

To: Panel on Health Services, Legislative Council of the Hong Kong Special Administrative Region of the Peoples Republic of China

November 30, 2018

Re: Pilot Accredited Registers Scheme for Healthcare Professions

I'm a Clinical Psychologist (CP) working in The Chinese University of Hong Kong and in the private sector. I support the current AR proposal by the Division of Clinical Psychology, Hong Kong Psychological Society (HKPS DCP). I understand that the proposal does not guarantee all those who are already practicing in the field to get registered, but I don't think we should sacrifice public's safety to such a large extent in order to include everybody. Moreover, the preparation for AR in our profession has already gone through a long period of time, and the debate between different camps has never ended. The view between different camps continued to be diversified. I don't think prolonging the discussion will help converge different opinions.

Below are a few points that I'd like to stress:

1. On-site supervision is an important and essential element in the training of CP. During clinical placements, I got the chance to observe my CP-supervisors to perform assessment, consultation and treatment. I could discuss with them right after the observation in order to understand how a CP may use his skills and knowledge in the exact setting that I was having the placements. On the other hand, I also got the chance to discuss with them the clients that I've just seen, including asking for opinions about the follow up action that's appropriate for the specific placement setting. These observations and experience form a template for me when I provide service to my clients after graduation.
2. Requiring a graduate of an overseas CP program to obtain the license to practice in the same country offering the program is a reliable way to assess whether one is qualified to practice. Different countries have different systems of training and registration. In Hong Kong, graduates from the local programs (offered by HKU and CUHK) are recognized as practicing CP automatically. Thus, the design of the program is to ensure that one is qualified to practice upon graduation. When evaluating whether a student can graduate, the most important criteria is whether one can practice independently as a CP, not just whether one has

reached a certain academic standard.

In other countries, however, the system may be different. For example, in the US, graduating from a recognized CP program only means that one fulfills the academic requirement, which is a pre-requisite to become a licensed/registered CP. Whether one is “fit” to practice relies on the licensing/registration body of the corresponding State to decide, and usually further clinical placements with on-site supervision is needed after graduating from the university program. Graduating from a CP program in US never means that one is considered “fit” to practice in that country. Although some may argue that some overseas CP programs have better quality than the local ones, there’s no objective way to prove it one way or the around. Thus, the current proposal requiring one to obtain proof of eligibility to practice (to get registered or licensed) in the same country providing the program is a reasonable way to guarantee the qualification of the candidate.

3. When candidates don’t fit the above criterion (point 2), the current proposal provides grandparenting clause to include those who are already working in non-government organizations (NGO) or universities to register under the scheme, after completing certain remedial courses. Some argued that the proposal is not inclusive enough, because those who were never employed by NGO or universities as CP could not get registered even under the grandparenting clause. I agree that this is the case, and that the proposal is not perfect. Nevertheless, when someone is not employed by a recognized body (such as NGO or university), or practicing privately, there’s no way to monitor or guarantee that this person has even been working as a CP after graduation. Moreover, if one is not working as a CP, one cannot claim that the AR scheme has affected his or her livelihood, which is what the current proposal tries to address.

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