

STANDING COMMISSION ON CIVIL SERVICE
SALARIES AND CONDITIONS OF SERVICE

REPORT No. 61

GRADE STRUCTURE REVIEW
FOR VETERINARY LABORATORY
TECHNICIAN AND MEDICAL
LABORATORY TECHNICIAN GRADES

CHAIRMAN

DR PANG YIU-KAI, GBS, JP

JULY 2019

公務員薪俸及服務條件常務委員會
Standing Commission on Civil Service Salaries and Conditions of Service

26 July 2019

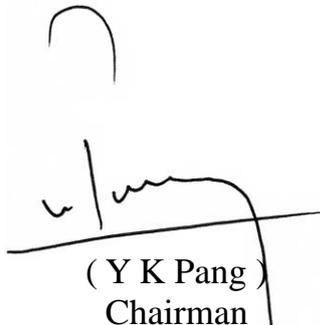
The Honourable Mrs Carrie Lam Cheng Yuet-ngor, GBM, GBS
The Chief Executive
Hong Kong Special Administrative Region
People's Republic of China

Dear Madam,

At the invitation of the Government, the Standing Commission on Civil Service Salaries and Conditions of Service (Standing Commission) has conducted a grade structure review for the Veterinary Laboratory Technician and Medical Laboratory Technician grades.

On behalf of the Standing Commission, I have the honour to submit our Report No. 61: Grade Structure Review for Veterinary Laboratory Technician and Medical Laboratory Technician Grades which contains our findings and recommendations.

Yours faithfully,



(Y K Pang)
Chairman

Standing Commission on Civil Service
Salaries and Conditions of Service

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Abbreviations

AFCD	Agriculture, Fisheries and Conservation Department
AI	Avian influenza
AMT	Associate Medical Technologist
AVT	Associate Veterinary Technologist
BSL3	Biosecurity Level 3
CGS	Clinical Genetic Service
CMT	Chief Medical Technologist
DH	Department of Health
EDD	Equine Disease Division
EDFZ	Equine Disease Free Zone
FPS	Forensic Pathology Service
GSR	Grade Structure Review
HA	Hospital Authority
HKCCSA	Hong Kong Chinese Civil Servants' Association
HKCEE	Hong Kong Certificate of Education Examination
HKDSEE	Hong Kong Diploma of Secondary Education Examination
HKU	The University of Hong Kong

HKU SPACE	School of Professional and Continuing Education of the University of Hong Kong
Improved Mechanism	Improved Civil Service Pay Adjustment Mechanism
MLS	Medical Laboratory Science
MLT	Medical Laboratory Technician
MLTB	Medical Laboratory Technologists Board
MPS	Master Pay Scale
MT	Medical Technologist
MTTB	Medical Technicians & Technologists Branch
NATA	National Association of Testing Authorities
PHLSB	Public Health Laboratory Services Branch
PLS	Pay Level Survey
PolyU	The Hong Kong Polytechnic University
QG	Qualification Group
SCSC	Senior Civil Service Council
SMP grade	Supplementary Medical Professions grade
SMP Ordinance	Supplementary Medical Professions Ordinance (Cap. 359)
SMT	Senior Medical Technologist
SSS	Starting Salaries Survey
SSSH	Sheung Shui Slaughter House

SVT	Senior Veterinary Technologist
The Commission	The Standing Commission on Civil Service Salaries and Conditions of Service
The Government	The Government of the Hong Kong Special Administrative Region
The Register	The Register of the Medical Laboratory Technologists
TPS	Training Pay Scale
VLD	Veterinary Laboratory Division
VLT	Veterinary Laboratory Technician
VT	Veterinary Technologist
WHO	World Health Organisation

Summary of Recommendations

Paragraph

The Veterinary Laboratory Technician Grade

Qualification Grouping and Entry Requirements

- (1) The qualification grouping of the Veterinary Laboratory Technician (VLT) grade should be re-classified from Qualification Group (QG) 3 Group II : Diploma Grades to QG 3 Group I : Higher Diploma or Associate Degree Grades. 5.12
- (2) The entry requirement of the VLT grade should be raised to Higher Diploma level. The Government should consider whether other academic qualifications recognised by the Medical Laboratory Technologists Board (MLTB) should be further accepted. 5.12 & 5.13
- (3) The Government's attention would be drawn to the need to consider the issues of qualification grouping of the VLT and Medical Laboratory Technician (MLT) grades in the wider context of the civil service QG framework in light of the findings of future pay surveys. 5.14

Merging of Ranks

- (4) The VLT II and VLT I ranks should be merged to form a new entry rank of Associate Veterinary Technologist (AVT). 5.25

Associate Veterinary Technologist Rank

- (5) The pay scale of the AVT rank should be set at Master Pay Scale (MPS) Points 14 – 24 with an omitted point at MPS Point 17. 5.31 & 5.35

Veterinary Technologist Rank

- (6) The pay scale of the Veterinary Technologist rank should be set at MPS Points 25 – 33A. 5.39

Creation of the Senior Veterinary Technologist Rank

- (7) A new promotion rank of Senior Veterinary Technologist should be created with a pay scale of MPS Points 34 – 39. 5.42

Conversion

- (8) Normal conversion arrangements should be adopted for the proposed adjustments to the pay scale of the VLT grade. The Government should consider drawing up any special conversion arrangements as appropriate. 5.48

The Medical Laboratory Technician Grade

Qualification Grouping and Entry Requirements

- (9) The qualification grouping of the MLT grade should be re-classified from QG 3 Group II : Diploma Grades to QG 3 Group I : Higher Diploma or Associate Degree Grades. 5.12
- (10) The entry requirement of the MLT grade should be raised to Higher Diploma level. The Government should consider whether other academic qualifications recognised by the MLTB should be further accepted. 5.12 & 5.13
- (11) The Government’s attention would be drawn to the need to consider the issues of qualification grouping of the VLT and MLT grades in the wider context of the civil service QG framework in light 5.14

of the findings of future pay surveys.

Merging of Ranks

- (12) The MLT II and MLT I ranks should be merged to form a new entry rank of Associate Medical Technologist (AMT). 5.25

Associate Medical Technologist Rank

- (13) The pay scale of the AMT rank should be set at MPS Points 14 – 24 with an omitted point at MPS Point 17. 5.31 & 5.35

Medical Technologist Rank

- (14) The pay scale of the Medical Technologist rank should be set at MPS Points 25 – 33A. 5.39

Senior Medical Technologist Rank

- (15) The pay scale of the Senior Medical Technologist rank should remain unchanged. 5.44

Chief Medical Technologist Rank

- (16) The Chief Medical Technologist rank should be retained. 5.44

Conversion

- (17) Normal conversion arrangements should be adopted for the proposed adjustments to the pay scale of the MLT grade. The Government should consider drawing up any special conversion arrangements as appropriate. 5.48

Other Issues

Promotion Requirements

- (18) The departmental managements of the Agriculture, Fisheries and Conservation Department (AFCD) and the Department of Health (DH) are encouraged to promulgate clear promotion requirements for the various ranks in the VLT and MLT grades after the Grade Structure Review. 5.50

Working Environment, Job-Related Allowances and Compensation for Overtime Work

- (19) The departmental management of AFCD is encouraged to consider administrative means to improve the physical working conditions at those remotely located laboratories as soon as possible. 5.52
- (20) The departmental managements of AFCD and DH are strongly encouraged to consider further if the special circumstances faced by staff of the VLT and MLT grades in certain laboratories warrant the introduction of specific job-related allowances. 5.52
- (21) The departmental managements of AFCD and DH should carefully monitor the amount of overtime work required and compensate staff accordingly, as well as consider any room for flexible deployment of staff to share out the heavy testing duties during seasonal disease outbreaks. 5.53

Continuous Monitoring of the Supply of Healthcare Manpower

- (22) The Government's continued efforts in monitoring the manpower supply situation for the medical laboratory technologist profession are fully supported. 5.54

Chapter 1

Introduction

1.1 This Report sets out the findings and recommendations of the Standing Commission on Civil Service Salaries and Conditions of Service (the Commission) in relation to the Grade Structure Review (GSR) for the Veterinary Laboratory Technician (VLT) and Medical Laboratory Technician (MLT) grades.

Background

The Commission

1.2 The Commission is a body appointed by the Chief Executive to advise on the structure, salaries and conditions of service of the non-directorate civilian grades in the civil service. Its terms of reference and membership in 2018 and 2019 are at **Appendix A** and **Appendix B** respectively.

Civil service pay policy

1.3 The civil service pay policy of the Government of the Hong Kong Special Administrative Region (the Government) is to offer sufficient remuneration to attract, retain and motivate staff of a suitable calibre to provide the public with an effective and efficient service; and to ensure that civil service remuneration is regarded as fair by both civil servants and by the public they serve through maintaining broad comparability between civil service and private sector pay.

Improved Civil Service Pay Adjustment Mechanism

1.4 To implement this policy, the Government has put in place the Improved Civil Service Pay Adjustment Mechanism (Improved Mechanism) since 2007. Under the Improved Mechanism, civil service pay is compared with private sector pay on a regular basis through regular surveys, namely, the six-yearly Pay Level Survey (PLS) to ascertain whether the civil service pay remains broadly comparable with the private

sector, the Starting Salaries Survey (SSS)¹ to compare the starting salaries of non-directorate civilian grades in the civil service with the entry pay of jobs in the private sector requiring similar qualifications and/or experience, and the annual Pay Trend Survey to ascertain year-on-year pay adjustments in the private sector.

1.5 With the implementation of the Improved Mechanism and through the regular conduct of pay surveys and the ensuing pay adjustments where appropriate, the pay of non-directorate civilian grades should be broadly comparable with that of their private sector counterparts. This has enabled most non-directorate civilian grades to recruit people of suitable calibre and to retain and motivate them.

Grade Structure Review for non-directorate civilian grades

1.6 Notwithstanding the conduct of regular service-wide surveys under the Improved Mechanism, some grades may still face recruitment and retention difficulties from time to time due to their unique circumstances, and a review and, if necessary, a revamp of their grade structures might be required to address such problems. Other than recruitment and retention difficulties, should there be fundamental changes in the job nature, level of responsibilities and job complexity of a grade, a GSR might also be called for.

1.7 Upon invitation by the Government, the Commission has completed two GSRs for non-directorate civilian grades since the implementation of the Improved Mechanism, namely, the GSR for the Veterinary Officer grade as well as the Government Counsel grade and the related Legal Aid Counsel grade and Solicitor grade in 2008 and the GSR for the Marine Officer and Surveyor of Ships grades in 2017. The Commission's recommendations and observations in the two GSRs were set out in its Report No. 43 and Report No. 57 respectively.

¹ In the past, SSS were conducted once every three years. In 2017-18, the Commission conducted a review on Civil Service PLS and SSS at the invitation of the Government and recommended, inter alia, the continued conduct of the PLS at a six-yearly interval but the conduct of the SSS as and when necessary in future in response to specific circumstances. The Government decided to accept in full the recommendations of the Commission in its Report No. 59: Review on Civil Service Pay Level Survey and Starting Salaries Survey published in December 2018.

Invitation from the Government

1.8 In June 2018, the Government invited the Commission to conduct a GSR for the VLT grade and the related MLT grade. The VLT grade in the Agriculture, Fisheries and Conservation Department (AFCD) is facing serious recruitment and retention problems. Since the result of the GSR may have implications for the MLT grade in the Department of Health (DH) which has identical entry requirements, the Government recommended that the GSR on the VLT grade should also cover the MLT grade. The Government requested the Commission to submit its findings and recommendations to the Chief Executive by mid-2019. Having considered the recruitment and retention situations of the two grades and other relevant pieces of information, the Commission was satisfied that there was a case to carry out a GSR for the two grades and readily accepted the Government's invitation to take on the task. The GSR commenced in August 2018.

Chapter 2

General Framework and Principles

Scope of the Review

2.1 Having regard to the invitation letter of the Government, and drawing reference from the experience of the GSRs completed in 2008 and 2017, the Commission considers that the current exercise should focus on whether and how the grade structures, entry requirements, pay scales and qualification grouping of the VLT and MLT grades should be altered with a view to improving their staff recruitment and retention situations. The Commission will also draw the Government's attention to other relevant findings, identified in the course of the GSR, which may fall outside the scope of the GSR but are nonetheless relevant to the efficient and effective management of the grades.

