



Hong Kong Association of Doctors
in Clinical Psychology Limited
香港臨床心理學博士協會有限公司

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BY EMAIL ONLY [ngai_fong@fhh.gov.hk]

Mr. FONG Ngai
Deputy Secretary for Food and Health (Health) 3
Food and Health Bureau

Dear Mr. Fong,

**Re: Position regarding Current Consultation of Accredited Register Scheme (“the AR Scheme”)
for Clinical Psychologists**

We are expressing our serious discontent over the recent alleged consultation initiated by “Hong Kong Institute of Clinical Psychologists (“HKICP”),” which we consider illegitimate in the process of the AR Scheme. We also convey our grave disappointment at the Accreditation Agent (“the Agent”) of the AR Scheme who is supposed to act as the trustee of the Government to carry out a fair proceeding of the consultation process but chooses to remain silent on this matter. Given the accommodative attitude to the procedural non-compliance of HKPS-DCP application, and the apparent side-taking by the Agent under the supervision of Professor Yeoh, we are obliged to make the following statements:

1. We do not accept the legitimacy of “HKICP” for the clinical psychology profession in the AR Scheme

“HKICP” has no role to play in the AR Scheme. As such, the posing to lead the consultation for the AR Scheme for the clinical psychology profession is allegedly an act to mislead. Moreover, this new organization, instead of HKPS-DCP, has declared to have gone through the assessment by the Survey Team and has started to invite comments from stakeholders on the so-called “revised proposal”. We do not accept the legitimacy of “HKICP” and the procedural propriety of this consultation process. As the Agent has not taken a proactive stance to clarify the confusing situation, we question the effort of the Agent to uphold the fairness of the AR process.

2. We disagree to the exclusivity of the current proposal recommended by HKPS-DCP or its institute, i.e., “HKICP”

HKADCP is gravely disappointed that the Agent has failed to fulfil its obligation in ensuring an inclusive proposal is put up for the AR Scheme in the clinical psychology profession. Despite the Government has repeatedly reassured stakeholders of the principle of inclusiveness for the AR Scheme, the contrary is evidenced in all proposals advanced by HKPS-DCP, and the one put forward by “HKICP.” Despite HKADCP has made numerous attempts in providing sincere feedbacks, we found the theme of exclusivity in all versions of the propositions, and with a political agenda being masked by the so called “standard-based” criteria. It is apparent that the purpose is to exclude graduates of CSPP-HK program from direct entry to the Scheme (Please refer Appendix 1). Similarly, the alternative qualifying arrangements consist of unfeasible routes, unreasonable and humiliating hurdles that will effectively exclude many current practitioners who are not already members of HKPS-DCP as well (Please refer to paragraph 5 herein).

3. We doubt the procedural justice of the AR process administered by the Agent in the CP profession

No proper explanation is provided to HKADCP by the Agent in accepting the late submission of the AR application by HKPS-DCP. The favouritism given to HKPS-DCP is further evidenced when the Agent elected to assess the HKPS-DCP's proposal before that of HKADCP. No substantial ground or convincing reason was provided for such move. In addition, the Agent has chosen not to assess both applications of HKPS-DCP and HKADCP for the sake of fair comparison. The impartiality of the Agent is thus compromised.

4. We urge for a fair and respectful treatment of opposing opinions from HKADCP and fellow practitioners

HKADCP holds the opinion that the Agent has deviated from the principle of professional autonomy being adopted by the Government in the implementation of the AR Scheme. While the Government has repeatedly re-affirmed the principle of professional autonomy, the Agent seems to have ignored the lack of consensus and dissenting situation of the profession, specifically between HKPS-DCP and HKADCP. Despite strong voices from various stakeholders against the discriminative nature of the HKPS-DCP propositions, no improvement on the inclusiveness of the proposals has been observed. Rather, the Agent continues to allow the non-inclusive proposal of HKPS-DCP to proceed further to the Assessment by the Survey Team. As such, HKADCP and many other stakeholders doubt the objectivity and reasonableness of the Agent, who had demonstrated a lack of fairness in evaluating opinions of the profession and recommendations being delineated by HKADCP during the consultations in past years.

5. We boycott the misleading consultation held by "HKICP" and denounce all the demeaning requirements in the proposal

HKADCP has decided to boycott the open consultation invited by "HKICP." It is not merely because of its questionable legitimacy and representation, but also of its unreasonable, unfair, unethical, harmful and logistically unfeasible requirements imposed upon current practitioners. As a consequence of accepting the unilaterally imposed so-called "standards, all CSPP-HK graduates are required to admit having significant shortfall in their full competencies, in terms of the body of knowledge and clinical skills needed for safe and effective practice. In addition to making "admitting of shortfall" as one of their basic alternative qualifying requirements, some other unreasonable conditions are imposed, and are highlighted as follows:

a. Using Clinical Records as Proof of Practice

As a pre-requisite, the applicants have to submit eight clients' case reports or case logs as the proof of practice EACH year for up to 10 years of practice. Apart from the enormous work on documentation, the use of de-identifying patients' records beyond clinical purposes has a potential risk of violating professional ethics including but not limited to APA ethical code. Also, it is logistically unfeasible and ethically improper to go back to the discharged clients to obtain their consent retrospectively. Seeking voluntary and explicit consent from existing patients for AR registration will impair the trusting therapeutic relationships as incompetency is implied. Furthermore, all patient records are under the management of the employing organizations which have the responsibility to protect the patients' confidentiality. Thus, it is anticipated that only a bare minimal number of, if there is any, organizations will approve their employed or employing CP to use the records of patients beyond the original clinical purposes.

b. Remedial Arrangements as a Result of the Imposed Shortfall in Competencies

According to the remedial arrangements, all the applicants have to attend interviews or assessments by a board with members who are registrants of “HKICP.”

