

立法會衛生事務委員會:

**就 2018 年 12 月 10 日認可醫療專業註冊先導計劃公聽會 -
臨床心理學家認可醫療註冊計劃的意見**

香港學術/資歷最高級別及國際執業資格的臨床心理學家未能順利於香港註冊

1. 香港尚未有臨床心理學家註冊制度，為讓僱主及服務使用者有信心，關注組成員均獲得香港學術及職業資歷評審局 Level 7(最高級別) 水平，以及英、美、澳、加、紐等，臨床心理學服務發展相對成熟的國家執業資格的臨床心理學家。

香港心理學會臨床心理學組(DCP)計劃書多次強調參照英、美、澳、加、等國家的專業註冊模式作藍本，但計劃書(參考附件 1: p.7 5.2.2 , 5.2.3.3)「當地畢業，當地註冊」並非以上國家的入門條件。以上條件令一群達到學術水平以及持有執業資格的臨床心理學家不能直接通過註冊。

以 40 個(隱藏個人資料)服務使用者病歷為工作證明

1. 計劃書要求，有 5 年非政府機構(well established NGOs) 工作經驗之臨床心理學家，除相關工作證明文件外，申請者需提交每年 8 個(共 5 年)，合共 40 個隱藏個人資料的病歷紀錄(de-identified, certified true copy)，以作臨床經驗之證明(參考附件 2: p.24 Appendix 2,第 3 點)。作為臨床心理學家，服務使用者的私隱是相當敏感的一欄。絕對不應該利用服務使用者的病歷或任何資料，作臨床上非必要之用途(no clinical necessity)，並以保護服務使用者私隱及照顧其需要作依歸。其實有很多方法可以作為工作證明，例如宣誓，機構推薦信等等。

Accredited Register Scheme (Clinical Psychologist) Concern Group

王彩琦博士 謹啟

[LOGO]	Hong Kong Institute of Clinical Psychologists Limited 香港臨床心理學家公會有限公司	Document No.	HKICP-RSD-PO-002-R0
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5.2.1.2.2.1 Academic components

5.2.1.2.2.2 Clinical supervised practice / placement / internship

5.2.1.2.2.3 Thesis or dissertation

5.2.2 Long-term arrangement (L2)

Applicants with qualification conferred by universities in the United Kingdom (UK), United States of America (USA), Australia and Canada who have fulfilled all the education and training requirements for registration / licensing to practice clinical psychology in the country where the qualification is conferred are normally considered as able to meet the standard of registration. The following requirements are guidelines for case-by-case assessment of overseas qualifications:

- 5.2.2.1 Hold a Bachelor degree with major in psychology or equivalent pre-requisite of study in psychology;
- 5.2.2.2 Hold a Master or Doctoral degree in clinical psychology accredited by one of the following bodies: Australia Psychology Accreditation Council (Australia), Canadian Psychological Association (Canada), Health and Care Professional Council (UK), or American Psychological Association (USA); and the accredited programme should meet the education and competency standards of local accreditation standard set by HKICP (refer to section 5.2.1.2.2); and
- 5.2.2.3 Have proof of fulfillment of all the requirements for registration/ licensing to practice clinical psychology in the country of the body which accredited the programme and where the degree is conferred. ~~As the entry requirement and training standard of different countries may vary, this requirement aims at ensuring the applicant has completed all the necessary education and training requirements based on the standard of a particular country where the degree is conferred.~~

5.2.3 Long-term arrangement (L3)

Applicants with qualification that, according to the assessment of HKICP, is equivalent to the qualification and standard required for entry into the register (refer to 5.1.2.1) but who may not be eligible for L2 (e.g., the qualification is accredited in a country not included in section 5.2.2.2). The following requirements are guidelines for case-by-case assessment:

- 5.2.3.1 Hold a Bachelor degree with major in psychology or equivalent pre-requisite of study in psychology;

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Appendix 2

Requirements of Proof of Practice for Application of Transitional Arrangement (T2): Experience-based grandfathering clause and Transitional Arrangement (T3): Remedial Training

Requirements of Proof of Practice for Application of - Transitional Arrangement (T2): Experience-based grandfathering clause, or Transitional Arrangement (T3): Remedial Training

Documents specified in Parts 1 to 3 must be submitted together with the application:

1. Documentary evidence of years of practice in clinical psychology in local university, public sector or established NGOs before <1st July 2018>

Documents certified by the employer with descriptions of position, nature of qualifications, duties performed and duration of employment on a full-time or part-time basis (the number of working hours per week has to be specified for part-time post) (refer to Part 4 for criteria of "Established NGOs").

2. At least <2> referees attesting to their competent practice as a clinical psychologist who can be contacted by the RC. At least <1> of them must be their supervisor at the workplace who is a recognized health or allied health professional or head of the organization.

3. Clinical evidence of years of practice in clinical psychology

~~Without breaching obligations of confidentiality and privacy or employer policy, <eight> de-identified, copies of real client records or case report per year of practice, which illustrate clinical psychology practice. These records or reports have to be certified as true copy by the person in charge of the clinical psychology service, who must be the clinical or administrative supervisor of the applicant.~~

Each client record / report MUST contain at least the following information:

3.1 Dates of consultation

- 3.2 First name of client only (or other non-identifying record of client name such as initial)