Guiding Principles and Key Considerations

2.2 Taking into account the terms of reference of the Commission and building on the experiences of past reviews, the Commission considers that the review should be guided by the following principles and key considerations –

- (a) the Government's civil service pay policy as set out in paragraph 1.3, which is to offer sufficient remuneration to attract, retain and motivate staff of a suitable calibre to provide the public with an effective and efficient service; and to ensure that civil service remuneration is regarded as fair by both civil servants and by the public they serve through broad comparability with the private sector;
- (b) the established pay principles, such as the qualification benchmark system for determining entry pay as well as the outcome of detailed deliberation in previous reviews,

notably the 1989 Salary Structure Review²;

- (c) how the work nature, job duties, responsibilities and workload of the two grades have evolved since the 1989 Salary Structure Review;
- (d) public expectation on the two grades under the prevailing social, economic and political climate;
- (e) morale, retention and career progression situation of the two grades;
- (f) how changes to the grade structures, pay scales, etc. recommended under the GSR may affect the existing staff of both grades;
- (g) wider implications that the recommendations of the GSR may have on related grades and beyond; and
- (h) relevant wider community interests, including financial and economic and public health considerations.

Mode of Operation

2.3 The Commission has adopted a two-tier mode of operation to conduct the GSR, under which a dedicated Working Group is established to conduct the GSR before submitting its findings and proposals to the full Commission for consideration. The membership of the Working Group is at **Appendix C**.

2.4 The Working Group conducted the GSR through a combination of fact-finding exercise, invitation and examination of written submissions from the departments, staff bodies and concerned staff, as well as visits and meetings with them. The Commission had invited written submissions from the departmental managements of AFCD and DH, staff bodies (including the staff association for the two grades, i.e., the Medical

² Upon invitation of the Government in March 1989, the Commission conducted a salary structure review of some 340 non-directorate civilian grades and completed the exercise in December 1990.

Technicians & Technologists Branch (MTTB) of the Hong Kong Chinese Civil Servants' Association (HKCCSA), the Senior Civil Service Council (SCSC) and the Model Scale 1 Staff Consultative Council) as well as staff of the VLT and MLT grades. A total of ten written submissions, as listed at **Appendix D**, were received.

2.5 As in the previous reviews, the Commission firmly believes that consultation with stakeholders is crucial for ensuring that adequate opportunities are provided for the staff associations, as well as individual staff members, to express their views to the Commission and its Working Group so that they will have a better understanding of the operations of the grades under review and a first-hand grasp of staff views and sentiments. In the course of this review, the Working Group organised four visits to the departments and met staff of the VLT and MLT grades. The Working Group also conducted separate meetings with the two departmental managements and the HKCCSA, one of the constituent associations of the SCSC, as well as the MTTB of the HKCCSA, to listen to their views. When the Commission came to a preliminary view on the submissions after considering the advice of the Working Group, it also invited the two departmental managements and the aforementioned staff associations to further listen to their views before finalisation of the GSR report. **Appendix E** lists out the meetings and visits conducted by the Commission and its Working Group respectively.

2.6 Throughout the Working Group's deliberation, it had adhered to the guiding principles and key considerations set out in paragraph 2.2 above. It had also taken full account of all the submissions of departmental managements, the staff associations as well as individual staff members, and duly considered the characteristics and the manpower situation of the two grades. The Working Group had put forth a series of preliminary recommendations for the Commission's consideration. After carefully reviewing the preliminary recommendations of the Working Group and conducting a final round of meetings with the departmental managements and the staff associations, the Commission finalised its recommendations. The Commission believes that its findings and recommendations in the GSR will help AFCD and DH address the manpower problems of the VLT and MLT grades and will be beneficial to the long-term development of the two grades.

Chapter 3

Overview of the Veterinary Laboratory Technician Grade

Overview

Basic Information

3.1 The VLT grade is a Supplementary Medical Professions grade (SMP grade) under the management of AFCD. The Director of Agriculture, Fisheries and Conservation is the Head of the VLT Grade.

3.2 AFCD is organised into five functional branches, namely, the Agriculture Branch, Fisheries Branch, Inspection and Quarantine Branch, Conservation Branch and Country and Marine Parks Branch. VLTs of AFCD work at the Veterinary Laboratory Division (VLD) and Equine Disease Division (EDD) of the Inspection and Quarantine Branch of AFCD³.

3.3 Established in 1997, VLD is responsible for providing surveillance and diagnostic services to meet the needs of the Government, the livestock, poultry and aquaculture industries, and the private veterinary practitioners. Apart from laboratory services provided to the public sector such as surveillance on avian influenza (AI) in birds, screening on prohibited and restricted chemicals in pre-slaughtered animals to safeguard public health, post-mortem services to assist the Hong Kong Police Force with investigation in cruelty to animals etc., VLD has also been providing diagnostic testing services to the private veterinary sector when an official governmental test report is deemed necessary, subject to service charges under the “user pays” principle. Since the major outbreak of Highly Pathogenic AI in 1997, VLD has been expanding in terms of organisation structure, range of testing services provided and the number of tests conducted.

3.4 With the establishment of the Equine Disease Free Zone (EDFZ) in Conghua, Guangzhou, and further successful trial movements of

³ There is one Veterinary Technologist posted to the Veterinary Section of the Hong Kong Zoological and Botanical Gardens in the Leisure and Cultural Services Department.

competition horses between EDFZ and Hong Kong, a new EDD was established in AFCD in December 2017, which is responsible for facilitating the cross-border transportation of Hong Kong competition horses between Hong Kong and Guangzhou and monitoring health conditions of horses in Hong Kong.

Veterinary Laboratory Technician grade

3.5 Members of the VLT grade constitute the backbone of the manpower of VLD and EDD, and provide the following services –

- (a) conducting laboratory tests (round-the-clock in case of emergencies such as disease outbreaks);
- (b) evaluating, validating and updating new testing protocols and methodologies;
- (c) carrying out maintenance and calibration of various laboratory apparatus;
- (d) writing up and updating the accreditation documentation;
- (e) participating in inter-laboratory comparisons/parallel studies and quality assurance programmes;
- (f) handling public enquiries on veterinary laboratory tests;
- (g) for the VLTs working at EDD, providing important information about disease prevention, spread and control and predicting horse disease outbreak and emergence; and
- (h) assisting in day-to-day administrative work.

3.6 The history of the grade can be traced to 1969⁴. Prior to 1979, there were two grades, namely the VLT grade (comprising the Student VLT rank, the VLT II rank and the VLT I rank) and the one-rank Veterinary Technologist (VT) grade. In 1979, the Commission

⁴ The Student VLT, VLT II and VLT I ranks became established offices under the Pension Benefits Ordinance (Established Offices) Order, Cap. 99J, on 15 January 1969.

recommended in its Report No. 2 that VT should become the promotion rank for VLTs with the necessary qualifications. In the 1989 Salary Structure Review, the Commission recommended no change to the structure of the grade⁵.

Qualification grouping and entry requirements

3.7 The VLT grade (now comprising the entry rank of VLT II⁶ and the promotion ranks of VLT I and VT) is classified under Qualification Group (QG) 3 Group II : Diploma Grades. Appointment to the entry rank of VLT II requires a Diploma in Medical Laboratory Science (MLS) of the Hong Kong Polytechnic/Polytechnic University or equivalent, registration as a medical laboratory technologist in Part II of the Register of the Medical Laboratory Technologists (the Register) under the Supplementary Medical Professions Ordinance (SMP Ordinance)⁷ (Cap. 359) and meeting the relevant language proficiency requirements⁸. The existing entry requirements are set out at **Appendix F**.

3.8 The SMP Ordinance provides a statutory framework for the registration, discipline and management of persons engaged in occupations supplementary to medicine. Currently, the Ordinance applies to the following five professions, viz., the medical laboratory technologists (to which the VLT and MLT grades belong), occupational therapists, optometrists, physiotherapists and radiographers. Each profession has a separate register and a person shall not practise such profession in Hong Kong unless he is registered in the relevant profession and holds a valid practising certificate. Qualifications recognised for registration as medical laboratory technologists in both Part II and Part I of the Register⁹ are set out at **Appendix G**.

⁵ In its Report No. 25, the Commission, while adjusting the pay of the student rank in view of the substantial amount of time trainees spent on functional duties, considered that the pay scales of the functional ranks, i.e. the VLT II, VLT I and VT ranks, were appropriate.

⁶ There is currently a Student VLT rank with pay under the Training Pay Scale (TPS) at TPS Points 4-6. VLT II rank forms a combined establishment with Student VLT rank, i.e. there is no specific limit on the number of posts in each of their constituent ranks. AFCD has not employed any Student VLT since 2001 and there is no incumbent staff. AFCD is arranging the deletion of the student rank.

⁷ The SMP Ordinance (Cap. 359) was enacted in 1980.

⁸ The language proficiency requirements of VLT II rank is Level 2 or above in both Chinese Language and English Language in the Hong Kong Diploma of Secondary Education Examination (HKDSEE) or Hong Kong Certificate of Education Examination (HKCEE) or equivalent.

⁹ Persons registered in Part I of the Register can practise without supervision, whereas those registered in Part II can only practise under the supervision of a person registered in Part I.

Pay and rank structure

3.9 As at 31 March 2019, the VLT grade had an establishment of 47 posts (25 VLT II, 13 VLT I and nine VT posts), and a strength of 35 staff (16 VLT IIs, 13 VLT Is and six VTs).

3.10 The current pay scale for the VLT II rank is Master Pay Scale (MPS) Points 8 – 21. The pay scales for the VLT I rank and VT rank are MPS Points 22 – 28 and MPS Points 29 – 33. For easy reference, the dollar value of the full MPS points as at 31 March 2019 is at **Appendix H**.

Table 3.1

Rank	Establishment (as at 31 March 2019)	Strength (as at 31 March 2019)	Current pay scale (MPS Points)
VT	9	6	29 – 33
VLT I	13	13	22 – 28
VLT II	25	16	8 – 21
Total	47	35	

Comparison with grades requiring registration under the SMP Ordinance

3.11 With the exception of the VLT and MLT grades, the other four SMP grades, namely, the Occupational Therapist grade, the Optometrist grade, the Physiotherapist grade and the Radiographer grade are all classified under QG 3 Group I : Higher Diploma or Associate Degree Grades. The pay and rank structure of these six grades are listed at **Appendix I**.

3.12 For rank structure, the four SMP grades under QG 3 Group I (except for the Optometrist grade which is a single-rank grade) all have a four-tier rank structure (e.g. in the case of the Radiographer grade, from Radiographer II to Radiographer I to Senior Radiographer and then Superintendent Radiographer). This is different from the VLT grade which has three tiers (viz., VLT II to VLT I and then VT) and the MLT grade which has five tiers (viz., MLT II to MLT I to Medical Technologist (MT) to Senior Medical Technologist (SMT) and then Chief Medical Technologist (CMT)). The pay for the entry rank of VLT II and MLT II (at MPS Point 8) is lower than that for the other four SMP grades,

including the entry ranks of Occupational Therapist II, Physiotherapist II and Radiographer II (at MPS Point 14) and the single-rank grade of Optometrist (at MPS Point 13).

Changes in Job Nature, Level of Responsibilities and Job Complexity

3.13 In the 1989 Salary Structure Review, the Commission recommended no change to the structure of the VLT grade. As three decades have passed since the last review, AFCD advises that there has been a complete rethink of the roles and job nature of the VLT grade, evolving from simple technicians with mechanical production line skills to technologists who are required to provide advice, develop new test methodologies and conduct researches, and which is now moving closer to roles and responsibilities in areas which, in the past, fell solely under the remit of laboratory scientists. The key factors contributing to the changes which AFCD cited are highlighted below –

- (a) New Testing Modalities – With technological advancement in recent years, new molecular-diagnostic techniques requiring in-house development, validation, and review which are highly technical in nature as compared with past conventional test modalities, have been introduced. The skills and knowledge of VLT grade staff, both in terms of width and depth, have to be enhanced. Their workload has also increased correspondingly.
- (b) Test Development, Research and Advisory Role – VLT grade staff nowadays are required to conduct researches for test method advancement to cope with the ever-changing needs of the veterinary laboratory field, involving multiple animal species, and to provide advice on the test methodologies and result interpretation. Their support to the Veterinary Officers is very important as the latter do not always have an in-depth understanding of some of the newly-developed laboratory testing methodologies.
- (c) Increased Biosafety Risks – Over the years, there has been an increasing risk of the VLT grade staff being exposed to health hazard in handling samples with infectious agents

which may be zoonotic in nature. The VLT grade staff working in the Biosecurity Level 3 (BSL3) Laboratory¹⁰ are required to undergo specific training in handling pathogenic and potentially lethal agents.

- (d) Quality Management – Laboratories of AFCD are accredited under the veterinary testing programme of the National Association of Testing Authorities (NATA), Australia. VLT grade staff are required to acquire auditing skills to assist in implementing and maintaining a detailed and extensive quality assurance system which was not under their remit previously.
- (e) Public Expectation and Increasing Demand – The rising expectation for higher quality laboratory testing services, both in terms of test accuracy and reporting time, associated with the social, economic and political changes in the community, have brought extra pressure on the VLT grade staff. There are also greater demands, both in number and in type, for surveillance testing. For example, there is an increased emphasis on food safety and hygiene requirements in animal products in the community. There are also tighter deadlines for reporting laboratory test results.

