

## 唐敏忠博士提交的意見書

主席、各位尊貴議員：

【發言身份】本人唐敏忠博士獲香港臨床心理學博士協會董事會授權發言。

### 【本會抱支持的立場和態度】

本會一直支持及尊重此「先導計劃」。自「計劃」推出以來，本會極力予以配合，無論在提交文件的時間和編寫文件的素質，巨細無遺。本會早期多次與楊永強教授，和方毅先生書信往來及會面，確保兩位有足夠資料進行評核認證。

### 【評核過程令人失望】

在學術和專業的水平上，本會一直持守與時並進，與國際標準接軌的原則和態度推動本港臨床心理學的發展。楊教授亦多次在會議中向本會說明，他認為被受爭議及被臨床心理學組（學組）在大眾媒介中指為「劣幣」的城大專業進修學院與AIU 合辦的博士課程具有相當的國際水平。學組為了排斥異己，以本地培訓模式作為「唯一」的學術和專業評審標準，漠視國際發展，固步自封。在見面會談時也馬虎了事，令分歧加深（有錄音為證）。

及後楊教授在沒有合理解釋下，決定給予學組「先行」接受評核的機會，而不再與本會會面，甚至不交代什麼時候給予本會相同機會接受評核。方先生亦以楊教授是委託人代表為由，拒絕再與本會會面商議，甚至書信亦不正面回覆，電話查詢更不被理會。二人表現，實在令人失望和氣憤。

【專業意見】眼見雙方在學術和專業上分歧困局，政府及楊教授非但沒有尋找專業的獨立第三方意見，也沒有就本會多次提出需要專業調解員的要求作出回應。坦言，以這些措施突破僵局，實在刻不容緩。

\* 【利益衝突】學組主要是由港大和中大的臨床心理學畢業生組成，如今提出的方案明顯為這兩間大學「度身訂造」、日後這兩間大學的畢業生將會成為認證方案的最大受益人。面對這一種利益衝突。政府沒有從中制衡，無確保過程保持公允，讓「先導計劃」的公信力大打折扣！

【共識為本】「先導計劃」原意是要推動界別凝聚共識，以包容態度建立認證制度。目前巨大分歧仍然存在之際，此計劃應該暫緩落實，無礙其它已達共識的專業率先推行。

【結語】主席、各位議員，學術及專業資格，並非由一班有利益衝突的人說了算。本會已經提出更具包容性的建議（見附頁）。待獨立第三方的專家去判斷學術及專業水平是最為公道的處理方法，亦可以維護註冊計劃的原意。希望大家會認同。多謝。

~~ 完 ~~



香港臨床心理學博士協會  
認可醫療專業註冊先導計劃（臨床心理學界別）  
臨時建議書  
2018年12月5日

### 指導原則

香港臨床心理學博士協會（簡稱“本會”）一向支持「認可醫療專業註冊先導計劃」（簡稱“先導計劃”），目的是為公眾提供安全有效的臨床心理服務。從2017年2月17日準時提交初步建議書開始，直至現時更新的臨時建議書，為確保先導計劃的公正性及公信力，本會始終秉持以下三項原則：。

a) 保障公眾利益

為了保證服務質素，只認可以實證為本及經廣受認可的權威機構所確認的訓練課程，使公眾能獲得具備充份專業能力的臨床心理學家服務。

b) 包容

吸納所有能符合「可接受的基本服務標準」<sup>註1</sup>之申請者，使他們能於劃一標準之監管中保持專業水平。

c) 公正

對來自不同教育及訓練背景之申請者，只要能符合“可接受的基本服務標準”，以客觀及不偏不倚的公正態度作出評審，杜絕歧視及偏見出現。

### 基本標準的框架

由先導計劃所確立之認證專業團體，將經由下列之途徑，吸納符合“可接受的基本服務標準”之申請者進入認證註冊。

途徑 A: 於香港受訓的臨床心理學畢業生

- 擁有臨床心理學碩士或博士學位，其大部分學術教育及臨床訓練均於香港進行；並
- 已被納入由香港臨床心理學博士協會或香港心理學會臨床心理學組認可的臨床心理學家名冊內

本途徑之相關課程包括：

- 香港中文大學<sup>註2</sup>或香港大學<sup>註3</sup>提供之臨床心理學碩士或博士課程
- 香港城市大學專業進修學院與美國 Alliant International University 加州專業心理學院合辦於香港提供的臨床心理學博士課程<sup>註4</sup>

