

22 August 2018

Chairman, Prof Hon Joseph LEE Kok-long, SBS, JP and Members
Panel on Health Services
Legislative Council of the Hong Kong Special Administrative Region
People's Republic of China

RE: Accredited Registers Scheme for Clinical Psychologists

Dear Chairman and Members of Panel on Health Services,

We represent a sizable population of non-Cantonese speaking psychologists currently practicing in Hong Kong who have been trained overseas and/or licensed/registered with overseas statutory regulatory bodies. We are writing to express in the strongest possible terms our opposition to the currently proposed Registration Criteria and Training Standard for the Accredited Registers (AR) of clinical psychologists that is non-inclusive, discriminatory, and largely harmful to the Hong Kong public. We kindly request your help in 1) ensuring that overseas trained and/or overseas licensed/registered, non-Cantonese speaking clinical psychologists are included in the workgroup for the AR scheme of clinical psychologists 2) postponing the completion deadline for the AR scheme of clinical psychologists until the requirements are inclusive of those already trained, licensed, and/or registered overseas 3) ensuring that the outcome and process of developing the AR scheme of clinical psychologists is fair, reasonable, inclusive, and transparent so as to adequately serve the mental health needs of Hong Kong's citizens.

The AR scheme for supplementary healthcare professionals was first announced in the 2016 Policy Address. Unbeknownst to many non-Cantonese speaking clinical psychologists, the profession of clinical psychologists was determined last year to meet criteria to begin the AR process, which is rumored to be passed by the end of this year. A few months ago, the Hong Kong Psychological Society (HKPS)-Division of Clinical Psychology (DCP) had apparently proposed a set of Registration Criteria and Training Standard for the AR of clinical psychologists and conducted an open consultation, also without our knowledge. While we support the objective to create an AR scheme for healthcare professionals in protection of the public, we are deeply concerned and upset by the development of the AR scheme within the profession of clinical psychologists when we finally learned about it over the past month.

First of all, there appeared to be a lack of effort in informing, consulting, and including non-Cantonese speaking clinical psychologists in the entire process of AR over the past two years. Only two local professional bodies have been actively involved in the AR scheme thus far with no representation from non-Cantonese speaking clinical psychologists who also practice in Hong Kong, serving the Hong Kong public. As a group, we have been excluded not only from the current proposal but also from the process of AR.

Secondly and more importantly, the Registration Criteria and Training Standard for the AR of clinical psychologists currently proposed by the HKPS-DCP appears to be narrowly based on local clinical psychology training programs that it acts to disregard non-locally trained clinical psychologists, ultimately harming both local and international communities within Hong Kong.

Specifically, the proposal appears to ignore the professional qualifications and/or licensure/registration obtained overseas and imposes more stringent criteria for registration (many of which are not required by statutory regulation bodies worldwide and simply appear to be arbitrary) on non-locally trained clinical psychologists whose qualifications are otherwise recognized internationally. While the proposal allows graduates from local clinical psychology training programs to become registered automatically, it creates unnecessary barriers (ranging from examination to various kinds of remedial training) for non-locally trained clinical psychologists to become registered, especially for those trained outside of U.S., U.K., Canada, and Australia. By driving away overseas trained clinical psychologists from the already scarce number of mental health professionals in the city, the Hong Kong public, specifically the diverse, non-Cantonese speaking population of Hong Kong will be deprived of clinical psychologists who are culturally competent to provide psychological services in English, French, German, and other languages native to clients.

We fear that the current proposal by HKPS-DCP acts to protect the interests of locally trained clinical psychologists more than that of the public and are in opposition to it. We are alarmed by the lack of consideration or consultation of clinical psychologists who have been trained and/or are licensed/registered overseas as a way of including those who are currently serving the public. It is reflective of the non-inclusive tone of the current proposal, which has potential long term effects, especially to the diverse, international communities within Hong Kong as well as the standing of Hong Kong as an international city.

We thereby kindly request your help with ensuring the followings:

- A. Overseas trained and/or licensed/registered clinical psychologists be included in the work group of the AR proposal,
- A. Postponement of the AR scheme for clinical psychologists until the requirements are inclusive of those already trained, licensed, and/or registered overseas, and
- B. The outcome and process of AR is fair and transparent with ongoing consideration and consultation to include current practicing clinical psychologists instead of excluding them and potentially hurting the public.

Sincerely,
The International Psychologists Concern Group