



SOCIETY OF REGISTERED SAFETY OFFICERS

Correspondence Address: P.O. Box 482, Fo Tan Post Office, Fo Tan, N.T., Hong Kong.

註冊安全主任協會

Mrs. Cherry Tse, JP
The Commissioner for Labour
Labour Department,
16/F, Harbour Building, 38 Pier Road, Hong Kong.

15th April 2010.

Dear Mrs. Tse,

Interpretation of Continuing Professional Development Records for Renewal / Revalidation of Safety Officers under Chapter 59

You are probably aware that it is now approaching to another peak load of renewal / revalidation of Safety Officers under the provision of Chapter 59 Section Z – Factories and Industrial Undertakings (Safety Officers and Safety Supervisors) Regulations. Indeed, some of Safety Officers have submitted their records of continuing professional development (CPD) for consideration of your Department as a requirement for the revalidation of Safety Officers.

However, our members reflect that, as a result of different interpretations, some of their CPD contents / activities could not be recognized by your Department as suitable CPD records for the revalidation of Safety Officers. Even taking reference to the Guidance Notes on Continuing Professional Development Programme under the Factories and Industrial Undertakings (Safety Officers and Safety Supervisors) Regulations, there is deviation on understanding of some CPD contents and activities between your Department and those members concerned. In fact, the vague descriptions in some areas of the Guidance Notes lead to different interpretations.

We further reveal that members of other learned safety and health institutions are also encountering the same problem. A number of typical examples on different interpretation of CPD record is attached for your immediate reference.

Whilst we fully support the view of your Department that we should maintain the professional level of the Safety Officers and that of the quality of their CPD programmes, you probably share our view that we should not gauge each CPD content or activity by a way of unrealistic extreme. More importantly, the validity and relevance of each CPD content or activity should be judged by its substance and intention instead of solely by its form (i.e., the title).

For the mutual benefit of your Department and the industry and to avoid unnecessary burden caused by the renewal / revalidation process of Safety Officers, we, on behalf of the Society

of Registered Safety Officers (SRSO), the Hong Kong Occupational Safety and Health Association (HKOSHA), the Institution of Occupational Safety and Health, Hong Kong Branch (IOSH(HK)) and the Hong Kong Industrial Safety Association (HKISA), would like to have a meeting with your Department to resolve the dispute as soon as possible. We strongly believe that, through discussion and exchange of views, we are able to reach a common understanding on interpretation of CPD records that would be acceptable by both sides.

To further demonstrate our sincerity and in view of the imminence, we propose the meeting be held at the Headquarters of your Department either in the morning or afternoon of 7th May 2010. Each professional safety and health institution will have two representatives to attend the meeting, adding up to a total of eight representatives.

For the sake of arrangement and mobilization, we would be grateful if you can reply on or before 29th April 2010 by email to michael.leung@sroso.org.hk or contact the undersigned at 2948 6127 (office) / 9681 4737 (mobile).

Thank you for your kind attention and assistance.

Yours sincerely,



Michael Leung
President, SRSO

Typical Examples on Different Interpretation of CPD Record

Notes: RSO – Safety Officer;

CPD – Continuing Professional Development

Case 1

The RSO acted as a speaker in a CPD Talk, not an audience. The reason given for not granting CPD points was that since the speaker could deliver the talk, he should have already been very well conversant with the content of the talk and hence there was no enhancement of professional competence. However, this judgment appeared to be in conflict with para. 7(f) of the captioned Guidance Notes (p. 4) that the involvement of the RSO as speaker can be considered to satisfy the requirements for a CPD programme.

Case 2

The RSO published articles in the in-house journal of the Society of Registered Safety Officers (SRSO). The reason given for not granting CPD points was that the SRSO was not recognized by the Labour Department as a professional body and so the articles were not published in the journal of a professional body. The approving officer only cited Occupational Safety and Health Council and the universities as such recognized professional bodies.

Case 3

The RSO participated at meetings of the Chemical Safety Advisory Committee (CSAC) of the Occupational Safety and Health Council. The reason given for not granting CPD points was that this Committee was not an occupational safety and health committee. Only those committees formed under individual industries are so considered. However, the said CSAC handles occupational safety and health matters with a Chief Chemist of the Government Laboratory acting as the chairperson and with members coming from the Labour Department OSHB, Fire Services Department, Department of Health, Environmental Protection Department, the Education Bureau, representative from the local large chemical manufacturers, representative from the local large laboratories, representative from local universities, and representatives from the local workers union.

