



中華人民共和國香港特別行政區政府總部醫務衛生局  
基層醫療署  
Primary Healthcare Commission  
Health Bureau, Government Secretariat  
The Government of the Hong Kong Special Administrative Region  
The People's Republic of China

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6<sup>th</sup> February 2026

***by email***

Mr Kenneth AU-YEUNG  
President  
Hong Kong Physiotherapists' Union  
G.P.O. Box 889, Hong Kong

Dear Mr AU-YEUNG,

**Reply to Hong Kong Physiotherapists' Union**

Thank you for your letter dated 22 January 2026 regarding the “Clinical Guideline for First-contact Physiotherapists on Assessment and Cross-disciplinary Management Approach for Common Musculoskeletal Problems in Primary Care Setting” (Clinical Guideline). As the Clinical Guideline was drafted by the Task Group on Physiotherapist Service Standards in Primary Healthcare, we would like to take this opportunity to express our appreciation for the Hong Kong Physiotherapists' Union's engagement in the process and the valuable input of your representative in the multidisciplinary Task Group.

As you know, the development of the Clinical Guideline was led by local experts and relevant stakeholders that included physiotherapists, family

doctors and orthopaedic surgeons, amongst others. In particular, the practice scope was defined by the Subgroup on Physiotherapist Guideline Formulation. In addition, the Advisory Group on Hong Kong Reference Framework for Common Musculoskeletal Problems in Primary Care Settings also provided expert guidance on the draft guideline. Moreover, meetings were held with the Physiotherapists Board to ensure alignment with corresponding amendments to the Code of Practice for Registered Physiotherapists.

Overall, the Clinical Guideline represents a consensus achieved through collaborative deliberation among all represented healthcare professionals. Our collective goal was to integrate diverse clinical perspectives into a unified, evidence-based protocol for the safe implementation of direct access arrangement for physiotherapy services in primary healthcare.

We would like to reiterate that “direct access” is a new arrangement implemented by the Government in a phased and orderly manner following the amendment of the Supplementary Medical Professions Ordinance (now renamed as the Allied Health Professions Ordinance, hereinafter referred to as the “Ordinance”), under the premise that patient safety should be safeguarded and that “no referral does not mean no diagnosis”. The Ordinance stipulates that physiotherapists may provide physiotherapy services directly to a patient without the need for a referral under three circumstances: (1) with a certificate issued by a registered medical practitioner or registered Chinese medicine practitioner within the past 12 months, stating the diagnosis of the patient’s condition; (2) the patient’s condition is recognized by any clinical guidelines issued by referencing authorities under the Ordinance (including the Primary Healthcare Commission (PHCC)), or the patient is enrolled in a cross-disciplinary collaboration arrangement of the PHCC; or (3) the situation meets the criteria specified in the professional code of practice as an emergency or involves the provision of specified community services. The Physiotherapists Board has already revised the professional code of practice in December last year. Making reference to the provisions regarding “first-contact physiotherapists,” including the guidance on relevant professional training and requirements for clinical records and documentation, the PHCC and Task Group formulated the Clinical Guideline at the primary healthcare level.

Regarding the second circumstance mentioned above, if a patient’s condition is recognized by any clinical guidelines issued by reference authorities under the Ordinance, he/she may receive professional services from a physiotherapist for that condition without a referral. Such conditions are not limited only to osteoarthritis of the knees and low back pain. As osteoarthritis of the knees and low back pain are the most common and evidence-supported musculoskeletal problems in Hong Kong, based on the recommendations of

the Expert Panel for guideline development, PHCC has published detailed guidelines on osteoarthritis of the knees and low back pain in the initial phase, and will further extend to cover other common musculoskeletal problems as needed and based on expert advice.

