



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

Dear members,

The 4 safety associations HKOSHA, HKISA and IOSH(HK) and us met with the officials of the Labour Department on 13 May 2010 morning to discuss on the RSO Revalidation in particular the granting and denial of CPD points.

The following ideas were exchanged during the meeting:

1. Labour Department opined that since all the 41 cases were unidentified, it would not be impossible to give a blanket reply. In general, some applicants were denied CPD points while others submitting the claim for the same item were successful because the failed applicants either had not given sufficient details of the programme in their applications, or that they had doubled claimed the same item twice while the successful applicants only claimed once. So each case had to be judged on its individual merits. These cases will be individually followed up by a representative of the safety associations with the Labour Department after the meeting. In this meeting, only broad principles would be addressed.
2. Items seeking CPD points, be they seminars, courses, talks, visits, must be OSH related. While understanding that development of knowledge and skills in other areas of work is beneficial to the individuals, such as management skills, report writing skills, putonghua, computer skills, knowledge of construction technology, they are considered not OSH related and hence it will be ultra vires (outside their power of jurisdiction) for LD to approve such items for CPD purposes. Some items may be rather borderline and fall into grey area, such as risk assessment. The Labour Department will try to be flexible in approving these items.
3. When further asked to clarify what was meant by double claiming, Labour Department gave an example that an applicant might claim CPD points for say a Confined Space CP course at the start of the 4-year cycle. So, 3 years later the Confined Space CP Revalidation course attended would still fall within this 4-year cycle. Such claim would not be considered as double claiming because the nature of the two courses were different. However, if an applicant claimed CPD points for a Confined Space CP Revalidation course at the start of this cycle, and another Confined Space CP Revalidation course 3 years later in the same

4-year cycle, that would be counted as double claiming because the nature of the two courses were the same.

4. For those courses that require examinations such as Safety Auditor Training Course, CPD points will only be granted to those having passed the examination and other course requirements. If the applicant failed, CPD points will not be counted. For those courses that were structured in module format, CPD points can be claimed upon the completion of each module subject to proof of completion of the module by the course provider, such as issuance of a module completion certificate or transcript.
5. A conference speaker should claim CPD points on preparation of the talk, not on the actual time of the talk itself. However, if the speaker stays behind to attend the entire conference and was issued with a CPD certificate, the speaker can claim the CPD hours of the conference, but not both.
6. Labour Department will issue a letter to Works Branch of the Development Bureau and the Housing Authority bringing them to the notice that as far as a RSO has submitted an applicant for revalidation, and has not yet been rejected by Labour Department, the registration of the RSO is still valid.
7. RSOs who are not happy with the judgment of the Labour Department officer on denial of CPD points can appeal to more senior officers or to the Administration Appeal Board.
8. The Guidance Notes on RSO Revalidation is being revised by the Labour Department. The Labour Department is considering to upload on the department website names of those courses whose CPD points were accepted by the Labour Department. Since seminars and forums are of a different nature, Labour Department will not apply the same measure to CPD points for these functions.
9. The safety associations are planning to hold regular meetings with the Labour Department on CPD and other health and safety issues."
10. SRSO will try to work out & upload any accepted seminar, conference and talk etc. list on our website for easy reference after the regular meetings with Labour Department. (Still in the planning stage)
11. Basically the 4-year period is counted backwards from the date of submission of the application for RSO Revalidation, e.g. if a RSO submits the application on 1

January 2010, then the 4-year period will be from 1 January 2006 to 31 December 2009 inclusive.

12. However, if the last time the RSO submitted his / her application on 1 April 2006 and got revalidated, then the period from 1 January 2006 to 31 March 2006 has to be taken out from the current 4-year period to avoid double counting, meaning that the current period will be less than 4 years (from 1 April 2006 to 31 December 2009 only). RSOs have to take this into account when counting the adequacy of his / her CPD points.
13. If the RSO is asked to provide more documents later to substantiate his / her application, the former date of application is still valid up to the point that either the RSO is unable to provide such documents and hence the CPD points cannot be granted, resulting in a failure in the application to which Labour Department will issue a letter. Then the RSO cannot exercise his / her authority under the FIU (SOSS) Regulations. The RSO should complete more CPD programmes and when the CPD points are adequate (i.e. 100 or more), then he / she has should submit another application later. However, there is a time lag from the first application, and hence the period of counting will be correspondingly moved to a later date. As an example, the RSO after completing some CPD programmes submitted another application on 1 March 2010. Then the 4-year period will be counted back from the date of the second application, i.e. 1 March 2006 to 28 February 2010, and not the first, and the CPD points previously gained between the period 1 January 2006 to 28 February 2006 will automatically be lost. This means that the RSO must complete more CPD programmes and gain more CPD points than the deficient points.
14. The date of revalidation of the "old" RSOs are mostly in June, and so the period of June 2002 to June 2006 can be considered as the first cycle, while the current period of June 2006 to June 2010 the second cycle. However, since more and more RSO's are registered within the last few years, and their dates of revalidation will most probably be other than June, these so-called "cycles" will one day be non-existent. Nonetheless, Labour Department still accepts that since most of the "old" RSOs will get revalidated, and the date of revalidation will remain in June, hence there will still peaks of RSO Revalidation Applications in June 2014, June 2018 ... etc.