

中華人民共和國香港特別行政區
立法會衛生事務委員會
主席及各委員

2018年7月15日

認可醫療專業(臨床心理學界別)先導計劃的註冊方案

回應：立法會 CB(2)1815/17-18(05)號文件

「進擊的城大校外心理學博士:巨人進城了，城牆的意義還在嗎?」- 張正剛

前言

自美國加州專業心理學院 - 亞萊恩國際大學(香港校區)- 臨床心理學博士(下稱"CSPP-HK PsyD")課程於2007年在香港提供專業培訓以來，課程質素與其畢業生的表現皆得服務機構及社區認可。儘管多年來正面評語不絕，CSPP-HK PsyD課程卻無奈地成為香港心理學會 - 臨床心理組(下稱"HKPS-DCP")的攻擊目標，近年更因先導計劃註冊方案之提出而情況失控。面對失實的指控，CSPP-HK PsyD課程總監Dr. Tien Liang (田良博士) 及合作院校 SCOPE (香港城市大學- 專業進修學院) 曾多次為不實指控澄清。

惟HKPS-DCP及其成員多次以本課程不乎合專業認證標準為由，指責本校畢業生未能達到美國心理學會國際訓練水平，但事實卻是APA不審查也不提供美國境外課程的認證服務。在同一級別的認證機構體系上，CSPP-HK PsyD課程是ASPPB / NR所認可的臨床心理學博士課程，其資歷水平與APA相等。除了眾多於網上平台及社交網站的攻擊與誹謗外，HKPS-DCP更通過與香港版韋氏智力量表分銷商的專利安排，拒絕讓其會員以外之合資格臨床心理學家獲取評估工具(包括：香港韋氏兒童智能量表 - 第四版及香港成人韋氏智力量表 - 第四版)，此舉剝削了一群能使用國際評估工具的臨床心理學家為港人服務的機會，亦大大減低他們受聘於本地社福機構的可能性。心理學博士校友聯會(下稱"本會")及學校對HKPS-DCP及其會員的持續散播誤導訊息和刻意中傷等行為表示關注，課程總監Tien Liang (田良博士) 曾於二零一六年三月去信立法會議員葉建源先生(見附件一)釐清事實。

本校友聯會冀盼透過此回應，讓公眾及各委員更明白本課程的模式及資歷，更重要是表明本校會對不實指控及此等誹謗中傷言論的零容忍。因此，本會就香港心理學會臨床心理學組註冊臨床心理學家張正剛先生提交於立法會之回應(立法會 CB(2)1815/17-18(05)號文件)及七月十三日在社會媒體<medium>對CSPP-HK PsyD課程內容斷章取義，羅列不盡不實的數據，在沒有證據的前設下，立論偏頗武斷，以攻擊的態度出發，現作出以下**嚴正回應**：

(1) 對於「跨國認可」模式是「國際漏洞」之說法

張先生在文中提及「跨國認可」模式是「國際漏洞」，此言論確實貶低了各先進國家所訂立的評核標準，亦誤導大眾香港臨床心理學訓練及認證比英、美、澳、紐、加更為優勝。惟事實是各畢業生在申請不同國家之註冊時皆經過當地所屬的政府機構/國家學院/公認註冊或專業機構對課程及實習的評核，名正言順地得到當地執業資格，因此張先生之言是保障本土畢業生的偏頗言論？還是視己人超越其他先進大國？

(2) 對於「城大校外課程開辦超過十年,歷年來只有三名畢業生(皆有美國執照)成功在香港心理學會註冊,佔其整體的畢業生不足百分之五。筆者估計與他們投考美國執業資格試低合格率有關」之說法

- I. 執業考試合格率：張正剛先生在未有向校方查證CSPP-HK PsyD課程畢業生在美國考獲美國專業執照的數據下，只以「香港心理學會」註冊名單為依歸，便推出莽論。根據資料顯示，CSPP-HK PsyD共有10多位畢業生赴美考取執業牌照，而全部成功獲取美國執業牌照，而選擇在香港心理學會註冊成為會員的共有三位。
- II. 香港業內執業情況：在本港，除香港心理學會外，香港臨床心理學博士協會也是另一臨床心理學註冊學會，而在CSPP-HK PsyD課程畢業又獲美國執業牌照的畢業生大部份是此會會員；同時，CSPP-HK PsyD畢業生亦有其他先進國家之執業註冊。
- III. 社會福利署臨床心理學家之專業資格：根據2013年10月29日劉家祖先生致時任張國柱議員的信函回覆中（附件二），就政府的社會福利署而言，當時該署所聘請的五十八位臨床心理學家中，只有三十四位為香港心理學會註冊成員，其他未有在該會註冊的臨床心理學家，仍繼續為香港市民提供臨床心理學服務。
- IV. 香港臨床心理學監管情況：在香港的現行制度下，沒有任何一個機構/團體為臨床心理學的法定認證註冊組織，故本港之臨床心理學家由多個專業團體、學會或所屬之國家機構所規管及認證，而註冊標準根據不同學歷及實習時數之要求而有所差異。現時的「認可醫療專業註冊計劃」，是本港臨床心理學業界首次為臨床心理學家制定相關專業認證制度。因此，香港心理學會-臨床心理學組並不是法定註冊機構，只是眾多學會之一，其會員更不是臨床心理學家的唯一認可標準。