Case 4

The RSO attended an Advanced Food Hygiene Safety Management course from the Chartered Institute of Environmental Health (CIEH). The Approving Officer considered that this was not OSH-related.

Case 5

No CPD point was granted for the SRSO AGM Seminar 2008 for some RSO. The reason given was that the contents, including the Director of the Department of Health speaking on Workplace Infectious Disease Safety Management, the Head of Infection Control Branch of the Centre for Health Protection, HKSAR Government speaking on Prevention and Control of Infectious Diseases in Occupational Settings, a Labour Department Senior Occupational Hygienist speaking on Occupational Hygiene and Control of Infectious Diseases in Workplaces, the Executive Director of the Occupational Safety and Health Council speaking on Promotion of Occupational Health and Infection Control in Workplaces, the Director of

Safety and Environmental of Chinese University of Hong Kong speaking on P3 Laboratories Design and Requirements, the President of the Hong Kong General Building Contractors Association speaking on General Safety Guidelines and Attentions for Contractors in Site of Infectious Diseases, a Crisis Management Consultant speaking on Flu Diligence: The Six Ps of Pandemic Preparedness, and the President of the Federation of Trade Union speaking on The Role of Union in Promoting Occupational Health in the Workplace were all considered not OSH-related.

Case 6

No CPD point was granted for the SRSO AGM Seminar 2009 for some RSO. The reason given was that the contents, including a Fire Services Department officer speaking on the Amendment of Dangerous Goods Law, a Civil Engineering Development Department Engineer speaking on the General Conditions of Contract: Site Safety Requirements, an Architectural Services Department Senior Engineer speaking on Ventilation Design to achieve Good Indoor Air Quality, an Electrical and Mechanical Services Department Engineer speaking on Protection of Underground Gas Pipes, a Housing Authority Senior Manager (Safety and Health) speaking on A Client's Perspective in Fostering Site Safety, and a safety practitioner speaking on the Involvement of the Client in Workplace Health and Safety were all considered not OSH-related.

Case 7

A Safety & Health Seminar on Swine Influenza and another on Preparedness for Influenza Pandemic were considered a seminar on public health and not occupational health and no CPD point was granted.

Case 8

No CPD point was granted to participants of an IOSH seminar on Travel Safety and Risk Management.

Case 9

No CPD point was granted to a participant of an IOSH seminar titled Relationship between Creativity, Danger & Safety in a Paradoxical Reality.

Case 10

No CPD point was granted to participants of a HKARMS seminar titled Baye's Theorem & Its Application in Quantitative Risk Assessment.

Case 11

No CPD point was granted to a participant of an International Conference on Probabilistic Safety and Management (PSAM9).

Case 12

No CPD point was granted to a participant of a HKIE-SSC seminar titled Road Trap & Mechanical Safety Device.

Case 13

No CPD point was granted to a participant of an IOSH seminar titled International Strategy Update & Designing Safety in & Keeping it There.

Case 14

No CPD point was granted to a participant of a HKIE-SSC Conference titled Disasters: Preparedness, Response & Recovery.

Case 15

No CPD point was granted to a participant of a SRSO talk on Supply Chain Risk Management.

Case 16

No CPD point was granted to a participant of a SRSO talk on Design and Construction of Re-provisioning of WSD Utilities and Infrastructure Works.

Case 17

No CPD point was granted to a participant of an IOSH talk on Strategic CPD of Safety Professionals.

Case 18

No CPD point was granted to a participant of an IOSH seminar on 5S and Safety.

Case 19

No CPD point was granted to a participant of an IOSH seminar on Code of Practice on Working near Electricity Supply Lines and another participant of a SRSO seminar on Prevention of Third Party Damage to Electricity Supply Lines.

Case 20

No CPD point was granted to a participant of an IOSH seminar Freight Container (Safety) Ordinance.

Case 21

No CPD point was granted to a participant of an IOSH seminar on Should Safety be a Lifelong Career.

Case 22

No CPD point was granted to a participant of an IOSH seminar on How Mentoring can Help the Learner "Learn" in the Workplace.

Case 23

No CPD point was granted to a participant of an OSHC seminar on Work Stress Handling.

Case 24

No CPD point was granted to a participant of an OSHC seminar on Health and Safety Issue in Enterprise's Social Responsibility.

Case 25

No CPD point was granted to a participant of a MTRC Operations Training Department training talk on Railway Safety Induction.

Case 26

No CPD point was granted to a participant of a CLPP Training Department training talk on Train the Trainer in PSBG SHE Induction Training for CP Certificate.

