Tacit Acceptance of HKICP's Violation of Procedural Justice Lack of Fairness Leading to Profession's Boycott of Consultation

(Hong Kong, 6 March 2019) In 2016, the Government launched the "Pilot Accredited Registers Scheme for Healthcare Professions" (AR Pilot Scheme) to promote self-regulation in the profession. In the following year, the Division of Clinical Psychology (DCP) of the Hong Kong Psychological Society submitted a proposal of accreditation standards for the AR pilot scheme. During the two rounds of consultation held by DCP, various groups of stakeholders complained that the accreditation standards were biased, in that they were specially tailor-made for the graduates of the Chinese University of Hong Kong (CUHK) and the University of Hong Kong (HKU), while purposely excluding other colleagues with overseas qualifications.

Various groups of stakeholders have requested that the proposal be revised without delay in order to promote inclusiveness. However, DCP has not responded to the opinions proposed by colleagues. Most recently, DCP even put in a new round of consultation, using the name "Hong Kong Institute of Clinical Psychologists" (HKICP), and claiming to have gone through the assessment process of the Jockey Club School of Public Health and Primary Care, Chinese University of Hong Kong (SPHPC-CUHK), in an obvious attempt to create an established fact. We believe that SPHPC-CUHK has attempted to consolidate the position of HKICP before gaining the necessary consensus from the profession, which is a complete violation of procedural justice. SPHKPC-CUHK must explain their position immediately. We cannot emphasize enough that we feel extremely sorry about the way in which procedural justice has been violated over the AR Pilot Scheme. A number of clinical psychology professional bodies announced today that we would "fully boycott the so-called 'HKICP' consultation process."

Multiple Violations of Procedural Justice

The original intention of the AR Pilot Scheme is to collect consensus from the profession and to set up an organization which can represent the entire profession, which will then facilitate the setting up of a voluntary registration system. At this stage, significant disagreements persist within the sector of Clinical Psychology regarding the accreditation standards. However, on February 15, 2019, an organization called the "Hong Kong Institute of Clinical Psychologists" (HKICP) sent out e-mails to other professional bodies in the profession, saying that it has gone through the assessment process and consultations of the latest proposal (see Appendix I).

The AR Pilot Scheme's past two rounds of consultations were conducted under the name of DCP (i.e. Application Body). Differences within the profession remain unresolved. Under the procedures of the AR Pilot Scheme, an institute will be established and operated after all assessment procedures are completed, and after the Government has made announcements of the results of the assessment. In view of the fact that the Government and SPHPC-CUHK still have not made any related official announcements, we feel it is very strange that although significant disagreements continue to exist within the profession, "HKICP" has unilaterally claimed to have "gone through" the assessment process. Upon enquiry SPHPC-CUHK acknowledged that DCP is the application body and that DCP has not yet gone through the assessment procedures. It is therefore shocking that SPHPC-CUHK claimed that DCP's change of names and the use of "HKICP" for the third round of consultation was not a problem.

SPHPC-CUHK has not given any rationale for the procedures taken, while DCP, posing as HKICP, jumped the gun in continuing with the earlier consultations, holding onto their stance of protectionism and pushing through with the harsher proposal in total disregard of procedural justice. All these are strongly condemned by several professional groups of clinical psychologists.

Loss of Creditability of Accreditation Organization

Not only has DCP, in using the name of HKICP to conduct consultation, violated procedural justice, SPHPC-CUHK has also demonstrated the lack of neutrality and

fairness as an accreditation organization, giving rise to the suspicion that it is biased towards DCP. Last December the Legislative Council Panel on Health Services held a public hearing on the AR Pilot Scheme. The panel received more than a hundred submissions from the public, and more than a hundred concerned professionals expressed their opinions at the hearing. Among the opinions expressed it was found that the strongest criticism was directed at the exclusionary stance of DCP's proposal. The proposal was shown to be extremely controversial, demonstrating a total lack of consensus within the profession. Professor Eng-Kiong Yeoh, the director of SPHPC-CUHK, did not attend the hearing, obviously once again showing distain for the opinions of the other stakeholders in the profession.

The government has confirmed numerous times in the past that the accredited registers scheme includes six accreditation criteria¹, and SPHPC-CUHK has specifically pointed out that DCP's proposed plan should be sufficiently inclusive. The entire profession had reasonable expectations of such proposed plan, meaning that an organization applying for accreditation must have fulfilled all accreditation criteria and shown inclusiveness before it can be accredited. Regrettably SPHPC-CUHK has repeatedly violated procedural justice and remained biased for DCP, causing serious damage to their creditability. In as early as February 2017, SPHPC-CUHK made an exception of receiving DCP's application after the deadline, and considered its proposal as a first priority, which is obviously unfair to proposals from other professional organizations in the field. At this moment, before the profession has reached any consensus on the accreditation criteria, SPHHPC-CUHK has skipped a step in confirming the status of HKICP, continuing its preferential treatment of DCP, a step that is bound to create further division within the profession.

Boycott of Consultation

Before receiving any reasonable explanation regarding the procedural problems

¹ "The standards include governance, operational effectiveness, risk management and quality improvement, standards for registrants, educational and training requirements, and management of the register", Discussion paper of LegCo Panel on Health Services, https://bit.ly/2C9vrlw

in the process of implementing the accredited registers scheme of clinical

psychologists, we find it difficult to trust the neutrality of Professor Yeoh and

SPHPC-CUHK, and recognize the so-called "HKICP". We strongly demand the

government to include an independent third party of professional organization

to assess proposals. Our opinion on the accreditation system will be submitted to

the government's Food and Health Bureau, to push for a more inclusive, neutral

and fair accreditation plan in protecting the quality of mental health and

safeguarding patients' interests in Hong Kong.

Co-signing organizations:

Hong Kong Association of Doctors in Clinical Psychology

Accredited Register Scheme (Clinical Psychologist) Concern Group

International Psychologists Concern Group

PsyD Alumni Association

Media Inquiry: Tim Ng (6802 3552)

Appendix 1

Screenshot taken from the HKICP Website (retrieved from

https://icphk.org.hk/en/what-s-new/25-accredited-register-scheme-for-clinical -psychologists on February 25, 2019)

The Hong Kong Institute of Clinical Psychologists (HKICP) is happy to announce that it has just gone through the Accreditation Assessment Process for Clinical Psychologists for the Accredited Registers Scheme for Healthcare Professions (Pilot Scheme). Upon fruitful discussion and due advice received during the process, the HKICP has adjusted and improved the documents, with the intention of making the Accredited Register for Clinical Psychologists as inclusive as possible. The HKICP is now making these documents open to all stakeholders for your perusal and feedback.

Please give your written feedback via email before 8th March 2019 Email: icp@icphk.org.hk

Appendix 2

SPHPC-CUHK's reply to HKADCP



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One of the assessment criteria that the Accreditation Agent will consider is whether the submission of the Division is able to demonstrate the inclusiveness through the use of reasonable criteria to admit professionals from different educational background and training. The Division should also conduct consultations with other key stakeholders such as relevant training institutions, service providers, parties representing and protecting interests of patients and consumers.