



本署檔號 Our Ref.: (42) in DH/ORPHF/18/25/22 Pt.6

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Dear Doctor,

**Commencement of Application for Clinic Licence and
Request for Letter of Exemption for Small Practice Clinic
under the Private Healthcare Facilities Ordinance (Cap. 633)**

Further to our letters to doctors/dentists issued on 23 May, 23 July and 8 September 2025, we write to remind you that **application for clinic licence and request for letter of exemption for small practice clinic (SPC) under the Private Healthcare Facilities Ordinance (Cap. 633) (the Ordinance) commences today**.

The Ordinance stipulates that all premises where registered medical practitioners and/or registered dentists practise, including hospitals, day procedure centres (DPCs), clinics and health services establishments, are required to obtain a licence or a letter of exemption from the Department of Health (DH). Applications for hospital and DPC licences have already commenced since 2019 and 2020 respectively.

Clinics

Under the Ordinance, a clinic refers to a premises that do not form part of the premises of a hospital, a DPC or an outreach facility; and that are used, or intended to be used, for providing medical services to patients or carrying out minor medical procedures on patients, without lodging. Operators are required to comply with all the requirements under the Ordinance and the Code of Practice for Clinics in order to obtain a clinic licence.

As a transitional arrangement, **clinics in operation on 30 November 2018** and apply for a licence within the period from **13 October 2025 to 13 April 2026 (both dates inclusive)** are eligible to be issued with a **provisional clinic licence** subject to the conditions that the DH considers appropriate. Clinics issued with a provisional clinic licence may continue to operate legally until the application for full licence is approved, withdrawn or rejected, or the date on which the transitional arrangement expires as appointed by the Secretary for Health by notice published in the

Gazette. Clinics which commenced operation at the existing premises after 30 November 2018 have to apply for a **full licence** and comply with all the requirements under the Ordinance and the Code of Practice for Clinics.

Small practice clinics

A SPC is a clinic operated only by registered medical practitioners and/or registered dentists, and meeting the conditions set out under section 41 of the Ordinance including the number of medical practitioners or dentists as operator(s) of the SPC, the exclusive right of operator(s) to use the premises and locum arrangement. If a facility falls under the meaning of a SPC, other than applying for a clinic licence, the operator may request for a letter of exemption from DH, which permits the person to operate the SPC without a licence under the Ordinance.

Preparation for application for clinic licence and request for letter of exemption

The application for clinic licence and request for letter of exemption for SPC are fully electronic. Operators should register an account at “e-Licensing” System (the System) <https://apps.orphf.gov.hk/Submission/> and submit their applications or requests via the System. In addition, clinic licence applicants and SPC operators need to register an “iAM Smart+” account in order to sign the application form or request the form digitally on the System. Please refer to <https://www.iamsmart.gov.hk> for registration/upgrading of an “iAM Smart+” account.

A recapitulation of hospital and DPC licences

In accordance with the Ordinance, a hospital licence is required for the operation of any private hospital. For premises where scheduled medical procedures are performed without lodging, a DPC licence is mandatory. For the definition of “scheduled medical procedure”, please refer to section 2 (<https://www.elegislation.gov.hk/hk/cap633>) and Schedule 3 (https://www.elegislation.gov.hk/hk/cap633?xid=ID_1561706539909_1422) of the Ordinance. Please be reminded that if any scheduled medical procedure is performed on the premises, the operator must obtain a DPC licence with no exemption arrangement instead of a clinic licence or letter of exemption for SPC.

Frequently Asked Questions (FAQs)

For easy reference, we attach FAQs on the following issues for your attention:

- Part A : Scheduled medical procedures; and
- Part B : Medical laboratories where pathologists practise that may be subject to licensing requirements.

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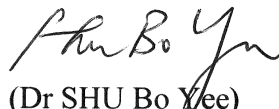
The full set of FAQs is available at the website of the Office for Regulation of Private Healthcare Facilities (ORPHF) (<https://www.orphf.gov.hk/>).

Online briefing sessions

As in the past few months, **we will continue to conduct online briefing sessions every month from November 2025 to April 2026** after commencing the regulatory regime for clinics in October 2025 to explain the requirements and procedures for making licence applications/exemption requests and answer enquiries. Please scan the QR Code below for online enrolment. You may also visit the website of the ORPHF for the presentation materials of the briefing and other useful information including the animation videos explaining the regulatory regime and the FAQs.

For enquiries, please contact us at 3107 8451 or visit our website. For dental related enquiry, please contact Dental Regulatory and Law Enforcement Office at 2631 1782.

Yours faithfully,


(Dr SHU Bo Yee)
for Director of Health

Simple Guide to the Ordinance



Code of Practice for Clinics



Online briefing sessions



Frequently asked questions

Part A – About scheduled medical procedures

Q1 If I provide medical treatment through platelet-rich plasma (PRP), do I need a DPC licence?