- Applicants with experiences of five years or above are, subject to the result of a clinical competency assessment, require to attend an additional training up to 300 hours plus clinical supervision hours to be assigned;
- Applicants with less than five years of experience will have to take one-year full-time training and additional clinical supervision up to two years.

The “trainees” are required to pass related examinations for basic knowledge and core competencies in CP practice, and obtain satisfactory recommendations from the clinical supervisors recognized by “HKICP” before admission to registration will be granted. Moreover, all the applicants have to complete compulsory trainings and pass the related examinations for using five specified psychological tests.

We consider these unreasonably imposed requirements are unacceptable for the following reasons:

- It is entirely unfair, unjustifiable and humiliating for holders of doctoral degree in CP who have completed four years of full-time training from an accredited program. Many of these professionals are experienced practitioners with international registrations in U.S., U.K., Australia or New Zealand. In contrast, the master level CPs newly graduated from CUHK or HKU with only two years of study can gain direct entry to the Register without equivalent assessment, training, or examinations as mentioned above.
- It is logical to believe that under such coercion to admit shortfalls in safe and effective practice when this is not the case; the practitioners will lose the trust from their patients and employers. As a result, it would be difficult for the applicants to continue their work in the profession. The requirement of one-year full time training is particularly impractical since it implies that the practitioners have to disengage with clients under their care and stop to earn a living to receive the full-time training.
- It is logistically unfeasible to make up for the supervised clinical practice. Those CPs who would have been labelled as being incompetent in certain specific group of clients will not be possible to seek employment in these organisations for the purpose of gaining the required clinical experience. Similarly, it is hardly possible to have employers offering supervised training opportunity to practitioners solely for meeting their AR registration need.

c. *Exclusion of CSPP-HK program from the Recognised List without any Impartial Accreditation Process.*

As stated above, HKICP chooses to recognize all CP training programs under CUHK and HKU while unreasonably excludes the CSPP-HK program from any recognized qualification lists. Since there are more than 100 CSPP-HK CP graduates who have been trained in Hong Kong just like their counterparts from CUHK & HKU, it will be more justified and cost-effective to assess the competency of ALL those AR applicants via an impartial accreditation process of ALL related CP training programs.

6. We urge for the intervention of an independent expert third party in resolving the dispute on the educational and training requirements of the profession

During the recent Public Hearing in Legislative Council on December 9, 2018, where Professor Yeoh was absent, HKADCP has stated the position that only third-party experts with professional standing are qualified to assess the professional eligibility of CSPP-HK graduates

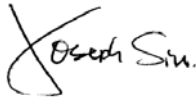
impartially and to compare the admission standards and qualifications posted by both HKPS-DCP and HKADCP. As the Agent has no capacity to evaluate the educational and training requirements for entry into the AR Scheme for the profession, we hold the opinion that there is no ground for the Agent to decline the request for this independent assessment. HKADCP believes that an independent expert panel can help to resolve the current dispute regarding the minimum safety professional standards between the two professional bodies making applications to the AR Scheme. Ignoring the request to involve an independent team of experts will further erode the three fundamental principles of fairness, openness, and justice of the whole AR process of assessment managed by the Agent.

With the lack of inclusiveness and reasonableness of the current proposal, we urge the Government and the Agent to consider HKADCP's revised proposal submitted during the aforementioned Public Hearing. To ensure the three fundamental principles are respected, we will offer assistance for the commissioning of an independent third-party expert panel.

Thank you for your kind attention.

Yours sincerely,

For and On Behalf of
Hong Kong Association of Doctors
in Clinical Psychology Limited



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Exclusion of the CSPP-HK graduates from direct entry to the register

Direct Entry Criteria	CSPP-HK Program	Consequence
1. Master and Doctoral degree conferred by HKU and CU	<ul style="list-style-type: none"> • Doctoral Degree conferred by Alliant International University in Hong Kong (CSPP-HK) • the training program is being conducted locally in Hong Kong and registered with the Education Bureau, HKSAR Government • Qualification of CSPP-HK graduates is evaluated as equivalent to local doctoral degree (level 7) by HKCQVV 	<ul style="list-style-type: none"> • Exclude from direct entry
1. Master or Doctoral program accredited by <ul style="list-style-type: none"> • Australia Psychology Accreditation Council in Australia, • Canadian Psychological Association in Canada, • Health and Care Professional Council in UK, and • American Psychological Association (APA) in USA <p align="center">PLUS</p> 2. Licensure or registration in the country where the degree is conferred	1. CSPP-HK program <ul style="list-style-type: none"> • obtained ASPPB/NR designation status which is equivalent to APA-accredited program; • satisfy the educational requirement for licensure in U.S. 2. Registration in recognized countries including Australia, Canada, and U.K.	<ul style="list-style-type: none"> • Exclude from direct entry • Exclude from direct entry