

## Consultant 65

3 February 2014

Dear Mr Witcomb

Re: HCA Competition Commission

I am writing to you as a Consultant Gynaecologist in full time independent practice in central London and wish to make some comments following the recent report published on the 21 January 2014 on 'Provisional Decision on Remedies'.

1. I understand the Competition Commission has suggested that HCA should be required to sell some of their central London hospitals. Having worked at an HCA hospital for a number of years I have to say I am extremely impressed with the high level of service they offer, their support for clinicians – particularly with encouraging innovation and practice development, and the high standard of clinical care and clinical governance. I am concerned that alternative providers may not be able to maintain the same high standards.
2. With regard to private medical insurers AXA PPP and Bupa have over 60% of the market which I do not believe is in the best interest of patients, doctors and hospitals and, if the Competition Commission is looking at reducing the potential influence of private hospital chains, they should certainly, in my opinion, take similar action with regard to private health insurers.
3. I am particularly concerned about the future of private medical practice for younger consultants who are often being forced to accept very low fees demanded by insurance companies if they are to have practice privileges. PMIs can and do remove practice privileges from consultants who they believe are charging excessively, often on the basis of flimsy evidence with no independent right of appeal in an attempt to drive down costs. I am sure you will be aware that reimbursement rates for consultations and procedures have not materially risen for over 8 years for the vast majority of coded procedures against a background of rising costs.