

APPENDIX XII

LETTER OF 24TH JUNE 1980 TO H.E. THE
GOVERNOR -- HEALTH INSPECTOR GRADE

24 June 1980

His Excellency Sir Murray MacLehose, G.B.E., K.C.M.G., K.C.V.O.,
Governor of Hong Kong

Your Excellency,

As Your Excellency is aware, we are engaged in the preparation of a further Report on a number of issues outstanding from our Reports Nos 1 and 2. Our current programme of work is set out in Chapter 20 of Report No. 2.

We felt, and continue to feel, obliged to give priority to the consideration of those issues listed in our published work programme, in particular to the consideration of the pay of those civil service grades on which we did not formulate advice for inclusion in Report No. 2. Nevertheless, in addition to these priority items we decided that if a grade dealt with in Report No. 2 produced sufficient new evidence to justify reconsideration of our initial recommendations we would include such reconsideration in our current review process.

Among the few grades who have submitted new evidence is that of Health Inspector and it is our intention to present our recommendations on this grade in the Report which is now in the course of preparation. This Report is unlikely to be completed before early September. However, in view of the Health Inspectors' sit-in we feel it appropriate to advise Your Excellency of the progress we have made in our reconsideration of the pay and structure of this grade together with our preliminary findings. Needless to say, these have not been influenced by the Health Inspectors' action.

New evidence in respect of the Health Inspector grade was submitted in late December 1979 in letters from the Hong Kong Public Health Inspectors' Association. The letters included a detailed statement of the role and responsibilities of Health Inspectors and provided further information in support of their case for upgrading the educational qualifications required for entry to the student rank from school certificate to matriculation. Subsequently we met the representatives of the Public Health Inspectors' Association on 25th January 1980. At this meeting the Association expanded on their claim and as a result we decided that the points they had made were sufficient to justify a further examination of the grade in

our current work programme. This examination of the Health Inspectors' claim has involved extensive research and investigation.

The present position is that appointment to the rank of Health Inspector requires possession of the Royal Society of Health "Diploma in Public Health Inspection for General Overseas Appointments". Recruits enter the grade as students and undergo two years' training for the Diploma. The minimum basic educational requirement for taking this Diploma examination and thus for appointment to the student rank is passes in the Hong Kong Certificate of Education Examination at grade C or above in English, Mathematics and Science. For this reason, the pay scale for the student rank is set at school certificate level.

For advancement in the grade, Health Inspectors are required to obtain a further Diploma. This is either the Royal Society of Health "Diploma for Inspectors of Meat and Other Foods" or the "Diploma of the Institute of Solid Wastes Management". The qualification for entry for the examinations for these Diplomas is possession of the Diploma in Public Health Inspection for General Overseas Appointments, that is to say, the Diploma required for appointment as a Health Inspector.

In presenting their case to us the Public Health Inspectors' Association focussed on the need to raise the educational entry qualification for the student rank from school certificate to matriculation. The main points made in support of their claim can be summarised as follows :

- (a) The Science and Mathematics content of some of the Diploma courses taken by Health Inspectors is now such that school certificate holders have been finding it increasingly difficult to pass the examinations particularly for the Diploma of the Institute of Solid Wastes Management. The Association has therefore suggested that results could be improved and standards raised if the minimum qualification for Student Health Inspectors was raised to matriculation level.
- (b) The duties of Health Inspector include work corresponding to that performed by Executive Officers, e.g. the preparation of memoranda, minutes and reports. Again, the Association has suggested that, if this type of work is to be performed adequately, an educational background above that of school certificate is necessary.
- (c) As Health Inspectors can advance to the rank of Senior Superintendent of Urban Services and exceptionally may be promoted into the Directorate, the Association has expressed the view that to

perform the managerial functions of these posts a basic educational background above that of school certificate level is required.

- (d) The senior ranks of the Health Inspector grade are required to perform a managerial role and to supervise officers in other grades, the entry qualification to some of which is matriculation or degree, e.g. Executive Officers or Amenities Officers. At Chief Inspector or Superintendent level, members of the Health Inspectorate are in overall charge of all the services provided by the Urban Services Department in a district.
- (e) The minimum age for the award of the Diploma for Public Health Inspection for General Overseas Appointments is 21. Candidates are therefore not usually selected for appointment below the age of 19, that is to say, sometime after the age at which school certificate is taken but when most matriculants leave school.
- (f) In the United Kingdom and the United States and other advanced countries, the Health Inspector is re-designated as Environmental Health Officer whose appointment requires a Bachelor Degree in Environmental Science plus practical training.

It was also brought to our attention that in May 1978 the Health Inspectors Training Board proposed that the educational standard for Student Health Inspector should be raised to matriculation.

We have summarised the principal points related to the Health Inspectors' claim in some detail since they indicate why their case appeared deserving of further consideration. However, investigation has shown that the Health Inspectors' case is not as straightforward as it first appeared.

In brief, the Health Inspectors' case for the upgrading of their entry qualification from school certificate to matriculation is based on two main arguments: first, the need for matriculation to pass their required examinations; second, the need for a higher basic educational background to perform the managerial functions of the senior ranks of the grade.

