



平等機會委員會

EQUAL OPPORTUNITIES COMMISSION

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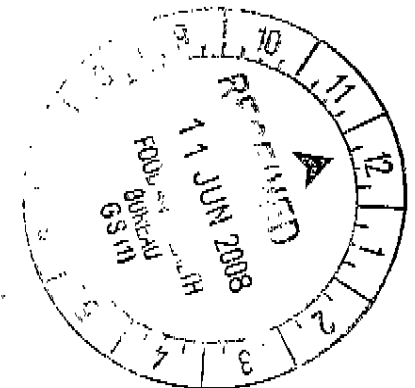
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(Fax No.: 2102-2525)

10 June 2008

Dr. York CHOW
Secretary for Food and Health
Food and Health Bureau
19/F Murray Building
Garden Road
Central, Hong Kong

Consultation on Health Care Reform
"Your Health, Your Life"



The Equal Opportunities Commission (EOC) welcomes the opportunity to comment on the consultation document on health care reform and would like to share with you a number of our views and concerns.

1. Gender and disability mainstreaming has always been an important area of work for the EOC and it is our vision that gender and disability mainstreaming remains an important strategy to achieve equality in health care. To develop a sustainable healthcare financing system, it would require policy makers to take into account respective situations of men, women and people with disabilities at the planning stage and to

mainstream provisions to accommodate those who are disadvantaged by their gender and/or disabilities so that steps may be taken to redress any imbalance or inequality that may be found in the treatment of these service recipients.

2. The EOC supports the proposal to enhance primary care and agrees that preventive care is essential to a healthy health care system. While we agree that providing healthcare service on an evidence-based and need- and risk-based principle is the right way forward, we would also like to draw your attention to the fact that the right to health is a basic individual right and that "basic models" might not be suitable for some people with special needs in our society. Their special needs should be examined and accommodation provided.
3. Achieving synergy by bringing together public and private healthcare providers is the correct approach in the long term, and should be supported, but we believe that the Government needs to pre-empt or resolve the potential conflict between the two sectors in relation to their respective goals, objectives and business models.
4. Although the Government has repeatedly stated that it will continue to provide highly subsidized public healthcare services to the population and the EOC does not in any way doubt the Government's sincerity in this regard, we note that there is no detailed measure laid out in the consultation document as to how and in what form that would be achieved. It is common ground that the provision of accessible and equitable health care services is an obligation for the Government, a principle enshrined in our domestic laws and international instruments on human rights. The rights of low-income groups, often disproportionately represented by women and people with disabilities, need to be protected under the proposed health care system.
5. As health insurance is proposed as one of the future financing options in the healthcare reform, we would like to point out that people with certain types of disabilities are still experiencing difficulties in finding appropriate insurance coverage. Exclusion clauses and pre-existing conditions clauses that are commonly found in insurance packages may

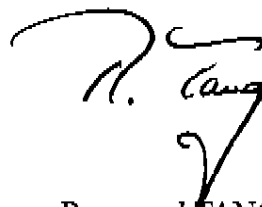
deprive people with certain disabilities of insurance protection. Policy makers would need to work in collaboration with the insurance industry if the future healthcare reform were to include an insurance component.

6. It is obvious that people with low or no income, especially the elderly, the homemakers and people with disabilities would be put in a disadvantaged position if our future healthcare system were to operate under most of the proposed supplementary financing options. There is a need for the Government to put in adequate measures to close the gap between the "haves" and the "have-nots" in our society in order to ensure parity in our healthcare system. The situation of the "working poor" in the community is often overlooked and it is important that the Government take steps to ensure that the "working poor" and their special needs are fully addressed in our future healthcare system.
7. It is not known at this stage if the provision of medication would be made independent from the provision of healthcare services in the future healthcare system but it is commonly known that many patients have great concerns about the current provisions of medication in the public healthcare system. New medications with lesser side effects are attractive to many patients, especially those with mental illness, as these medications allow the individual to lead a more independent and dignified life. We would urge the government to review the medication lists and treatment needs of patients, especially those with mental illness, in a major re-engineering of the healthcare system.
8. While we agree that having an electronic health record sharing system would facilitate physicians to diagnose and could probably improve efficiency in general, we are concerned about the risk posed to the integrity of personal data and possible leakage. The EOC has received complaints from time to time alleging discrimination arising from disclosure of medical history, especially from those with mental illness. It is important to put in place an effective system to guard against unauthorized access as well as accidental leakage or disclosure of an individual's medical records.

9. The Government has rightly noted the limitations of each of the financing options listed in the consultation document. We would encourage the authority to exercise further efforts to explore new and improved alternatives to these financing options cited, taking into account the views and contributions from all stakeholders.

Should you have any further question, please feel free to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R. Tang', with a large, sweeping flourish above the name.

Raymond TANG

Chairperson

Equal Opportunities Commission