



**Registration reference F431EE64**

**To: Panel on Health Services**

**Special meeting on Monday, 10 December 2018, from 2:30 pm to 5:30 pm  
in Conference Room 1 of the Legislative Council Complex**

Dear Panel,

I have been prompted to submit this statement due to my grave concerns regarding the proposed registration scheme for Clinical Psychologists in Hong Kong. As it currently stands, the proposal contains (hopefully) unintentional bias, which discriminates against some members of the profession - particularly those who are overseas trained and licenced or did not graduate from either Hong Kong University or the Chinese University of Hong Kong.

If the current AR-Scheme is not amended, it will severely limit access to appropriate mental health services for the international community living in Hong Kong, both now and in the future.

I am writing as a Clinical Psychologist and longstanding member of the Australian Psychological Society. I have the privilege of working in a very busy medical practice here in Hong Kong as part of an integrated medical and mental health team.

Many of our team are overseas trained and licenced (including Australia, US, UK) and all have impeccable credentials and experience. Having an international team is essential, as we service the non-Cantonese speaking population of Hong Kong. In terms of delivering adequate mental health services, it is critical that our clients / patients have access to providers with *native language skills and socio-cultural competence*.

The work we do is critical to ensuring the welfare of our clients, the non-Cantonese population of Hong Kong, and the broader community of Hong Kong.

We fulfil a very important function that the already severely overburdened local mental health system cannot easily provide. It is challenging work, even for those of us sharing social and cultural backgrounds with our multicultural clients.

In Australia, where I was trained, and where I maintain a full license to practice as a Clinical Psychologist certified by the Psychology Board of Australia (PsyBA), registration has been both mandatory and well-regulated for decades.

In addition, all university training programs for psychologists (including Clinical Psychologists) have long been subject to rigorous oversight and accreditation by national regulatory bodies. To maintain registration I have been required to undertake continuing professional development and supervision.

I have completed the equivalent of 10 years formal training in Psychology (Clinical), which is four years more than what is currently required under the proposed scheme. I have both a PhD (Clinical) and Masters in Clinical Psychology, in addition to several years clinical experience. I am also a longstanding member of the Australian Psychological Society. Yet under the proposed scheme, it is possible that my application for registration could be rejected.

I believe that it is very laudable that Hong Kong now finally moves towards establishing a register. It is however somewhat ironic that practitioners such as myself should be encountering barriers to registration ( as per the proposed AR Scheme) and membership of the Hong Kong Psychological Society, given the current proposal is sensibly modelled after the best practice models developed by countries including Australia. That Hong Kong can benefit from the work of others is a wonderful reflection of the collegiate way in which our helping profession should operate across borders.

Unfortunately, the process leading to the development of the current proposed AR Scheme for Clinical Psychologists appears to have become highly politicized - mired by disagreement between competing non-statutory groups representing some, but not all, clinical psychologists practicing in HK.

There has been a deeply concerning lack of inclusion in this process, with those of us who are overseas trained or non- Cantonese speaking being totally excluded from this process. We are all highly visible, as evidenced by a simple internet search. Yet no effort was made to communicate with us in regard to the development of a scheme which will profoundly and adversely impact access to appropriate mental health services to the non- Cantonese populations we serve, in addition to our ability to practice.

This by now very advanced proposal for a registration scheme has attracted the serious concern of many of our Consuls, Chambers of Commerce, Business leaders, NGOs and patient advocacy groups. It even has implications for international trade agreements. Verbal reassurances have been provided at the highest level that those who are licenced or registered to practice in several countries including Australia will be automatically registered under the proposed scheme.

***Unfortunately, this is simply not factual. No-one has been prepared to commit to this in writing, and as the current proposal stands, this statement contradicts the proposed process for application.***

I would like to call your attention to the area concerning the supposed automatic registration of clinical psychologists from identified countries (UK, US Canada and Australia) as indicated in the relevant HKICP documents:

The latest iteration of the AR Scheme ***continues to exclude the majority of overseas trained and licenced practitioners.***

I refer specifically to those sections of the proposal which set out the **Requirements for Registration – for Overseas Registered Psychologists:**

**Accordingly:**

**Long-term Arrangements 2 and 3 (Routes L2 & L3) apply to overseas trained clinical psychologists with overseas license or registration.**

