

## Consultant 22

1 May 2012

Dear Sir

I enclose comments relating to the Competitions Commission investigation into private medical insurance (PMI).

### RESTRICTED PRACTICE

I am concerned by the actions of private medical insurance (PMI) companies that only allow an independent medical practitioner to join as a "provider" of care if they agree to only charge within the fee scale that the PMI company produces ie to be fee assured. This is restrictive, inequitable and discriminatory in comparison to other doctors who are providers for the same PMI company but do not adhere to the fee scale designed by the company (non fee assured).

### MANAGED CARE

I am also concerned about the restrictive practice by PMI companies who contact patients directly and coerce them to see a particular consultant who may or may not be the most appropriate doctor for them to see. This role has hitherto been the responsibility of the general medical practitioner (GMP) who knows the patient and importantly knows the most appropriate specialist to refer to.

I understand that this is against the General Medical Council (GMC) guidelines on private practice, which state that the GMP should be the gatekeepers and triage patients. This ensures that the patient sees the most appropriate specialist. It is my opinion that if the PMI company is the point of triage then it maybe in their interest to direct patients to the cheapest treatment or specialist. This may not be in the best clinical interests of the patient.

The medical profession has clear guidance on performance and activity in providing independent private care for patients via the GMC and statutory audit. These measures are not in place to monitor the activity of a PMI, whose role in my opinion, is not to decide who assesses, investigates or treats individual patients. The contract for independent healthcare provision remains between the doctor and the patient (not the PMI company). It is my opinion that this should remain the fundamental guiding principle in this matter.