Consultant 55

6 February 2014

Dear Sir/Madam

Competition Commission and private healthcare

With regard to the recent report from the competition commission on private healthcare providers,

1) BUPA and AXA/PPP together make up well over 60% of the PMI market, which is surely a panopoly, and yet the CC report fails to even mention this problem let alone suggest a remedy. I have personal experience of these large insurers restricting patient choice, patients see me as I am new and so have signed up to the pricing structure set by BUPA but are unable to see my colleagues who have not (see point 3)

2) Some of the PMIs are price fixing, which is clearly anti-competitive.

3) The actions of some of the PMIs in forcing newly appointed consultants to have to sign up to highly restrictive contracts to be allowed recognition is an anti-competitive restriction of trade, as well as being discriminatory.

4) Increasingly, some of the major PMIs are actively diverting GP and physio referrals, interfering with the patient's medical care and removing the patient's right to choose which consultant they might want to see. By removing patient choice and also by removing the right of a patient to even be allowed to pay a top-up fee is an anticompetitive distortion of the market that is clearly to the detriment of the 'consumer'.

5) The ability of the major PMIs (who have a controlling panopoly) in delisting consultants purely on the basis of fee levels (with the consultant having no right to any independent appeal) again represents a clear anticompetitive restriction of trade.

6) The 'remedies' that the CC is suggesting in their provisional report will do <u>nothing</u> to improve the private healthcare sector for the benefit of the patient.

The centres I practice in are all of high quality and the large institutions such as HCA offer a broad range of specialties and professional opinions facilitating excellent multidisciplinary care. Breaking these up will adversely impact the care on offer in selected cases.