3.14 The Commission has considered the submission of the AFCD departmental management, the views conveyed by the staff associations and by individual staff members and reached the conclusion that the scope of work and complexity of responsibility of the VLT grade has indeed increased substantially since 1989. The changes in the job nature, level of responsibilities and job complexity of the VLT grade are of an incremental nature arising from technological advancement and social changes. They are natural and inevitable, though not fundamental.

¹⁰ The BSL3 laboratory, a self-contained modular laboratory physically separated from other laboratory buildings, satisfies the requirements of the World Health Organisation and World Organisation for Animal Health for handling and isolation of pathogens with high zoonotic potential. With the emergence of H7N9 AI, BSL3 Laboratory came into operation in December 2012 and was further expanded in 2017.

Manpower Situation

3.15 One of the key considerations in the current GSR is whether there are proven and persistent recruitment and retention difficulties encountered by the VLT grade. The Commission and its Working Group have looked into the recruitment, retention, vacancy and career progression situations of the grade.

Recruitment

3.16 AFCD has encountered persistent and serious difficulties in the recruitment of sufficient candidates to fill the VLT II vacancies. The Commission appreciates the effort put up by AFCD in resolving its recruitment problem by implementing various stop-gap measures to enhance the chance of successful recruitment including the adoption of a flexible approach in arranging all-year-round recruitment exercise¹¹. However, AFCD has consistently failed to identify a sufficient number of candidates to meet the recruitment targets, as illustrated below in the statistics of the latest recruitment exercises conducted between 2014 and 2019 –

Table 3.2

Date of Recruitment Exercise	Target Number of Recruits / Number of vacancies	Number of Applications Received/ Applicants Invited for Interview	Number of Offers Made	Number of Offers Declined	Number of Candidates Reported for Duty
2019	12	129/18	2	1	0 ¹²
2018 ¹³	10	113/22	1	0	1
2017	7	47/17	2	1	1
2015	7	81/18	2	1	1
2014	8	102/16	2	1	1

¹¹ With no application deadline stipulated, interested candidates can apply anytime. AFCD checks the number of applications received on a regular basis and determines the arrangements for interviews.

¹² One candidate has accepted offer and is expected to report duty in August 2019.

¹³ All-year-round recruitment exercise launched in June 2018.

3.17 In each of the recruitment exercises set out above, only one VLT II was successfully recruited¹⁴ against the target of filling seven to 12 vacancies. In other words, only around 8% to 14% of the VLT II vacancies were filled each time. The result is far from satisfactory and this clearly demonstrates the persistent and serious recruitment difficulties AFCD faces.

3.18 AFCD is competing with DH, the Hospital Authority (HA) and the private sector for the same pool of suitable candidates to fill the VLT II posts. With a substantially lower entry pay scale of MPS Points 8 – 21 (\$20,270 to \$40,420 as at 31 March 2019) as compared with that of the Associate Medical Technologist working in HA¹⁵ (\$27,340 to \$46,420 as at 31 March 2019), the VLT grade in AFCD is not as competitive as HA in terms of pay offer. In terms of the nature of work and exposure, the VLT grade which is mainly responsible for handling animal testing is also considered by many candidates and the VLT grade staff to be narrow in scope when compared with the MLT grade in DH and the Medical Laboratory Technologist grade in HA whose main duty is to handle medical laboratory testing. Prima facie, the VLT grade is less attractive to candidates with similar qualification in MLS because of the perceived limitation in the scope for development due to the lack of exposure to conducting medical laboratory tests.

Retention and Vacancy

3.19 Apart from persistent recruitment difficulties, AFCD also encountered difficulties in retaining VLT grade staff in the period from 2015 to 2017. This situation seems to have eased over the past two years.

¹⁴ Including the candidate mentioned in footnote 12.

¹⁵ HA reformed its Medical Laboratory Technologist grade in February 2008. In particular, HA combined the first two ranks of the grade to form a new single basic rank of Associate Medical Technologist and upgraded the pay scale and qualification requirement of the new basic rank to a pay scale equivalent to MPS Points 13 – 24 and a Bachelor of Science degree in MLS respectively.

Table 3.3

Year	Resignations [@]		Resignation Rate [#]	
	VLT II	Total (VLT II + VLT I +VT)	VLT grade	Civil Service
2018-19	0	0	0%	0.84%
2017-18	0	0	0%	0.80%
2016-17	3	3	8.33%	0.63%
2015-16	1	1	2.78%	0.65%
2014-15	0	0	0%	0.55%
Average	/	/	2.22%	0.69%

[@] Only the rank with officers resigning is listed in the table.

[#] Expressed as a percentage of the total strength at the beginning of the financial year.

3.20 As the establishment of the VLT grade is relatively small, any wastage of the VLT grade staff has a serious impact on the total strength available to cope with the routine duties and responsibilities expected of the grade, resulting in a heavier burden on the VLT grade members staying in the service. Amid its small establishment of only 25 VLT II posts, four resigned in the past five years. Although no VLT II left in the past two years from 2017-18 to 2018-19, AFCD considers that this only reflects the fact that currently, all incumbent VLT IIs are either relatively junior or they are more settled in the rank¹⁶ and are more inclined to stay in the service. This should not be seen as an indication that the retention problem has been resolved.

3.21 The establishment, strength and vacancy positions of the VLT grade in the past three years are tabulated below –

¹⁶ According to AFCD, as at 31 March 2019, there are only two VLT II who have joined the grade for less than two years while the rest have joined the grade for 11 years or more.

Table 3.4

As at	Establishment	Strength	Vacancy	Vacancy Rate	
				VLT grade	Civil Service
31 March 2019	47	35	12	25.53%	4.92%
31 March 2018	47	34	13	27.66%	3.69%
31 March 2017	44	33	11	25.00%	4.27%
Average	/	/	/	26.06%	4.29%

A breakdown of the above figures by rank is at **Appendix J**.

3.22 As at end March 2019, the overall vacancy rate of the grade stood at 25.53 % (i.e. 12 vacancies against an establishment of 47), which was significantly higher than the rate of 4.92% for the entire civil service. The average vacancy rate of 26.06% in the past three years was far higher than the civil service average of 4.29%. At the entry rank level, as at 31 March 2019, there were nine VLT II vacancies which, when calculated against the total establishment of 25 VLT II posts, represented a significant vacancy rate of 36%. With persistent and serious recruitment and, to a certain extent, retention problems, the manpower shortage problem with the VLT grade has remained unresolved and extra workload inevitably has to be shared out by the existing staff which may, in turn, aggravate the problem of staff turnover due to huge work pressure.

Career Progression

3.23 On average, it takes about 9.47 years for a VLT II to be promoted to VLT I. To progress upwards to the VT rank, it takes a further average of 7.19 years.¹⁷ AFCD has pointed out that the career development and advancement prospect for the VLT grade may not be attractive, particularly when considered alongside the other considerations set out in paragraph 3.18.

¹⁷ The figure on average number of years of service for promotion to VLT I is based on the results of the previous three promotion exercises conducted in 2011, 2013 and 2014, while that for promotion to VT is based on the results of the previous three promotion exercises conducted in 2009, 2010 and 2016.

3.24 As at 31 March 2019, there were only 12.5% (2 out of 16) VLT IIs who were in the age bracket of 21 to 30 while the others were in the more mature age bracket of 36 to 45 years old. AFCD has failed to recruit the younger generation to join the grade. This may in turn give rise to a succession problem for the grade in the long run if the recruitment problem persists.

Chapter 4

Overview of the Medical Laboratory Technician Grade

Overview

Basic Information

4.1 The MLT grade is an SMP grade under the management of DH. The Director of Health is the Head of the MLT Grade.

4.2 As at 31 March 2019, there are 13 major services in DH, including the Specialised Services and the Centre for Health Protection. The Clinical Genetic Service (CGS) and Forensic Pathology Service (FPS) under the Specialised Services and the Public Health Laboratory Services Branch (PHLSB) under the Centre for Health Protection are supported by MLT grade staff, amongst others.

4.3 CGS is the major service provider in the territory for the diagnosis and provision of counselling on genetic disorders. CGS provides comprehensive genetic testing services with a primary role in genetic diagnosis, counselling and prevention.

4.4 FPS provides forensic pathology and clinical forensic medicine services to government departments. It operates public mortuaries which are specialised forensic pathology facilities for conducting medico-legal investigation of deaths that are reportable to the Coroner in accordance with the Coroners Ordinance (Cap. 504). It also works closely with the Police and provides professional input on medico-legal aspects of criminal cases.

4.5 PHLSB comprises the Microbiology Division, the Histopathology & Cytology Division, the Chemical Pathology & Haematology Division and the Neonatal Screening Division. Its major functions include providing laboratory diagnostic and public health consultation services, providing laboratory support on outbreak investigation, conducting quality assurance programme, acting as Reference Laboratory to provide confirmatory service and technology transfer/training, and collaborating with local and international partners on

disease surveillance, infection control standards and information exchanges.

Medical Laboratory Technician grade

4.6 Members of the MLT grade are deployed to work in CGS, FPS and PHLSB of DH, providing the following services –

- (a) conducting routine and specialised medical laboratory tests and examinations (working for extended hours outside normal office hours on a need basis having regard to operational need, e.g. during public health emergencies such as outbreak of seasonal influenza);
- (b) evaluating, validating and updating new testing protocols and methodologies;
- (c) undertaking quality control, quality assurance and laboratory safety activities and measures;
- (d) supporting the accreditation of DH laboratories;
- (e) carrying out maintenance and calibration of laboratory apparatus;
- (f) supporting inter-laboratory collaborations with local and non-local laboratories;
- (g) assisting in maintaining data/statistics and handling enquiries relating to medical laboratory tests; and
- (h) supporting day-to-day operation of DH laboratories.

4.7 The MLT grade has a long history which can be traced to the 1950s¹⁸. Prior to 1979, the MT grade (comprising the MT, SMT and CMT ranks) and the MLT grade (comprising the Student MLT, MLT II and MLT I ranks) were two different grades. In its Report No. 2 of 1979, the

¹⁸ The Chief Medical Technologist rank became an established office under the Pension Benefits Ordinance (Established Offices) Order on 1 April 1954. The MLT I and MLT II ranks became established offices under the same Ordinance on 1 April 1959.

Commission noted that MLTs, on obtaining the qualification of Associate Membership of the Institute of Medical Laboratory Sciences, were eligible for advancement to the MT rank. The various ranks in the MT grade were treated as the senior ranks of the MLT grade. At the time, staff members had also submitted to the Commission that the MLT II and MLT I ranks should be merged but a review carried out in 1978 indicated that there was a clear functional difference between the two ranks. In the 1989 Salary Structure Review, the Commission noted that the staff and the departmental management had requested a revision of the pay scales of the grade to reflect the change from Diploma to Higher Diploma in the level of the course in MLS required for appointment. However, as there had been no significant change in the nature of work and level of responsibility of the grade, the Commission did not support the request. To ease the retention difficulties, the Commission recommended an omitted point at MPS Point 12 for the MLT II rank. The Commission also agreed to delete the Student MLT rank since no Student MLT had been recruited since 1978.

Qualification grouping and entry requirements

4.8 As with the VLT grade, the MLT grade is classified under QG 3 Group II : Diploma Grades and is also one of the six SMP grades in the civil service. The existing entry requirements, set out at **Appendix F**, are the same as those for the VLT grade. The requirement for registration under the SMP Ordinance for appointment is the same as with the VLT grade.

Pay and rank structure

4.9 The MLT grade consists of five ranks: MLT II, MLT I, MT, SMT and CMT. As at 31 March 2019, the MLT grade had an establishment of 261 posts (103 MLT II, 44 MLT I¹⁹, 95 MT, 18 SMT and 1 CMT posts) and a strength of 261 staff²⁰ (130 MLT IIs, 23 MLT Is, 93 MTs, 14 SMTs and 1 CMT) in DH.

4.10 The Commission observes that the MLT grade has a seemingly inverted structure between the ranks of MLT I and MT, where the

¹⁹ In the 2017 Resource Allocation Exercise, 21 MLT II posts were upgraded to MLT I posts for strengthening the laboratory technical support in DH and meeting the increasing job duties, job complexity and level of responsibility of the MLT grade.

²⁰ Including one MLT I and one SMT who were on pre-retirement leave as at 31 March 2019.

establishment of the MT rank is greater than that of the MLT I rank²¹. The rank ratios of MLT II to MLT I and MLT I to MT are 2.34 to 1 and 0.46 to 1 respectively.

4.11 DH advises that the seemingly inverted structure between the ranks of MLT I and MT has existed since the 1970s or perhaps even earlier and the situation has remained unchanged following the establishment of DH in 1989. Although the history of this seemingly inverted structure between the ranks of MLT I and MT cannot be traced, DH advises that it is possible that the shape is caused by the fact that the two ranks used to belong to two different grades in the past.

