

10 Dec 2018

Chairman, Dr. Hon Pierre Chan and Members  
Panel on Health Services  
Legislative Council of the Hong Kong Special Administrative Region  
People's Republic of China

**Re: Accredited Registers Scheme for Clinical Psychologists**

Good afternoon Chair and members of the Panel on Health Services

Please let me introduce myself, I am a California licensed clinical psychologist and I am here today to represent the International Psychologists Concern Group.

Most of us in the group are non-Cantonese speakers but we have all been trained, licensed, or registered to practice as clinical psychologists in countries where the profession has long been regulated such as the U.K., U.S.A, Australia, and France. We would therefore like to express our support of the Government's initiative to take a step toward regulating the profession and protecting the public.

We, however, remain concerned with the wording of the current proposal as it could potentially exclude any non-locally trained clinical psychologists even if we fulfil the criteria of having been trained by accredited programs and meeting all requirements for licensing or registration overseas. The specific wordings we refer to are the clause that we must meet the education and competency standards of local accreditation standard set by the Hong Kong Institute of Clinical Psychologists (HKICP) and the case-by-case caveat.

The education and training standards of clinical psychologists differ across countries and in some cases are incompatible with local standards yet the standards of overseas countries where the profession has long been regulated are not beneath that of Hong Kong. We ask that the proposal be inclusive of these differences in terms of education and training.

More importantly, the HKICP Registration Committee and Professional Standards Committee responsible for the case-by-case assessment of non-locally trained clinical psychologists do not seem to have adequate representation of non-Cantonese speaking clinical psychologists from overseas.

The current proposal requires some applicants to submit very detailed client records including clients' first name or initials and additional information as proof of practice. This has been confirmed by the American Psychological Association, which many of us are a member of, to be a violation of the Association's ethics code. In the event that we are unable to become registered and are required to undergo remedial training, we are also concerned with the feasibility of such arrangements as the proposed remedial training requires individuals to work and be supervised in local universities, hospitals, universities, or NGOs that may not have much vacancies for non-Cantonese speakers.

Many of us have come to see this international city as our home and wish to safeguard clinical psychology services available to the public, especially in the current context

of mental health crisis. In view of the unique issues faced by non-locally trained clinical psychologists, we request that members of our group be included in the HKICP committees to better evaluate the qualifications of overseas trained, licensed, or registered clinical psychologists and to represent the interests of the non-Cantonese speaking populations that we serve as language and cultural competency are of paramount importance in our line of work. Alternatively, we suggest again that the Government consider employing a third-party international expert in the field of psychology to help design the proposal.

Sincerely,  
The International Psychologists Concern Group