途徑 B: 符合澳洲、加拿大、紐西蘭、英國、或 美國臨床心理學課程監管機構所制定之教育及訓練標準的畢業生 (相關之監管機構名單見附錄一)

途徑 C: 依據「祖父條款」進入先導計劃之臨床心理學家

- 已被納入由香港心理學會臨床心理學組認可的臨床心理學家名冊；並
- 未持有正式臨床心理學教育及訓練資歷；並
- 擁有超過 10 年於認可工作機構累積的香港臨床心理學服務經驗

所有經 A、B 或 C 途徑直接進入先導計劃之申請者，均無須參與任何額外的訓練、考試或臨床督導。因為他們已擁有符合本地或國際專業機構所認可的資歷。

#### 影響分析及將來安排

經 A、B 或 C 途徑進入先導計劃之申請者，相關的影響分析及將來安排，見附錄二

#### 認證專業團體的註冊安排

經 A、B 或 C 途徑進入先導計劃之申請，必須於認證專業團體成立後一年內遞交。

未能經 A、B 或 C 途徑進入先導計劃之申請者，將由下列機制處理：

#### 途徑 A、B、或 C 以外的認證機制

在先導計劃實施後，如有申請人不能循以上途徑進行註冊，認證專業團體在聽取臨床心理學專業顧問團隊的獨立評估意見後，可能會進一步修訂認證準則。評估是以保障公眾利益、包容、及公正為指導原則，以確立持續對等的專業能力資歷水平，有關費用將由認證專業團體承擔。

於認證專業團體開始運作後之一年內，將會成立下列兩個的處理機制：

##### 1. 更新資歷名單的機制

設立機制，持續評估及更新認可的資歷名單。使更多不同背景的臨床心理學家有機會被納入認證專業註冊。

##### 2. 訂立增補考核方式的機制

對於未能符合已更新的認可資歷名單之申請者，認證專業團體於聽取專業顧問團隊的獨立意見後，將制定適當的增補考核方式，使更多符合專業水平的臨床心理學家能有機會被納入認證專業註冊。有關費用將由申請人承擔。

上述機制將會經常被檢討及改善，使申請人於獲得專業註冊前，做好改善專業水平的準備，最終令公眾能獲得安全有效的臨床心理服務。

## 附錄一

### 途徑 B 相關之國家監管機構名單

#### 澳洲

- Psychology Board of Australia

#### 加拿大

- Regulatory bodies in each Canadian jurisdiction granting licensure to practice:
  - Alberta
    - o College of Alberta Psychologists
  - British Columbia
    - o College of Psychologists of British Columbia
  - Manitoba
    - o Psychological Association of Manitoba
  - Newfoundland Labrador
    - o Newfoundland and Labrador Psychology Board
  - New Brunswick
    - o College of Psychologists of New Brunswick
  - Northwest Territories
    - o Registrar of Psychologists, Department of Health and Social Services
  - Nova Scotia
    - o Nova Scotia Board of Examiners in Psychology
  - Nunavut
    - o Registrar, Professional Licensing, Nunavut Health and Social Services
  - Ontario
    - o College of Psychologists of Ontario
  - Prince Edward Island
    - o Prince Edward Island Psychologists Registration Board
  - Québec
    - o Ordre des psychologues du Québec
  - Saskatchewan
    - o Saskatchewan College of Psychologists

#### 紐西蘭

- New Zealand Psychologists Board

#### 英國

- Health & Care Professions Council

#### 美國

- Association of State and Provincial Psychology Boards (ASPPB) Member Boards
- ASPPB/National Register Joint Designation<sup>註5</sup>