總結以上各點，張先生把學會提升至一個至高無上的權威地位，並嘗試利用未經証實的數據質疑CSPP-HK PsyD課程畢業生之專業能力，實令人大惑不解，而本會更對其個人專業操守有所保留。

就張正剛先生在未經與校方聯絡和查證下，單方面於社會媒體及社交平台擅自發表有關CSPP-HK PsyD課程及其畢業生之失實及誹謗內容，本會翻查香港心理學會臨床心理學組及英國心理學會剛在2018年更新的專業倫理守則指引。此舉有違指引的3.1（有關尊重Respect），3.3（有關責任Responsibility），及3.4（有關誠信Integrity）的核心價值（參考一及二），屬極度不負責任的行為，除對本會會員帶來負面形象，更讓本會會員之專業及名譽在社會上蒙受不必要的懷疑。

本會期盼日後討論能建立在專業守則的基礎上，以互相尊重、理性持平、開放善意的態度溝通。亦希望透過是次回應，能停止於不同傳媒、網上平台及社交網站的攻擊與誹謗。

恭請 鈞安

心理學博士校友聯會 謹啟

2018年7月15日

副本呈送：

香港心理學會

香港心理學會臨床心理學學組

食物及衛生局副局長徐德義醫生, JP

食物及衛生局副秘書長(衛生)方毅先生

食物及衛生局首席助理秘書長(衛生)馮品聰先生

衛生署助理署長(衛生行政及策劃) 林文健醫生

參考:

The British Psychological Society (2018). *Code of Ethics*. Retrieved:

<https://www.bps.org.uk/news-and-policy/bps-code-ethics-and-conduct>

Hong Kong Psychological Society (2012). *Code of Professional Conduct*. Retrieved:

<http://www.hkps.org.hk/index.php?fi=code>

附件一



CSPP CALIFORNIA SCHOOL OF
PROFESSIONAL PSYCHOLOGY
ALLIANT INTERNATIONAL UNIVERSITY

30 March 2016

Hon Mr. IP Kin Yuen
Legislative Councillor
7/F, Chung Kiu Commercial building
51 Shantung Street, Mong Kok,
Hong Kong

Dear Hon Mr. IP,

This is an addendum to the letter dated 2 March 2016 addressed to you from Louis Ma, Director of the School of Continuing and Professional Education (SCOPE) at City University of Hong Kong regarding the Doctor of Psychology in Clinical Psychology (PsyD) Program offered by the California School of Professional Psychology (CSPP) at Alliant University (AU). This addendum is from the CSPP-HK Program, and it is also shared with SCOPE.

I thank you for facilitating an opportunity to dialogue with members of the Hong Kong Psychological Society's (HKPS) Division of Clinical Psychology (DCP). We are eager to engage in communications that will ultimately serve Hong Kong's mental health treatment needs. The purpose of this letter is to clarify information provided in the letter from SCOPE, and to address some of our additional ongoing concerns with the HKPS-DCP. I request that the below listed concerns be on the agenda for our discussions with HKPS.

Before all else, we take all voiced concerns about our program seriously. If you are receiving complaints from any of our students, we would greatly appreciate a chance to address the students' specific concerns.

In terms of the HKPS, our first concern is that, despite our repeated clarifications, the HKPS-DCP continues to spread false information that the CSPP-HK Program is not recognized by a local and reputable professional society in the United States. This false information has led to the appearance that our program, and by extension our graduates, do not meet professional accreditation standards. The fact remains that the CSPP-HK Program has been evaluated and has received accreditation by a reputable professional society widely recognized in the United States. I would gladly provide any additional information to demonstrate that the CSPP-HK Program is accredited by Association of State and Provincial Psychology Boards (ASPPB)/National Registry. Similarly, HKPS has continued to spread false information that the CSPP-HK Program was refused accreditation by the American Psychological Association, despite the fact that we have repeatedly clarified that the American Psychological Association offers accreditation only to university programs conducted entirely in the United States – it would not evaluate or accredit programs in Japan, Hong Kong or even in Canada.