4.12 The current pay scale for the entry rank of MLT II is MPS Points 8 – 21 with an omitted point at MPS Point 12. The pay scales of the promotion ranks of MLT I, MT, SMT and CMT are MPS Points 22 – 28, MPS Points 29 – 33, MPS Points 34 – 39 and MPS Points 40 – 44 respectively. Though the MLT grade has a five-tier rank structure as compared with the three-tier structure of the VLT grade, the pay structure of the first three tiers of the MLT grade (i.e. MLT II, MLT I and MT) are similar to those of the VLT grade (i.e. VLT II, VLT I and VT), except that an omitted point at MPS Point 12 is applicable to the MLT II rank only.

Table 4.1

Rank	Establishment (as at 31 March 2019)	Strength (as at 31 March 2019)	Current pay scale (MPS Points)
CMT	1	1	40 – 44
SMT	18	14	34 – 39
MT	95	93	29 – 33
MLT I	44	23	22 – 28
MLT II	103	130	8 – 21 (Omitted at 12)
Total	261	261	

²¹ A civil service grade is considered to have an inverted shape structure if the number of posts in its first promotion rank is larger than that in its basic rank. Such a grade structure could not be viable in the long run as there would unlikely be enough officers in the basic rank to meet the succession need of the next higher rank. Moreover, junior officers in the basic rank might have to be pushed up prematurely to act in the first promotion rank. As MT is not the first promotion rank of the MLT grade, the MLT grade may not exactly be considered a grade with an inverted shape structure in the strictest sense.

Comparison with grades requiring registration under the SMP Ordinance

4.13 As mentioned in paragraphs 3.11 and 3.12, the qualification grouping and pay and rank structure of the MLT grade resemble those of the VLT grade but are different from the other four SMP grades. Details of the qualification grouping and the pay and rank structure of these six grades are listed at **Appendix I**.

Changes in Job Nature, Level of Responsibilities and Job Complexity

4.14 Similar to the VLT grade, the MLT grade was also covered in the 1989 Salary Structure Review. As three decades have passed since the last review, DH advises that there has been an increase in the job complexity, level of responsibilities and job duties of the MLT grade over the years and the key factors contributing to the changes are summarised below –

- (a) Status of reference laboratory – DH laboratories have, over the years, acquired the status of reference laboratory in various aspects locally and globally, such as Local Reference Laboratory for Middle East Respiratory Syndrome, World Health Organisation (WHO) National Influenza Centre of Hong Kong, WHO Regional Reference Laboratory for Measles and Rubella in the Western Pacific Region and WHO Global Severe Acute Respiratory Syndrome Reference Laboratory. Testing work in these laboratories is often under intense media scrutiny, both in terms of turnaround time and quality of results. This helps allay public panic.
- (b) Quality Assurance and Accreditation Programmes – DH laboratories have participated in external quality assurance and accreditation programmes, e.g. the Cytogenetic Laboratory has become a Hong Kong Laboratory Accreditation Scheme accredited laboratory since 2009. This has inevitably led to extra work and duties for the MLT grade staff, including writing up, keeping and conducting regular review of documents, test validation and evaluation, equipment maintenance and

calibration and internal audit work.

- (c) Advancement in technology – With rapid advances in medical laboratory science, more complex and sophisticated laboratory technologies (in terms of the underlying science and data interpretation) are introduced. Greater intellectual capacity is required of the technical staff to handle the workflow and the large volume of data generated. It has also brought about a significant increase in the number and type of tests that can be conducted.
- (d) Rise in public expectation – With the rise in public expectation about the standard and quality of service, as well as public concern over infectious diseases of public health significance, there has been a rising demand for the number and type of tests to be conducted and the turnaround time for reporting testing results. This inevitably increases the job pressure of the MLT grade staff. Besides, medico-legal autopsies of homicide cases and suspected homicide cases are almost exclusively handled by the FPS of DH. There is rising public expectation for professional standard and integrity of the DH laboratories attaining the highest standard. In turn, meticulous documentation, maintenance of chain of custody and strict confidentiality are required of the MLT grade staff in these autopsy cases.

4.15 As with the VLT grade, although the Commission considers that there are no fundamental changes in the job nature of the MLT grade, it agrees that there has undoubtedly been an increase in the level of responsibilities and job complexity of the MLT grade over the past decades, albeit that the changes are of an incremental nature arising from technological advancement and social change, rather than of a fundamental nature.

Manpower Situation

4.16 DH indicates in its submission that the grade has faced recruitment and retention difficulties. The Commission and the Working

Group have examined the recruitment, retention, vacancy and career progression situations of the grade for an informed assessment.

Recruitment

4.17 DH did face recruitment difficulties for the entry rank of MLT II a few years ago but the situation seemed to have eased lately as illustrated in the statistics of the recruitment exercises conducted between 2014 and end 2017. DH did not conduct any MLT II recruitment exercise in 2018 but launched a new MLT II recruitment exercise in March 2019. The recruitment exercise is still in progress.

Table 4.2

Date of Recruitment Exercise	Target Number of Recruits / Number of vacancies	Number of Applications Received/ Applicants Invited for Interview	Number of Offers Made	Number of Offers Declined	Number of Candidates Reported for Duty
Dec 2017	8	59/30	14	6	8
May 2017	11	73/50	20	13	7
Jan 2017	11	61/13	7	1	6
2016	14	75/20	8	4	4
2015	14	54/35	21	12	9
2014	19	61/27	16	4	12

4.18 As mentioned in paragraph 3.18, the VLT and MLT grades of the civil service, together with HA and the private sector, are competing for the same pool of suitable candidates in their recruitment exercises. DH’s recruitment statistics of the MLT II rank from 2014 to December 2017 show that DH did encounter, to a certain degree, some recruitment difficulties with an average of 63% (or a range from around 29% to 100%) of the vacancies being filled in the six recruitment exercises conducted during the period. However, in the latest recruitment exercise conducted in December 2017, all vacancies were successfully filled. In this connection, the Commission appreciates the effort put up by DH in resolving its recruitment problem by increasing the frequency of its recruitment exercises (three recruitment exercises conducted in 2017), granting incremental credit for experience to new recruits, and identifying more candidates for consideration for interview.

Retention and Vacancy

Table 4.3

Year	Resignations [@]			Resignation Rate [#]	
	MLT II	MT	Total	MLT grade	Civil Service
2018-19	3	1	4	1.54%	0.84%
2017-18	4	0	4	1.60%	0.80%
2016-17	7	0	7	2.75%	0.63%
2015-16	4	1	5	1.96%	0.65%
2014-15	2	1	3	1.18%	0.55%
Average	/	/	/	1.81%	0.69%

[@] Only ranks with officers resigning are listed in the table.

[#] Expressed as a percentage of the total strength at the beginning of the financial year.

4.19 According to DH, 23 officers resigned in the past five financial years, of which 86.96% (i.e. 20 out of 23) were MLT IIs. Of those who resigned, 52.17% (i.e. 12 out of 23) indicated that they left the grade to join HA or the private hospitals or laboratories. The average resignation rate of the grade at 1.81% is slightly higher than the civil service average of 0.69%.

4.20 The establishment, strength and vacancy positions of the MLT grade in the past three years are tabulated below –

Table 4.4

As at	Establishment	Strength ²²	Vacancy	Vacancy Rate	
				MLT grade	Civil Service
31 March 2019	261	261	0	0.00%	4.92%
31 March 2018	259	259	0	0.00%	3.69%
31 March 2017	259	250	9	3.47%	4.27%
Average	/	/	/	1.16%	4.29%

A breakdown of the above figures by rank is at **Appendix J**.

²² Including staff who were on pre-retirement leave.

4.21 As at end March 2019, including the two staff who were on pre-retirement leave, the vacancy rate of the MLT grade was naught.

4.22 In view of the low vacancy rate and the satisfactory recruitment situation in the latest recruitment exercise, the Commission is of the view that there are no proven persistent recruitment difficulties for the MLT grade. Yet the grade has been experiencing some slight turnover problems, as evidenced by a resignation rate which is higher than that of the whole civil service. DH has to deal with these turnover problems when they arise.

Career Progression

4.23 The career progression of the MLT II rank is not favourable due to the small establishment of the MLT I rank. On average, it takes an MLT II some 21.2 years to be promoted to be an MLT I. On the other hand, the promotion prospect improves significantly from the rank of MLT I to the rank of MT. It takes an average of 5.8 years to be promoted to MT due to the larger establishment of the MT rank when compared to that of the MLT I rank. For further progression, it takes an average of another 24.2 years for an MT to be promoted to SMT and 8.8 years for an SMT to be promoted to CMT.²³

4.24 As at 31 March 2019, about 27% (35 out of 130) of the MLT IIs were in the age bracket of 21 to 35. As compared with the VLT grade, which has a very small establishment and is facing persistent recruitment difficulties, there is less concern over succession problem in the MLT grade.

4.25 Nevertheless, the Commission acknowledges the need to improve the career development opportunity for the entry rank of MLT II at DH so as to boost staff morale and keep them in the service of the MLT grade.

²³ The figures on the average number of years of service for promotion are based on the results of the last three completed promotion exercises for the MLT I, MT and SMT ranks (i.e. in 2016 to 2018), and that of the last completed promotion exercise for the CMT rank (i.e. in 2015).

Chapter 5

Analyses and Recommendations

5.1 Based on the manpower statistics of the VLT and MLT grades as set out in Chapter 3 and Chapter 4, the Commission has concluded that the VLT grade is facing persistent and serious recruitment and retention difficulties which, if not properly addressed, will be detrimental to the efficient operation of AFCD, and which will in turn adversely affect its role in the protection of public health. The MLT grade, though not facing persistent recruitment difficulties, has been experiencing slight turnover problems in the past. If not properly addressed, the turnover rate in DH will continue to deplete DH's training and recruitment resources which is detrimental to the provision of testing and validation services necessary for the maintenance of public health in Hong Kong.

5.2 The Commission and its Working Group received a total of ten submissions from the departmental managements of AFCD and DH, the staff associations and individual members of the VLT and MLT grades. The following major proposals have been put forth in the submissions as well as at the meetings the Commission and its Working Group held with the departmental managements, staff associations and at the sessions that the Working Group held with VLT and MLT grades staff –

- (a) re-classifying the qualification grouping and revising the entry requirements of the VLT and MLT grades;
- (b) merging the two ranks of VLT II and VLT I to form a new entry rank of Associate Veterinary Technologist (AVT) as well as merging the two ranks of MLT II and MLT I to form a new entry rank of Associate Medical Technologist (AMT)²⁴ in the two grades respectively;
- (c) revising the pay scale of the entry ranks of the VLT and

²⁴ The staff associations propose to call the merged entry ranks of the VLT and MLT grades as Veterinary Technologist II (VT II) and Medical Technologist II (MT II) respectively, which are comparable, in terms of grade structure, to the AVT and AMT proposed by the departmental managements of AFCD and DH.

MLT grades with one omitted point;

- (d) revising the pay scale of the VT and MT ranks²⁵ which will be the first promotion rank in the two grades, after the proposed merger of the VLT II and VLT I ranks to form a new entry rank of AVT and the MLT II and MLT I ranks to form a new entry rank of AMT;
- (e) creating a new promotion rank of Senior Veterinary Technologist (SVT) in the VLT grade; and
- (f) whether to delete the CMT rank and revise the pay scale of the SMT rank of the MLT grade.

Analyses and Recommendations

5.3 We have carefully considered the proposals put forth by the departmental managements, the staff associations and individual staff members in their entirety. Our analyses and recommendations are set out in the ensuing paragraphs.

Re-classifying the qualification grouping and revising the entry requirements of the VLT and MLT grades

5.4 From the submissions received, all stakeholders consider that the qualification grouping of the VLT and MLT grades should be re-classified in view of the changes in job duties, level of responsibilities and job complexity of the two grades over time. But they differ as to under which QG the two grades should be re-classified. Both the departmental managements of AFCD and DH propose to re-classify the VLT and MLT grades from QG 3 Group II : Diploma Grades to QG 3 Group I : Higher Diploma or Associate Degree Grades. The staff associations, on the other hand, propose to re-classify the two grades to QG 8 : Degree and Related Grades. Individual staff members who have made written submissions hold divergent views, with some supporting re-classifying the QG of the VLT and MLT grades to QG 3 Group I while

²⁵ The first promotion ranks for the VLT and MLT grades proposed by the staff associations are named as VT I and MT I respectively, which are comparable, in terms of grade structure, to the VT and MT proposed by the departmental managements of AFCD and DH.

the others support re-classifying it to QG 8.