## 附錄 II

香港臨床心理學博士協會於 2018 年 12 月制訂  
有關認可醫療專業註冊先導計劃  
臨時建議書之  
影響分析及將來安排

臨床心理學家的資歷類別	進入先導計劃之影響分析	於先導計劃完成後之將來安排
畢業自香港中文大學或香港大學提供之臨床心理學碩士或博士課程，並已被納入由香港心理學會臨床心理學組認可的臨床心理學家名冊	經途徑 A 直接進入先導計劃；無須參與任何額外的訓練、考試或臨床督導	此資歷將被納入由先導計劃確立之認證專業團體所認可之資歷名單
畢業自香港城市大學專業進修學院與美國 Alliant International University 加州專業心理學院合辦於香港提供的臨床心理學博士課程，並已被納入經香港臨床心理學博士協會認可的臨床心理學家名冊	經途徑 A 直接進入先導計劃；無須參與任何額外的訓練、考試或臨床督導	將來無需安排，因為此課程已停止招生
達到澳洲、加拿大、紐西蘭、英國、或美國臨床心理學課程監管機構所制定之教育及訓練標準的畢業生 (相關之監管機構名單見附錄一)	經途徑 B 直接進入先導計劃；無須參與任何額外的訓練、考試或臨床督導	此資歷將被納入由先導計劃確立之認證專業團體所認可之資歷名單
依據「祖父條款」進入先導計劃之臨床心理學家： 已被納入由香港心理學會臨床心理學組認可的臨床心理學家名冊；並 未持有正式臨床心理學教育及訓練資歷； 並 擁有超過 10 年於認可工作機構累積的香港臨床心理學服務經驗	經途徑 C 直接進入先導計劃；無須參與任何額外的訓練、考試或臨床督導	將來無需安排，因為此途徑僅為一次性過渡措施

註 1

Table 2: Key themes of literature review, Final Report of the Regulatory Frameworks for Healthcare Professionals prepared by JC School of Public Health and Primary Care, The Chinese University of Hong Kong retrieved from

[https://www.fhb.gov.hk/download/press\\_and\\_publications/otherinfo/180500\\_sr/cuhk\\_report\\_on\\_regulatory\\_frameworks\\_for\\_healthcare\\_professionals.pdf](https://www.fhb.gov.hk/download/press_and_publications/otherinfo/180500_sr/cuhk_report_on_regulatory_frameworks_for_healthcare_professionals.pdf) 於 2018-11-3 閱覽

註 2

香港中文大學提供之臨床心理學課程資料

<https://www.psy.cuhk.edu.hk/index.php/en/graduate> 於 2018-11-12 閱覽

註 3

香港大學提供之臨床心理學課程資料

[https://www.psychology.hku.hk/?page\\_id=1145](https://www.psychology.hku.hk/?page_id=1145) 於 2018-11-12 閱覽

註 4

香港城市大學專業進修學院與美國 Alliant International University 加州專業心理學院合辦於香港提供的臨床心理學博士課程資料

<http://www.scope.edu/Home/Programmes/PostgraduateProgrammes/DoctorofPsychology/HongKongClinicalPsychologyPsyDProgram/AccreditationProfessionalCredentials.aspx> 於 2018-11-12 閱覽

註 5

ASPPB/National Register Joint Designation

<https://www.asppb.net/page/JointDesignation> 於 2018-11-12 閱覽



**Provisional Proposal**  
On the Pilot Accredited Registers Scheme for Clinical Psychologists in Hong Kong  
Issued on: December 5, 2018

## Guiding Principles

Hong Kong Association of Doctors in Clinical Psychology Limited (“HKADCP”) embraces the following tenets as the guiding principles in supporting the pilot Accredited Registers Scheme for clinical psychologists (“AR Scheme”), in our original proposal submitted on the deadline of 17 February, 2017 and equally in this Provisional Proposal, trusting that assurance of such tenets by all stakeholders concerned will safeguard and lead to the **impartiality** and the **credibility** of the AR Scheme. The **ULTIMATE OBJECTIVE** of our participation is to address the needs of the community by the provision of safe and quality clinical psychological services. To achieve such objective, our tenets emphasize:

**a) Safeguarding Public Interest**

It is, in its essence, taken to be the competence of clinical psychologists trained from programs that can be verified and accredited by third-party authorities which are widely recognized and respected, and supported by evidence-based research.

**b) Inclusiveness**

It is, in its essence, taken as the acceptance of registrants who can satisfy the “minimally acceptable standards of care”<sup>Note 1</sup> that can be reasonably expected from them when they provide psychological services to recipients. These standards are defined under “Framework of Minimally Acceptable Standards” in this proposal.

**c) Fairness**

It is, in its essence, taken to mean an impartial, unbiased and just attitude to accept qualified registrants irrespective of where they received education, and the modality of their training in so far as these education and training satisfy the “minimally acceptable standards of care”, and that this attitude is demonstrated to be free of any political or cartel influences and applied without prejudice to any particular group.

## Framework of Minimally Acceptable Standards

The “minimally acceptable standards of care” shall be standards adopted in clinical psychology programs of the following academic institutions and/or standards adopted by the following professional institutions in which applicants hold membership of, or recognition to practice. Applicants who have recognition from one of the following education or professional institutions depicted in Route A, B, or C, shall be deemed to possess registrable qualifications to be admitted as accredited clinical psychologists in the Accredited Professional Body (APB) to be established under the Scheme.

