

**COMPETITION COMMISSION (CC)**  
**PRIVATE HEALTHCARE MARKET INVESTIGATION**  
**ANNOTATED ISSUES STATEMENT**

**SIMPLYHEALTH GROUP LTD (SIMPLYHEALTH)**

**RESPONSE DOCUMENT**

Simplyhealth welcomes the work that has been completed to date by the CC, in particular in reviewing whether the private healthcare market is functioning appropriately for the benefit of customers and patients. Simplyhealth is supportive of the process and methodology that has been adopted by the CC, and also of the CC's current thinking, as set out in the Annotated Issues Statement.

As one of the smaller PMI providers, Simplyhealth has already advocated that the CC recognise the role that insurers themselves play as funders of care in the private healthcare market. Simplyhealth, accordingly, is pleased that the CC has taken this on board in its findings to date.

Simplyhealth welcomes and is very encouraged to see that the CC considers that transparency of information is as important in the private healthcare sector as it is in the NHS. In particular, Simplyhealth is pleased that the CC has considered that there is no reason that the availability of information to patients that are treated privately should not be at least as extensive and comprehensive as it is to patients treated in the NHS. Simplyhealth has referred to the CC its additional submission on this particular subject, which was prepared and submitted jointly with the Picker Institute Europe.

Simplyhealth has taken particular note of the CC's conclusion that insurers do not appear to have buyer power over hospital operators. Furthermore, as a smaller PMI provider, Simplyhealth would like to reinforce the position that the countervailing bargaining power of some insurers in negotiations is limited to the largest PMIs and therefore not reflective of the entire PMI market. This power cannot usually be exercised without potentially impacting services provided to customers and patients.

Simplyhealth continues to be committed to responding to the investigation and helping to inform the CC to ensure a competitive, sustainable private healthcare market for the benefit of customers and patients.

Simplyhealth is a leading healthcare provider in the UK, and is classified as one of the smaller PMI providers. Simplyhealth believes in helping people access affordable healthcare and delivering exceptional personal customer service.

Throughout its 140-year history, Simplyhealth's mission has always been to provide people with affordable healthcare, whatever the financial climate. Simplyhealth is committed to its mutual values and to supporting communities.