5.5 As for entry requirements, both departmental managements recommend setting Higher Diploma in MLS as the updated academic qualification for entry while the staff associations consider that a Bachelor's degree is required. To allow for flexibility and considering that under the current legal framework, holders of Higher Certificate in MLS, similar to holders of Higher Diploma in MLS, are also accepted for registration in Part I of the Register, the departmental management of DH further proposes that the entry qualification for the MLT grade should be extended to cover "a qualification recognised for registration in Part I of the Register under the SMP Ordinance". Details of the entry requirements as proposed by the departmental managements are at **Appendix K**.

5.6 Both departmental managements consider that setting the minimum entry qualification at the Higher Diploma level is necessary and sufficient for the competent performance of the relevant jobs. Holders of Higher Diploma in MLS should have learnt the theories of most of the routine laboratory methods and technologies and acquired the basic skills to enable them to perform their functions effectively within a short period of time upon the assumption of duty.

5.7 The departmental management of DH has also pointed out that since only some of the registrants in Part II and Part I of the Register hold qualifications at degree or above level²⁶, setting the entry qualification at the degree level may exclude a significant portion of the registered medical laboratory technologists already in the market from joining the VLT and MLT grades in the future. This will hinder the department's flexibility in recruitment in case of disease outbreak and/or a surge in demand for MLT staff. Besides, the proposed QG (i.e. QG 3 Group I) is in line with that for the other SMP grades, i.e., the Physiotherapist, Occupational Therapist, Radiographer and Optometrist grades.

5.8 On the other hand, the staff associations consider the departmental managements' proposals to re-classify the two grades to QG 3 Group I inappropriate as the Higher Diploma programme in MLS is no

²⁶ According to the database on the medical laboratory technologists kept by the Central Registration Office of DH, as at 13 July 2018, 62% and 41% of the registrants in Part II and Part I respectively of the Register hold qualifications at degree or above level.

longer offered by the local tertiary institutions²⁷. They argue that an entry requirement below the level of a Bachelor's degree does not reflect the market situation as most graduates nowadays are degree holders and HA has already raised the entry requirement of its Medical Laboratory Technologist grade (comparable to the MLT grade in DH) to degree level since 2008²⁸. Besides, the vast majority of members of the VLT and MLT grades now are degree holders.

5.9 As stated in paragraphs 3.14 and 4.15, the Commission recognises that there has been an increase in the job complexity and the level of responsibilities for the staff of the two grades over time, albeit that the changes are of an incremental nature arising from technological advancement and social change, rather than of a fundamental nature. We consider it essential to change the qualification grouping of the two grades so that candidates with the necessary calibre can be recruited to continue to provide an effective and efficient service at the two departments.

5.10 In considering the appropriate qualification grouping for the VLT and MLT grades, the Commission has taken into account the established civil service QG system where the level of qualification required for a job is the minimum level considered necessary for the competent performance of the job. We have also borne in mind the legitimate concern of the departmental management of DH about the need to maintain flexibility in the qualification requirement for the MLT grade so as not to make it unduly restrictive in case of a surge in demand for MLT staff.

5.11 All practising medical laboratory technologists, including both MLTs and VLTs, must hold a practising certificate under the SMP Ordinance. Holders of a Higher Diploma in MLS are qualified for registration in both Part I and Part II of the Register. A summary of the requirements for registration as set out in the Medical Laboratory Technologists (Registration and Disciplinary Procedure) Regulations (Cap. 359 sub. leg. A) is at **Appendix G**. Though the local institutions are no

²⁷ The Higher Diploma in MLS previously offered by the Hong Kong Polytechnic University was upgraded to degree level with effect from the 2004-05 academic year.

²⁸ HA conducted a review of its Medical Laboratory Technologist grade in 2008. Subsequent to the review, the entry requirement of the grade was upgraded to degree level, though the entry salary was only set at HA General Pay Scale Point 13 (equivalent to MPS Point 13, which is the benchmark pay point of QG 3 Group I).

longer offering Higher Diploma in MLS, there is still a course offered in the relevant discipline at the higher certificate level²⁹. Besides, a person who holds a qualification not prescribed in the aforementioned regulation may also apply for registration and assessment will be made by the relevant professional registration board based on individual merits.

5.12 In light of the above considerations, the Commission agrees that a Higher Diploma in MLS should be the minimum level required for the competent performance of the job of VLTs and MLTs now given the change in job complexity and level of responsibilities of the two grades over time. While a Bachelor's degree will offer useful elements to better equip VLTs or MLTs in performing their jobs, it is not the minimum requirement and such a requirement may also restrict the pool of candidates available for consideration for appointment. We therefore agree with the departmental managements and **recommend re-classifying the qualification grouping of the VLT and MLT grades to QG 3 Group I : Higher Diploma or Associate Degree Grades and raising the entry requirement to Higher Diploma.**

5.13 On DH's suggestion to further accept other academic qualifications recognised by the Medical Laboratory Technologists Board which administers the registration of Medical Laboratory Technologists, we will defer it to the Government and the relevant authorities to handle as this is an accreditation issue.

5.14 Notwithstanding the above, the Commission has taken note of staff concerns over the need to heed market conditions where most graduates in MLS are now degree holders and that HA has already raised the entry qualification requirement of its Medical Laboratory Technologist grade to a Bachelor's degree and that most MLT grade staff now hold qualifications higher than a Higher Diploma. As the Commission had already noted in its Report No. 59³⁰ that "...some Staff Sides consider the qualification and/or experience possessed by the civil service recruits of some of the ranks are different from and usually higher than the entry

²⁹ There are currently three courses in MLS offered by the local institutions, namely, Bachelor of Science in MLS offered by the Hong Kong Polytechnic University, Bachelor of Science in MLS offered by the Tung Wah College and Higher Certificate in MLS offered by the School of Professional and Continuing Education of the University of Hong Kong (HKU SPACE).

³⁰ Standing Commission Report No. 59: Review on Civil Service Pay Level Survey and Starting Salaries Survey, paragraph 7.20.

requirements...”, we would draw to the Government’s attention the need to consider the related issue of qualification grouping of the VLT and MLT grades in the wider context of the civil service QG framework in light of the findings of future pay surveys.

Merging the two ranks of VLT II and VLT I to form a new entry rank of AVT as well as merging the two ranks of MLT II and MLT I to form a new entry rank of AMT in the VLT and MLT grades respectively

5.15 Both departmental managements propose to merge the current entry rank and the first promotion rank in the VLT and MLT grades, i.e. VLT II and VLT I as well as MLT II and MLT I, to form a new single rank of AVT in the VLT grade and AMT in the MLT grade respectively. The staff associations share similar views (the VT II and MT II ranks proposed by the staff associations are ranks comparable to the departmental managements’ proposed AVT and AMT ranks in terms of grade structure).

5.16 The departmental management of AFCD has pointed out that the testing duties undertaken by VLT IIs and VLT Is are similar, with the major functional difference being in their authority to issue laboratory test reports. According to the current policy and practice in AFCD, VLT Is are responsible for overseeing and counterchecking all the results of tests conducted by VLT IIs before the issue of reports (i.e. vertical crosschecking). After the proposed merger, the new AVT rank will in general take up all the existing duties of both VLT II and VLT I ranks. An AVT in future can cross-check another AVT’s report before issue (i.e. horizontal crosschecking), enhancing work efficiency. According to AFCD, this will be especially beneficial if the testing work must be completed within a strict and short reporting time.

5.17 As for the MLT grade, the departmental management of DH considers that there is no significant job difference between the MLT II and MLT I ranks. Under DH’s current guidelines for promotion, both MLT IIs and MLT Is can be promoted to the MT rank provided that they are registered in Part I of the Register and have at least five years’ continuous service in the MLT I or MLT II rank. MLT Is are not the appraising officers of MLT IIs. The test reports submitted by MLT Is and MLT IIs are currently signed off by MTs or other officers at a higher rank and the work flow will remain unchanged after the proposed merger. Currently, while some MLT Is are assigned work that involve higher job complexity and level of responsibility and are required to assist MTs in some of their

duties, such duties may also be taken up by the more senior and experienced MLT IIs. The departmental management of DH has further advised that by simplifying the grade structure, the overall operational efficiency of the grade will be enhanced and there will be improved flexibility in the deployment of staff. The departmental management of DH has further submitted that the proposed merger of the MLT II and MLT I ranks mirrors the structure of the comparable grade of Medical Laboratory Technologist in HA³¹.

5.18 Both departmental managements have further justified their proposals on the ground that the mergers will provide better career paths for the two grades and will improve staff morale. The proposed mergers are expected to help retain VLT IIs and MLT IIs because they will be granted increments until they reach the maximum pay point of the two merged ranks, without having to wait for vacancies at the VLT I and MLT I ranks and promotion to those ranks for a salary increase upon promotion.

5.19 The staff associations hold a similar view that the structures of the two grades should be comparable to that of the Medical Laboratory Technologist grade in HA and support the proposed rank mergers though they are asking for a different pay scale as elaborated in paragraph 5.30 below.

5.20 In considering the proposed mergers, the Commission has taken note that in the 1989 Salary Structure Review, there was a precedent in the merging of the Nursing Officer I and Nursing Officer II ranks in the Registered Nurse grade and there was further reshuffling of duties amongst these two ranks and the Senior Nursing Officer rank to streamline the then multi-layer supervisory structure of the grade, with a view to increasing operational efficiency and enhancing the career progression prospects of the grade.

5.21 Mindful of the need to rationalise any functional differences that currently exist between the two relevant ranks in the VLT grade and the MLT grade, the Working Group has raised the issue with the departmental managements of AFCD and DH separately. It has raised with the departmental management of AFCD concerns over the possible

³¹ HA has merged the two lowest ranks of its Medical Laboratory Technologist grade into one single rank of AMT subsequent to the grade review in 2008.

impact of the change in workflow, i.e. from vertical crosschecking to horizontal crosschecking, on the quality of the testing work. The departmental management of AFCD has assured the Working Group that the proposed horizontal crosschecking is in line with internationally accepted practice, and that AFCD's veterinary laboratories are accredited under the veterinary testing programme of NATA where there are protocols and steps which play an important part in ensuring accuracy of tests. AFCD also advises that officers registered in Part I of the Register should be able to work independently as stipulated in the SMP Ordinance. As such, they can issue test reports directly without the need for crosschecking by another officer. Therefore, the proposed horizontal crosschecking is only an extra step to be taken in line with good laboratory practice, but it is not a necessary step in safeguarding the quality of the testing work. In case of doubt, the AVTs can always seek advice from their supervisors such as VTs and Veterinary Officers.

5.22 The Working Group has taken note that as recent as 2018, DH upgraded 21 MLT II posts to MLT I posts and has thus enquired with the departmental management of DH if the 2018 upgrading exercise was to recognise functional differences in some of the MLT posts. In response, DH has advised that the upgrading exercise was mainly to strengthen the laboratory technical support in DH and meeting the increasing job duties, job complexity and level of responsibility of the MLT grade. In order to make sure that any functional differences amongst the MLT II and MLT I posts, should they exist, will not be overlooked in the course of the proposed rank merger, the Working Group has reminded the departmental management of DH on the need to consider reshuffling any supervisory duties previously taken up by MLT Is so that these duties will be rationalised and taken up by the appropriate ranks within the revised MLT grade structure after the proposed rank merger. The departmental management of AFCD has likewise been reminded to consider conducting a similar rationalisation exercise upon the proposed rank merger.

5.23 The current rank ratios of VLT II to VLT I and VLT I to VT in AFCD³² are 1.92 to 1 and 1.63 to 1 respectively. After the proposed merger of the two ranks of VLT II and VLT I to form the AVT rank, the rank ratio of the proposed AVT to VT will become 4.75 to 1. As for the

³² The VT post in LCSD has been excluded in calculating the rank ratio of VLT I to VT and that of the proposed AVT to VT in AFCD in this paragraph.

MLT grade at DH, the current rank ratios of MLT II to MLT I and MLT I to MT are 2.34 to 1 and 0.46 to 1. After the proposed merger of the two ranks of MLT II and MLT I to form the AMT rank, the rank ratio of the proposed AMT to MT will become 1.55 to 1. The departmental managements of AFCD and DH have both confirmed that they do not envisage that the changed rank ratios after merging will pose difficulty in management.

5.24 The Commission acknowledges the view of the two departmental managements that the structures of the VLT and MLT grades should be consistent with that of the other SMP grades, such as the Physiotherapist and the Radiographer grades. We also agree that enhancement of the structure of the two grades through merging the two relevant ranks should help address the recruitment and retention difficulties in AFCD and maintain the attractiveness of a career with the MLT grade in DH. Furthermore, we also appreciate that the proposed rank mergers should help enhance the overall operational efficiency of the two grades.