**In other words – Being registered/ Licensed to practice as a clinical psychologist in the identified countries will NOT be enough to qualify for registration.**

- The current AR Scheme states that each applicant ***will still be assessed on a case-by-case assessment by HKICP.*** Alarmingly, neither of these bodies includes any overseas trained clinical psychologists. In addition, this type of process is ***not transparent.***
- In addition to having an accredited masters or doctoral degree in clinical psychology, the degree ***should meet the education and competency standards of local accreditation set by HKICP - this is where the real difficulty with the current proposal lies.***

These proposed standards are very Hong Kong centric - they have, understandably, been developed in the context of graduates from two local universities (HKU and CUHU) and the delivery of mental health services largely within a public health and hospital authority setting.

As a result, these standards and criteria *are not always compatible, relevant or feasible with/for overseas clinical psychology training programs.*

As an example, following a change in national policy starting in the 1980's, the Australian government *devolved mental health services from hospital / largely institutional settings to a predominantly community based model of service delivery*, which relied upon a very broad range of providers - Government, NGOs and private practitioners.

With its widely geographically distributed population, service delivery in Australia is often very different to the way it is delivered in high density Hong Kong. Supervised practice requirements and settings therefore for Australian programs reflect this type of service delivery and the opportunities for supervised practice.

Some of the experiences and requirements of Australian post graduates will therefore be quite different from those stipulated for Hong Kong students. *This does not mean that there*

*will be a significant difference in clinical skills acquired by all graduates, as the clinical programs developed for Hong Kong are closely modeled from those already established in countries including Australia, the US, UK Canada etc. The core competencies and resultant standards of practice that graduates demonstrate will be essentially the same.*

*The current proposal suggests opportunity for “remedial” training or internships. Again, this is much compromised. If, for example, an overseas registered clinical psychologist is identified as not meeting specific required hours of practicums within a hospital setting, unless they speak Cantonese, they will not be able to complete an internship in Hong Kong.*

***As is currently stands, the overly rigid and Hong Kong centric criteria developed by the HKICP can be used by HKICP to exclude any applicant - irrespective of overseas registration status.***

### **Proposed Solutions to the problems identified in this submission:**

Whilst much of the current proposal seems to be sound and in line with best practice, a few critical amendments will make this fair for all, by addressing the bias and apparent discrimination that elements of the proposal foster.

### **Proposed Amendments to the AR-Scheme**

1. The provision *in writing* that overseas trained and registered psychologists from the approved countries are granted registration. That reference to “assessment on a case by case process” for any applicant already registered/ licenced from the approved countries *must be removed*.
2. That clinical psychologists registered in countries other than those already mentioned should also have an opportunity for automatic inclusion (i.e. France- which has a very large expatriate community in Hong Kong need services in/by French therapists). This would require greater communication between the HKICP and relevant international registration bodies and may require some time to resolve, given the language issues involved.

### **To address the dispute between “competing” professional groups:**

#### *Rationale:*

1. The fact that the current proposal will effectively remove from practice over 100 practicing clinical psychologists is a grave error. There is already a very serious deficit in psychological services in Hong Kong. In the context of a deeply disturbing rise in the suicide rate and an overwhelmed existing mental health service (waiting lists which can extend for over 3 years) this is unacceptable. With the capacity to graduate as

few we 28 clinical psychologists per year, HKU and the CUHK cannot be expected to either redress or meet the current needs of the public in Hong Kong.

2. When students have entered programs of study in good faith, and graduated with qualifications that have been recognised by respected licensing boards, they should be “grandfathered” into a newly proposed system *without penalty*. If all current members of the CD HKPS were required to have their credentials and training from the past assessed in the same manner proposed by the current proposal, it is very likely that many would fail to meet the proposed requirements. *This is why it is usual practice to apply new standards to new graduates and not to apply them retrospectively to current practitioners.*

**Solution:**

Allow those who are currently in practice and hold qualifications that allowed them to be licensed at the time for their graduation from countries such as the US, UK, Australia and Canada, to be automatically granted registration under the new scheme.

Please let me reiterate that I fully support a registration scheme and the current proposal has many laudable features. The above minor changes could redress the undesirable potential for bias and discrimination inherent in the current proposal and must be considered as a matter of some urgency.

Yours faithfully

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