Apart from osteoarthritis of the knees and low back pain, Table 3.2 of the Clinical Guideline has also listed 10 common musculoskeletal problems that can be effectively managed using physiotherapy and addressed at the primary healthcare level, covering no fewer than 20 conditions, for which “direct access” physiotherapy services can be provided under the cross-disciplinary collaboration arrangement of PHCC. These include elbow pain caused by conditions commonly known as “tennis elbow” and “golfer’s elbow,” as well as ankle and foot pain resulting from lateral ankle sprains and plantar fasciitis. First-contact physiotherapists who have received training and enrolled in the Primary Care Directory (PCD) can provide “direct access” services to members of District Health Centres (DHCs) as Network Service Providers under the district health network. Starting from 12 January this year, three DHCs have commenced a pilot arrangement to provide “direct access” physiotherapy services to members in need, thereby streamlining the process. The DHCs will triage cases according to the Clinical Guidelines and arrange for eligible members to receive first-contact physiotherapy services. So far, the process has generally been smooth, with members typically able to receive first-contact physiotherapy services within about a week, and no waiting list issues have been identified.

Family doctors are the key providers of primary healthcare services, offering comprehensive, holistic, continuous, preventive and coordinated care to the citizens. Eligible members are required to pair with a family doctor according to the “family doctor for all” concept. At the same time, to ensure continuity of healthcare services, all DHC service users are required to join eHealth. In fact, under the cross-disciplinary collaboration arrangement of PHCC, first-contact physiotherapists providing “direct access” physiotherapy services must record the patient’s conditions and deliver services in accordance with the agreed protocol. Depending on the need (such as when specific red-flag symptoms appear or the condition does not improve as expected), they must inform the member’s family doctor via eHealth in a timely manner, ensuring that the member can receive further treatment promptly when necessary.

PHCC will continue to monitor the operation of the pilot arrangement at the DHCs, and enhance the eHealth platform to facilitate communications among healthcare team members. The Task Group will review the readiness of eHealth, availability of trained first-contact physiotherapists, and the pilot

implementation of direct access physiotherapy services after 1 year, and make refinements to the Clinical Guidelines as necessary.

We welcome comments on the Clinical Guideline, and will bring your concerns to the attention of the Task Group for deliberation.

Thank you again for your feedback.

Yours sincerely,



(Prof. Martin WONG)  
Convenor of the Task Group on  
Physiotherapist Service Standards in  
Primary Healthcare



(Dr. PANG Fei-chau)  
Commissioner for Primary  
Healthcare

c.c.:

- Prof. LO Chung Mau (Secretary for Health, Health Bureau, The Government of HKSAR)
- Dr. FAN Yuen Man Cecilia (Under Secretary for Health, Health Bureau, The Government of HKSAR)
- Ms. MAK Tse Ling Elaine (Deputy Secretary for Health 3, Health Bureau, The Government of HKSAR)
- Dr. LAM Man Kin, Ronald, JP (Director of Health, Department of Health)
- Mr. TSAI Wing-chung, Philip (Chairman of Allied Health Professions Council)
- Mr. Antonio KWONG Cho-shing (Chairman of Physiotherapists Board)
- Mr Daydrew NG Ho-yin (Secretary (Allied Health Professions Council) Department of Health, Health Bureau, The Government of HKSAR)
- Dr. Hon David LAM Tzit-yuen (Bills Committee Chairman on Supplementary Medical Professions (Amendment) Bill 2025)
- Prof Hon CHAN Wing-kwong (Bills Committee Deputy Chairman on Supplementary Medical Professions (Amendment) Bill 2025)
- Hon Tommy CHEUNG Yu-yan, GBM, GBS, JP, Hon YUNG Hoi-yan, JP, Hon LAM So-wai, Hon Edward LEUNG Hei, Hon CHAN Pui-leung, Hon Judy CHAN Kapui, MH, JP, Hon CHAN Hoi-yan, Hon Lillian KWOK Ling-lai, Hon Benson LUK Hon-man, Revd Canon Hon Peter Douglas KOON Ho-ming, BBS, JP, Hon TANG Fei, MH, Hon TANG Ka-piu, BBS, JP, Hon Adrian Pedro HO King-hong (Bills Committee Members on Supplementary Medical Professions (Amendment) Bill 2025)
- Panel on Health Services Legislative Council 2026 (Attn: Ms Macy NG (Senior Council Secretary (3)3))