5.25 In light of the above considerations, we **recommend that the VLT II and VLT I ranks be merged to form the AVT rank in AFCD and the MLT II and MLT I ranks be merged to form the AMT rank in DH.** We believe that with an enhanced pay scale after the merger, the entry ranks of the two grades will become more attractive and induce more potential candidates to apply for the jobs, thus addressing recruitment and retention problems in the two departments which might have come about in the past.

5.26 As mentioned in Chapter 4, there is at present a seemingly inverted structure in the MLT grade between the MLT I rank and the MT rank. Such a structure would not be viable in the long run as there would unlikely be enough officers in the lower rank to meet the succession need of the higher rank. While the proposed rank merger should remove the effect of a seemingly inverted shape in the MLT grade structure between the MT rank and the MLT I rank, we hold the view that the merger should not be a means to tackle any administrative problems arising from an inverted shape grade structure. Instead, the merger should solely aim to tackle any recruitment and retention problems of the grades concerned and to improve departmental operational efficiency.

Revising the pay scale of and introducing an omitted point for the entry ranks of the VLT and MLT grades

Pay scale of the entry ranks

5.27 While sharing similar views on the merger of ranks, the departmental managements of AFCD and DH and the staff associations hold different stances regarding the pay scales of the merged entry ranks of the two grades. The departmental managements of AFCD and DH propose a pay scale of MPS Points 14 – 24 for the merged AVT and AMT ranks³³, while the staff associations propose a pay scale of MPS Points 14 – 27. Some individual staff members of the MLT grade also put forth a proposed pay scale of MPS Points 14 – 28 for the merged entry rank of AMT.

5.28 Both departmental managements consider that the manpower problems arise mainly due to the substantial pay gap between the entry ranks of the two grades and the Medical Laboratory Technologist grade in HA. The current proposal should help narrow the existing pay gap.

5.29 In this connection, both departmental managements propose to set the starting salary of the new AVT and AMT ranks at MPS Point 14, i.e, one point above the benchmark of QG 3 Group I at MPS Point 13 so as to make the remuneration package of AVT and AMT more comparable to that for the entry rank of the Medical Laboratory Technologist grade of HA. This proposal on the entry pay point, together with the recommended maximum pay point at MPS Point 24³⁴ for the two grades, will put the pay scale of the new AVT and AMT ranks on par with the entry rank pay scales of the other SMP grades.

5.30 On the other hand, while also proposing a starting salary at MPS Point 14 for the two merged ranks of AVT and AMT, the staff associations are proposing a maximum pay point at MPS Point 27. This

³³ The current pay scale for the VLT II and MLT II rank is MPS Points 8 – 21 (with an omitted point at MPS Point 12 applicable to MLT II rank only), while the pay scale for VLT I and MLT I rank is MPS Points 22 – 28.

³⁴ The maximum pay point for most of the entry ranks of other SMP grades, namely Occupational Therapist II, Physiotherapist II and Radiographer II, is set at MPS Point 24, except for the single-rank Optometrist grade which has its maximum pay point set at MPS Point 23. Detailed pay and rank structures of these grades are listed at [Appendix I](#). The maximum pay point for the AMT rank in HA is set at HA General Pay Scale Point 24 which is equivalent to MPS Point 24.

proposed pay scale of MPS Points 14 – 27 follows from their recommendation to re-classify the two grades to QG 8 : Degree and Related Grades.

5.31 In light of the above justifications, the Commission **recommends that the pay scale of the AVT and AMT ranks be set at MPS Points 14 – 24** which will be consistent with those of the entry ranks of the other SMP grades under QG 3 Group I. This revision will also make the pay scales for the entry rank of the VLT and MLT grades more comparable to that of the Medical Laboratory Technologist grade of HA, with a view to addressing the manpower problems in AFCD and DH.

Omitted point

5.32 Both departmental managements and the staff associations propose an omitted point for the entry ranks of the VLT and MLT grades as another measure to forestall retention difficulties of the two grades.

5.33 Both departmental managements propose an omitted point in the pay scale for the merged entry rank of AVT in the VLT grade and that for the merged entry rank of AMT in the MLT grade at MPS Point 17, i.e. an omitted point after three years of service. This proposal ties in with the requisite probationary period of the two entry ranks and the years of post-qualification experience required for registration in Part I of the Register³⁵ under the SMP Ordinance. On the other hand, the staff associations propose setting the omitted point at MPS Point 18.

5.34 Omitted points are provided in some ranks where officers can jump certain incremental points in their pay scales. In the 1989 Salary Structure Review, the Commission accepted that omitted points in a pay scale did increase the attractiveness of the pay scale and was useful in tackling recruitment and retention problems. In the same review, omitted points were recommended for some SMP grades, including the MLT grade³⁶ to ease retention difficulties. Since October 1989, an omitted

³⁵ Persons registered in Part I of the Register can practise without supervision, whereas those registered in Part II can only practise under the supervision of a person registered in Part I. The requirements for registration in Part I of the Register are set out in **Appendix G**.

³⁶ The Commission recommended omitted points for some SMP grades, including MPS Point 12 for the MLT II rank, MPS Point 16 for the Occupational Therapist II rank and MPS Point 30 for the Physiotherapist I and Radiographer I ranks, in the 1989 Salary Structure Review.

point has been introduced in the pay scale for the entry rank of MLT II at MPS Point 12. So far, there is no omitted point in the pay scale for VLT IIs.

5.35 In light of the need to tackle the serious recruitment and retention difficulties in the VLT grade and the slight turnover problem in the MLT grade, we **recommend an omitted point at MPS Point 17 for both the AVT and AMT ranks.** Setting it at MPS Point 17 will not only provide an incentive for AVTs and AMTs qualified for registration in Part I of the Register to stay on, but will also improve/maintain the attractiveness of the pay scale of the entry ranks of the two grades, thereby improving their manpower situations. Setting the omitted point at MPS Point 17 instead of Point 18 will mean that AVTs and AMTs will get a point jump three years instead of four years (as proposed by the staff associations) after joining the respective grades which should be welcomed by staff at the entry ranks.

Revising the pay scale of the VT and MT ranks for the VLT and MLT grades

5.36 Both departmental managements propose to adjust the pay scale of VT and MT from MPS Points 29 – 33 to MPS Points 25 – 33A to be consistent with the pay scale of comparable ranks in the other SMP grades. The staff associations, on the other hand, propose to revise the pay scale of VT I and MT I to MPS Points 28 – 33 (the VT I and MT I ranks proposed by the staff associations are ranks comparable to the existing VT and MT ranks in terms of grade structure). This follows from their proposed pay scale for the entry rank of VT II and MT II at MPS Points 14 – 27.

5.37 Both departmental managements also point out that the additional pay point at MPS Point 33A is proposed in recognition of the increase in responsibility and a higher level of expertise required of the VT and MT ranks in recent years. For example, VTs play an essential role in leading VLT Is and VLT IIs and providing them with advice on the test development, quality management programmes and overall operation of relevant laboratories, while MTs have to oversee the implementation of new and advanced technology in conducting laboratory tests and examinations, which includes providing relevant training to medical laboratory personnel, evaluating the testing results and preparing reports.

5.38 The Commission notes that MPS Point 34 is the pay point at which a civil servant becomes eligible for housing benefits. In the civil service, salary points have always been used as the basis to determine entitlement to housing benefits. In the 1989 Salary Structure Review, the Commission decided that where a rank scale was extended beyond the then MPS Point 37 (now MPS Point 33) in recognition of job factors, but officers of the rank remained ineligible for the specific housing benefit, the officers would receive an extended pay point at the then MPS Point 37A (now MPS Point 33A). The dollar value of the then MPS Point 37A (now MPS Point 33A) was identical to the then MPS Point 38 (now MPS Point 34) but without entitlement to the specific housing benefit.

5.39 In view of the above, we agree to the departmental managements' proposals to add one pay point (i.e. MPS Point 33A) to the relevant pay scales and **recommend a pay scale of MPS Points 25 – 33A for the VT and MT ranks.**

Creating a new promotion rank of SVT for the VLT grade at AFCD

5.40 The departmental management of AFCD proposes to create a new promotion rank of SVT with a pay scale of MPS Points 34 – 39 to strengthen communication and coordination among all ranks of the VLT grade as well as to create a better career path for the VLT grade in AFCD. This pay scale is modelled on that of comparable ranks of the other SMP grades, including the SMT rank in the MLT grade at DH. The staff associations also share the view on a need to create a new promotion rank for the VLT grade but they propose a pay scale of MPS Points 34 – 44.

5.41 AFCD is the only provider of government veterinary laboratory testing services in Hong Kong. With technological advancement, it is necessary to create a SVT rank to lead the VLT grade to fully uphold the quality of high-level and multi-faceted veterinary laboratory services. The proposed SVT rank, being the highest rank in the VLT grade, will assume a grade management role. The departmental management of AFCD further proposes that the proposed SVT rank will take up a supervisory role in the planning and coordination of all laboratory activities associated with the development of VLD in AFCD. Since the major outbreak of Highly Pathogenic AI in 1997, VLD has been expanding in its organisation structure, the range of diagnostic services provided and the number of tests conducted. With the emergence of different public health issues, such as antimicrobial resistance, a new veterinary laboratory

will be set up in the future AFCD Animal Management and Animal Welfare Building Complex under the Kai Tak Development project. The new rank of SVT will take the lead in coordinating all preparatory work for the new laboratory, reviewing the laboratory testing protocols and practices and planning for the future development and advancement of the veterinary laboratory services. Besides, the proposed SVT rank will also assume the role of Quality Manager to closely monitor, review and improve the quality assurance system of VLD in compliance with NATA's accreditation requirements.

5.42 According to the established civil service pay policy, the number of ranks and the division of responsibilities among ranks in a grade are determined by operational requirements. A new rank is created only if it is functionally justified and the pay scale of the new rank is set by reference to the pay scale of comparable ranks in the relevant QG³⁷. Having considered the functional need for the creation of the new SVT rank and having taken note of the pay scales of comparable ranks in the other SMP grades, we **recommend that an SVT rank be created with a pay scale of MPS Points 34 – 39**. With better promotion prospect arising from the creation of the new rank, the attractiveness of the grade should be enhanced. This will, in turn, serve to improve the serious and persistent recruitment and retention situation in the VLT grade. We, however, do not support the staff associations' proposal to set the pay scale of the SVT rank at MPS Points 34 – 44 as it is not consistent with the current pay scales of comparable ranks in the other SMP grades.

Whether to delete the CMT rank and revising the pay scale of the SMT rank of the MLT grade at DH

5.43 The staff associations have proposed to delete the CMT rank of the MLT grade at DH. They consider the CMT rank obsolete and propose that its functions be taken up by the Executive Officer grade. The staff associations also recommend revising the pay scale of the SMT rank from MPS Points 34 – 39 to MPS Points 34 – 44. The departmental management of DH, however, considers that there is a practical need to retain the CMT rank to assist in personnel and grade management matters. The CMT also has to liaise with users of the service and partners in the region for professional improvement and participating in various MLS

³⁷ Standing Commission Report No. 23: First Report on 1989 Salary Structure Review, paragraph 4.80.

related committees. Furthermore, the departmental management of DH does not see any strong justification to significantly raise the maximum point of the SMT rank as the major manpower problems lie with the entry rank.

5.44 In view of the absence of strong justifications advanced by the staff associations to significantly raise the maximum point for the SMT rank and having taken into account the reasons put forth by the departmental management of DH on a functional need for the CMT rank, we find it reasonable to **retain the CMT rank and recommend that no change is required to the pay scale of the SMT rank.**

Conversion

5.45 Under the existing civil service system, whenever a pay scale is revised, there is a need to convert the salary point of each serving officer to the new scale. The overriding principle is that no one should receive less pay on conversion to the new scale. Special conversion arrangements may be necessary to cater for special circumstances such as when the revision is related to a change in structure, e.g. a variation in the number of ranks in the grade, as in the case of the current GSR.

5.46 Both the departmental managements of AFCD and DH propose to adopt the normal conversion arrangements of the civil service as set out in **Appendix L** for their serving staff and confirm that no staff will be worse off on conversion. The departmental management of DH further proposes an exceptional conversion arrangement to provide an additional pay point to those MLT Is who are on the old minimum (i.e. MPS Point 22) irrespective of whether they opt to convert to the new scale. This is to ensure that the newly-promoted MLT Is will not be worse off when compared with the senior MLT IIs who get an incremental jump from MPS Point 21 to MPS Point 23³⁸ upon normal conversion.

5.47 In the course of staff consultation, some staff raised with the Working Group their concerns that staff currently acting in the ranks of

³⁸ Under normal conversion arrangements, when both the minimum and the maximum of the scale are raised and the revised scale has a maximum (i.e. MPS Point 24 for the merged AMT rank) which is two or more points higher than the old maximum (i.e. MPS Point 21 for the current MLT II rank), a civil servant who has served for one or more years on the old maximum should convert to two points above his existing pay point (i.e. MPS Point 23 upon normal conversion).