Second is the concern that the HKPS-DCP has sought to harm CSPP-HK Program students through dissemination of false and misleading information. Our students and alumni have reported that the release of a 3 March 2014 letter from HKPS-DCP has directly resulted in denial of training opportunities at the student's clinical placement sites, as well as denial of employment to our graduates. These letters from HKPS-DCP to the local Hong Kong NGO are attached scanned document, title "HKPS 2014 letters to NGO". Whereas the reports from our students and graduates are difficult to substantiate in writing since no organization would document on paper their reasons for denial of an applicant, it has been reported to our alumni verbally and to me personally from supervisors of clinical placement agencies that HKPS has pressured them to exclude our students from agency training workshops and not to offer jobs to our graduates.

Third is the concern that the HKPS-DCP has sought to deny the CSPP-HK Program and its graduates their means of livelihood through the denial of access to essential professional materials. HKPS-DCP has a proprietary arrangement with the distributor of the Hong Kong version of the child's intelligence test, the WISC-IV (HK), in that professionals can acquire the test only with membership in the HKPS-DCP. The HKPS-DCP claims that our doctoral level graduates are not qualified to own or administer the test, when in fact, the reason our graduates do not have access to this one test instrument is because HKPS-DCP does not accept our graduates as members. Their assertion that only those clinical psychologists who have "earned the eligibility of being a qualified user of WISC-IV (HK)" meet professional standards is both misleading and self-serving. CSPP-HK Program students have over one year of academic course work in providing psychological assessment, which includes training in administration and scoring of the intelligence tests known as the WISC and WAIS as well as other assessment devices. In addition, our students have clinical field training opportunities to conduct full psychological assessments. Our students are trained to the U.S. standards for conducting full assessment batteries and rendering psychiatric diagnosis

Finally, the HKPS-DCP through its direct mailings, web postings, and at various meetings, have repeatedly implied that the CSPP-HK Program training is sub-par and that only students of Chinese University of Hong Kong and University of Hong Kong meet standards for training as a clinical psychologist. The traditional U.S. training program, on which the CSPP-HK Program is based, is different from the traditional Hong Kong model. For a comprehensive comparison, please see attached. While different, the US training model is not inferior.

We look forward to a facilitated dialogue with HKPS-DCP members about the above listed concerns.

Sincerely,



TIEN Liang, Psy.D, ABPP
Professor and Director; AIU/CSPP-HK Program



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立法會綜合大樓 906 室
立法會張國柱議員辦事處〔社會福利界〕
立法會議員
張國柱先生

張議員：

查詢社署聘請臨床心理學家之現存制度

本年 9 月 27 日的來函收悉。就你查詢有關本署及受本署資助的社會福利機構聘請臨床心理學家的事宜，本人現獲授權回覆。

投考本署的臨床心理學家的職位，申請人必須具備以下資歷：

- (a) 持有本港大學所頒授的臨床心理學碩士學位，或具備同等學歷；以及
- (b) 在綜合招聘考試能力傾向測試試卷取得及格成績；以及
- (c) 符合語文能力要求，即在綜合招聘考試兩張語文試卷（中文運用及英文運用）中取得「二級」成績，或具備同等成績；以及能操流利廣東話及英語。

本港現時並沒有心理學家的法定註冊制度，而本署臨床心理學家職位的入職條件中亦沒有要求應徵者需為任何專業學會的會員。至於受本署資助的社會福利機構，本署並沒有就其聘請的臨床心理學家職位的入職條件提出特定要求。本署網頁提供予非政府機構參考有關一般職位的入職資格的資料中¹，亦沒有要求應徵臨床心理學家職位的人士需為任何專業學會的會員。

在處理臨床心理學家職位的申請時，若申請人持有非本地學歷或一些由本地大學及海外大學合辦的課程學歷申請時，我們會將有關的學歷資料送交公務員事務局進行學歷評核，以決定該學歷是否符合有關的入職要求。如持有的非本地學歷被評核為與入職要求相若時，該申請可獲同樣考慮。

¹ http://www.swd.gov.hk/te/index/site_ngo/page_subventions/sub_modesofsub/id_subvention/



由於本署沒有要求臨床心理學家需為任何專業學會的會員，我們並沒有受資助的社會福利機構所聘請的臨床心理學家的學會註冊的統計資料。至於本署所聘用的58位臨床心理學家，其中有34位是香港心理學會學會為本（Hong Kong Psychological Society, Society-based Registration）的註冊臨床心理學家。

香港城市大學專業進修學院及海外大學（California School of Professional Psychology, Alliant International University）合辦的心理學博士（臨床心理）課程的畢業生若申請本署的臨床心理學家職位，本署會按既定的機制，客觀及公平地考慮申請者的資歷。

如對上述回覆有何疑問，請致電 2892 5590 與本人聯絡。

社會福利署署長

（劉家祖  代行）

2013 年 10 月 29 日