《2025年電子健康紀錄互通系統(修訂)條例草案》

Electronic Health Record Sharing System (Amendment) Bill 2025



電子健康紀錄互通系統條例(第625章) Electronic Health Record Sharing System Ordinance (Cap. 625)

- 2015年生效以支援2016年推出的醫健通平台 Commenced in 2015 to support the establishment of eHealth launched in 2016
- 為系統的資料收集、互通、使用及保障提供法律依據 Provide the legal basis for the collection, sharing, use and safekeeping of data shared through eHealth
- □ 保護系統和個人資料的安全
 Protect eHealth system and personal data

現時條例主要條文 Existing Key Provisions of Cap. 625

主要參與人士 Key players

- 已登記的醫護接受者 Registered HCRs
- 已登記的醫護提供者 Registered HCPs
- 13類醫護專業人員13 healthcare professionals
- 代決人
 Substitute decision makers
- 其他相關人員Others

電子健康紀錄的用途 Data uses

- 改善醫療服務 Improvement of healthcare
- 研究及統計 Research and statistics
- 疾病控制及監察
 Disease control and surveillance
- 其他法律所准許的使用 Use permitted by or under any other law

私隱和系統安全 Privacy and security

- 參與同意和互通同意
 Joining consent and sharing consent
- 「有需要知道」和「病人正接受其 護理」原則 "Need-to-know" and "patient under care"
- 未獲授權取覽和使用資料的罪行 (例如:損毀或更改資料,直接促銷)
 Offences related to unauthorised access and uses of data (e.g. damage or modify data, direct marketing)

醫健通發展里程碑

Development Milestones of eHealth



2009 - 2022



2025

醫健通 eHealth

2024 - 2028

第一及第二階段發展 Stage 1 & 2 Development

- 《電子健康紀錄互通系統條例》 (2015) eHRSS Ordinance (2015)
- 醫健通電子健康紀錄互通平台(2016) eHR sharing platform (2016)
- 醫健通流動應用程式(2021) eHealth App (2021)

今日醫健通 eHealth Today

- **逾610萬**登記人數 **Over 6.1 million** registrants
- 約3,700間私營醫護機構已登記
 Around 3,700 registered private HCPs
- 370萬醫健通流動應用程式下載量 3.7 million eHealth App downloads

醫健通+ eHealth+

 集醫療數據互通、服務提供及流程 管理於一身的綜合數碼健康平台 Comprehensive healthcare information infrastructure for data sharing, service support and care journey management

醫健通+四大策略方向

Four Strategic Directions of eHealth+

統一電子病歷 One Health Record

加強公私營電子健康紀錄互通,為 市民建立個人終身電子健康紀錄 Strengthening eHR sharing across public and private sectors to create a life-long personalised record for citizens



統一健康工具 One Digital Front Door to Empowering Tool

鼓勵及便利市民積極自主地 管理及監察健康 Empowering citizens to proactively manage and monitor their health



統一治理流程

One Care Journey

促進跨機構、跨界別及跨境護理協調,建立一體化及連貫治理流程Facilitating cross-HCP, cross-sector and cross-boundary care coordination to establish an integrated and coherent care journey



統一數據平台 One Health Data Repository

促進醫療研究及創新,協助公共 衛生監察,完善醫療生態系統 Facilitating medical research and innovation and health surveillance to develop a comprehensive healthcare ecosystem

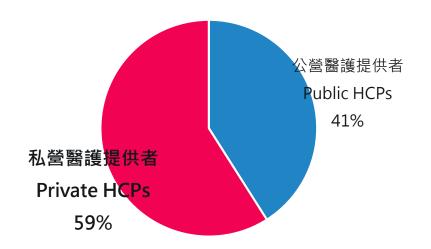


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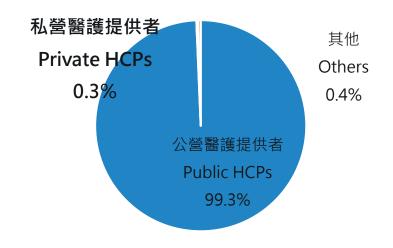
為市民建立全面的個人電子健康紀錄戶口 Build a Comprehensive and Complete eHR Profile for Citizens

保障市民取得重要電子健康紀錄的權利 Safeguard Citizens' Right to Obtain Important eHRs

醫護提供者取覽醫健通的次數 (截至2025年2月) eHealth Access by HCPs (as of Feb 2025)