**Route A:** For any graduate of clinical psychology (“CP”) program conducted by any one of the universities in Hong Kong, who

- Holds a Master or Doctoral degree in CP, with **the majority of academic courses and clinical placement conducted in Hong Kong, AND**
- Holds a membership in the Register of Clinical Psychologists maintained by the Hong Kong Association of Doctors in Clinical Psychology (HKADCP) or the Division of Clinical Psychology of the Hong Kong Psychological Society (DCP-HKPS).

Programs currently covered by this route are:

- Master or doctoral degree programs in clinical psychology conducted by the Chinese University of Hong Kong <sup>Note 2</sup>, and the University of Hong Kong <sup>Note 3</sup>.
- Doctoral program in clinical psychology conducted by the School of Continuing and Professional Education at City University of Hong Kong in collaboration with California School of Professional Psychology, Alliant International University <sup>Note 4</sup>.

**Route B:** For any graduate of CP program, who has fulfilled all the education and training requirements as recognized by the national regulatory bodies for CP practice, in either Australia, Canada, New Zealand, the United Kingdom, or the United States of America (A list of these national bodies is given in Appendix I).

**Route C:** For grandfathering any clinical psychologist in Hong Kong who

- Holds a membership in the Register of Clinical Psychologists maintained by the Division of Clinical Psychology of the Hong Kong Psychological Society (DCP-HKPS), **AND**
- Does not possess any formal qualifications in CP, **AND**
- Possesses proof of practice as clinical psychologist for at least 10 years in recognized work settings in Hong Kong.

All applicants via Route A, B and C shall not have any obligation to attend remedial training, examination, or clinical supervision because they have already attained qualifications and /or experience that meet the registration requirements of respective local and international professional bodies.

### **Impact Analysis and Future Arrangement for CPs Admitted to AR Scheme**

An impact analysis and the related future arrangement for those clinical psychologists admitted to AR Scheme via Route A, B, or C, is given in Appendix II.

### **Registration in the Accredited Professional Body**

Application for registration to the APB from current qualified clinical psychologists via either Route A, B, or C **must be submitted within one year** of the commencement of operation of the APB.

Application for registration to the APB other than via Route A, B, or C shall be registered under the mechanisms given below.

## **Mechanisms for accrediting clinical psychologists other than via Route A, B, or C**

After its establishment and upon applications of these other clinical psychologists not already included in these three routes, the Accredited Professional Body (APB) shall further assess qualifications and competence of these applicants. Such assessment shall be based on the already endorsed registrable qualifications, and to be further adapted with reference to advices from a team of independent and well recognized persons in the clinical psychology profession (hereafter referred to as "independent advisors") to be engaged by and at the cost of the APB. The purpose of the **assessment is to look for equivalent level of qualifications and competence** basing on the three Guiding Principles of Safeguarding Public Interest, Inclusiveness, and Fairness.

Within one year of the commencement of operation of the APB, two additional mechanisms shall be established to process applications from those holders of CP training qualifications not meeting the endorsed list of registrable qualifications specified in the proposed Route A, B, or C.

1. A mechanism for updating the endorsed list

A mechanism for updating the endorsed list of registrable qualifications shall be established so that positive evaluation results of these objective assessments can be added to the endorsed list of registrable qualifications. The accreditation process of these other clinical psychologists shall then proceed.

2. A mechanism for remedial measures

For those applicants with qualifications and training that cannot meet such equivalent level, these applicants shall be given opportunities to make up for their inadequacy at the recommendation of the APB basing on the opinion of the independent advisors, and at the costs of the applicants.

These mechanisms shall be reviewed and improved from time to time for the purpose of facilitating these individuals' preparation for professional competence, AND for the purpose of ensuring equivalent level of safety of psychological services to be provided to the community BEFORE their admission as accredited clinical psychologists.

## Appendix I

### List of national regulatory bodies under Route B

#### **Australia**

- Psychology Board of Australia

#### **Canada**

- Regulatory bodies in each Canadian jurisdiction granting licensure to practice:
  - Alberta
    - o College of Alberta Psychologists
  - British Columbia
    - o College of Psychologists of British Columbia
  - Manitoba
    - o Psychological Association of Manitoba
  - Newfoundland Labrador
    - o Newfoundland and Labrador Psychology Board
  - New Brunswick
    - o College of Psychologists of New Brunswick
  - Northwest Territories
    - o Registrar of Psychologists, Department of Health and Social Services
  - Nova Scotia
    - o Nova Scotia Board of Examiners in Psychology
  - Nunavut
    - o Registrar, Professional Licensing, Nunavut Health and Social Services
  - Ontario
    - o College of Psychologists of Ontario
  - Prince Edward Island
    - o Prince Edward Island Psychologists Registration Board
  - Québec
    - o Ordre des psychologues du Québec
  - Saskatchewan
    - o Saskatchewan College of Psychologists