VLT I and MLT I might be worse off if they were yet confirmed to the VLT I or MLT I ranks at the time of rank merger and conversion. They fear that their seniority would be diluted upon rank merger. Both departmental managements reckon that complication will arise if there are still some MLT or VLT staff acting in the old promotion ranks of MLT I or VLT I but yet confirmed to those old promotion ranks at the time of rank merger and conversion. They have undertaken to explore suitable measures to tackle the issue. On the subject of seniority, DH advises that according to existing policy, officers in the same rank promoted to a higher rank or transferred to another rank on the same date retain their existing relative seniority. In other words, the merger will not compromise the seniority of MLT Is and VLT Is when the MLT II and MLT I ranks are merged to become the AMT rank and when the VLT II and VLT I ranks are merged to become the AVT rank.

5.48 In light of the above considerations and in line with the established practice, **we agree with the two departmental managements to adopt the normal conversion arrangements. On the proposal of DH at paragraph 5.46 to make a special conversion arrangement, we see merit in this proposal** based on the justifications advanced by DH which appear to be in line with the spirit that no staff will be worse off on conversion but will defer it to the Government to draw up any special conversion arrangements as appropriate.

Other issues

5.49 In conducting the GSR, we have come across issues which fall outside the ambit of the review but which we consider of relevance to the effective and efficient management of the two grades. We would like to bring them to the attention of the Government. The issues are set out below.

Promotion requirements

5.50 In the course of the GSR, the staff associations put forth in their submissions proposals on new promotion requirements³⁹ for various

³⁹ The staff associations propose the following new promotion requirements: (a) a Master's degree in MLS or Biomedical Sciences or equivalent and at least five years of experience as VT II or MT II for promotion to VT I or MT I; and (b) at least a further seven years of experience as VT I or MT I for promotion to SVT or SMT.

ranks of the two grades. As promotion requirements fall outside the remit of the current GSR, we have not examined the matter in detail. However, for the avoidance of doubt, we encourage the two departmental managements to promulgate clear promotion requirements for the various ranks in the grades after the GSR.

Working environment, job-related allowances and compensation for overtime work

5.51 In the course of the departmental visits and meetings with staff, the Working Group received views from staff on unsatisfactory working conditions, the need for specific job-related allowances and for overtime allowance during seasonal disease outbreaks. For the VLT grade staff, they raised concerns about the remote location of the Tai Lung Veterinary Laboratory and the Sheung Shui Slaughter House (SSSH), as well as the less than desirable working environment, especially at SSSH. On the other hand, MLT grade staff working in specific laboratories raised that they had to work in uncomfortable protective gear for long hours when handling test samples of certain diseases. Some members of staff stressed that they were frequently required to work overtime to handle urgent testings.

5.52 The departmental management of AFCD has advised the Working Group that a new veterinary laboratory with a much better working environment will be set up under the Kai Tak Development project. However, to address existing staff concerns, the Commission would encourage the departmental management of AFCD to consider administrative means to improve the physical working conditions at those remotely located laboratories as soon as possible given that a healthy working environment is conducive to boosting staff morale and improving efficiency and effectiveness of service. The two departmental managements are strongly encouraged to consider further if the special circumstances faced by staff of the VLT and MLT grades, such as the unsatisfactory working environment of certain laboratories and the specific work requirement of wearing protective gears for long hours, warrant the introduction of specific job-related allowances to address staff concerns.

5.53 The Commission notes a staff association's view that frequent overtime work is required when there is an upsurge in laboratory testing duties during seasonal disease outbreaks and understands that overtime work is unavoidable for the purpose of safeguarding public health. The

two departmental managements are advised to carefully monitor the amount of overtime work required and compensate their staff accordingly, as well as to consider any room for flexible deployment of staff to share out the heavy testing duties during seasonal disease outbreaks.

Continuous Monitoring of the Supply of Healthcare Manpower

5.54 In the course of the GSR, the Working Group has considered if the manpower problems in the VLT and MLT grades come about solely because of competition from HA and the private healthcare sector which pay more than the Government or if there is a fundamental imbalance in the supply and demand of graduates from MLS or equivalent disciplines. The Working Group has taken note that the Food and Health Bureau has been monitoring the supply of healthcare manpower. In its “Report on Strategic Review on Healthcare Manpower Planning and Professional Development” published in 2017, the Government has projected that there will be a slight shortage (but close to equilibrium) of medical laboratory technologists in the short to medium term and sees a need to keep in view the manpower situation of medical laboratory technologists in the market. In the same report, the Government further acknowledges that increased training places and the provision of self-financing programmes can help meet the increasing demand for medical laboratory technologists in both the public and private sectors. The Government is therefore subsidising 20 training places of the MLS programme operated by the Tung Wah College under the Study Subsidy Scheme for Designated Professions/Sectors for the 2017-18 cohort.

5.55 The Commission fully supports the Government’s continued efforts in monitoring the manpower supply situation for the medical laboratory technologist profession among other healthcare personnel, particularly in the face of a growing ageing population in Hong Kong.

Chapter 6

Concluding Remarks and Acknowledgements

Concluding Remarks

6.1 With the ever-growing and changing health needs of the community brought about by challenges such as changes in disease trends, emerging infections, ageing population and biological hazards communicable via animals and birds over the years, the public expectation on laboratory testing quality, test accuracy and turnaround time is skyrocketing. The VLT and MLT grades are unquestionably playing a more and more important role in safeguarding public health and food safety.

6.2 Through studying the written submissions received, meeting with the departmental managements of AFCD and DH, the relevant staff associations, as well as individual staff members of the two grades, and visiting the departmental laboratory facilities, we have acquired a better understanding of the operations of the two departments and the challenges faced by the VLT and MLT grades. We are greatly impressed by the dedication and commitment of the VLT and MLT grade members in providing internationally recognised veterinary and medical laboratory service which is essential to the well-being of the wider community.

6.3 We have reviewed the pay and rank structures of the two grades, having regard to the guiding principles and key considerations agreed for adoption in the GSR, as well as the information and views collated in the course of the exercise. Our recommendations are set out in Chapter 5. These recommendations, which include improving the pay scale of the merged entry ranks of AVT and AMT and the promotion ranks of VT and MT, as well as creating a promotion rank of SVT in the VLT grade, if endorsed and implemented, will enhance the pay of most serving staff of the two grades and bring the entry pay of the two grades to a level more comparable to that of the relevant rank in HA. We trust that these measures will not only help arrest the manpower problems identified in Chapter 3 and Chapter 4, but will also help bring about an attractive career for the VLT and MLT grades working in the Government.

6.4 Compared with the civil service, HA and the private sector can adjust the pay of the comparable jobs of the VLT and MLT grades much faster as necessary in response to market fluctuations. The Government, which relies on the regular pay surveys and, where appropriate, grade structure reviews, to ascertain the broad comparability of civil service pay with the private sector, is less flexible in offering more competitive pay to attract the same pool of talents in response to market fluctuations. However, it remains the Commission's view that in tackling recruitment and retention problems, pay adjustment could not be the only solution. Apart from a reasonable remuneration package, more recognition and appreciation of good performance, coupled with healthy promotion prospects, are essential and equally important in motivating staff to continue to give their best in performing their duties. We have accordingly touched on non-pay issues in the last part of Chapter 5, in the hope that the relevant authorities will take further steps outside the framework of pay and structure to enhance the overall attractiveness of a career with the two grades.

Acknowledgements

6.5 The Commission would like to convey our sincere gratitude to all parties who have contributed to the conduct of this GSR. We would like to thank the departmental managements of AFCD and DH and the staff associations for providing us with useful information and written submissions which have facilitated our deliberations. During the visits to the departments, we have received every co-operation and assistance from all quarters which has further enabled us to gain a better understanding of the operations of the departments and the challenges faced by the VLT and MLT grades. Our thanks also go to all staff members of the VLT and MLT grades for their valuable views and participation in the GSR.

6.6 We would also like to record our appreciation to the staff of the Joint Secretariat for their hard work and unfailing support throughout the exercise.

Standing Commission on Civil Service Salaries and Conditions of Service

Terms of Reference

I. To advise and make recommendations to the Chief Executive in respect of the non-Directorate Civil Service, other than judicial officers and disciplined services staff, on –

- (a) the principles and practices governing grade, rank and salary structure;
- (b) the salary and structure of individual grades;
- (c) whether overall reviews of pay scales (as opposed to reviews of the salary of individual grades) should continue to be based on surveys of pay trends in the private sector conducted by the Pay Survey and Research Unit, or whether some other mechanisms should be substituted;
- (d) the methodology for surveys of pay trends in the private sector conducted by the Pay Survey and Research Unit, subject to advice under I(c) and having regard to the advice of the Pay Trend Survey Committee;
- (e) matters relating to those benefits, other than salary, which the Commission advises as being relevant to the determination of the civil service remuneration package, including the introduction of new benefits or proposed changes to existing benefits;
- (f) suitable procedures and machinery to enable staff associations and staff to discuss with management their views on matters within the terms of reference of the Commission;
- (g) the circumstances in which it would be appropriate for the Commission itself to consider any issue, and how staff associations and management might present their views to the Commission in such circumstances; and
- (h) such matters as the Chief Executive may refer to the Commission.

II. The Commission shall keep the matters within its terms of reference under continuing review, and recommend to the Chief Executive any necessary changes.

III. The Commission shall give due weight to any wider community interest, including financial and economic considerations, which in its view are relevant.

IV. The Commission shall give due weight to the need for good staff relations within the Civil Service, and in tendering its advice shall be free to make any recommendations which would contribute to this end.

V. In considering its recommendations and advice, the Commission shall not prejudice the 1968 Agreement between the Government of the Hong Kong Special Administrative Region and the Main Staff Associations (1998 Adapted Version).

VI. The staff associations making up the Staff Side of the Senior Civil Service Council and the Model Scale 1 Staff Consultative Council may jointly or individually refer matters relating to civil service salaries or conditions of service to the Commission.

VII. The heads of departments may refer matters relating to the structure, salaries or conditions of service of individual grades to the Commission.

VIII. The Commission shall not consider cases of individual officers.

IX. The Commission may wish to consider in the light of experience whether changes in its composition or role are desirable.

X. In carrying out its terms of reference, the Commission should ensure that adequate opportunities are provided for staff associations and management to express their views. The Commission may also receive views from other bodies which in its view have a direct interest.

Membership of the Commission in 2018

Chairman

Dr Wilfred Wong Ying-wai, GBS, JP

Members

Mrs Edith Chan Ngan Man-ling, MH

Mr Chan Tze-ching, BBS, JP

Ms Christina Maisenne Lee (since 1 August 2018)

Mr Lee Luen-fai, JP

Mr Lee Ming-kwai, GBS

Ms Angela Lee Wai-yin, BBS, JP

Mr Joseph Lo Kin-ching

Ms Elaine Lo Yuen-man

The Honourable Tony Tse Wai-chuen, BBS

Dr Carrie Willis Yau Sheung-mui, SBS, JP (until 31 July 2018)

Mr Wilfred Wong Kam-pui, JP

Membership of the Commission in 2019

Chairman

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The Honourable Tony Tse Wai-chuen, BBS

**Membership of the Working Group on
Grade Structure Review for
Veterinary Laboratory Technician and
Medical Laboratory Technician Grades**

Convenor

Mr Lee Luen-fai, JP

Members

Mrs Edith Chan Ngan Man-ling, MH

Ms Christina Maisenne Lee

Ms Elaine Lo Yuen-man

The Honourable Tony Tse Wai-chuen, BBS

List of Submissions Received

Departmental Management

Director of Agriculture, Fisheries and Conservation

Director of Health

Staff Bodies

Hong Kong Chinese Civil Servants' Association, Senior Civil Service Council

Medical Technicians & Technologists Branch, Hong Kong Chinese Civil Servants' Association (two submissions)

Others

A submission from 17 staff of the Veterinary Laboratory Technician grade

A submission from one Medical Technologist

An anonymous submission

A submission from one Senior Medical Technologist

A submission from one Medical Laboratory Technician II

**List of Meetings / Visits Conducted by
the Commission and its Working Group**

	Date
Commission / Working Group Meetings	24 August 2018 25 January 2019 26 March 2019 21 May 2019 11 June 2019
 Meetings with Departmental Management	
Management of Agriculture, Fisheries and Conservation Department	12 April 2019 21 June 2019
Management of the Department of Health	12 April 2019 21 June 2019
 Meetings with Staff Bodies	
Hong Kong Chinese Civil Servants' Association, Senior Civil Service Council	12 April 2019
Medical Technicians & Technologists Branch of the Hong Kong Chinese Civil Servants' Association	12 April 2019 21 June 2019
 Meetings with Staff	
Staff of the Veterinary Laboratory Technician grade	30 January 2019 (one session)
Staff of the Medical Laboratory Technician grade	28 February 2019 (one session) and 14 March 2019 (two sessions)

