

To whom it may concern,

I am writing to submit my view re the CMA review of the private dental services market, specifically regarding the proposed scope of the investigation.

While the current focus on pricing transparency, market concentration, and consumer choice is welcome, I would strongly encourage the CMA to explicitly incorporate consumer outcomes, and in particular Patient-Reported Outcome Measures (PROMs) and patient satisfaction metrics, as a central component of the review framework.

Dental patients are currently required to make decisions based on incomplete or inconsistent information, often limited to price, location, and anecdotal reviews. This does not adequately reflect the quality or effectiveness of care, nor does it enable meaningful comparison between providers. As a result, consumer choice is constrained, and competitive pressure on clinical quality is weakened. PROMs offer a robust, patient-centred mechanism to address this gap. By capturing outcomes directly from patients, such as improvements in function, pain, and quality of life, PROMs provide insight into the real-world effectiveness of treatments. In other areas of healthcare, the routine collection and publication of PROMs has demonstrably improved transparency, accountability, and ultimately patient outcomes.

There is a strong precedent for this approach within the UK healthcare system. In the private acute sector, the PHIN (Private Healthcare Information Network) mandate requires providers to collect and publish both clinical outcomes and PROMs data. This initiative has materially enhanced the information available to patients and referrers, supporting more informed decision-making and fostering competition on quality as well as price.

Given the parallels between private acute healthcare and private dentistry, particularly in terms of elective procedures, variable pricing, and consumer-led decision-making, it is reasonable to expect that similar benefits could be realised in the dental sector. However, dentistry currently lacks a consistent, standardised framework for outcomes measurement, and this represents a significant gap in the functioning of the market.

I would therefore encourage that the CMA:

- Explicitly include consumer outcomes, including PROMs and patient satisfaction, within the scope of the market review
- Assess the feasibility of introducing standardised outcomes collection and reporting across private dental providers
- Consider how outcomes data could be made accessible and meaningful to consumers at the point of decision-making
- Seek input from non-dental healthcare stakeholders, particularly organisations and regulators with experience in outcomes transparency frameworks (such as those involved in the PHIN mandate), to inform best practice and implementation considerations

Broadening the scope in this way would align the review with modern healthcare policy priorities, which increasingly emphasise value-based care and patient-centred outcomes. More importantly, it would ensure that any resulting interventions address not only cost and access, but also the quality and effectiveness of care received by patients.

Thank you for considering this perspective. I would welcome the opportunity to provide further information if helpful, including input in the “evidence gathering and analysis” and “consultation” phases that are to come.