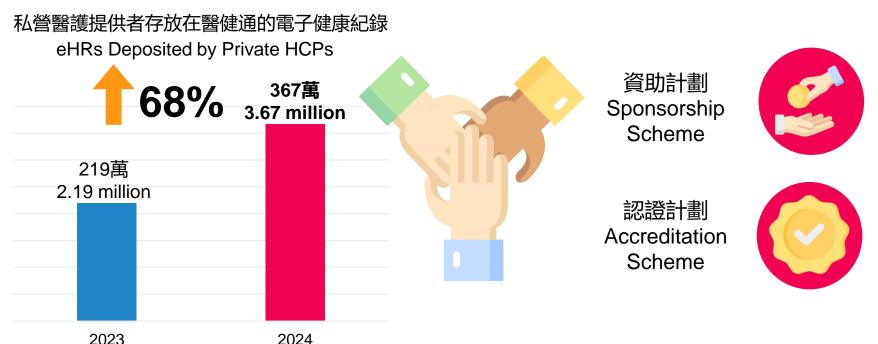
總共:>1千萬次取覽 Total:>10 million access 醫健通電子健康記錄來源 (截至 2025 年 2 月) Source of eHRs (as of Feb 2025)



總共:>45億電子健康紀錄
Total:>4.5 billion eHRs

保障市民取得重要電子健康紀錄的權利 Safeguard Citizens' Right to Obtain Important eHRs

與私營醫護界別携手協作 Collaboration with the Private Healthcare Sector



(I) 精簡市民的同意機制 Streamline Citizens' Consent Mechanism



市民只需給予參與同意, 醫護提供者便可存放電子健康紀錄 Citizens only need to provide joining consent for HCPs to provide eHRs



市民擁有電子健康紀錄的自主控制權,需給予**互通同意**,醫護提供者才能**取覽**電子健康紀錄 (可於**醫健通流動應用程式**輕鬆管理) Citizens own full control over eHRs, Sharing consent is required for HCPs to access eHRs (easily managed on the eHealth App)

(II) 保障市民取得重要電子健康紀錄的權利 Safeguard Citizens' Right to Obtain Important eHRs

賦權醫務衞生局局長可要求指明醫護提供者(包括沒有登記醫健通的醫護提供 者)將指明重要健康紀錄在指定時間内存放在市民的個人醫健通戶口 Empower SH to require all specified HCPs (including HCPs not registered on eHealth) to provide specified important health data of citizens into their personal eHealth account within a specified period of time

潛在指明重要電子健康資料 Potential Specified Important Health Data of HCRs



敏感及藥物不良反應 Allergies and Adverse **Drug Reactions**



Prescription



診斷 Diagnosis



疫苗接種紀錄 **Immunisation** Records



化驗及放射報告 Laboratory and Radiology Reports 10

(II) 保障市民取得重要電子健康紀錄的權利 Safeguard Citizens' Right to Obtain Important eHRs

尊重市民自主管理健康紀錄 Respect Citizens' Autonomy to Manage eHRs



市民已登記醫健通 Citizen registered with eHealth



基於市民同意 Based on citizen's consent



確保技術可行性 Ensure technical feasibility

執法細節 Enforcement Details



按市民投訴進行調查 Investigation upon receiving complaint of subject citizen



專員可發出執行通知 eHRC may issue enforcement notice



違反執行通知將被罰款
Contravention of an enforcement notice
may be liable to fines



已盡一切努力履行規定和市民明確要求不可提供資料為抗辯理由 Due diligence and citizens' refusal as defence grounds

2.

支援基層醫療和市民健康管理 Support Primary Healthcare and Citizens' Health Management

(I) 擴展可使用醫健通的指明醫護專業人員 Expand eHealth Access to Specified HCProfs

現時可取覽電子健康紀錄的醫護專業人員 HCProfs with Access to eHealth



藥劑師 Pharmacist



牙醫 Dentist



牙齒衞生員 Dental Hygienist



醫生 Doctor



助產士 Midwife



護士 Nurse



醫務化驗師 Medical Laboratory Technologist



職業治療師 Occupational Therapist



視光師 Optometrist



放射技師 Radiographer



物理治療師 Physiotherapist



脊醫 Chiropractor



中醫 Chinese Medicine Practitioner

(I) 擴展可使用醫健通的指明醫護專業人員 Expand eHealth Access to Specified HCProfs

認可醫療專業註冊計劃 Accredited Registers Scheme for Healthcare Professions



言語治療師 Speech Therapist



聽力學家 Audiologist



營養師 Dietitian



教育心理學家 Educational Psychologist



臨床心理學家 Clinical Psychologist



在醫院管理局、衞生署、在政府或醫管局控制或管理的醫護機構(例如地區康健中心)和指定醫護提供者提供醫護服務的指明醫護專業人員

Specified HCProfs that provide healthcare in HA, DH, healthcare facilities controlled or managed by the Government (e.g. District Health Centres), the HA and other specified HCPs





