

Hong Kong Dietitians Association (HKDA)

-Statement for the public hearing for the Panel of Health Services regarding Accredited Register (AR) Scheme for Allied Health Professionals

On behalf of the Hong Kong Dietitians Association (HKDA), who acted as the lead applicant for the Accredited Register Scheme for Dietitians in Hong Kong, I would like to express the followings to urge the government to continue launching the AR Scheme for qualified allied health professionals.

1. HKDA was established in 2001, consists of majority of qualified dietitians (“營養師”) in Hong Kong. Currently we have approximately 300 qualified members. All HKDA members are qualified dietitians who have completed at least a Bachelor or Master’s Degree in Nutrition and Dietetics recognized overseas or locally who also hold a membership/registration of the dietetic association/board in the country they acquired qualification. All recognized dietetics program includes sufficient level of supervised dietetic training. Members are required to obtain at least twelve (12) Continuing Professional Development (CPD) points in order for annual membership renewal. Currently, members with sufficient annual CPD will be granted the title Hong Kong Dietitians Association Accredited Dietitian (HKDA AD) 香港營養師協會認可營養師*

**This title will not be used by HKDA after the announcement of the success of AR Scheme for dietitians. The Registry of AD will be handled by the Hong Kong Academy of Accredited Dietitians (HKAAD).*

2. HKDA’s objectives include
 - i. to establish standards of dietetic practice and conduct for Accredited Dietitians
 - ii. to promote optimal nutrition and wellbeing to the general public through participation in public seminars and talks, exhibitions, publications and media interviews
 - iii. to provide training opportunities to its members and to encourage education in dietetics
 - iv. to facilitate support for research in the field of food, nutrition and dietetics
 - v. to maintain a list of persons who are qualified as Accredited Dietitians as being competent to practice dietetics in Hong Kong and
 - vi. to discuss with and apply to the Government of Hong Kong SAR for the recognition and local statutory registration for dietitian.
3. Since decades ago, the association has realized that many people without supervised dietetic training have emerged claiming themselves as “營養師” in the market providing variety of dietetic services to the public. Alarmingly, some of the self-claimed “營養師” is providing clinical dietetic services on disease management to the public.
4. Due to lack of proper regulation of the dietetic profession lingered for so many years, along with the increasing power of social and digital media in the past decades, we realized that not only the general public cannot distinguish who is qualified or not; even health professionals including doctors, nurses, allied health professional colleagues and government departments cannot identify whom, where and how to find qualified dietitians for services.
5. We also found that many reporters from the mass media including newspaper, TV, radio, digital media which has large coverages have been inviting unqualified self-claim “營養師” to perform media interviews without checking their qualifications. Often, the association found that misinformation was given out by these unqualified individuals.

6. People with unqualified dietetic training further take advantage of this long-standing loophole creating their own organizations/societies/associations with their self-recognized registration system, to further confuse the public. They have been spreading rumors and misinformed the public in the past years to intentionally harm the qualified dietetic profession and our association. To short list a few:
 - taking advantage of the unprotected title 認可營養師 along with their organization name and use widely in the public.
 - telling the public that dietitians ONLY work in public hospitals. They deceive the public that supervised dietetic training is not necessary for 營養師 or people who teach nutrition who works in other areas such as the community, private practice, weight loss and beauty centers, gyms, etc.
 - misinformed students who are interested in pursuing their career in the dietetic field not to go through proper education pathway and not worthwhile to invest in proper dietetic education to become a qualified dietitian.
 - providing self-claimed mentorship program which is not objectively evaluated or audited by any medical professionals or lay members.
 - Some organizations even charges people with an unjustifiable amount of registration fee, without any proof of financial status of the organization(s), which might generate a potential fraud.
7. In addition, among these self-claimed “營養師”, no proper Continuing Professional Education/Development system and professional indemnity insurance coverage are implemented.
8. Many self-claimed “營養師” without supervised dietetic training, continue professional development and professional indemnity insurance coverage, publicly handle or claim that they are able to treat people with chronic diseases such as diabetes, cancers, heart diseases, hypertension, dysphagia, eating disorders, malnutrition and nutrition support including tube feeding etc. often advertised in their service brochures, name cards, websites and social/digital media platforms. No doubt that improper handling of this vulnerable population by unqualified self-claimed “營養師” may pose significant harm to the service users. The lack of proper regulation of allied health professionals further facilitates these self-claimed unqualified personnel continue to exploit the trust and jeopardize the health of this vulnerable population which must not be overlooked by the government.
9. Furthermore, we are extremely concern that people, especially those self-claimed “營養師”, giving out improper, misleading and inaccurate nutrition advises/messages frequently to the public via the mass media without consideration of any liabilities. Examples include:
 - providing medical nutrition advise without considering individual differences;
 - encouraging or teaching the public to go on extreme dieting such as ketogenic diet/fasting/meal replacements as a medical treatment;
 - creating public fear about eating certain foods leading to serious diseases such as cancers.
 - exaggerating any benefits and harms of certain foods without any up-to-date scientific evidence;
 - advertising medical nutrition products to the public without strong scientific evidence;
 - promoting and selling unnecessary nutraceutical products and tests (e.g. nutrigenomics test, food allergy/intolerance tests);
 - explicitly recommending specific food and nutrition products with favoritism along with potential financial conflict of interest provided by the sponsoring companies/industries;

- providing health and medical advices out of their professional competency (e.g. Traditional Chinese Medicine; food safety issues; psychological counseling advise relating to eating behaviors)
 - utilizing patients' or clients' "testimonials" (cannot proof if they are real testimonials) to advertise their service more superior than others or to replace scientific evidence.
10. Without a proper regulation system for Dietitians, there will be no channel for the public to file complaint(s) when they encounter any unsatisfied services or violation of dietetic practice legitimately.
 11. Without a proper regulation system for Dietitian, no organization in Hong Kong would have the power to properly handle any complaints or violation of dietetic practice legitimately.
 12. Without a proper regulation system; no proof of professional qualification and proper recruitment for dietitians can be verified unless they seek help from professional bodies such as HKDA or in the future the Hong Kong Academy of Accredited Dietitians (HKAAD).

The dietetic profession has been proactively working towards gaining regulation for their profession for many years. We have been working very closely with the Food and Health Bureau and Chinese University of Hong Kong Jockey Club School of Public Health and Primary Health Care since 2013 on the Accredited Register (AR) Scheme for health professionals which are currently not regulated under Statutory Registration.

The Accredited Register Scheme for Dietitians Working Group submitted that Self-Assessment Tool to demonstrate their compliance with each of the standards for accreditation which covered governance, operational effectiveness, risk management and quality improvement, standards for registrants, educational and training requirement, and management of the register in order to be accredited. A new independent entity named the Hong Kong Academy of Accredited Dietitians will be responsible for handling the operation of the Registry for Dietitians in the future. The Working Group also completed the Surveying carried out by independent Accreditation Agents in April 2018; pending for the announcement of AR Scheme for Dietitian tentatively in the first quarter of 2018.

Nevertheless, we also demand strong support from the government namely the Department of Health and the Food and Health Bureau to support and recognize the importance of the AR Scheme. Since the AR scheme is only a voluntary system, we hope that the Accredited Register scheme can help pave the way towards a Statutory Registration system for Allied Health Professionals in the long run, so that our professional competency and public interest can be fully protected.

Ms. Sylvia Lam
Chairman of Hong Kong Dietitians Association 2007-2019
6th December, 2018