 6 of Annex 2); and

#### (III) Technical amendments

- (vi) facilitating trade unions' operation and rationalising RTU's work (paragraphs 7 to 9 of Annex 2).
- 12. Overall speaking, the aforementioned proposed amendments will enhance the protection of national security and improve the trade union regulatory regime in a targeted manner. With due regard to the freedom and right of Hong Kong residents to form and join trade unions, the proposed amendments will not adversely affect the operation of law-abiding trade unions.

## **Consultation with the Labour Advisory Board**

13. The Labour and Welfare Bureau / the Labour Department consulted the Labour Advisory Board on the above proposed amendments on 22 January 2025, and members expressed support at the meeting. We plan to introduce the amendment bill into the Legislative Council in April 2025.

# **Advice Sought**

14. Members are invited to note the above proposed amendments and give views.

Labour and Welfare Bureau Labour Department February 2025

### **Proposed Amendments Relating to Safeguarding National Security**

To safeguard national security, the Government proposes to strengthen the powers of the Registrar of Trade Unions (the Registrar) on supervising and regulating trade unions under the Trade Unions Ordinance (TUO). Details are as follows.

# (I) Regulation over trade union registration and eligibility for assuming union office

Empowering the Registrar to refuse applications for new registration or amalgamation of trade unions as necessary for safeguarding national security

2. To prevent any organizations engaging in acts or activities that endanger national security from registration as trade unions, we propose to amend TUO to empower the Registrar to refuse applications for new registration or amalgamation of trade unions if it is necessary for safeguarding national security (hereinafter referred to as "national security ground"). As for the prohibition of operation of trade unions, the Safeguarding National Security Ordinance (SNSO) has introduced an overarching mechanism for prohibiting the operation of specified organizations in the Hong Kong Special Administrative Region (the HKSAR) (including trade unions registered under TUO) by order if it is necessary for safeguarding national security<sup>1</sup>. A prohibited trade union is dissolved on the taking effect of the order, and its registration under TUO is also cancelled upon No appeal mechanism against the order is provided under Similarly, there is no appeal mechanism against the decision of the SNSO. Registrar on refusing the application for new registration or amalgamation on the national security ground under TUO. The applicants cannot appeal to the court against the relevant decision of the Registrar.

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Section 60(1) of SNSO: "If the Secretary for Security reasonably believes that it is necessary for safeguarding national security to prohibit the operation or continued operation of an organization specified in subsection (3) in the HKSAR, the Secretary for Security may, by order published in the Gazette, prohibit the operation or continued operation of the organization in the HKSAR."

<u>Prohibiting persons convicted of specified offences from serving as trade union</u> officers or promoters for new union registration applications

- 3. The existing section 17(3) of TUO provides that save with the consent of the Chief Executive (CE) in Council, no person who has been convicted of any offence specified in Schedule 1 (i.e. fraud, dishonesty, extortion and membership of a triad society) shall serve as an officer<sup>2</sup> of a registered trade union within the period of five years from the date of his conviction or discharge from prison, whichever is the later. To safeguard trade unions from undue influence of persons convicted of offences endangering national security and to deter convicted persons with ulterior motives from performing unlawful or defiant activities through the formation of new trade unions, we propose to:
  - (i) add "offence endangering national security" to Schedule 1 to TUO and prohibit a person convicted of such offence from assuming office in any registered trade unions or from serving as a promoter for any new union registration applications from the date of his conviction. The above restrictions cannot be lifted by consent of CE in Council; and
  - (ii) prohibit a person convicted of any existing Schedule 1 offence (i.e. not including "offence endangering national security") from serving as a promoter for any new union registration applications within the period of **five years** from the date of his conviction or discharge from prison, whichever is the later. The existing restriction on assumption of union office during the aforesaid period will be maintained. The above restrictions **can** be lifted by consent of CE in Council as per the existing provisions of TUO.
- 4. As offences endangering national security are more serious than the existing Schedule 1 offences, we consider that stricter restrictions should be imposed on persons convicted of offences endangering national security in respect of the assumption of union office or the intended formation of new trade unions.

As defined in TUO, "officer", in relation to a trade union or a branch of a trade union or a trade union federation, includes any member of the executive thereof, but does not include an auditor.

The definition of "offence endangering national security" under section 7 of SNSO applies to "any other Ordinance", including TUO.

According to section 5(3) of TUO, every new union registration application shall be signed by not less than seven voting members of the trade union (i.e. promoters).