#### **New Zealand**

- New Zealand Psychologists Board

#### **United Kingdom**

- Health & Care Professions Council

#### **United States of America**

- Association of State and Provincial Psychology Boards (ASPPB) Member Boards
- ASPPB/National Register Joint Designation <sup>Note 5</sup>

## Appendix II

### **Impact analysis on Clinical Psychologists and Future Arrangement**

Being affected by the Provisional Proposal prepared in December 2018 by HKADCP  
In the context of the Pilot Accredited Register Scheme for CP

<b>Clinical Psychologist with Specific Attributes</b>	<b>Impacts on entry to the Pilot AR Scheme</b>	<b>Future arrangement subsequent to the completion of the Pilot AR scheme</b>
Graduate of Master or Doctoral degree programme conducted by the Chinese University of Hong Kong or the University of Hong Kong, AND holds a membership in the Register of Clinical Psychologists maintained by the Division of Clinical Psychology of the Hong Kong Psychological Society	<b>Direct entry via Route A</b> without any obligation of attending additional remedial training, examination, nor clinical supervision	Such qualifications are to be included in the list of registrable qualifications recognized by the Accredited Professional Body to be established under the Pilot AR Scheme
Graduate of Doctoral degree programme conducted by the School of Continuing and Professional Education at City University of Hong Kong in collaboration with California School of Professional Psychology, Alliant International University, AND holds a membership in the Register of Clinical Psychologists maintained by the Hong Kong Association of Doctors in Clinical Psychology	<b>Direct entry via Route A</b> without any obligation of attending additional remedial training, examination, or clinical supervision	<i>No arrangement will be necessary as this program is currently teaching out in 2018 and no longer admits new students</i>
Holder of a CP training qualification that has fulfilled all the education and training requirements as recognized by the national regulatory bodies for CP practice, in either Australia, Canada, New Zealand, the United Kingdom, or the United States of America (see Appendix I)	<b>Direct entry via Route B</b> without any obligation of attending additional remedial training, examination, or clinical supervision	Such qualifications are to be included in the list of registrable qualifications recognized by the Accredited Professional Body to be established under the Pilot AR Scheme
Existing clinical psychologist with at least 10 years of practice experience in recognized work settings in Hong Kong, AND holding a membership in the Register of Clinical Psychologists maintained by Division of Clinical Psychology of the Hong Kong Psychological Society, AND without any formal qualifications in clinical psychology.	<b>Direct entry via Route C</b> without any obligation of attending additional remedial training, examination, or clinical supervision	<i>No arrangement will be necessary as this is a one-off arrangement in the pilot scheme</i>

*Note 1*

Table 2: Key themes of literature review, Final Report of the Regulatory Frameworks for Healthcare Professionals prepared by JC School of Public Health and Primary Care, The Chinese University of Hong Kong retrieved from  
[https://www.fhb.gov.hk/download/press\\_and\\_publications/otherinfo/180500\\_sr/cuhk\\_report\\_on\\_Regulatory\\_frameworks\\_for\\_healthcare\\_professionals.pdf](https://www.fhb.gov.hk/download/press_and_publications/otherinfo/180500_sr/cuhk_report_on_Regulatory_frameworks_for_healthcare_professionals.pdf) on 2018-11-3.

*Note 2*

CP programs conducted by the Chinese University of Hong Kong retrieved from  
<https://www.psy.cuhk.edu.hk/index.php/en/graduate> on 2018-11-12.

*Note 3*

CP programs conducted by the University of Hong Kong retrieved from  
[https://www.psychology.hku.hk/?page\\_id=1145](https://www.psychology.hku.hk/?page_id=1145) on 2018-11-12

*Note 4*

CP programs conducted by the School of Continuing and Professional Education at City University of Hong Kong in collaboration with California School of Professional Psychology, Alliant International University retrieved from  
<http://www.scope.edu/Home/Programmes/PostgraduateProgrammes/DoctorofPsychology/HongKongClinicalPsychologyPsyDProgram/AccreditationProfessionalCredentials.aspx> on 2018-11-12

*Note 5*

ASPPB/National Register Joint Designation retrieved from  
<https://www.asppb.net/page/JointDesignation> on 2018-11-12