



醫院管理局
HOSPITAL
AUTHORITY

梁智仁教授 主席

銀紫荊星章 · 太平紳士 · 中國科學院院士

Prof John C Y Leong, Chairman
SBS, JP
Academician of Chinese Academy of Sciences

Ref: HA301/11

13 March 2015

Dr Ko Wing-man, BBS, JP
Secretary for Food and Health
18/F, East Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Dear *Dr Ko,*

**Hospital Authority's Response to the Public Consultation Documents on
Voluntary Health Insurance Scheme and
Regulation of Private Healthcare Facilities**

Pursuant to the Government consultation documents on Voluntary Health Insurance Scheme (VHIS) and Regulation of Private Healthcare Facilities (PHFs) launched on 15 December 2014, the Hospital Authority (HA) would like to submit its responses to these two consultation documents as enclosed at Annexes 1 and 2 respectively.

In general, HA supports the policy directions and recommendations proposed in the consultation documents, and welcomes the Government's initiatives on introducing VHIS as a supplementary financing option to relieve pressure from the public sector and its commitment to revamping the existing regulatory regime for PHFs to strengthen regulation and enhance standards.

Should there be enquiries, please feel free to contact Miss Margaret Cheung, Head of Corporate Services at

Yours sincerely,

(John C Y Leong)
Chairman

**Hospital Authority's Response to the
Government's Consultation Document on
Regulation of Private Healthcare Facilities**

(March 2015)

**Response of the Hospital Authority to the
“Regulation of Private Healthcare Facilities”
Consultation Document**

In response to the consultation document on “*Regulation of Private Healthcare Facilities*”, the Hospital Authority (HA) has the following views and comments on the proposals for revamping the existing regulatory regime for private healthcare facilities (PHFs).

2. In general, HA welcomes the policy directions and recommendations proposed in the Consultation Document. The importance placed by the Government on strengthening regulation and enhancing standards to meet public demand and better safeguard public health with its focus on private sector involvement are considered appropriate and in line with international trend. HA’s responses to relevant areas of the Consultation Document are as follows:

On Corporate Governance

3. The establishment of an information system connectable with Electronic Health Record Sharing System (eHRSS) will provide the framework necessary for the smooth transition of patients between different levels of care and between HA and the private sector. This public-private collaboration will contribute to the sharing of standards, quality practices, training and development opportunities and patient information between the two sectors.

On Standard of Facilities

4. The scope of proposed regulation includes premises management, physical conditions and infection control, which include policy and guidance on the control and prevention of infectious diseases for diagnosis, treatment, operation and proper documentation. These measures will help facilitate a territory-wide coordinated approach in contingency responses and preparedness for infectious disease outbreaks.

Clinical Quality

5. HA recognizes the importance of credentialing and notes the proposal on implementing policies or a mechanism for credentialing visiting doctors in private hospital settings. On credentialing of particular medical procedures, HA is adopting a coordinated approach within the public hospital service and will communicate with the

Hong Kong Academy of Medicine for alignment of requirements as necessary, as it is considered important for the public and private sectors to adopt uniform professional standards.

6. Regarding medical incidents reporting, the government proposed PHFs to establish a comprehensive sentinel events management system to help strengthen internal quality assurance. HA can contribute its experience in continuous quality improvement in this regard. This includes aligning the list and definition of sentinel events of HA with that of the Department of Health, and adopting 「醫療風險警示事件」 (currently known as 「嚴重醫療事故」) as the Chinese translation of sentinel event.

7. In this connection, there is a need to provide statutory protection from legal discovery and from use as evidence in litigation or disciplinary proceedings, and for information or documents obtained or produced in the course of root cause analysis.

8. HA looks forward to a future direction of extending the sentinel events management system to the non-hospital PHFs, in order to prevent repeat occurrences and reduce incidents and/or injuries in all PHFs. The challenge of sentinel events reporting in non-hospital PHFs is likely to be substantial but it would be worthwhile to develop a strategy to address the issue.

Regulatory Authority

9. The establishment of the proposed regulatory authority will ensure proper oversight of regulated PHFs to safeguard the safety and interests of the public.

Hospital Authority

March 2015