5. To enhance monitoring of the appointment of trade union officers, we propose to require a trade union officer who has been charged with or convicted of any offence specified in the amended Schedule 1 (hereinafter referred to as "specified offence") to inform the Registrar in writing specifying the nature of the offence in respect of which he has been charged with or convicted of as soon as practicable. If a trade union officer charged with a specified offence notifies the Registrar as required, he may continue to assume union office before the conclusion of the relevant criminal proceedings; however, if he fails to comply with the notification requirement, the Registrar may serve upon the officer a notice in writing requiring him to cease holding office until the conclusion of the relevant criminal proceedings. Where a trade union officer convicted of a specified offence continues to assume union office without obtaining the consent of CE in Council (if applicable), the Registrar may take prosecution action against the officer and serve upon the officer a notice in writing requiring him to cease holding office. If a trade union officer charged with or convicted of a specified offence does not comply with the written notice issued by the Registrar, the Court of First Instance may, on the application by the Registrar, grant an injunction prohibiting such officer from holding office.

# (II) Forestalling undue interference from an external force / organizations of an external place

Regulating trade unions' receipt and use of funds provided by an external force

6. SNSO has introduced the offence of "external interference endangering national security" to prevent undue influence by external force with the affairs of our country and the HKSAR. To forestall trade unions from receiving financial contributions from an external force 7 to perform acts or activities endangering national security or interfere with local elections, we propose to make new provisions in TUO for the following regulation:

<sup>&</sup>lt;sup>5</sup> Section 52 of SNSO.

Under section 6 of SNSO, "external force" means (i) a government of a foreign country; (ii) the authority, political party or any other organization that pursues political ends in an external place; (iii) an international organization; and the related entity or related individual of (i) to (iii), etc. Under section 3 of SNSO, "external place" means a region or place outside the HKSAR (other than the Mainland and Macao).

The meaning of "external force" under TUO will have the same meaning of "external force" under SNSO (see footnote 6).

- (i) requiring trade unions to make an application to the Registrar declaring the source(s) and usage, etc. of funds provided by an external force before receiving the funds. Trade unions shall not receive such funds unless approved by the Registrar;
- (ii) prohibiting trade unions from using funds provided by an external force for local elections (including elections of the District Councils (DC), Legislative Council (LegCo), Election Committee (EC) and CE) under TUO, even if the trade unions are approved to receive such funds [Note: See paragraph 6 of Annex 2 on EC and CE elections]; and
- (iii) requiring trade unions which have been approved to receive funds provided by an external force to keep separate and detailed accounts of the funds; and report such accounts to the Registrar regularly.

#### Regulating trade unions' affiliation with organizations of an external place

- 7. The existing section 45 of TUO regulates the affiliation of registered trade unions with organizations established in foreign countries as follows:
  - (i) section 45(1) allows a trade union to be or become a member of an organization of workers or employers, or a relevant professional organization <sup>8</sup> (hereinafter referred to as "related organization") established in a foreign country, if it is so authorized by ballot of a majority of its voting members (hereinafter referred to as "authorized by ballot of its members"). The trade union shall, within one month after becoming a member of a related organization in a foreign country, notify the Registrar in writing;
  - (ii) section 45(3) provides that a trade union shall not be or become a member of an organization in a foreign country falling outside the aforesaid categories, unless the consent of CE has been obtained and it is so authorized by ballot of its members; and

Under TUO, "relevant professional organization" means an organization the objects of which are to promote the interests of persons engaged or employed in a trade, industry or occupation which is the same as, or similar to, the trade, industry or occupation with which the trade union is directly concerned.

- (iii) section 45(6) prohibits a trade union from affiliating with any political organization or body established in a foreign country.
- 8. To forestall trade unions from engaging in acts or activities endangering national security through affiliation with organizations of an external place<sup>9</sup>, we propose to expand the coverage of section 45(3) and section 45(6) of TUO from "foreign country" to "external place", and regulate trade unions' affiliation with organizations established in an external place as follows:
  - (i) maintain the existing requirement that a trade union is **allowed to be or become a member of a <u>related organization in a foreign country</u> if it is so <b>authorized by ballot of its members**. The trade union shall, within one month after becoming a member of a related organization in a foreign country, notify the Registrar in writing;
  - (ii) a trade union is **prohibited from being or becoming a member of any political organization or body of an external place;** and
  - (iii) a trade union shall not be or become a member of <u>other organization</u> <u>of an external place</u>, unless the consent of CE has been obtained and it is so authorized by ballot of its members.