Visits to Departments

AFCD facilities at –

- Tai Lung Veterinary Laboratory; and
- Sheung Shui Slaughterhouse

30 January 2019
and 14 March 2019

DH facilities at –

- Clinical Genetic Service at Cheung Sha Wan;
- Forensic Pathology Service at Kwai Chung Public Mortuary; and
- Public Health Laboratory Centre and Clinical Pathology Laboratory Centre of the Public Health Laboratory Services Branch at Nam Cheung Street and Lek Yuen, Shatin

28 February 2019
and 14 March 2019

**Existing Entry Requirements of
the Veterinary Laboratory Technician II and
Medical Laboratory Technician II Ranks**

<u>Veterinary Laboratory Technician II rank</u>
Entry requirements -
<ul style="list-style-type: none"> (a) have a Diploma in Medical Laboratory Science (MLS) of the Hong Kong Polytechnic/Polytechnic University or equivalent; (b) be registered under Part II of the Register of the Medical Laboratory Technologists Board (MLTB) of Hong Kong; and (c) have met the language proficiency requirements of Level 2 or above in Chinese Language and English Language in the Hong Kong Diploma of Secondary Education Examination (HKDSEE) or Hong Kong Certificate of Education Examination (HKCEE) or equivalent.
<u>Medical Laboratory Technician II rank</u>
Entry requirements -
<ul style="list-style-type: none"> (a) have a Diploma in MLS from an institute recognised by the MLTB of Hong Kong, or equivalent; (b) have registered in Hong Kong as a Medical Laboratory Technologist in Part II of the Register of Medical Laboratory Technologists under the Supplementary Medical Professions Ordinance (Cap. 359); (c) have a valid Practising Certificate issued by the MLTB of Hong Kong; and (d) have met the language proficiency requirements of Level 2 or above in Chinese Language and English Language in the HKDSEE or the HKCEE, or equivalent.

**Qualifications Recognised for
Registration in Part II and Part I of the Register of
the Medical Laboratory Technologists⁽¹⁾**

Part II

- According to section 12(1)(a) of the Supplementary Medical Professions (SMP) Ordinance, a person who holds the following qualifications as prescribed in section 4 of the Medical Laboratory Technologists (Registration and Disciplinary Procedure) Regulations shall be qualified for registration in Part II Register –
- (a) a Diploma in Medical Laboratory Science (MLS) issued by the Hong Kong Polytechnic;
 - (b) an Ordinary Certificate in Medical Laboratory Technology issued by the Department of Extra-mural Studies of the University of Hong Kong (HKU);
 - (c) a Certificate of Competency in Medical Laboratory Technology issued by the Medical and Health Department of the Hong Kong Government prior to 1982;
 - (d) a certificate from the Board that he has passed an examination relating to the profession of a medical laboratory technologist conducted under section 15A of the SMP Ordinance for the purposes of section 12(1)(a) of the SMP Ordinance;
 - (e) a Higher Certificate in Medical Laboratory Technology issued by the Department of Extra-mural Studies of the HKU;
 - (f) a Higher Diploma in MLS issued by the Hong Kong Polytechnic or The Hong Kong Polytechnic University (PolyU);
 - (g) a Bachelor of Science degree in Biomedical Science awarded by the Hong Kong Polytechnic or PolyU; or

⁽¹⁾ Information extracted from the website of the Medical Laboratory Technologists Board (<https://www.smp-council.org.hk/mlt/>).

- (h) a Bachelor of Science degree in MLS awarded by PolyU.
- A person who holds a qualification other than those mentioned above may also apply for registration, and the assessment will be made on individual merits having regard to –
- the standard of qualification (only academic qualification at higher diploma or above would be considered); and
 - whether the programme(s) covers an adequate number of MLS relevant subjects.

Part I

- Holders of the following qualification plus not less than three years of post-qualification recognised experience⁽²⁾ (two years of which should be gained in Hong Kong) shall be qualified for registration in Part I Register –
- (a) a Higher Certificate in Medical Laboratory Technology issued by the Department of Extra-mural Studies of HKU;
- (b) a Higher Diploma in MLS issued by the Hong Kong Polytechnic or PolyU;
- (c) a Bachelor of Science degree in Biomedical Science awarded by the Hong Kong Polytechnic or PolyU; or
- (d) a Bachelor of Science degree in MLS awarded by PolyU.

⁽²⁾ Only experience gained by the applicant after he has attained a qualification which is recognised for Part I registration should be counted as "post-qualification experience".

**Master Pay Scale
(as at 31 March 2019)**

Point	\$	Point	\$
49	129,325	24	46,420
48	124,830	23	44,325
47	120,495	22	42,330
46 (44B)	116,265	21	40,420
45 (44A)	112,250	20	38,490
44	105,175	19	36,665
43	101,520	18	34,930
42	97,340	17	33,290
41	93,315	16	31,685
40	89,460	15	30,165
39	85,770	14	28,725
38	81,975	13	27,340
37	78,380	12	25,790
36 (33C)	74,830	11	24,270
35 (33B)	71,520	10	22,865
34 (33A)	70,590	9	21,585
33	70,090	8	20,270
32	66,945	7	19,030
31	63,930	6	17,855
30	61,060	5	16,790
29	58,345	4	15,735
28	55,705	3	14,780
27	53,195	2	13,870
26	50,825	1	13,045
25	48,540	0	12,265

**Pay Scales of Grades Requiring
Registration under the Supplementary Medical Professions
Ordinance for Appointment**

Grade	Qualification Group (QG)	Rank Structure	Pay Scale	Omitted Point (MPS Pt.)
Occupational Therapist	QG 3 Group I	Occupational Therapist II ^ Occupational Therapist I Senior Occupational Therapist Superintendent Occupational Therapist ^	MPS 14-24 MPS 25-33A MPS 34-39 MPS 40-44	16 - - -
Optometrist	QG 3 Group I	Optometrist	MPS 13-23	-
Physiotherapist	QG 3 Group I	Physiotherapist II ^ Physiotherapist I Senior Physiotherapist Superintendent Physiotherapist ^	MPS 14-24 MPS 25-33A MPS 34-39 MPS 40-44	- 30 - -
Radiographer	QG 3 Group I	Radiographer II Radiographer I Senior Radiographer Superintendent Radiographer ^	MPS 14-24 MPS 25-33A MPS 34-39 MPS 40-44	- 30 - -
Medical Laboratory Technician	QG 3 Group II	Medical Laboratory Technician II Medical Laboratory Technician I Medical Technologist Senior Medical Technologist Chief Medical Technologist	MPS 8-21 MPS 22-28 MPS 29-33 MPS 34-39 MPS 40-44	12 - - - -
Veterinary Laboratory Technician	QG 3 Group II	Veterinary Laboratory Technician II Veterinary Laboratory Technician I Veterinary Technologist	MPS 8-21 MPS 22-28 MPS 29-33	- - -

QG 3 Group I : Higher Diploma or Associate Degree Grades

QG 3 Group II : Diploma Grades

^ Ranks currently with no establishment and strength. Notwithstanding this, the departmental management of the Department of Health has advised that new posts may be created in these ranks should operational needs arise in future.

Breakdown of the Establishment and Strength Figures of the Veterinary Laboratory Technician and Medical Laboratory Technician Grades by Rank

Veterinary Laboratory Technician grade

	Establishment	Strength	Vacancy	Vacancy / Establishment
<i>(as at 31 March 2019)</i>				
Veterinary Technologist	9*	6	3	33.33%
Veterinary Laboratory Technician I	13	13	0	0.00%
Veterinary Laboratory Technician II	25	16	9	36.00%
<i>Sub-total:</i>	47	35	12	25.53%
<i>(as at 31 March 2018)</i>				
Veterinary Technologist	9*	6	3	33.33%
Veterinary Laboratory Technician I	13	13	0	0.00%
Veterinary Laboratory Technician II	25	15	10	40.00%
<i>Sub-total:</i>	47	34	13	27.66%
<i>(as at 31 March 2017)</i>				
Veterinary Technologist	6	6	0	0.00%
Veterinary Laboratory Technician I	13	13	0	0.00%
Veterinary Laboratory Technician II	25	14	11	44.00%
<i>Sub-total:</i>	44	33	11	25.00%

* Including three time-limited posts filled by acting arrangements.

Medical Laboratory Technician grade

	Establishment	Strength [^]	Vacancy [@]	Vacancy / Establishment [@]
<i>(as at 31 March 2019)</i>				
Chief Medical Technologist	1	1	0	0.00%
Senior Medical Technologist	18	14	4	22.22%
Medical Technologist	95	93	2	2.11%
Medical Laboratory Technician I	44*	23	21	47.73%
Medical Laboratory Technician II	103	130	-27	-26.21%
Sub-total:	261	261	0	0.00%
<i>(as at 31 March 2018)</i>				
Chief Medical Technologist	1	1	0	0.00%
Senior Medical Technologist	18	11	7	38.89%
Medical Technologist	95	93	2	2.11%
Medical Laboratory Technician I	23	28	-5	-21.74%
Medical Laboratory Technician II	122	126	-4	-3.28%
Sub-total:	259	259	0	0.00%
<i>(as at 31 March 2017)</i>				
Chief Medical Technologist	1	1	0	0.00%
Senior Medical Technologist	18	9	9	50.00%
Medical Technologist	95	91	4	4.21%
Medical Laboratory Technician I	23	22	1	4.35%
Medical Laboratory Technician II	122	127	-5	-4.10%
Sub-total:	259	250	9	3.47%

* Including 21 MLT I posts upgraded from 21 MLT II posts in June 2018.

[^] Including staff who were on pre-retirement leave and not yet struck off strength.

[@] A negative value indicates the situation of over-strength of a rank which could have resulted from acting arrangements within the grade.

**Updated Entry Requirements of the
Veterinary Laboratory Technician and
Medical Laboratory Technician Grades
Proposed by the Respective Departmental Managements of
the Agriculture, Fisheries and Conservation Department and
the Department of Health**

<u>Veterinary Laboratory Technician grade</u>
Entry requirements -
<ul style="list-style-type: none"> (a) have a Higher Diploma in Medical Laboratory Science (MLS) or equivalent; (b) be registered in Hong Kong as a medical laboratory technologist in Part II of the Register of the Medical Laboratory Technologists under the Supplementary Medical Professions Ordinance (SMP Ordinance) (Cap. 359); (c) hold a valid Practising Certificate by the Medical Laboratory Technologists Board (MLTB) of Hong Kong; and (d) have met the language proficiency requirements of Level 2 or above in Chinese Language and English Language in the Hong Kong Diploma of Secondary Education Examination or Hong Kong Certificate of Education Examination (HKCEE), or equivalent.
<u>Medical Laboratory Technician grade</u>
Entry requirements -
<ul style="list-style-type: none"> (a) have a Higher Diploma in MLS from a Hong Kong Polytechnic/Polytechnic University or a qualification recognised for registration in Part I of the Register of Medical Laboratory Technologists under SMP Ordinance (Cap. 359), or equivalent; (b) have registered in Hong Kong as a Medical Laboratory Technologist in Part II of the Register of Medical Laboratory Technologists under the SMP Ordinance (Cap. 359); (c) hold a valid Practising Certificate issued by the MLTB of Hong Kong; and (d) have met the language proficiency requirements of Level 2 or above in Chinese Language and English Language in the HKDSEE or the HKCEE, or equivalent.

**Normal Conversion Arrangements Applicable to the
Grade Structure Review for the
Veterinary Laboratory Technician and
Medical Laboratory Technician Grades**

- (a) When both the minimum and the maximum of the scale are raised –
 - (i) where a civil servant's pay is less than the minimum of the revised scale he should receive the new minimum;
 - (ii) where a civil servant's pay is equivalent to or above the new minimum he should advance to the next point on the scale;
 - (iii) where the revised scale has a maximum which is two or more points higher than the old maximum, a civil servant who has served for one or more years on the old maximum should convert to two points above his existing pay point.

- (b) When both the minimum and the maximum of the scale are lowered –
 - (i) where both the minimum and maximum of the revised scale are lower than the minimum and maximum of the old scale a civil servant should be given a continuing option to retain his old scale on a personal basis until such time as it is to his advantage to transfer irrevocably to the revised scale;
 - (ii) where a civil servant opts to convert to the revised scale he should convert to the same numbered point on that scale subject to this not being above the scale maximum.

- (c) When the minimum of the scale is lowered and the maximum is raised –
 - (i) where a civil servant's pay is less than the maximum of the old scale or where he has served on the old maximum for less than one year he should convert to the same numbered point on the revised scale;
 - (ii) where a civil servant has served for one or more years on the maximum of the old scale he should convert to the next higher numbered point on the revised scale.