As far as the first point is concerned the records of the last five years show that over 90% of the school certificate students passed the first Diploma examination to qualify for appointment as Health Inspectors. We were advised that those who failed in their first attempt may resit the examination. During the same period, over 80% of Health Inspectors with school certificate background

obtained the Royal Society of Health Diploma for Inspectors of Meat and Other Foods. This second diploma qualifies them for advancement in the Health Inspector grade from rank II to rank I. The results in the examination for the Diploma in Solid Wastes Management, which is only an alternative for advancement, are less satisfactory. There is not the same incentive to select this Diploma and the results may also be affected by the fact that study for the Solid Wastes Diploma examination is on a part-time day-release basis whereas the other two Royal Society of Health diplomas are both full-time courses.

With regard to the second point we have seen no evidence to prove that school certificate holders in the Health Inspectorate are not capable of performing the managerial duties assigned to them. Furthermore, in our opinion, the basic educational qualification held by Student Health Inspectors ceases to have the same importance on completion of training when they all become diplomates of the Royal Society of Health. In other words they have all undergone a further period of study, which in addition to providing specialist training also better equips them academically to perform the duties of their grade.

It is common in both the private and public sectors for up and coming employees to be given appropriate courses in management to prepare them for more senior managerial positions. We believe this is a better way of ensuring that senior ranks in the Health Inspectorate improve their managerial performance.

The other points raised were the age at which the Diploma for Public Health Inspection for General Overseas Appointments is awarded, the minimum entry qualification for student Environmental Health Officers in the United Kingdom and elsewhere, and the Health Inspectors Training Board's recommendation for raising the entry qualification to matriculation. On these points we would comment as follows :

- (i) We understand that the majority of students are already 21 at the time they sit their examination and that even if they are under 21 they do not have to wait until reaching that age before receiving a Health Inspector's pay. We are also aware of a proposal for changing the period of training from two to three years to enable students to obtain practical on-the-job experience. We support this proposal which should make the training more effective and alleviate, if not eliminate, the age problem.
- (ii) We have already stated in paragraph 6.22 of our Report No. 2 that the pay and structure of the Hong Kong civil service should be related to Hong Kong circumstances and not to those of other countries.

- (iii) The Health Inspectors Training Board is a departmental board understandably concerned with raising the standards of the Health Inspectorate. As already indicated the records show that school certificate students are capable of achieving satisfactory results in the R.S.H. Diploma examinations. Moreover, we believe that if the revised training arrangements are introduced the quality of the trained Health Inspector should further improve.

Our conclusion therefore is that while it is reasonable for the Urban Services Department to recruit, as it does at present, a proportion of matriculants, a case has not been made for denying school certificate holders entry to the Health Inspector grade. However, educational qualifications are not the only factor in setting pay scales and we have also considered whether the duties and job content of Health Inspectors warrant any adjustment to their pay scales. In this respect our examination has brought to light an unsatisfactory situation relating to all grades with student ranks.

This arises from the system of setting pay scales for grades with student ranks on the basis of the educational qualifications required for entry to the training rank. The occupants of these ranks are in fact students undergoing training in a manner somewhat similar to that provided by tertiary educational institutions. Thus the situation exists where on the one hand students undergo training outside Government at their own expense, and enter the civil service at rates of pay set by the qualifications they then hold, while on the other hand occupants of student ranks are paid and trained by Government itself and on completion of their training enter a rank with pay scales influenced by the educational qualifications which they required to join the civil service as students. This is particularly unsatisfactory in the case of grades whose students require matriculation. The pay afforded to the student rank produces a situation where, after three years' training, the starting pay for the job is higher than that normally provided for a university graduate. In our opinion the pay scales of civil service grades should be set having regard to the qualifications required for the job undertaken by the fully trained officer. This is an area, therefore, where we shall be conducting a further review.

Finally, in view of the stress laid by the Health Inspectors on upgrading their entry qualification to matriculation, we feel we should draw attention to another issue which we have under consideration. In paragraph 34 of our Report No. 1, we mentioned that the gap between the school certificate and matriculation benchmarks, i.e. Point 5 for school certificate, and Point 16 for matriculation, appeared too large. That is to say that

eleven pay-points is too great a difference for two years' additional education. We made no adjustments to these benchmarks in our Report No. 2 because at that time we had insufficient evidence on which to base a recommendation. We subsequently commissioned a survey by the Pay Investigation Unit to obtain private sector evidence on the starting pay associated with educational qualifications. We have now received the results of this survey which clearly indicate that while the benchmark for school certificate is set at an appropriate level that for matriculation is far too high. We shall also include consideration of this in our future programme of work.

Having carefully considered all aspects of the case presented by the Public Health Inspectors' Association, both on its merits and in the context of our wider responsibilities for the civil service as a whole, our recommendation will be that the existing entry qualifications and pay scales should remain unchanged, except for any adjustment arising out of the additional one year training. We shall, however, be giving further consideration to this grade in the review of civil service grades with student ranks referred to above.

We hope that this letter will assist the Administration in its approach to the current problem.

I have the honour to be,
Your Excellency's obedient servant,

(S.Y. Chung)
Chairman