Regulating the assumption of office by trade union officers in organizations of an external place

- 9. We propose to **regulate the assumption of office by trade union officers in organizations of an external place** as follows:
  - (i) if a trade union has been or become a member of a related organization in a foreign country or other organization of an external place in accordance with the law (hereinafter referred to as "affiliated organization"), its trade union officer is allowed to assume office in the affiliated organization. The trade union officer is required to notify the Registrar in writing within one month after the assumption of office in the affiliated organization;
  - (ii) a trade union officer is prohibited from assuming office in any political organization or body of an external place; and

The meaning of "external place" under TUO will have the same meaning of "external place" under SNSO (see footnote 6).

(iii) a trade union officer shall not assume office in a <u>non-affiliated</u> organization of an external place, unless the consent of CE has been obtained.

### (III) Enhancement of enforcement powers

Strengthening the statutory powers of the Registrar on regulating and investigating trade unions

- 10. To effectively prevent, suppress and investigate trade unions' suspected unlawful acts as well as acts and activities that may endanger national security, we propose to strengthen the statutory powers of the Registrar on regulating and investigating trade unions, including:
  - (i) requiring trade unions to **keep specified records**<sup>10</sup> **for two years** and render such records within the specified timeframe when required by the Registrar;
  - (ii) empowering the Registrar or any person authorized by him in writing to enter any premises occupied by the trade union or its branch and inspect the above specified records, relevant documents or information, and to make copy of the records, documents or information, conduct examination and inquiry as necessary and seize any evidence related to contravention of TUO or trade union rules, or an offence under TUO during the inspection;
  - (iii) empowering the Registrar or any person authorized by him in writing to make an inquiry for carrying out the Registrar's functions and duties under TUO. The trade union and / or its officers under inquiry are required to provide information and documents as may be reasonably required for the purpose of the inquiry (i.e. not limited to the specified records mentioned in paragraph 10(i)) within such period in the mode and / or at the place specified by the Registrar or any person authorized

The specified records include: (i) account books of the trade union and relevant records (e.g. vouchers, bank statements, invoices, receipts, etc.); (ii) register of members containing specified information (e.g. name, occupation and type of membership of the members, etc.); and (iii) minutes of the annual / extraordinary general meetings and executive members' meetings, and records of resolution passed by the trade union officers without a meeting.

by him in writing and answer questions relating to any matter under inquiry;

- (iv) empowering the Registrar to serve upon a trade union or its officers that engage in an act or activity suspected to be inconsistent with the union rules 11 a notice in writing, ordering the trade union or the officers to refrain from performing such act or activity; and
- (v) with respect to a **trade union which has filed an appeal against the notice of intended cancellation of registration**, empowering the Registrar to **serve a written notice on the trade union for appointment of an administrator to take over the management of assets of the trade union** until the conclusion of the appeal, with a view to preventing improper disposal of the trade union's assets or continual conduct of acts or activities suspected to be inconsistent with the union rules.
- 11. Any trade unions or their officers that contravene the relevant requirements in paragraphs 3, 5, 6, 8, 9 and 10 above shall be subject to criminal liability, and appropriate penalties will be stipulated under TUO.

The rules shall concern matters specified in Schedule 2 to TUO, including, among others, the objects for which the trade union is established, the appointment and replacement of officers, and the purposes to which the funds of the trade union may be applied, etc.

# Other Proposed Amendments for Improving the Trade Union Regulatory Regime

Apart from the proposed amendments for enhancing the protection of national security, we also propose related amendments to improve the trade union regulatory regime. Details are as follows.

# (I) Regulation over cancellation of trade union registration and naming of trade unions

Empowering the Registrar of Trade Unions (the Registrar) to cancel the registration of a trade union undergoing dissolution on the "members' interest ground"

- 2. Currently, where a trade union is voluntarily dissolved, the dissolution proceedings (including the disposal of assets and the distribution of funds) are governed by the rules of the trade union. To ensure proper conduct and completion of the dissolution proceedings without delay, we propose to:
  - (i) empower the Registrar to cancel the registration of a trade union based on the "members' interest ground", i.e. there is evidence or information revealing that the trade union has prejudiced (or is likely to prejudice) the general interest of its members in the dissolution process; and
  - (ii) require a trade union which has passed a resolution of dissolution in accordance with its rules to inform the Registrar in writing within 14 days after the passing of such resolution. A trade union that contravenes the above requirement shall be subject to criminal liability, and appropriate penalty will be stipulated under the Trade Unions Ordinance (TUO).

Aligning the notice period and appeal period for cancelling the registration of a trade union

3. At present, the Registrar is required to give to a trade union not less than two months' prior notice in writing specifying the ground upon which he intends to cancel its registration (hereinafter referred to as "notice period"). Moreover, any voting member of the trade union may appeal to the Court of First Instance within 28 days after the service of such notice (hereinafter referred to as "appeal

period"). To rationalise the relevant procedures, we propose to align the notice period with the appeal period as 28 days.

