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**To:** panel\_hs@legco.gov.hk

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**Date:** Monday, July 16, 2018 02:33PM  
**Subject:** July 16th Meeting on Accredited Registers Scheme for Healthcare Professionals

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To: All members of Panel on Health Services / Prof Hon Joseph LEE Kok-long, SBS, JP,  
Chairman of Panel on Health Services

RE: Accredited Registration Scheme for Clinical Psychologists

We are writing to express our concern with the progress of the Accredited Registers (AR) Scheme regarding Clinical Psychologists. Whilst we understand and welcome the objective to create an AR Scheme to protect the Hong Kong public, it is disturbing how the current proposal on the Registration Criteria and Training Standard for the AR of clinical psychologists recommended by the Hong Kong Psychological Society-Division of Clinical Psychology (HKPS-DCP) is so narrowly-based on local clinical psychology training that it could have severe consequences for the availability of mental health treatment for the public.

It is widely known that there is a shortage of clinical psychologists serving the Hong Kong public. The average wait time to see a clinical psychologist in a public hospital is said to be on average 18 months. In the meantime, local graduate programs are not able to cope with the growing demand of psychological services with only a handful of new clinical psychology graduates each year. A considerable number of overseas trained clinical psychologists also work in the private practice setting serving the Hong Kong public with some specifically serving the non-Chinese speaking population.

The current proposal from HKPS-DCP has excluded this entire group of individuals from being grandfathered into the accredited registration scheme and also imposes local training standards that are largely incompatible with training standards overseas as requirements for inclusion. The exclusive, protectionist spirit of the current proposal could have severe consequences for the public as there will be fewer accredited clinical psychologists available; not to mention, locally trained clinical psychologists simply may not have the language capacity or cultural competence to serve the diverse, non-Chinese speaking population that overseas trained clinical psychologists are able to serve.

To give you an example, we are a private practice clinic mainly serving the English-speaking community. We have seven clinical psychologists in our practice who all have doctoral degrees in clinical psychology from the United Kingdom and USA. All of us are either licensed/registered or are eligible for licensure/registration with at least one statutory regulation body for psychologists overseas. Under the current proposal, most if not all of us will have to take an examination or remedial training despite the fact that we may have more extensive training, supervision and experience than local clinical psychology graduates. We find it concerning how little effort is shown by this HKPS-DCP proposal to be inclusive of us, practicing clinical psychologists who have been trained overseas and are recognized by statutory regulation bodies internationally as well as some of us being recognized currently by HKPS-DCP.

As already stated, we are worried about the potential shortage of clinical psychologists that could result from passing the proposed locally-based, Registration Criteria and Training Standard for the AR of clinical psychologists, especially within the non-Chinese speaking community where good enough psychological services and care are already limited. Our suggestion is that Members of the Panel on Health Services consider those who are licensed/registered or are eligible for licensure/registration overseas to be grandfathered into the AR scheme so as to have a more inclusive and diverse group of clinical psychologists serving the people of Hong Kong. We are open and willing to collaborate and join discussions to see how this can best be achieved - as we ultimately have the same goal of providing services of the highest standard of care to the Hong Kong public. Please allow us to work together in an inclusive way to ensure that the wellbeing of the people of Hong Kong comes first.

Sincerely,

Dr. Sharmeen Shroff, Psy.D  
Dr. Tess Browne, DClinPsy  
Dr. Hannah Sugarman, DClinPsy  
Dr. Michele A. Bland, Psy.D  
Dr. Sheri-McCurdy Lightbound, Psy.D  
Dr. Natalie Loong, Psy.D  
Dr. Kaili Chen, Psy.D

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