「有需要知道」和「病人正接受其護理」 原則

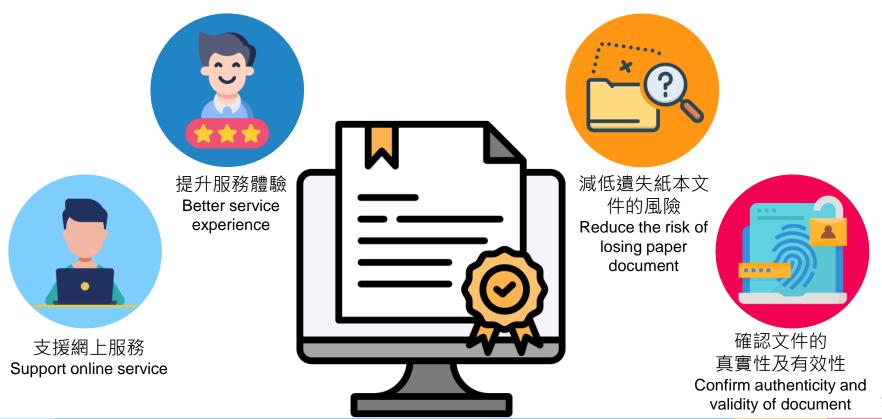
"Need-to-know" and "patient under care"



按職能設定取覽限制 Role-based Access Control

(II) 便利市民使用電子醫療文件

Facilitate Citizens' Use of Electronic Medical Documents



(II) 便利市民使用電子醫療文件

Facilitate Citizens' Use of Electronic Medical Documents

□ 為醫健通發出的電子醫療文件提供清晰的法律框架 Provide a clear legal framework to offer legal backing for electronic medical documents issued via eHealth



病假紙 Sick Leave Certificates



處方 Prescriptions



轉介信 Referrals

□ 規定指明醫療文件其電子紀錄格式僅可以經由醫 健通發出或僅可經由醫健通發出,以便集中管理 文件和支援相關文件的使用流程

Provide that specified medical documents may only be issued in electronic form through eHealth or only be issued through eHealth to facilitate the centralised management and support the uses of these documents



支援市民跨境醫療需求 Support Citizens' Cross-boundary Healthcare Needs

支援市民跨境醫療需求

Support Citizens' Cross-boundary Healthcare Needs

病人跨境自攜電子健康紀錄 Patients self-carry their eHRs across the boundary







跨境健康紀錄 Cross-boundary Health Record

個人資料夾 Personal Folder

支援市民跨境醫療需求

Support Citizens' Cross-boundary Healthcare Needs

- 賦權電子健康紀錄專員認可符合指明要求的**非香港醫護提供者和公共健康紀錄系統**可以在醫健 通提供和取覽電子健康紀錄,並施加條件和要求 Empower the eHRC to recognise **non-Hong Kong HCPs and public health record systems** that have fulfilled specified requirements to provide to and obtain from eHealth sharable data of HCRs and to impose conditions and requirements
- 運認可的非香港醫護提供者只有**當參與醫健通的市民使用其服務時**, 並在明確授權下,方可取 覽及存放市民的醫健通紀錄,其他任何情況下醫健通紀錄均不會跨境傳送 Recognised non-Hong Kong HCPs can only access and deposit citizens' eHealth records when a registered citizen uses its services and provides explicit consent; under no other circumstances will eHealth records be transmitted across the boundary



充分保障資料私隱和系統安全 Sufficient protection of data privacy and system security



獲得市民同意 Obtained citizens' consent



「有需要知道」和「病人正接受其 護理」原則 "Need-to-know" and "patient under care"

4.

優化使用和取覽醫健通資料的法律框架 Refine the Legal Framework for the Use and Access of eHealth Data

(I) 清楚說明政府使用醫健通資料的權限 Clearly Specify the Government's Use of eHealth Data

指明政府和獲授權人士可使用醫健通上的可識辨身分資料 為**市民登記、管理和評估政府授權的醫護計劃**

Provide that the Government and authorised persons can use identifiable data on eHealth for enrolment of citizens in, administration of and evaluation of Government-authorised healthcare programmes



(II) 清楚說明市民及關連人士的參與

Clearly Provide the Participation of Citizens and Related Persons

訂明可提供和取覽電子健康紀錄的人士

Specify individuals who can provide and access eHRs



相關人士 Relevant persons



醫護接受者 HCRs



獲授權的第三方 Authorised Third Parties

確保電子健康紀錄的相關和準確性 Ensure relevance and accuracy of eHRs





賦權電子健康紀錄專員採取行動以保護系統的 完整性和安全性

Empower eHRC to safeguard system integrity and security

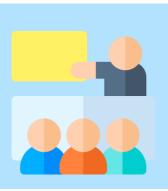


未來工作 Way Forward

與持份者保持緊密溝通
Continued
Engagement with
Stakeholders



公眾教育 Public Education



制定實務守則 Formulate Code of Practice



提供技術支援 Provide Technical Support



謝謝 Thanks

