

June 28, 2018

Division of Clinical Psychology  
The Hong Kong Psychological Society Limited  
Room 506, Lemmi Centre,  
50 Hoi Yuen Road,  
Kwun Tong, Kowloon

RE: Consultation on the Accredited Register (AR) Scheme for Clinical Psychologists (Phase 2)-**Part 1**

Dear Sir/Madam,

As invited, I am writing to express my opinion and questions about the registration criteria and training standard proposed by DCP-HKPS for the accredited register of clinical psychologists. Given it is a proposal written by a professional body, it is a surprise to see such worrying level of professionalism in presenting the framework of this significant establishment of the AR scheme. I seriously consider that the proposed framework registration criteria and training standard **failed to meet its third principle, "fair access and inclusive" by suggesting many double standards criteria and even failed to provide ethically professional references in supporting those double standard criteria.**

I appreciate that the institute-to-be will be inclusive and provide fair access, yet, the proposal presented itself as doing the opposite. First, from the proposal, its long-term arrangement is implying that people graduating from its list of accredited local programs are holding equivalent academic and training standards as professionals trained from internationally well-known overseas national bodies, yet, the valid proofs of how the local programs are maintaining standards compatible to the national standards of the overseas bodies are lacking. Without providing such proofs, it is failing to meet its first principle, "protection of public", by justifying how the local postgraduate programs in clinical psychology are meeting those overseas bodies' national standards. The DCP-HKPS website also does not provide such information. It is abnormal to see such lack of valid proof in a professional document, given the professional level of the institute-to-be. Please provide a rationally professional statement to debunk this double standard.

In my suggestion, the bar for L2 should include more accrediting bodies including the WASC Senior College and University Commission (WSCUC) from the US so that the principle of "fair access and inclusive" can be met. The proposed bar for L2 is irrationally high that it is hindering many globally qualified clinical psychologists from entering the scheme smoothly and thus hindering the growth of clinical psychologists for the urgent needs from high mental crises rates in Hong Kong, which would violate the first principle "protection of public".

Secondly, it is important to understand that the level of strictness of the license issued by various nations is very different. A person with a US doctorate degree may not have a US license but he or she can very likely obtain a New Zealand license as New Zealand only requires master level training. Under the trend of global village, using the acquirement of a

license from the country a person obtained the degree from is indeed restricting global professionals from serving Hong Kong. It is not fair to them as people graduating from locally accredited programs, who actually are mostly at master levels only, does not need to acquire a license to get into the AR scheme while most other countries require a doctorate degree for licensure.

In my opinion, to avoid such double standard and to meet the principle of “fair access and inclusive”, a fair yet high bar can be set at acquiring a license without need to acquire a license from the country a person obtained the degree from. To meet the third principle, “fair access and inclusive”, please provide what will be the fair steps you will take in making sure this fairness can be facilitated. It is important to remember that the locally accredited programs are not be able to serve the local non-English/Cantonese speaking communities such as people with Europeans ethnicities. By hindering the many globally qualified clinical psychologists from entering the scheme smoothly, it would fail to meet it first principle “protection of public”.

In short, in truly meeting the first and third principle, please provide the valid proofs of how the local programs are maintaining standards compatible to the national standards of the overseas bodies are lacking. And also, please provide what will be the fair steps you will take in making sure a fair bar can be set to welcome most qualified professionals globally while being able to provide best protection of the public without hindering the public’s access to these professionals.

It is disappointing not seeing these proofs and framework being provided at the beginning, given the professional level of the institute-to-be. Given all the above, a phase 3 public consultation is necessary by providing the above missing information.

I have divided my opinions into two separate documents in hoping to ease your workload by responding to each of my document with only few question-specific main points. Thank you for your time.

Cordially yours,

[Redacted Signature]

Email: [Redacted]

Organization: [Redacted]

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RE: Consultation on the Accredited Register (AR) Scheme for Clinical Psychologists (Phase 2)-**Part 2**

Dear Officer,

As invited, I am writing to express my opinion and questions about the registration criteria and training standard proposed by DCP-HKPS for the accredited register of clinical psychologists. This is the second part of my views with my first part to be found in the same email I sent to you. I seriously consider that the proposed framework registration criteria and training standard **is suggesting many double standards criteria and using many ambiguous terms, thus has failed to meet its third principle, "fair access and inclusive"**.

First, from my understanding, the AR scheme is a "VOLUNTARY, society-based registration" as the AR scheme website said. There should not be examination unless the AR scheme is a licensure board from the government, which is NOT the case. If there will be examination, who can ensure the fairness and transparency of the exam? And who will be responsible for all the administration fees? Even if there somehow need to be one, ALL applicants should take it so to be fair and thus perfectly fit the "fair access and inclusive" principle of the institute-to-be. People from L1 or L2 cannot be exempted.

Secondly, there is not a section on explaining how the institute-to-be will do in ensuring the fairness and transparency of the case-by-case evaluation during the transitional arrangement. If the evaluators are from master levels, as members from the DCP-HKPS are mostly from master levels, and they are evaluating people from doctorate levels, how it can be ensured that the evaluators are qualified to do so? Please provide the steps will be made in protecting this fairness, as the third principle support for.

Third, a fair, clear and unified standard of what justify "adequate clinical training", "mode of study", etc, is missing in all of your official documents. Without such supporting documents, your proposal is presenting itself as ambiguous and arbitrary which is worrying for readers without providing valid references what effort will be made to protect the public, as the first principle support for.

Fourthly, I hear rumors that the Doctor of Psychology in Clinical Psychology program provided by Alliant International University in partnership with City University of Hong Kong will not be included as a "local" program. Being ethical, please provide what are your rationale in excluding, if this is true at all, this program as "local" which having been serving many local Hong Kong communities for over 10 years? It would be unfair and immature to base the rationale on the which country the diploma is being issued and neglect the actual

community services accomplished by the program. If this exclusion is true, it has failed to meet the second principle, "fair access and inclusive".

In short, in truly meeting the first and second principle, please provide the rational steps you will make to ensure the fairness and transparency of the evaluation process, a document defining the ambiguous terms, and debunk the above rumors.

It is disappointing not seeing these practical frameworks being provided at the beginning, given the professional level of the institute-to-be. Given all the above, a phase 3 public consultation is necessary by providing the above missing information.

I have divided my opinions into two separate documents in hoping to ease your workload by responding to each of my document with only few question-specific main points. Thank you for your time.

Cordially yours,

[REDACTED]

Email: [REDACTED]

Organization: [REDACTED]