

**JOINT LIAISON GROUP OF OCCUPATIONAL SAFETY & HEALTH  
(JLGOSH)**

Your Ref. : (5) in L/M (2) to OSTC/SO/25  
15 August 2002

**Mrs Pamela Tan, JP**  
**Commissioner for Labour**  
Labour Department  
16/F Harbour Building  
38 Pier Road, Hong Kong

Dear Mrs Tan,

**Draft Guidance Notes on Continuous Professional Development Programmes  
under the Factories and Industrial Undertakings (Safety Officer and Safety  
Supervisors) (Amendment) Regulation 2001**

Thank you for providing the various safety organizations each with a copy of the captioned Guidance Notes drafted by your Department.

We are pleased to submit jointly our comments and suggestions to the draft Guidance Notes as presented in the attached paper.

We hope that all our comments and suggestions will be fully considered by your Department.

Yours sincerely,  
*For and on behalf of JLGOSH*



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Y K Kam  
President  
HK Occupational Safety and Health Association

**Joint Liaison Group of Occupational Safety & Health**

c/o Hong Kong Industrial Safety Association

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Presented to : **Mrs. Pamela Tan Kam Mi-Wah, JP**  
**Commissioner for Labour**

15 August 2002

**Comments on the  
Draft Guidance Notes on  
Continuing Professional Development Programmes under  
the Factories and Industrial Undertakings (Safety Officers and  
Safety Supervisors) (Amendment) Regulation 2001**

Issued by the Labour Department on 15 August 2002

Presented by : **Joint Liaison Group of Occupational Safety and Health  
(JLGOSH)**

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*(Abbreviations : GN = Guidance Notes*

*DGN = Draft Guidance Notes)*

**1. Introduction**

1.1 The Labour Department has drafted the captioned Guidance Notes (GN) and has distributed the draft to safety organizations for consultation.

1.2 The following organizations of Joint Liaison Group of Occupational Safety and Health (JLGOSH) would like to present their comments on the Draft Guidance Notes (DGN) jointly by this paper :

*(in alphabetical order)*

- (i) China Hong Kong Society of Safety Engineering
- (ii) Construction Industry Safety-Management Association
- (iii) HK Industrial Safety Association
- (iv) HKIE – Safety Specialist Group
- (v) HK Occupational Safety and Health Association
- (vi) HK Polytechnic University Industrial Centre Safety Course Alumni Association

(vii) Institution of Occupational Safety & Health, HK Branch

(viii) Society of Accredited Safety Auditors

- 1.3 A Forum was held on 5 August 2002 at the Lecture Hall TU101 of the HK Polytechnic University, and was attended by over 100 safety practitioners. This paper is based on the opinions and suggestions collected in the Forum.
- 1.4 The submission does not necessarily represent the full and only opinions of individual organizations involved in the joint submission.

## 2. Overall Comments

- 2.1 We support the DGN in general, except those points we make in this paper.
- 2.2 “Professional Bodies” is not defined in the DGN, and should be clarified.
- 2.3 The GN should clearly state the time frame of the application for revalidation. Labour Department should inform the applicant of the result of his application **within 28 days** from the date of application submission.

## 3. Specific Comments

### 3.1 Clause 7a

The CPD programmes should not be limited to occupational safety and health. They should be extended to cover common fields that can help RSO to perform better and specific fields related to the business of the organization in which the RSO is employed. Examples of common fields include: legal study, training and education, quality assurance, management skills, environment protection, etc. Examples of specific fields include: building technology / civil engineering for a RSO working in construction industry; mechanical/marine engineering for a RSO working in a shipyard; chemical technology for a RSO working in chemical industry, etc.

We propose to change the clause to “The CPD programmes should be relevant to the professional needs of safety officers. **For example, subjects related to occupational safety and health; general subjects such as legal study, training**

**and education, quality assurance, management skills, environmental protection, etc; or specific subjects relevant to the industry in which a safety officer is employed; ”**

Furthermore, we suggest that training in **personal development** should also be included and counted for CPD hours.

### 3.2 Clause 7d

Add “**technical visit**” as one of the activities which can help developing or imparting professional knowledge because “technical visit” is physically demonstrating new ideas or practical ways of dealing with problems and hence achieving the requirements.

### 3.3 Clause 8B

Add “**technical visit**” after the “forums and workshops” in line 3 of the paragraph.

Delete “**However, meetings of a social nature are not entitled to earn CPD hours.**” in the last sentence of the paragraph, since it is well understood to be the case.

### 3.4 Clause 8C

Books published should not be limited to those by professional bodies. Books published by commercial publishers should also be accepted.

### 3.5 Clause 8D

A service on the Executive Committee of a professional body should be regarded as a Professional Service in respect of CPD. As such service will expose a RSO to working with other safety professionals in developing programmes or organizing activities to promote the standards of the safety profession, and the standards of OSH in the territory at large.

We propose to modify the clause to “To claim CPD hours in this category, the safety officer shall participate in services on advisory boards, technical or research committees or special working groups, **executive committees** of professional bodies, **statutory bodies, or formal organisations** dealing with occupational safety and health issues.”

### 3.6 Clause 8E

In the last sentence, safety officer who develop new safety technology should also be eligible to claim CPD hours under this heading.

### 3.7 Clause 10

Time spent on doing homework, projects, and dissertations and time spent on group discussion/study of taught programmes should also be counted for CPD hours, because attendance of lecture normally forms only a small portion of total time that students are expected to spend on taught programmes.

The measurement of CPD for publications should be specified. Suggest to add **“For publications, each 500 words is counted one CPD hour.”** between clause 10 and 11.

## 4. **Conclusion**

We support the DGN in general, but would require that the scope of acceptable CPD programmes is to be broadened in order to better serve the developmental needs of safety officers. We summarize our views and recommendations as follows :

- (a) “Professional Bodies” should be defined.
- (b) An applicant should be informed of the result of application for revalidation within 28 days from the date of submitting the application.
- (c) The scope of CPD programmes should be broadened to include some general subjects.
- (d) “Technical visit” should be included as a CPD activity.
- (e) Books published by commercial publishers should be accepted as a work of CPD.
- (f) A service on the Executive Committee of a professional body should be included as a CPD activity.
- (g) Developing a new safety technology should be eligible for claiming CPD hours.

- (h) Homework, projects, dissertations, and group discussion/study of taught programmes should be eligible for CPD hours
- (i) For publication, each 500 words is to be counted one CPD hour.

We hope that our suggestions will all be adopted by the Labour Department in finalizing the GN.

For and on behalf of JLGOSH



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Y K Kam  
President  
HK Occupational Safety and Health Association

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