### Improving regulation over the naming of trade unions

- 4. To protect the public or trade union members from being misled by an improper trade union name, we propose to empower the Registrar to refuse an application for union registration, amalgamation or change of union name on the ground that the proposed name of the trade union is:
  - (i) likely to mislead the public or the members of such trade union or of any other existing trade union as to the true character or purpose of the trade union; or
  - (ii) inconsistent with the objects or rules of the trade union.

# (II) Relaxing the eligibility for trade union membership and the use of trade union funds for local elections

Allowing trade unions to consider whether to admit persons who are not ordinarily resident in Hong Kong as their members

5. The existing section 17(1) of TUO provides that no person shall be a member of a registered trade union unless he is ordinarily resident in Hong Kong and engaged or employed in a trade, industry or occupation with which the trade union is directly concerned. To protect the occupational interests of imported workers and relevant employees who are permitted to work in Hong Kong through different admission schemes but reside outside Hong Kong¹, we propose to provide exceptional arrangement whereby **trade unions may consider whether to admit persons who are not ordinarily resident in Hong Kong as their members in accordance with their rules, and the relevant rules must have been registered by the Registrar.** In determining whether to register the relevant rules, the Registrar will consider whether the trade unions concerned intend to admit members whose employment is reasonably connected with Hong Kong, while the requirement that members must be engaged or employed in a

For example, "the Enhanced Supplementary Labour Scheme", "the Labour Importation Scheme for the Construction Sector" and "the Labour Importation Scheme for the Transport Sector" allow employers to arrange their imported workers from the Mainland to reside in (i) the accommodation provided by the employer in Hong Kong / on the Mainland which meets the specified standard; or (ii) the imported workers' own residential premises on the Mainland.

trade, industry or occupation with which the trade union is directly concerned will remain unchanged.

Allowing trade unions to use their funds (must not be provided by an external force) for elections of the Election Committee (EC) and the Chief Executive (CE)

6. TUO currently allows trade unions to use their funds for elections of the District Councils (DC) and the Legislative Council (LegCo)<sup>2</sup>. Under the improved electoral system, an eligible trade union can be registered as a corporate voter for the Labour EC Subsector<sup>3</sup> to elect EC members of the Subsector, and EC members of the Subsector essentially come from trade unions. We propose to allow trade unions to use their funds for EC and CE elections, but **the funds provided by an external force are prohibited from being used for local elections** (paragraph 6 of Annex 1).

#### (III) Technical amendments

Facilitating trade unions' operation and rationalising the work of the Registry of Trade Unions (RTU)

Allowing voting by members' representatives (MRs) on matters relating to trade unions' intended affiliation with organizations of an external place

7. We propose to amend section 45(1) and section 45(3) of TUO to explicitly provide for voting by MRs on matters relating to trade unions' intended affiliation with related organizations in a foreign country or other organizations of an external place subject to the rules of the trade unions. Certain sections of TUO<sup>4</sup> currently allow a trade union to deal with its affairs subject to the approval

Sections 33A, 33B and 34 of TUO provide that except for paying the expenses of DC and LegCo elections, trade union funds shall not, whether in Hong Kong or elsewhere, be applied directly or indirectly for any political purpose; or be paid or transferred to any person or body of persons in furtherance of any political purpose.

An eligible trade union refers to a trade union registered under TUO of which all the voting members are employees and has been operating for the three years immediately before making its application for registration as a corporate voter.

For example, section 23(1) and section 33B of TUO respectively provide that a trade union may change its name and approve expenses for specified electoral purposes subject to the approval of a majority of its members or MRs present at a general meeting where the rules of the union allow voting by MRs.

by a majority of its members present at a general meeting of members or by a majority of MRs present at a general meeting of MRs.

Providing greater flexibility for registered trade union federations in admitting new member unions

8. Under the existing section 56(1) of TUO, a registered trade union federation is required to, among others, obtain the consent of all officers of the union federation before admitting a new member union. To provide greater flexibility for trade union federations in admitting new member unions, we propose to lower the threshold such that trade union federations are only required to obtain the consent of a majority of their officers for the admission.

Rationalising and streamlining the relevant work arrangements of RTU

9. We propose to provide more flexibility in the appointment of officers of RTU, streamline the keeping of entries or amendments in the register of trade unions after endorsement of the Registrar or any person authorized by him in writing, and substitute the expression "form prescribed" in all relevant sections of TUO with "form specified" so as to empower the Registrar to make forms by administrative means.