Case 27

No CPD point was granted to a participant of a HK Red Cross first-aid course (兒童心肺復甦法證書課程). The RSO's view is "因 MTR, 商場, 及在工地車路口撞倒單車或誤入工地遇溺之意外需要用。如它不承認兒童急救就全部正常急救課程內有關兒童之 CPD hours 亦不能計, 影響全部急救課之 CPD。".

Case 28

No CPD point was granted to a participant of an Occupational Safety & Health Council seminar on An Introduction to Air Pollution Control (Volatile Organic Compounds) Regulations. The RSO's view is "Because air pollution involving Lung Health and purchase of PPE dust mask and confined space works, it should be considered as a safety & health seminar, not just because it is a Environmental Regulation".

Case 29

No CPD point was granted to a participant of an Occupational Safety & Health Council seminar on Introduction to the Building (Minor Works) Regulation. The RSO's view is "Because BD's Supervision Plan needs the Safety Officer to up-grade on construction technology, procedure & related knowledge, new regulations involved application of new safety law, procedure and knowledge".

Case 30

No CPD point was granted to a participant of a Hong Kong Association of Risk and Safety Management / Hong Kong Polytechnic University and Society of Registered Safety Officers seminar on New Technology for Water Rehabilitation and Utility Management. The explanation was that this was a Utility Works Skill seminar, not OSH.

Case 31

No CPD point was granted to a participant of a Hong Kong Association of Risk and Safety Management seminar on Applying Business Analytics for Sound Stress Testing Practices and Operational Risk Assessment. The RSO's view is "這些新工程技術涉及新風險, 新危險品及程序, 正是風險評估所需之知識。".

Case 32

No CPD point was granted to a participant of a SRSO seminar titled Road Works Safety in Hong Kong.

Case 33

No CPD point was granted to a participant of a HKARMS seminar titled Enterprise Risk Management.

Case 34

No CPD point was granted to a participant of an OSHC seminar titled The 2nd China Hong Kong Safe and Healthy Community Network Annual Conference.

Case 35

No CPD point was granted to a participant of an OSHC seminar titled Seminar on Hong Kong Safe and Healthy School Accreditation Scheme and Experience Sharing.

Case 36

No CPD point was granted to a participant of an OSHC seminar titled Safe Transportation of Dangerous Goods and Related Regulations.

Case 37

No CPD point was granted to a RSO for the time spent in preparing and launching the Safe Foreman Award function which was jointly organized by the Lighthouse Club and the Society of Registered Safety Officers, including the setting of the assessment questions, interviewing of competitors, and co-organizing the award ceremony.

Case 38

The RSO has been attending a course that takes several years to complete, and CPD point was not granted for partial completion of individual modules. Why is it so? If completion is the criteria, then the first few years before completion would fall into the previous cycle. Would those years be counted in the current cycle of completion?

Case 39

The RSO has attended a Safety and Environmental course and was told by the Approving Officer that the course has to be 100% OSH for CPD points to be granted. There was no partial granting of CPD points for the Safety portion of the course.

Case 40

The RSO completed a Bachelor degree in Occupational Safety and Health some years ago (outside the current CPD cycle) but has not used this degree for registration purpose (his registration, again many years ago, involved using a Certificate of Proficiency in Industrial Safety instead). Can this RSO use the Bachelor Degree for revalidation purposes even if it was gained outside the current CPD cycle?

Case 41

The RSO has not adequate CPD points and will only submit the application by end of May the earliest or even early June, anticipating that revalidation may not be granted before the expiry of the previous CPD cycle (6th June 2010). Will his current registration still be considered valid if the case is still being processed. The same happens to other RSO's who are required to submit further evidence for elaboration. However, in the last CPD cycle, the Development Bureau had asked for the revalidation letter to consider these RSO's registration status being current. Would Labour Department liaise with the Development Bureau to clarify on this issue?

General Observations

- 1 The Guidance Notes is too general and not specific. This could lead to different interpretation between the Labour Department and local safety organizations and / or RSO's.
- 2 Some RSOs who receive CPD certificates through attendance of seminars organized by local safety organizations but later their CPDs could not be recognized. But the Labour Department has not announced before hand which organizations are considered recognized.
- 3 If speaking in seminars, publishing articles in local safety journals and attendance of some Government-funded committee meetings are not CPD rewarding, then RSO's will not be encouraged to be speakers, to contribute good articles to these journals, and / or serve the local community through participation in committees. Once again, the Labour Department has not announced before hand which journals are considered recognized.