

From: International Psychologists Concern Group <intlpsychologists@gmail.com>
To: panel_hs@legco.gov.hk

Date: Thursday, October 25, 2018 07:13AM

Subject: Concern Regarding Latest AR Scheme Proposal for Clinical Psychologists

History: [➔](#) This message has been forwarded.

Dear Members of the Panel on Health Services, Legislative Council of Hong Kong,

We have had the opportunity to review the latest proposal regarding the AR Scheme and would like to share our concern about the proposed scheme.

Attached, please see the letter we have sent to the Division of Psychology addressing these issues.

Sincerely,

International Psychologists Concern Group

Attachments:

Letter to DCP.pdf

October 23, 2018

Division of Clinical Psychology
The Hong Kong Psychological Society
Room 506, Lemmi Centre
50 Hoi Yuen Road
Kwun Tong, Kowloon

Dear Division of Clinical Psychology,

RE: Accredited Registers Scheme for Clinical Psychologists

We are writing to express our opposition to the latest draft documents on the Accredited Register (AR) Scheme for clinical psychologists. During the International Psychologists Concern Group (IPCG)'s meeting with Dr. Kitty Wu, Dr. Charles Pau, and Dr. Joyce Chao of the DCP's subcommittee for AR on September 26, we were under the impression that our concerns and feedback would be seriously taken into consideration when drafting the new proposal, but we are now disappointed to learn that our feedback was not factored into the most recent revised proposal.

We have been in contact with other concern groups such as the AR Concern Group and the Accredited Register Scheme (Clinical Psychologists) Concern Group, both of which share the same sentiment - their feedback have not been taken into consideration by the latest proposal. In fact, we learn that across the groups, we share similar concerns about the previous and the latest proposals with many points that we unanimously oppose to. The IPCG, AR Concern Group, and the Accredited Register Scheme (Clinical Psychologists) Concern Group are therefore jointly writing this letter in hopes that our feedback can be heard, addressed, and taken into account this time around.

- 1) Opposition to the criterion under L2 and L3 that requires applicants' license/registration to be from the same country where their degree is conferred:

Due to the increased ability to travel and pursue studies, many people are educated in one country, then return 'home' to a different country. Or alternatively, immigrate to another country after their educational and clinical training. Therefore, it is not uncommon to obtain licensure or registration from countries different from the country where one's degree is conferred. It does not seem fair, reasonable, or sensible clinically that only applicants whose license/registration are from the same country where their degree is conferred may have the opportunity to become registered through L2 and L3 under the

latest proposal. To illustrate our point, consider two clinical psychologists registered with the Health and Care Professions Council (HCPC) of the United Kingdom, one received training from an accredited clinical psychology program in the U.K. and the other received training from an accredited clinical psychology program in the U.S. For both individuals, their HCPC registration recognize and signify that they meet the minimum education and training standard of the U.K. to legally practice a clinical psychologist there. If both have the same recognition by HCPC, why should one be barred from becoming registered with HKICP under the latest proposal? This criterion does not exist in clinical psychology licensing or registration bodies internationally and has been opposed by various groups since the last proposal announced in May.

Prior to the Hong Kong government proposed a registration systems in the health professions, a large group of clinical psychologists have already obtained overseas registrations (the UK, US, Australia, Canada, and New Zealand). These professionals can practice as clinical psychologists both overseas and Hong Kong. We suggest that as long as a clinical psychologist is registered or licensed overseas, the clinical psychologist is not required to provide an education qualification conferred in the same country from where the registration/license is obtained.

- 2) Opposition to case-by-case assessment method of reviewing eligibility in L2, L3, T1, T2, and T3:

The current proposal provides for unobstructed registry for graduates of clinical psychology programmes of Chinese University of Hong Kong and University of Hong Kong. All other applicants will be assessed on a case-by-case basis. We are of the opinion that “case by case assessment” facilitates bias against non-Chinese University or Hong Kong University clinical psychology graduates. It camouflages the damaging effect of this proposal. We urge the removal of “case by case assessment.”

- 3) Opposition to the criterion under L2, L3 and T1 that overseas accredited programmes or qualifications must meet the education and competency standards of local accreditation standard set by HKICP:

According to the proposed Education Standards of Clinical Psychology in Hong Kong (HKICP-CPD-PO-002-R0), it appears that those who have not graduated from Chinese University or Hong Kong University must have had a supervisor who is a registrant of HKICP. Most foreign trained clinical psychologists would not have worked in local universities, the public sector or established NGOs in Hong Kong during their training

due to the physicality of our training programs as well as cultural and linguistic differences to the local Hong Kong population. Furthermore, we would not have experience working in the aforementioned settings either.

Additionally, with regards to the requirements of the supervisor, we can foresee how challenging it would be to find enough supervisors that would match the aforementioned criteria.

Those of us who have to pass an admission interview and remedial training for test use are baffled by the proposed requirements for remediation. The standards as well as the remediation process appears arbitrary and vague, with more questions than answers pertaining to the current infrastructure and long term sustainability. There is no guideline or detail as to what remediation entail, and whether they would be culturally sensitive and adapted to one's training background. Furthermore, clinical psychology training affords us the possibility of a wide range of professional work. As such, some clinical psychologists choose not to include assessments in their professional activities. Are these clinical psychologists then forced to do "remedial training for test use" even if it is not aligned with their personal career interest?

We sincerely urge you to consider creating an AR Scheme workgroup that includes clinical psychologists from various cultural, linguistic, and educational backgrounds, and to reconsider the proposal given the points we have mentioned above. If the AR scheme goes into statutory registration as it is written now, we believe that Hong Kong would suffer a mental health crisis and many non-Cantonese speakers would lose access to appropriate professionals that can support them through their turmoil.

We are available to meet and to share our opinions. As clinical psychologists we hope that the AR Scheme will fundamentally be inclusive and fair rather than protectionist and biased, otherwise we stand to lose the common goal of being humanistic and ethical clinical psychologists.

Best regards,

The International Psychologists Concern Group in conjunction with the following groups:

The AR Concern Group

The Accredited Register Scheme (Clinical Psychologist) Concern Group