Dear Sir/Madam,

My concern with the Clinical Psychology requirements in the AR scheme for Healthcare Professions is that in its current form, it still prevents International Clinical Psychologists from having a clear pathway to admittance. In my opinion, the vagueness of the pathways offered indicate a spirit of exclusion and discrimination. The pathways offered for International Clinical Psychologists to gain admittance into the scheme are flawed and unfair, as I will outline below.

- 1) Under the scheme, International Clinical Psychologists ("ICPs") will be evaluated on a case-by-case basis. I think this is fine, however, I believe that the group that evaluates ICPs should consist of ICPs whom the scheme deems have "acceptable" requirements. It would be unfair and biased of the evaluating group to only consist of Hong Kong trained psychologists.
- 2) The remedial training that is required for those who do not meet the requirements under the AR scheme is set up to make ICPs fail because the settings in which ICPs would need to work (hospital, university, NGO) all require Cantonese language, which the majority of ICPs do not speak.

In addition to these reasons, in my mind, the AR scheme also represents a mindset of discrimination and exclusion. This concerns and saddens me as it is not congruent with the Hong Kong that I know, as a welcoming international city. I hope that the AR scheme in it's current form will not pass and will undergo additional review and public consultation to fine-tune the issues above, not just for ICPs, but also for the large non-Cantonese speaking population that calls Hong Kong home. With this scheme, it feels to me that Hong Kong would be taking a hit with its reputation as an international city. I know that many non-Mandarin and non-Cantonese speaking people who live in China travel to Hong Kong specifically to get mental health services. I wouldn't want that to be the case for Hong Kong, were people who live here feel that they have to seek mental health services outside of Hong Kong because there aren't enough Clinical Psychologists who speak English or who understand their culture. The current AR scheme puts the mental health of the general public at risk by making it exceedingly and unnecessarily difficult and not having a clear, fair pathway for ICPs to gain admittance.

I hope you will take into consideration the concerns outlined above and put forward a AR scheme that addresses them.

Yours faithfully,

Bhavna Bharvani, M.A. Clinical Counsellor