A1 Yes, transplant of any cell, tissue or organ, including autograft, allograft, xenograft, processed tissue or blood products (including PRP) and skin flap (including face lift) are scheduled medical procedures under the category of surgical procedure.

Q2 If I conduct hair transplant on my patients, do I need a DPC licence?

A2 The following are scheduled medical procedures under the category of surgical procedure, namely transplant of any cell, tissue or organ, including autograft, allograft, xenograft, processed tissue or blood products (including PRP) and skin flap (including face lift). Exception includes skin graft less than 1% of total body surface area. You need to check the technique used in your hair transplant and apply for a DPC licence if it is a scheduled medical procedure.

Q3 I am an ear, nose and throat (ENT) surgeon. I conduct endoscopic surgery like nasal polypectomy for my patients. Do I need a DPC licence?

A3 The following are scheduled medical procedures under the category of endoscopic procedure, namely:

- (i) endoscopic procedure requiring image guidance,
- (ii) endoscopic procedure involving invasion of sterile cavity or gastrointestinal tract, and
- (iii) therapeutic endoscopic procedure.

You need to apply for a DPC licence for performing therapeutic endoscopic nasal polypectomy.

Q4 Is loop electrosurgical excision procedure (LEEP) a scheduled medical procedure? Do I need a DPC licence if I provide LEEP?

A4 Yes, LEEP is a scheduled medical procedure under the category of therapeutic endoscopic procedure. A DPC licence is required if you provide LEEP.

Q5 Is proctoscopy, including banding of haemorrhoids, a scheduled medical procedure?

A5 Proctoscopy, whether diagnostic or therapeutic, is an exception to the scheduled medical procedures, which means it could be provided in all types of private healthcare facilities, including clinics and SPCs.

However, please be reminded that the following endoscopic procedures, including (i) endoscopic procedure requiring image guidance, (ii) endoscopic procedure involving invasion of sterile cavity or gastrointestinal tract, and (iii) therapeutic endoscopic procedure, are scheduled medical procedures, and will require a DPC licence. Moreover, therapeutic gastrointestinal endoscopy for children aged under 12 years old may only be carried out in a hospital.

Part B – About medical laboratories where pathologists practice

Q6 I am a medical practitioner operating a private medical/pathology laboratory. Do I need to apply a clinic licence or request a letter of exemption for SPC for the laboratory under the Ordinance?

A6 The Ordinance aims to regulate premises where registered medical practitioners and/or registered dentists practise. If you provide direct patient services such as medical consultation, blood taking, performing medical procedures, prescribing laboratory tests, explaining laboratory reports to patients, etc., or delegate your medical duties to other persons in the laboratory, the premises would fall under the definition of private healthcare facility under the Ordinance.

If your laboratory meets the definition of a SPC, regarding number of doctors and dentists, exclusive right to use the premises, locum arrangement, you may request for a letter of exemption.

Please refer to Section E of the FAQ for more details on SPC requirement. If your laboratory does not meet the definition of a SPC, then you need to apply for a clinic licence.

Q7 I am a pathologist who only report laboratory investigations and issue reports to the referring doctors. Do I need to apply a clinic licence or request a letter of exemption for SPC for the premises where I work?

A7 Premises where a pathologist solely makes reporting laboratory investigations and issuing reports to the referring doctors do not fall into the definition of a private healthcare facility. You do not need to apply a clinic licence or request a letter of exemption for the premises where you merely prepares/issues laboratory reports for the referring doctors.

Q8 I own a private medical/pathology laboratory but I am not a doctor. I engage a pathologist for reporting laboratory investigations and issuing reports to the referring doctors. Is my laboratory required to obtain a clinic licence or request a letter of exemption for SPC under the Ordinance?

A8 Premises where a pathologist merely prepares/issues laboratory reports for the referring doctors do not fall into the definition of a private healthcare facility.

If the registered medical practitioner provides direct patient services such as medical consultation, blood taking, performing medical procedures, prescribing laboratory tests, explaining laboratory reports to patients, etc. or delegates of his/her medical duties to other persons at your premises, the premises would fall under the definition of private healthcare facility. You will be required to obtain the relevant licence under the Ordinance.

Medical practitioners should observe requirements of practice in association with non-qualified person and delegation of medical duties to non-qualified persons as stipulated in the [Code of Professional Conduct](#) issued by the Medical Council of Hong Kong.

Other healthcare professionals such as medical laboratory technologists, registered nurses and enrolled nurses who may perform procedures like blood taking should also observe relevant requirements of their respective Ordinances and requirements on training, prescription/referral and delegation as stipulated in their respective codes of practice.

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