

**Comments from The Hong Kong Polytechnic University on the
Private Healthcare Facilities Bill**

This new bill should clarify the necessity of registration for those healthcare practitioners who are in the disciplines not subject to statutory registration (under section 20I of the Legislative Council Ordinance, Cap. 542). If it is necessary, what would be the arrangement? Does it include the disciplines of Orthotics, Prosthetics and Rehabilitation Engineering? Are the clinics run by the healthcare practitioners of the captioned disciplines included in this new bill. This will have high impact on the current healthcare practitioners, their clinics and the relevant training programmes. Detailed explanation should be provided in this new Bill.

2. Part 3 - Licensing Scheme, Division 1 - Issue of Licence, Clause 13 - Application for licence

The procedures of application for licence should be specified for rehabilitation, physiotherapy or occupational clinics.

3. Part 6 - Complaints against Private Healthcare Facilities, Division 1 - Committee on Complaints against Private Healthcare Facilities, Clause 71 - Establishment

The Complaints Committee should also consist of physiotherapist(s), occupational therapist(s) and non-healthcare-related practitioner(s), e.g. representatives from patient groups. It would ensure a proper establishment of the Complaints Committee, which could discharge its functions better.