

To: Hong Kong Psychological Society (HKPS)-Division of Clinical Psychology (DCP)  
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Chairman of the Panel on Health Services, Legislative Council of Hong Kong:  
Prof. Hon Joseph LEE Kok-long, SBS, JP

**RE: Accredited Registers Scheme for Clinical Psychologists**

I am writing to express my concern and opposition with the current progress of the Accredited Registers (AR) Scheme for Clinical Psychologists. While I understand and welcome the objective to create an AR Scheme to protect the public, it is disturbing how the proposed Registration Criteria and Training Standard for the AR of Clinical Psychologists currently put forth 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 detrimental effects, ultimately harming 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 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 AR Scheme and also imposes as requirements for inclusion local training standards that may not even be compatible with training standards overseas. The exclusive, protectionist spirit of the current proposal could essentially harm the public as there will be less 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. Any steps which further restrict the already limited mental health services available to expatriate and ethnic minority populations of Hong Kong is unacceptable.

I find it shocking how little effort has been shown by this HKPS-DCP proposal to be inclusive of overseas trained and currently practicing clinical psychologists who are recognized by statutory regulation bodies internationally.

As already stated, I am worried and strongly oppose the current proposal submitted by the HKPS-DCP because of 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 psychological services and care are already limited. We request that the Panel on Health Services of the Legislative Council of Hong Kong as well as the Secretary and the Deputy Secretary for Food and Health of the Food and Health Bureau with oversight of the AR Scheme, allow professional and lay members in the non-Chinese speaking community to participate in the work group of the AR Scheme for clinical psychologists to ensure that both the Chinese *and* non-Chinese speaking communities are served by adequate number of qualified clinical psychologists.

Sincerely,  
Dr Monica Borschel